



Puget Sound Energy
P.O. Box 97034
Bellevue, WA 98009-9734
pse.com

Received
Records Management
Nov 25, 2024

November 25, 2024

Filed Via Web Portal

Jeff Killip, Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop
Lacey, WA 98503

**Re: Docket PG-240560 Rulemaking to amend WAC 480-93-188 (1) Gas Leak Surveys,
and 480-93-200 (1) Reporting Requirements**

Dear Executive Director Killip,

Puget Sound Energy, Inc. (“PSE”) appreciates this opportunity to comment on the Washington Utilities and Transportation Commission’s proposed amendments to rules provided in Washington Administrative Code (“WAC”) chapter 480-93. As discussed in more detail below, WAC 480-93-188(1) contains proposed amendments regarding how entities such as PSE should conduct leak surveys and WAC 480-93-200(1) contains proposed amendments to reporting requirements in pipeline emergencies, and the removal of redundant language found in this rule. PSE supports the Commission’s efforts to streamline regulations, provide clarity, and avoid duplicative compliance obligations. PSE discusses these amendments below.

WAC 480-03-188(1) Gas Leak Surveys

PSE strongly supports amendments to the requirement that leak detection surveys must be conducted “over” all pipelines. As the rulemaking recognizes, there are new technologies that do not require placing leak detection on the surface of a pipeline. PSE and its contractors utilize different types of technology to assess and monitor leaks. For example, in addition to atmospheric sampling near pipelines, the use of geospatial analysis can enhance leak detection surveys. By removing the word “over,” the Commission is encouraging technological innovation while maintaining and even enhancing public safety. PSE supports this change.

WAC 480-03-200(1)

Currently, as written, and as acknowledged in the proposed rulemaking, WAC 480-93-200(1) is redundant of federal requirements. See 40 C.F.R. Pts 192 and 191. Currently, WAC 480-93-200(1)(a) & (b) contain reporting requirements that are duplicative of the reporting requirements

Jeff Killip, Executive Director and Secretary

November 25, 2024

Page 2 of 2

in CFR Pt. 191.5. Incidents under WAC 480-93-200(1) are required to be reported to the Commission, and Incidents (as defined in CFR Pt. 191.3) are required to be reported to National Response Center, which in turn reports to the Commission and the Pipeline Hazardous Materials Administration (“PHSMA”). This creates unnecessary and redundant reporting. PSE encourages the Commission to remove the requirements under WAC 480-93-200(1)(a) & (b) and instead have a single requirement to report “incidents” as defined in CFR Pt. 191.3.

Currently, WAC 480-93-200(1)(c) requires the reporting of all evacuations. As evacuations become more commonplace, due to involvement of first responders, the increase in the required reporting to the Commission has become overly burdensome to both PSE and Commission staff. These reporting requirements have little to no increased benefit in public safety nor has there been any useful data that can be utilized to further monitor and assess pipeline incidents. PSE agrees that the Commission should more narrowly define what evacuations should be reported to include a High Occupancy Structure or Area as defined in WAC 480-93-005(14).

PSE supports the Commission’s efforts to revise the regulations and looks forward to actively participating in the docket. If you have questions about this filing, please contact Justin Wahlborg, Sr Compliance Program Manager, at 425-766-1811 or Justin.Wahlborg@pse.com. If you have any other questions, please contact me.

Sincerely,

/s/ Wendy Gerlitz

Wendy Gerlitz
Director, Regulatory Policy
Puget Sound Energy
PO Box 97034, BEL10W
Bellevue, WA 98009-9734
425-462-3051
Wendy.Gerlitz@pse.com