



STATE OF WASHINGTON

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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Ref No. Docket PG-080110

March 6, 2009

Bob Titus, Director
Energy Services – Gas Division
City of Ellensburg
501 N. Anderson St.
Ellensburg, WA 98926

Dear Mr. Titus:

Re: 2008 Standard Natural Gas Inspection – City of Ellensburg, Washington

Thank you for your letter of intent dated December 23, 2008, addressing the findings from staff's audit of Ellensburg's facilities conducted during the week of August 4, 2008. We have reviewed both Ellensburg's letter of intent and the attachments you have provided to the commission. Additionally, on February 18, 2009, Ms. Stephanie Zuehlke, Pipeline Safety Engineer, met with you, Steve Prue, and Darren Larsen to discuss the details of Ellensburg's letter of intent. The following response will address the items identified in that letter. Docket PG-080110 will be closed as of March 6, 2009.

Item 1

WAC 480-90.328 Meter Identification

Staff accepts Ellensburg's response to broaden their existing procedural language regarding the placement of meter identification, as well as your commitment to achieve full compliance within 5 years.

Item 2

WAC 480-93-012(2) & (5) Odorization of Gas

Staff accepts your response in that you have revised your procedures to require the model and serial numbers of calibrated instruments utilized to be recorded.



Item 3

WAC 480-93-140(1) Service Regulators

Staff accepts your response in that you have revised your procedures to include language regarding regulator vent orientation and that the locations identified during our inspection have been remediated.

Item 4

WAC 480-93-170(4), (6), & (7)(f) Tests and Reports for Gas Pipelines

- 4.a. Subsequent documentation provided by Ellensburg and further investigation indicates that the cited services did not require a pressure test under this requirement.
- 4.b. Staff accepts Ellensburg's response.
- 4.c.i. Additional subsequent documentation was provided indicating that this service met compliance requirements.

Item 5

WAC 480-93-180(1) and (3) Plan and Procedures

- 5.a.i.&b. Subsequent documentation and information provided to staff indicates that Ellensburg leak survey crews had submitted a report to remediate this location prior to the audit. After review of this new documentation staff is satisfied that remediation for this location was completed and in accordance with Ellensburg procedures.
- 5.ii.-v. Ellensburg has remediated these services meeting regulatory requirements.
- 5.c. Additional subsequent documentation was provided to staff which indicated that these services meet regulatory requirements.
- 5.d. Staff accepts Ellensburg's response.
- 5.e.i. Additional subsequent records were provided to staff which indicated that this service sufficiently recorded the length of pipe replaced.
- 5.e.ii. Ellensburg recognizes the necessity of providing enough documentation to determine whether pipe length has been increased, decreased, or unchanged after service repair.
- 5.f.ii. Additional and subsequent documentation was provided by Ellensburg indicating that they met with their procedural requirements.
- 5.f.i.&iii.-v. Staff accepts Ellensburg's commitment toward improving their present reporting format.
- 5.g. Staff accepts Ellensburg's explanation that meter readers are not utilized to complete atmospheric corrosion inspection.

Item 6

WAC 480-93-186(2) Leak Evaluation

Staff accepts Ellensburg's commitment to properly document the perimeter of a leak area in accordance with regulatory requirements.

Item 7

WAC 480-93-187(12) and (13) Gas Leak Records

Staff accepts Ellensburg's commitment to improve their record keeping by consistently providing detail sufficient to determine magnitude and location of CGI readings taken and to identify the type of equipment and SN utilized to measure gas levels.

After further review, staff has decided that instance 7.a.iii. meets these requirements.

Item 8

WAC 480-93-188(4)(e), (5)(c) and (f) Gas Leak Surveys

Staff accepts Ellensburg's response in that they have corrected and improved their forms and procedures by using a separate form to record rechecks.

Item 9

CFR 49 192.353(a) Customer Meters and Regulators: Location

Staff accepts your response in that you have remediated meter guard deficiencies.

Item 10

CFR 49 192.355(b)(2) Customer Meters and Regulators: Protection from Damage

Ellensburg has provided the commission with a revised procedure Section 21.3.2. which addresses issues identified during our inspection. Staff has reviewed the revised procedures and accepts the revisions made under the title "Service "regulator vents and relief vents." Staff has also reviewed and accepts your Gas Engineer's follow-up investigation report for the cited incident.

Item 11

CFR 49 192.365(b) Service lines: Location of Valves

Staff accepts your response in that you have remediated the cited locations in accordance with regulatory requirements.

Item 12

CFR 49 192.455(a)(1) External Corrosion Control

Staff accepts your response in that you have remediated the cited locations in accordance with regulatory requirements.

Item 13

CFR 49 192.479 Atmospheric Corrosion Control: General

Staff accepts Ellensburg's response in that they have remediated atmospheric corrosion at these locations.

Item 14

CFR 49 192.481 Atmospheric Corrosion Control Monitoring

Staff accepts Ellensburg's response in that they have properly remediated the cited locations.

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Areas of Concern

Item 1

Staff accepts Ellensburg's explanation and response.

Item 2

Staff accepts Ellensburg's response.

If you have any questions, please contact Stephanie Zuehlke, at (360) 664-1318. Please refer to docket number PG-080110 in any future correspondence regarding this inspection.

Sincerely,



David W. Danner
Executive Director and Secretary

cc: Anne F. Soiza, Director, Pipeline Safety
Steve Prue, Gas Engineer, City of Ellensburg