



Gas Companies-Safety Rulemaking

Chapter 480-93 WAC

UG-011073

Minutes from February 25, 2003 Workshop

Present:

Bruce Paskett, Northwest Natural Gas
Paula Pyron, Northwest Industrial Gas Users
Keith Meissner, Cascade Natural Gas
Stephanie Kreshel, Puget Sound Energy
Kaaren Daugherty, Puget Sound Energy
Duane Henderson, Puget Sound Energy
Robert Sheppard, Weyerhaeuser Paper Co.
Steve King, WUTC
Sondra Walsh, WUTC
Karen Caille, WUTC
Don Trotter, WUTC
Kim West, WUTC
Scott Rukke, WUTC
David Lykken, WUTC
Wayne Wienholz, WUTC
Sam Hicks, WUTC

Steve King welcomed everyone attending the Commission workshop on Gas Safety Rules, Docket UG-011073. For reference, copies of the rules and other comments can be accessed from WUTC website with the address of www.wutc.wa.gov/011073. Steve King began the workshop by introducing himself as Director of Safety and Consumer Protection and his role as a facilitator in the workshop.

The purpose of the workshop was to discuss the draft rules that the Commission issued on January 17, 2003, the comments received and other comments that will be brought up during the meeting. Following the workshop, the Commission staff will respond in writing to the written comments, and the revised draft rules will be issued. Draft rules

will be in Code Reviser format showing the staff proposed changes over the current rules.

The rules will be in numerical order throughout this workshop. Pipeline staff will either describe the intent of the rules, state whether it's a new rule or if it's a revision of an existing rule. Following the explanation of the intent of the draft rules, discussions between staff and the stakeholders will take place. All comments on the rules will be summarized and made available in the minutes of the meeting.

1. **WAC 480-93-002, 003 and 004**

Sondra Walsh informed the members that Commission staff did not do much drafting within 480-93-002, 003 and 004 of these rules because they are standard Commission rules that have been drafted by the Commission's attorney. The written comments received will be submitted back to the Commission's attorney to see if changes need to be made.

Kaaren Daugherty of PSE had a concern in the second sentence, which the word "exclusively" was removed in the rule. Commission staff will respond in writing.

2. **WAC 480-93-005**

Commission staff will review the rule to come up with one term that describes companies under the Commission jurisdiction, company operator, gas company and make sure they are used consistently throughout the rules.

Commission staff will review the definition of "transmission line".

Commission staff will redraft the proximity rule defining MAOP, and used appropriately throughout the rule.

Commission staff will also review the definitions of "gathering line", service line", and "covered task." Staff will respond in writing.

3. **WAC 480-93-015**

The companies present had no comments pertaining to this rule. Wayne Wienholz explained that the odorization rule was reviewed by staff for language and clarity regarding the concentration of gas and air mixture, the odor testing requirements, calibration specification on the equipment and record retention. The intent was to be more descriptive, and achieve uniformity amongst the companies.

4. **WAC 480-93-017**

PSE will submit to the Commission proposed language for item (2). Bruce Paskett of NWN had a concern on the emergency response activity regarding construction plans. Mr. Paskett feels that forty-five days is too long of a wait, and suggested a notification to Commission staff on the emergency would be a different course of action.

Staff will review these two concerns from PSE and NWN, as well as written comments submitted by companies.

5. **WAC 480-93-018**

Bruce Paskett of NWN stated that because of security concerns, NWN is not willing to provide specific information. Don Trotter stated this matter should be addressed with the legislature. Steve King explained to the stakeholders that the Commission is currently working to develop the pipeline mapping system as required by the statute. The Commission believes that the intent is to acquire the mapping information from companies, and share the information with the local government and first responders. The Commission needs to decipher a way to address the concern of security raised by Mr. Paskett. An implementation plan has been completed and provides information to the Commission to meet with companies and local governments about what our need assessment has determined and ask for feedback and incorporate it into the implementation plan.

Commission staff will review the word “designated representative” and ensure the appropriate usage throughout the rules. Subsection (3) will also be clarified, and Mr. Paskett will submit proposed language to the Commission.

6. **WAC 480-93-020 and WAC 480-93-030**

NWN had a concern on item (3), where the language stated “must provide documentation proving that it is not practical to select an alternative route.” Keith Meissner raised the issue of incorporating engineering design criteria designating SMYS rather than designate 250 psig or 500 psig to reflect the final integrity of the pipeline. Scott Rukke explained that Staff had discussions regarding this issue. The rule is based on pressure, not on SMYS as a result of the third party damage concerns.

Commission staff will review the definition of MAOP and MOP, and will respond back to the stakeholders in a separate meeting. Commission staff is proposing to incorporate WAC 480-93-030 into the new draft of WAC 480-93-020, and the proscribed area rule as a separate rule will be deleted.

7. **WAC 480-93-040**

No comments were made regarding this rule at the workshop.

8. **WAC 480-93-080**

Commission staff will review companies' comments regarding allowing fillet welds in addition to API 1104 testing criteria. Staff will review any proposal for increasing the frequency of testing of welders. Commission staff will address the concern about the timeliness of revised or current editions to be adopted into state codes. Kaaren Daugherty of PSE had a comment with regard to the format of the rule for clarification on the final paragraph. This refers to the qualification card being dated for qualification expiration. Since they have the anniversary date of the task on the card rather than an expiration date, she feels that an alternate language should be considered so they don't have to redesign their card.

Commission staff will review the rule incorporating the anniversary date of the task per PSE request.

9. **WAC 480-93-082, 480-93-100, 480-110, 480-93-111 and 480-93-112**

No comments were made regarding eliminating these rules at the workshop.

10. **WAC 480-93-xxx**

Commission staff and PSE will look at the NACE Standard reference to see whether the change in the 2002 edition Standard meets the needs. On page 14 of the draft rule, Commission staff will review item 6(c) and address the concerns expressed there and see what they can do to meet that concern. On 7(a), Commission staff will be limiting subsection (a) in the same way that (b) is "each time a company employee." Mr. Meissner requested that Commission staff clarify when the coating needs to be removed. Commission staff, PSE and other interested parties are going to have a separate meeting on the whole issue of bare steel.

11. **WAC 480-93-115**

If the rule is intended to be applied retroactively, it will specifically state that intent in the draft rule. Commission staff clarified that subsections (1) and (2) are applicable to steel. PSE believes that subsection (1) duplicates the Federal Code.

CNG would like to focus on “migration” and method to avoid migration beyond just sealing the casing.

Commission staff will look at all concerns. Commission staff will also clarify the design and construction rule if it applies retroactively.

12. **WAC 480-93-120**

No comments were made regarding this rule at the workshop. This rule is incorporated into WAC 480-93-124.

13. **Master Meter**

Don Trotter asked companies to file comments on the issue relating to 80.04.010 and 80.28.210 as they apply to the draft rule WAC 480-93-002 application of rule, and WAC 480-93-005 definition relating to master meter and gas company. The comments should be submitted by March 10, 2003.

14. **WAC 480-93-124**

Commission staff will define the term “annually”. Bruce Paskett of NWN feels that pipeline markers are putting pipeline facilities at risk via terrorism and/or third party damage. Commission staff will review the concerns expressed by the companies.

15. **WAC 480-93-130**

At this time, Commission staff did not have any proposed changes regarding this rule. PSE requested editing the word “stages” to “system”, and modify structure of the sentences. Commission staff will respond to all comments in writing.

16. **WAC 480-93-140**

Kaaren Daugherty of PSE would like Commission staff to define the term “start up”. Companies have concerns regarding the limitations and frequencies of this requirement. Commission staff will review the documentation of the draft rule, as well as the recommendations of the manufacturer.

17. **WAC 480-93-150**

No comments were made regarding eliminating this rule at the workshop.

18. **WAC 480-93-155**
PSE recommends adding the word “allowable” in the title. Commission staff will confirm whether approval is required and how to address that issue. PSE will propose some language for this issue. Commission staff considers subsection (8) to be current with OPS requirements. Commission staff will also review the proposal that was submitted to OPS.
19. **WAC 480-93-160**
No comments were made regarding this rule at the workshop.
20. **WAC 480-93-170**
No comments were made regarding incorporated portion of this rule in the reporting rule. The remainder of the rule is incorporated in the new testing rule.
21. **WAC 480-93-175**
No comments were made regarding this rule at the workshop.
22. **WAC 480-93-yyy**
Subsection 1(a), Commission staff proposed to remove the word “whichever is less”. The word “feasible” will be added in subsection 2 and 3. Commission staff will look at modifying the separation of other utility requirement, as well as making a distinction between power and non-power separation requirements. On subsection 4, Bruce Paskett will provide some language on providing safety to above ground pipe. Mr. Paskett was concerned that a two-week time frame does not allow an adequate timeline for permanent modifications. In subsection 8, the word “If feasible” will be added to the beginning of the sentence. PSE requested this section to be more general.
23. **WAC 480-93-180**
No comments were made regarding this rule at the workshop.
24. **WAC 480-93-183**
No comments were made regarding deleting this rule at the workshop.
25. **WAC 480-93-184**
No comments were made regarding deleting this rule at the workshop.
26. **WAC 480-93-185**
Commission staff requested that companies submit useful language regarding leaks. Bruce Paskett of NWN volunteered to provide language in regards to the

re-grading and/or downgrading of active leaks. More work is needed on who takes custody of suspect gas facility following an incident, and the timely return of the suspect gas facility to the owners. Commission staff will look at the second half of item 2 about the need and intent of this rule, and whether further clarification is needed.

27. **WAC 480-93-186**

Bruce Paskett of NWN suggested changing the word on the right hand column in the leak grade from “example” to “criteria.” Commission staff will also look at changing the phrase from “gas is likely” to “gas could potentially”.

Bruce Paskett also requested to give examples of the word “substructure” in the rule.

28. **WAC 480-93-187**

Commission staff will clarify subsection 2(e) and 2(j) and distinguish them more clearly. Commission staff will also look at the unique identification number of leak detection equipment, leak survey and response to leak investigation.

29. **WAC 480-93-188**

In subsection 2, Commission staff will change the phrase from “no manufactures’ recommendation” to “no manufactures’ specified frequency, calibration must be done monthly”. Commission staff will define the term “monthly”. In subsection 8, Commission staff will review the record retention requirement to make it more consistent. Commission staff will clarify what “not to exceed 3 years” means.

30. **WAC 480-93-190**

No comments were made regarding deleting this rule at the workshop.

31. **WAC 480-93-200**

NWN requested Commission staff review the 2-hour limit on reporting. PSE requested Commission staff to review the requirement of reporting to the Commission due to media attention or facility damage exceeding \$1,000. Commission staff will respond in writing to the written comments.

The timeline for submitting responses is critical. Commission staff needs to evaluate the comments, and prepare a response to the comments. The revised draft will be sent out allowing the stakeholders ample time to provide the written comments. These comments will be addressed prior to the next stakeholder meeting.