

**Summary of Written Comments
Natural Gas Pipeline Safety Rulemaking
For February 14, 2003 Comments
UG-011073**

Revised: June 25, 2003

ISSUE	INTERESTED PERSON	COMMENTS	STAFF RESPONSE
<p>1) 480-93-002 Application of Rules.</p>	<p>Edward A. Finklea, Chad M. Stokes of Attorney for the Northwest Industrial Gas Users (NWIGU)</p> <p>Kaaren Daugherty, P.E. Consulting Engineer, Standards & Work Practices Puget Sound Energy (PSE)</p>	<p>“Gas Company” in WAC 480-93-002 should be cross referenced to the specific definition of 480-93-005.</p> <p>This rule is unclear regarding who the UTC has jurisdiction over. Who does the UTC want to regulate? Clarification is important so operators can articulate this to customers. Please see comments under definition for ‘Gas Company’ in –005. PSE requests the following minimum clarifications:</p> <p>PSE recommends this paragraph to be item (1).</p> <p>In the second sentence, replace the word “that are” to “exclusively.”</p> <p>In the second sentence, the word “the” before the word “federal” to be deleted.</p> <p>In the second sentence, delete the word “the” before “Pipeline Safety” and replace it with “Title 49 CFR Subchapter D.”</p>	<p>The application of rules has been re-written to better define who the rules in Chapter 480-93 WAC are applicable to.</p>

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2) WAC 480-93-003 Additional Requirements (General)	Kaaren Daugherty, P.E. Consulting Engineer, Standards & Work Practices Puget Sound Energy (PSE)	<p>PSE proposes to add item (2) that read, “These rules do not relieve any gas company from any of its duties and obligations under the laws of the state of Washington.”</p> <p>For clarity, PSE requests that subsection (1) be included under -002 because it deals more with application of rules than with additional requirements. PSE requests the following changes.</p> <p>(1) PSE recommends item (1) to be deleted.</p> <p>(2) PSE proposes to delete the numbering of item (2).</p>	Staff disagrees, this rule is a common rule that the Commission drafted for all the Chapters.
3) WAC 480-93-005 Definitions	Edward A. Finklea, Chad M. Stokes of Attorney for the Northwest Industrial Gas Users (NWIGU)	In WAC 480-93-005, multiple words with the same meaning should be avoided as they lead to confusion or misinterpretation. For example, it would be preferable to use the term “Confined space” or “enclosed space” in the rule, but not both. In addition, “Gas company” should be used throughout the rule, rather than using separate terms “Gas company” and “Company.”	Staff agrees. The term “enclosed space” has been deleted.

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	<p>Kaaren Daugherty, P.E. Consulting Engineer, Standards & Work Practices Puget Sound Energy (PSE)</p>	<p><u>“Confined space or enclosed space”...</u> It not clear where “enclosed space” is used in these rules. PSE requests that the rule only use the term confined space.</p> <p>PSE suggested to delete the word “or enclosed” and insert comma (,) after the word tunnels.</p> <p><u>“Company,” Gas company”....</u> PSE requests a revised definition for “company” and “gas company” for clarity regarding who the WUTC has jurisdiction over according to 93-002, Application of Rules.</p>	<p>Staff agrees, change has been made.</p> <p>The use of the term “gas company” has been changed to “operator”</p>

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		<p><u>“Gathering line”...</u> PSE would like to know why the Commission needs to define gathering line since this term is not used in these rules other than in the definition for transmission line. If this definition remains in these rules, then PSE requests the following change for clarification:</p> <p>PSE recommends to add the word “production” before the word “well.”</p> <p><u>“Main”...</u> PSE requests this definition to be deleted. Subsections (b) and (c) appear to predate a revision to 480-93-188 that now requires leak survey of all pipelines. These subsections are especially confusing because services sometimes cross a public right-of-way.</p> <p><u>“Prompt action”...</u> PSE requests the following grammatical changes.</p> <p>PSE proposes the word “consistently” to be spelled “consistently.”</p> <p>A comma should be added after the word “necessary.”</p>	<p>Staff’s proposed changes are based on RSPA Advisory Bulletin (ADB-02-06), Definition of Onshore Gas Gathering Lines issued on October 10, 2002.</p> <p>Staff agrees, change has been made.</p> <p>Staff agrees with the proposal to delete subsection b. Staff does not agree to delete subsection c. This subsection ensures pipeline construction on an easement meet the more stringent construction requirements.</p> <p>Staff agrees. Changes have been made.</p> <p>Staff agrees. Changes have been made.</p>

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		<p><u>“Reading”...</u> PSE requests deleting the 2nd sentence. It is more appropriately located in 18601 480-93-186.</p> <p><u>“Service line”...</u> PSE finds the service line definition confusing, especially the second sentence. PSE requests deleting this definition from these rules based upon the NPRM issued by RSPA on November 13, 2002 (Docket No. RSPA-02-13208) that redefines service line. At the very least, PSE recommends the following changes for clarity: <u>PSE suggested changes:</u> <u>“Service line”</u> means a gas pipeline, not a main, gathering or transmission line, which provides services <u>that transports gas from a common source of supply to one building.</u> Rule 155, 188</p>	<p>Staff agrees. The second sentence has been moved to 480-93-186 (2)</p> <p>Staff agrees. Staff has deleted this definition and will adopt the federal definition.</p>

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		<p><u>“Transmission line”...</u> PSE would like to know the intent of the WUTC in defining transmission line in these rules. The wording begins to define a transmission system versus a transmission line. This broad definition changes tens of miles of transmission line into hundreds of miles and subjects to very low stress level pipelines to the ever-increasing federal regulations for high stress transmission lines.</p> <p><u>“Tunnel”...</u> PSE requests deleting this definition because it is included in the definition for confined space.</p> <p><u>“Covered Task”...</u> The proposed definition for covered task broadens the impact of the DOT rule. Operators will need rules for implementation because we are under the time frame of DOT operator qualification.</p> <p><u>“Sniff Test”...</u> PSE requests the following changes for clarity: <u>PSE suggested changes:</u> “Sniff Test” means a qualitative test utilized to determine proper concentrations of odorant.</p> <p>In the second paragraph, replace the words “(Minimum Federal Safety Standards for Gas Pipeline)” to “Pipeline Safety.”</p>	<p>The intent of the proposed language is to clarify the original rule to include the downstream pipe off the transmission line as transmission.</p> <p>Staff agrees. Definition deleted.</p> <p>Staff agrees. This proposed change will include new construction.</p> <p>Staff is satisfied with the definition as written. The intent is to require that both “Threshold” and “Readily Detectable” methods be used when conducting Sniff Tests.</p>

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	<p>Keith A. Meissner Pipeline Safety Engineer Cascade Natural Gas (CNG)</p>	<p><u>“Maximum Operating Pressure”...</u> We are concerned that this term is not being used consistently in these proposed rules. Maximum Operating Pressure (MOP) is used interchangeably with MAOP. MOP as it is defined here has a significantly different meaning from MAOP. The two are not interchangeable. In most locations MOP is used in these proposed rules, MAOP should have been used. This issue should be discussed.</p> <p>A proposed version of WAC 480-93-999 was not released with this package for comments. We are concerned about this proposed rule and would appreciate the opportunity to comment.</p>	<p>Staff agrees. To prevent inconsistencies, staff is proposing to delete the definition of MOP and has changed the title to 480-93-155 to Increasing Maximum Allowable Operating Pressure. This change is also reflected in 480-93-200 (3) which requires a company to report to the Commission if the pressure limits are exceeded as determined in the proximity rule..</p> <p>That is correct. This will follow once staff has a near complete draft of the rules and have identified which rules will be proposed to be adopted by reference. The draft will be sent to all stakeholders who have participated in the rulemaking when it is drafted.</p>

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	<p>Joy C. Peery Codes & Standards Northwest Natural (NWN)</p>	<p><u>Service line”...</u> We recommend this definition incorporate “split services” or that “split services” as it pertains to existing Commission waivers be added as a definition.</p> <p><u>“Confined space”...</u> We suggest that this definition is not applicable to natural gas in open top spaces because the specific gravity of natural gas is significantly less than that of air and, therefore, may not accumulate in an open top structure.</p> <p><u>“Gas company,” “Company”...</u> We suggest that throughout this proposed rule, the term “operator” is use in lieu of “gas company” to avoid confusion.</p> <p><u>“Transmission line”...</u> Suggest using the 49 CFR §192.3 definition of transmission line to avoid confusion.</p> <p><u>“Covered Task”...</u> b) Construction activity as a covered task is not consistent with the definition in the federal OQ rule, 49 CFR, §192.801.</p>	<p>Staff disagrees. This requested change is only allowed by waiver request.</p> <p>Staff disagrees. Natural gas can accumulate in open top spaces.</p> <p>Staff agrees, change has been made.</p> <p>See reply to PSE above.</p> <p>Staff agrees. The proposal is to add new construction.</p>

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<p>4) WAC 480-93-010 Compliance with federal standards (General). This rule will be incorporated in rule 480-93-999</p>	<p>Edward A. Finklea, Chad M. Stokes of Attorney for the Northwest Industrial Gas Users (NWIGU)</p> <p>Keith A. Meissner Pipeline Safety Engineer Cascade Natural Gas (CNG)</p>	<p>The deletion of WAC § 480-93-010 ("Compliance with federal standards") in the draft proposed rule is followed with the comment "This rule will be incorporated in rule 480-93-999," which is the incorporation by reference provision of the current rules (which also currently cross-references to WAC § 480-93-010 and details the specific federal standards that are incorporated by reference). It is the intent of the draft proposed rule to make changes to WAC § 480-93-999? If so, the parties need an opportunity to see proposed revisions and have the opportunity to comment.</p> <p>A proposed version of WAC 480-93-999 was not released with this package for comments. We are concerned about this proposed rule and would appreciate the opportunity to comment.</p>	<p>Yes, staff will re-draft 480-93-999 when the rules are in draft format and it is known what we propose to incorporate. The draft rule will be sent to stakeholders for review.</p> <p>That is correct. This will follow once staff has a near complete draft of the rules and have identified which rules will be proposed to be adopted by reference. The draft will be sent to all stakeholders who have participated in the rulemaking when it is drafted.</p>

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5) WAC 480-93-015 Odorization of Gas.	Kaaren Daugherty, P.E. Consulting Engineer, Standards & Work Practices Puget Sound Energy (PSE)	<p>PSE requests the following change. Sniff test is a defined term in –005. There is no reason not to use the term here. PSE has a general request for consistent record keeping time frames – see subsection (4).</p> <p>PSE proposes deleting the word “odorant level checks.”</p>	<p>Staff agrees. Changes have been made.</p> <p>Staff agrees. Changes have been made.</p>
6) WAC 480-93-017 Filing requirements for design, specification, and construction procedures. (Design and Construction).	<p>Kaaren Daugherty, P.E. Consulting Engineer, Standards & Work Practices Puget Sound Energy (PSE)</p> <p>Joy C. Peery Codes & Standards Northwest Natural (NWN)</p>	<p>Please explain the reason for the revision. PSE requests the following changes in subsection (1) for consistency and clarity:</p> <p>(1) Any <u>Every</u> gas company operating a gas pipeline facility in this state must have on file with the <u>Commission</u> all applicable design, specification and construction procedures <u>standards</u>. used for each pipeline facility. All procedures <u>standards</u> must detail...</p> <p>PSE requests clarification on subsection (2). What role does the Commission really want to have?</p> <p>PSE recommends replacing the word “procedures” to “standards.”</p> <p>1) Request clarification of the intent this paragraph.</p>	<p>Staff has removed the last sentence of subsection (2).</p> <p>Staff Disagrees. The use of the term procedure is consistent with 192.13 and 192.605</p>

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<p>7) WAC 480-93-018 Maps, drawings, and records of gas facilities. (O&M)</p>	<p>Kaaren Daugherty, P.E. Consulting Engineer, Standards & Work Practices Puget Sound Energy (PSE)</p>	<p>PSE requests the following changes to subsections (1) and (2) of this rule for consistency throughout these rules. The terms designate representatives and authorized representatives are not used consistently. What is the intent here? Perhaps a definition of “commission” is needed.</p> <p>(1) PSE recommends deleting the word “each” in the beginning of the sentence and replacing it with “Every.”</p> <p>In the first sentence, delete the words “or its designated representatives.”</p> <p>(2) PSE recommends deleting the word “each” in the beginning of the sentence and replacing it with “Every.”</p> <p>Delete the words “or its authorized representatives.”</p> <p>PSE finds subsection (3) confusing. There are many different records and maps that are kept and it may not be appropriate to have the same updating frequency for all. PSE recommends the following language for clarity and for operator flexibility:</p> <p>(3) PSE recommends the entire item be deleted and replace it with the words “Every gas company must have procedures for reviewing and updating maps, drawings, and records required by this section. These procedures must include provisions for the distribution of these maps, drawings, and records to appropriate operations</p>	<p>Staff has deleted “or its designated representatives in rule language.</p> <p>Staff has deleted this language.</p> <p>Staff has redrafted subsection (3).</p> <p>Staff has redrafted subsection (3).</p>

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<p>8) WAC 480-93-020 Proximity Considerations. (Design and Construction)</p>	<p>Joy C. Peery Codes & Standards Northwest Natural (NWN)</p> <p>Kaaren Daugherty, P.E. Consulting Engineer, Standards & Work Practices Puget Sound Energy (PSE)</p>	<p>personnel and a schedule for updating.”</p> <p>3) Please clarify the intent of this paragraph.</p> <p>PSE requests the following changes for clarity in format (subsection (3) is not linked to the opening statement):</p> <p>PSE recommends the opening statement to become item (1).</p> <p>The word “A” in the beginning of the sentence be replaced with “Every.”</p> <p>Replace the word “facility at the following pressure” to “as follows:”</p> <p>(1) Change item (1) to (1a).</p> <p>(1a) Change item (a) to (i).</p> <p>(1b) Change item (b) to (ii).</p> <p>(1c) Change item (c) to (iii).</p> <p>(2) Change item (2) to (2b).</p> <p>(2a) Change item (a) to (i).</p> <p>(2b) Change item (b) to (ii).</p>	<p>Redrafted per language proposed by NWN.</p> <p>Staff has renumbered the proposed rule.</p>

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	<p data-bbox="426 634 793 737">Keith A. Meissner Pipeline Safety Engineer Cascade Natural Gas (CNG)</p> <p data-bbox="426 1183 772 1286">Joy C. Peery Codes & Standards Northwest Natural (NWN)</p>	<p data-bbox="831 306 1514 375">(3) PSE suggested to separate item (3) that begins ... “Maps and records...” to become item (4).</p> <p data-bbox="890 415 1579 483">In the second sentence, replace the word “above” with “in subsection (1).”</p> <p data-bbox="890 524 1579 592">In the last sentence, delete the word “above” and “and (2).”</p> <p data-bbox="831 634 1587 959">We are concerned that no proposal was made that incorporates engineering design and strength criteria into this rule. The draft rule ignores factors besides internal pressure that affect the strength of pipelines, such as pipe diameter, pipe material strength, and pipe wall thickness. These proximity rules should require Commission approval if the engineering stress of a pipeline exceeds established criteria, such as a percent of material specified minimum yield stress.</p> <p data-bbox="831 1000 1579 1143">We note that this rule contains confusion regarding MOP and MAOP. Paragraph (1) contains MAOP, but paragraph (2) contains MOP. It is unclear if this is intentional. We cannot fully comment until this is clarified.</p> <p data-bbox="831 1183 1549 1252">This requirement may significantly delay the design and construction of new pipeline facilities.</p>	<p data-bbox="1621 306 1780 337">Staff agrees.</p> <p data-bbox="1621 415 1944 483">Staff agrees. Change has been made.</p> <p data-bbox="1621 634 1980 737">This needs to be based on pressure not on stress due to third part damage concerns.</p> <p data-bbox="1621 1000 1990 1068">Staff has removed references to MOP and MAOP.</p> <p data-bbox="1621 1183 1980 1326">Staff disagrees. This proposed change to the requirement is less stringent that the current rule.</p>

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<p>9) WAC 480-93-040 Location of gas compressor stations on gas pipelines. (Design and Construction)</p>	<p>Kaaren Daugherty, P.E. Consulting Engineer, Standards & Work Practices Puget Sound Energy (PSE)</p>	<p>PSE recommends changing the title to reflect that the rule is not location on the pipeline, rather it is location within proximity to buildings.</p> <p><u>PSE suggested changes:</u> <u>WAC 480-93-040 Location of gas compressor stations on gas pipelines.</u></p> <p>The proposed revisions dramatically change the existing rule and we do not believe this was the intent. PSE requests the following changes for clarity and to retain original structure of rule. PSE would also like to discuss applicability of this rule to end use applications.</p> <p>(1) PSE proposes to delete the numbering for item (1).</p> <p>PSE separated the paragraph that begins “At least 500 feet..” as new subsection (a). Also suggested is the phrase “if the installed capacity is equal to or greater than 1,000 horsepower” to be inserted at the end of subsection (a).</p> <p>(2) PSE recommends changing item (2) to become subsection (b).</p> <p>PSE suggested Subsection (b) should begin with the words “At least 250 feet..” Also suggested is the phrase “if the installed capacity is less than 1,000 horsepower” to be inserted at the end of subsection (b).</p>	<p>Staff agrees. Change has been made.</p> <p>Staff disagrees. Please provide an explanation why you believe the proposed rule language changes the intent.</p>

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<p>10) WAC 480-93-080 Welder and joiner identification and qualification certificates. (O&M)</p>	<p>Joy C. Peery Codes & Standards Northwest Natural (NWN)</p> <p>Kaaren Daugherty, P.E. Consulting Engineer, Standards & Work Practices Puget Sound Energy (PSE)</p>	<p>(1) In the first sentence, NWN recommends replacing the word “are” to “is.”</p> <p>PSE recommend changing the title by deleting the word <u>certificates</u>.</p> <p>The proposed rule disallows Appendix C for welder qualification. This is a major impact to PSE operations and we would like to know the basic for this revision. PSE’s own standards currently limit Appendix C qualified welders to weld on pipelines operating at less than 60 psig which exceeds the minimum federal safety standards. PSE requests the following changes:</p> <p>(4)<u>(5)</u> Change item (1) to (5).</p> <p>PSE proposes deleting the entire first sentence.</p> <p>PSE recommends inserting the words “and joiner” after the word “welder.”</p> <p>PSE proposes inserting the words “and requalification” before the word “test result.”</p> <p>(1a)<u>(3)</u> Change the subsection (a) to item (3).</p> <p>Delete the word “A” and replace with “Every” at the beginning of the sentence.</p>	<p>Staff disagrees.</p> <p>Staff agrees. Change has been made.</p> <p>Staff has redrafted the rule.</p>

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	<p>Joy C. Peery Codes & Standards Northwest Natural (NWN)</p>	<p>(1b) Change the subsection (b) to item (2).</p> <p>PSE proposes inserting the words “and joining” after the word “Qualified welding.” Also suggested inserting the word “or joining” after the word “welding” at the end of the sentence.</p> <p>(2) PSE recommends deleting this entire item.</p> <p>(3)(4) Change item (3) to item (4).</p> <p>(4) PSE recommends deleting this entire item.</p> <p>(5)(1) Change item (5) to item (1).</p> <p>When the edition of any of the above documents recognized in 49 CFR, Part 192 changes, WAC 480-93-080 references will conflict with federal code. Appendix C to Part 192, Qualification of Welders for Low Stress Level Pipe, should be added to the list of approved welder qualifications since it is an acceptable procedure under the federal pipeline safety code.</p> <p><u>NWN suggested changes:</u></p> <p>(1) All welding procedures and welders must be qualified to API Standard 1104 (18th edition <u>most current edition listed in 49 CFR, Part 192, Appendix A</u>), <u>49 CFR, Part 192, Appendix C</u> or section IX of the ASME Boiler and Pressure Vessel Code (1995 <u>edition most current edition listed in 49 CFR, Part 192, Appendix A</u>).</p>	<p>Staff has redrafted the rule.</p>

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<p>11) WAC 480-93-110 Corrosion control.</p>	<p>Michael J. Faulkenberry, P.E. Chief Gas Engineer, Avista Utilities</p> <p>Kaaren Daugherty, P.E. Consulting Engineer, Standards & Work Practices Puget Sound Energy (PSE)</p>	<p>Avista would like to know why the 49 CFR 192 Appendix C requirements are not acceptable for pipelines operating with a hoop stress under 20% SMYS.</p> <p>PSE requests the following changes for language consistency. <u>PSE suggested changes:</u></p> <p>(1) <u>Except as provided in subsection (8), e</u>Every gas company must ensure that all of its metallic gas pipelines,...</p> <p>(3) PSE suggested to separate item (1) that begins, “Every gas company must record and retain....” which would become item (3).</p> <p>(3)(4) Change item (3) to item (4). Replace the word “Each” with “Every.”</p> <p>(4)(5) Change item (4) to item (5).</p> <p>(a)(6) Change subsection (4a) to item (6).</p> <p>(b)(a) Change subsection (b) to subsection (a).</p> <p>(5)(7) Change item (5) to item (7).</p>	<p>Staff has redrafted the rule.</p> <p>This suggested change is not clear to staff. Need clarification from PSE.</p>

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		<p>Insert the word “steel pipelines” before the word “casings” and delete the word “carrier pipe.”</p> <p>(b) Insert the word “pipeline and” before the word “casings” and delete the word “and carrier pipe.”</p> <p>(c)(i) Change subsection (c) to (i).</p> <p>(d)(ii) Change subsection (d) to (ii).</p> <p>(e)(iii) Change subsection (e) to (iii).</p> <p>PSE suggested subsection (iii) should begin with the words “Leak surveys must be performed..”</p> <p>PSE recommends inserting the words “of a shorted condition” after the word “discovery.”</p> <p>(6)(8) Change item (6) to item (8).</p> <p>Replace the word “facilities” with “pipelines.”</p> <p>(b) Replace the word “subsection 6(a)” with “subsection 8(a).”</p> <p>(d) Replace the word “subsection 6” with “subsection 8.”</p>	<p>Staff has re-worded the rule to include metallic casings and metallic pipelines.</p> <p>Staff has re-worded the rule to include metallic casings and metallic pipelines.</p>

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	<p>Keith A. Meissner Pipeline Safety Engineer Cascade Natural Gas (CNG)</p>	<p>(7)(9) Change item (7) to item (9).</p> <p>At the beginning of the sentence, replace the word “its facilities” with “pipeline.”</p> <p>(a)(10) Change subsection (a) to item (10).</p> <p>(b)(a) Change subsection (b) to subsection (a).</p> <p>(8)(11) Change item (8) to item (11).</p> <p><u>PSE suggested changes on item 11:</u> Companies must be kept <u>keep</u> records of all tests, <u>evaluation, investigation, surveys, and other</u> and requirements <u>of this section</u> in sufficient detail to provide evidence of compliance.</p> <p>(5) We recommend that paragraph (5)(b) be changed. The appropriate language of the current 480-93-115 should be retained, “the condition shall be evaluated within ninety days to determine whether a hazardous condition exists.” Searching for “potential corrosion conditions” inside casings is not necessary as long as the condition is determined to pose no hazard.</p> <p>(7) We recommend paragraph (7)(b) be deleted. Such tests are unnecessary with an adequately maintained cathodic protection system. The existing surveys required by 49 CFR 192 and WAC 480-93 are sufficient to determine the adequacy of a cathodic protection system.</p>	<p>Staff has reworded this section.</p> <p>Staff has redrafted this rule.</p> <p>Staff has redrafted this rule.</p>

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	<p>Joy C. Peery Codes & Standards Northwest Natural (NWN)</p>	<p>The proposal requires the removal of the protective coating to take the readings, and then a coating replacement. The integrity of the coating is the first step in corrosion protection and its integrity should not be compromised without a demonstrate able benefit.</p> <p>(1) "...complete remedial action within ninety days to correct any cathodic protection deficiencies known and indicated by the company's records." <u>NWN comment:</u> Environmental or permit restrictions may prevent completion of correction activities within the stipulated 90-day timeframe.</p> <p>(2) The cathodic protection criteria adopted by each company must be in accordance with the requirements <u>should be based on a consideration of the recommended practices of the most current edition of the National Association of Corrosion Engineers (NACE), Standard RPO169 96.</u> <u>NWN comments:</u> 1. The current edition of the NACE Standard is RPO169-2002.</p>	<p>Staff disagrees. If a company experiences permit restrictions or delays, staff will work with the company if the request for the permit was made prior to the 90 day requirement.</p>

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<p>12) WAC 480-93-115 Casing of pipelines. (Design and construction)</p>	<p>Kaaren Daugherty, P.E. Consulting Engineer, Standards & Work Practices Puget Sound Energy (PSE)</p>	<p>2. RPO169 is a recommended practice—it does not specify requirements: “NACE standards are prepared by the Association's technical committees to serve as voluntary guidelines in the field of prevention and control of corrosion. These standards are prepared using consensus procedures. NACE offers its standards to the industrial and scientific communities as voluntary standards to be used by any person, company, or organization.”</p> <p>(7b) “...each time...” <u>NWN comment:</u> This requirement would be an unnecessary duplication of effort that would increase costs significantly without providing a corresponding increase in pipeline safety.</p> <p>The first sentence duplicates 49 CFR Part 192. PSE requests the following changes for clarification and consistency. <u>PSE suggested changes:</u></p> <p>(1) Whenever a gas company installs pipeline casing, the casing must be designed to withstand the superimposed load. Steel pipe in a casing, the casing must be encased in a bare steel casing.</p> <p>(2) A separate test lead wire must be attached to the <u>steel pipe and bare steel casing</u> and the steel gas pipeline to verify that no electric short exists between the two.</p>	<p>Staff disagrees.</p> <p>Staff has re-drafted section 1.</p> <p>Staff disagrees.</p>

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<p>13) WAC 480-93-124 Pipeline markers. (O&M)</p>	<p>Keith A. Meissner Pipeline Safety Engineer Cascade Natural Gas (CNG)</p> <p>Joy C. Peery Codes & Standards Northwest Natural (NWN)</p> <p>Kaaren Daugherty, P.E. Consulting Engineer, Standards & Work Practices Puget Sound Energy (PSE)</p>	<p>(3) Question: All casings or is the rule just for steel in bare steel?</p> <p>(1) The first sentence of Paragraph (1) is redundant information to 49 CFR 192.323 and should be deleted. The second sentence should state, “Steel pipe must not be encased in a coated steel casing.”</p> <p>(3) We recommend paragraph (3) be deleted. Migration of gas should not be addressed by requiring the casings be sealed. Gas migrating out of casings is not a common problem, and can be addressed by taking appropriate precautions in the design and installation of casings.</p> <p>Casings should only be installed when there is an engineering requirement to support the superimposed load.</p> <p>Subsection (1) of this proposed rule should only deal with markers for buried pipelines as most of the language indicates. The addition of “where a pipeline is exposed” seems to be thrown in. PSE requests that this be deleted for clarification and because markers for pipelines above ground are covered in 49 DFR 192.707. By contrast, subsection (2) adds a specific additional requirement to the CFR rule. PSE requests the following changes to subsection (1):</p>	<p>The rule applies to all metallic pipe in metallic casings except copper. See CFR 192.467 (c).</p> <p>Staff has re-drafted section 1.</p> <p>Staff disagrees. Staff believes that the issue of migrating gas is a valid concern.</p> <p>Casings are not required. Section 1 has been re-drafted.</p> <p>Staff disagrees. The proposed rule is drafted to be more stringent than the Federal requirement.</p>

ISSUE	INTERESTED PERSON	COMMENTS	STAFF RESPONSE
		<p>(1) Pipeline markers must be placed at all railroad, road, irrigation, <u>and</u> drainage ditch crossings, and <u>and</u> at all fence lines where a pipeline crosses private property. or where a pipeline is exposed. <u>Exceptions to this rule must comply with 49 CFR, Part 192.707(b).</u></p> <p>PSE suggested to separate the sentence that begins with “Pipeline markers...” to become item (a).</p> <p>PSE recommends the last sentence that read “Exceptions to this rule..” be deleted.</p> <p>Subsection (2) and (3) conflict with each other with respect to surveys/inspections. Does the commission want bridge markers surveyed annually and all others every three years? PSE recommends the following for clarification. <u>PSE suggested changes:</u></p> <p>(2) PSE recommend deleting the entire sentence that begins with “Each gas company must annually...”</p>	<p>Staff disagrees.</p> <p>Staff agrees. Language is deleted.</p> <p>Yes, bridge crossings need to be surveyed annually.</p> <p>Staff has made proposed changes to section 2.</p>

ISSUE	INTERESTED PERSON	COMMENTS	STAFF RESPONSE
	<p>Keith A. Meissner Pipeline Safety Engineer Cascade Natural Gas (CNG)</p>	<p>(3) PSE recommend item (3) to be read... “Every gas company must survey pipeline markers to ensure they are visible and legible. Markers that are reported damaged and missing must be replaced within 30 days. Results of marker surveys must be kept for a minimum of 5 years.</p> <p>(a) Pipeline marker surveys <u>for bridges</u> must be conducted <u>annually not to exceed 15 months.</u></p> <p>(b) <u>Pipeline marker surveys for all other pipelines must be conducted every three years.</u>” and the recorded results of the surveys must be kept for a minimum of 6 years.</p> <p>We are concerned that the period for replacing missing markers within 30 days is too short. We suggest that markers that are reported damaged and missing be replaced within 45 days. This matches other proposed period extensions.</p> <p>The prescribed marker survey periods in Paragraphs (2) and (3) should be ”at a minimum, annually not to exceed 15 months” and “at a minimum, every three years not to exceed 42 months” respectively.</p> <p>The requirement to keep records for marker surveys should be changed to two years. Marker survey records are not essential safety records and gas companies should not be burdened with keeping them for extended periods.</p>	<p>Staff agreed to change the replacement timeframe to 45 days on the Comments dated April 5, 2002.</p> <p>Staff agrees. Proposed rule reflects 45 days.</p> <p>Staff agrees with the 12 months proposal, but disagrees with 42. Staff proposes 39 months.</p>

ISSUE	INTERESTED PERSON	COMMENTS	STAFF RESPONSE
	<p data-bbox="426 269 772 375">Joy C. Peery Codes & Standards Northwest Natural (NWN)</p> <p data-bbox="426 565 743 703">Michael J. Faulkenberry, P.E. Chief Gas Engineer, Avista Utilities</p>	<p data-bbox="831 269 1503 375">(1) The installation of pipeline markers at locations “where pipeline is exposed” subjects the subject pipeline to unnecessary security risks.</p> <p data-bbox="831 415 1566 521">(2) The installation of pipeline markers at bridge crossings subjects the subject pipeline to unnecessary security risks.</p> <p data-bbox="831 561 1566 740">Staff agreed with a 45-day timeframe in replacing line markers in its response in their Summary of Written Comments dated April 5, 2002. Also, staff agreed with a 5-year record retention. The current revision does not reflect these agreements.</p> <p data-bbox="831 1040 1539 1146">Avista Utilities would like to know what the basis for a separate line marker survey or patrol is. This should be combined with the existing patrols.</p>	<p data-bbox="1621 561 1990 708">Staff agreed to change the replacement timeframe to 45 days on the Comments dated April 5, 2002.</p> <p data-bbox="1621 1040 1980 1292">Staff is not proposing a separate patrol. This patrol can be conducted with other maintenance activities. The proposed rule does not propose that they be separate.</p>

ISSUE	INTERESTED PERSON	COMMENTS	STAFF RESPONSE
<p>14) WAC 480-93-130 Multistage pressure regulation. (Design and construction)</p>	<p>Kaaren Daugherty, P.E. Consulting Engineer, Standards & Work Practices Puget Sound Energy (PSE)</p> <p>Joy C. Peery Codes & Standards Northwest Natural (NWN)</p>	<p><u><i>PSE requests the following changes for clarification:</i></u> Insert the phrase “at a pressure regulating station,” after the word “more stages” at the beginning of the sentence.</p> <p>Replace the word “system” with “stages.”</p> <p>Replace the word “system” with “stages.”</p>	<p>Staff agrees. Change has been made.</p> <p>Staff agrees. Change has been made.</p>
<p>15) WAC 480-93-140 Meter regulators. (Design and construction)</p>	<p>Kaaren Daugherty, P.E. Consulting Engineer, Standards & Work Practices Puget Sound Energy (PSE)</p>	<p>PSE requests that the title of this section be changed to reflect the terminology in the OPS NPRM issued November 13, 2002 (RSPA-02-13206).</p> <p>The proposed revisions to this rule have major implications on PSE gas operations. PSE has very specific purchase specifications for services regulators and we feel the proposed rule is unfair because there is no acknowledgement that a gas operator with a quality control program is different from others who may install service regulators on an infrequent basis.</p> <p>PSE also recommend to separate the paragraph into two which will read...</p> <p>(1) Meter <u>Service regulators</u> must be installed,...</p> <p>(2) Meter <u>Unless the gas company has written purchase specifications and a quality control program, service regulators and associated safety devices installed on services</u> must be inspected...</p>	<p>Staff agrees. Change has been made.</p> <p>his proposed rule is based on manufacturing recommendations.</p> <p>Staff agrees.</p> <p>Staff disagrees.</p>

ISSUE	INTERESTED PERSON	COMMENTS	STAFF RESPONSE
<p>16) WAC 480-93-155 Increasing maximum operating pressure. (O&M)</p>	<p>Keith A. Meissner Pipeline Safety Engineer Cascade Natural Gas (CNG)</p>	<p>This is our normal procedure, but it is not a significant safety concern. The error that can occur with the springs used for 7 in. w.c. delivery is very small, roughly 1 in. w.c. These tests should not be required for every start-up.</p>	<p>Staff disagrees. Due to the potential for the fuel line to see line pressure in the event of a failure.</p>
	<p>Joy C. Peery Codes & Standards Northwest Natural (NWN)</p>	<p>“...each start up..” and “at a specified flow rate.” <u>NWN comment:</u> Please clarify the intent of this section.</p>	<p>“at a specified flow rate” is per manufacturing recommendations</p>
	<p>Michael J. Faulkenberry, P.E. Chief Gas Engineer, Avista Utilities</p>	<p>Avista would like a clarification on each start-up. What are you calling a start-up?</p>	<p>Language has been changed to “turn-on” instead of start up.</p>
	<p>Kaaren Daugherty, P.E. Consulting Engineer, Standards & Work Practices Puget Sound Energy (PSE)</p>	<p>PSE recommends that the title be corrected to “Increasing Maximum Allowable Operating Pressure.”</p> <p>PSE requests the following changes for consistency and clarification:</p> <p>Replace the word “Each” with “Every” at the beginning of the sentence.</p> <p>(7) Records deemed necessary by the cCommission Staff to...</p>	<p>Staff agrees. Change has been made.</p> <p>Staff agrees. Change has been made.</p>

ISSUE	INTERESTED PERSON	COMMENTS	STAFF RESPONSE
	<p>Keith A. Meissner Pipeline Safety Engineer Cascade Natural Gas (CNG)</p>	<p>(8) Uprates must be based on a previous strength test that would substantiate the maximum allowable operating pressure. When there is no documented history of strength <u>a post construction tests to substantiate the proposed MAOP, one a new test</u> must be conducted in conjunction with the uprate.</p> <p>The title of the rule should be changed to “Increasing Maximum Allowable Operating Pressure”.</p> <p>This rule is being changed from a notification requirement to an approval request. If an uprate is planned according to WAC 480-93-155, and 49 CFR Part 192, no approval from the Commission should be necessary. The plan conforming to these rules will conform to established safety standards and guidelines. Automatically requiring Commission approval would be unnecessary for many projects.</p> <p>(8) We recommend that Paragraph (8) be deleted. In the past uprates have been approved by the Commission without pressure tests conforming to a predetermined specification. These pipelines were evaluated by the gas company; an uprate report and request submitted to the Commission for review; discussed; and permission granted to perform the uprate. This proposed rule should not restrict the Commission from granting its permission for a pipeline to be uprated based upon review of the uprate study and discussion of the uprate procedure.</p>	<p>Staff has re-drafted the proposed rule section.</p> <p>Staff agrees. Change has been made.</p> <p>Staff changed the proposed rule language from Commission approval to staff review.</p> <p>Staff disagrees. This section relates to RSPA interpretation 192.555 No. 5 dated May 31, 2001.</p>

ISSUE	INTERESTED PERSON	COMMENTS	STAFF RESPONSE
<p>17) WAC 480-93-160 Reporting requirements for proposed construction. (Design and construction)</p>	<p>Joy C. Peery Codes & Standards Northwest Natural (NWN)</p> <p>Kaaren Daugherty, P.E. Consulting Engineer, Standards & Work Practices Puget Sound Energy (PSE)</p>	<p>NWN suggested the title should be changed to “Increasing Maximum Allowable Operating Pressure.”</p> <p>Are LDCs allowed to uprate <60 psig systems without notifying the WUTC?</p> <p>Upgrades are generally performed while pipelines are in operation and it may not be feasible or desirable to take them out of service to test. Pressure testing a pipeline with natural gas to 1½ times the new MAOP may not be in the best interest of public safety. Suggest deleting statement 8.</p> <p>The proposed change that replaces “greater than 20% SMYS” with “transmission”, combined with the proposed definition of transmission in these roles is burdensome. If the commission wants notification for all transmission projects then operators can provide this, but providing a host of paperwork for a project that the commission chooses not to review is wasteful. If the commission wants additional details for a given notification, then they could be provided upon request. The 45 day requirement is too burdensome for all the projects this proposed rule will trigger. PSE recommends the following changes:</p> <p>(1) Every gas company must file a proposed construction report <u>notification to the commission at least 45 30 days prior to construction or replacement of any gas transmission pipeline setting forth the proposed route and the specifications for the pipeline.</u></p>	<p>Staff agrees. Change has been made.</p> <p>Yes, pending previous pressure test.</p> <p>Staff disagrees. This section relates to RSPA interpretation 192.555 Number 5 dated May 21, 2001.</p> <p>The 45 days is consistent with the uprate requirements.</p> <p>Staff disagrees.</p>

ISSUE	INTERESTED PERSON	COMMENTS	STAFF RESPONSE
	<p>Joy C. Peery Codes & Standards Northwest Natural (NWN)</p>	<p>(2) <u>For any gas pipeline intended to be operated at 20% or more of the specified minimum yield strength of the pipe used, The a report must be included with the notification and must be filed with the commission setting forth the proposed route and the specifications for the pipeline and must include but is not limited to the following items:</u></p> <p>(2)(3) Every gas company must submit a report to the commission on the fifteenth day of each month describing the progress of such construction or major reconstruction <u>replacement</u> for the preceding month, <u>for pipelines subject to the requirements of subsection (2).</u></p> <p>Is this rule for capital projects versus operations and maintenance work? We suggest an exception for emergency repairs if the rule includes both.</p> <p>(1) Every gas company must file a proposed construction report at least 45 days prior to construction or replacement of any ^{Comment 1} gas transmission (≥20% SMYS) ^{Comment 2} pipeline.</p> <p><u>Comment:</u></p> <p>1. Suggest that this provision be limited to lengths greater than a specified length, e.g., 2000 feet of pipeline.</p>	<p>Staff proposes to delete this section.</p> <p>Yes.</p> <p>Same response as to PSE on page 29.</p> <p>Staff disagrees.</p>

ISSUE	INTERESTED PERSON	COMMENTS	STAFF RESPONSE
<p>18) WAC 480-93-175 Moving and lowering gas pipelines. (Design and construction)</p>	<p>Kaaren Daugherty, P.E. Consulting Engineer, Standards & Work Practices Puget Sound Energy (PSE)</p> <p>Keith A. Meissner Pipeline Safety Engineer Cascade Natural Gas (CNG)</p> <p>Joy C. Peery Codes & Standards Northwest Natural (NWN)</p>	<p>2. Recommend limiting this requirement to transmission lines $\geq 20\%$ SMYS.</p> <p>3. Does this rule apply to operations and maintenance work as well as capital projects? We suggest an exception for emergency repairs if the rule includes both.</p> <p>The proposed revisions to subsection (3) are significant and PSE would like to know the basis for this. PSE requests the following changes: (3) <u>Plastic pipelines and steel pipelines having a diameter of 2 inches or less operating at 60 pounds per square inch gauge (psig) or less and having a diameter of two inches or less may be moved...</u></p> <p>It is not clear that paragraphs (1) and (2) do not apply if the criteria in paragraph (3) are met. As written, paragraphs (1) and (2) always apply.</p> <p>(3) The word “nominal” should be added before the word “diameter” in paragraph (3).</p> <p><u>NWN suggested changes:</u> (1) (Second sentence). “This study must be reviewed and approved by the company’s senior engineer <u>a licensed professional engineer</u> and retained...”</p>	<p>Staff disagrees.</p> <p>No. As stated above this is applicable to capital projects. Emergency repairs are exempt.</p> <p>Staff agrees. Change has been made.</p> <p>Staff believes this is to limiting to a company. Staff has new proposed language in section 1.</p>

ISSUE	INTERESTED PERSON	COMMENTS	STAFF RESPONSE
<p>19) WAC 480-93-yyy Protection of Plastic Pipe. (New Rule) (Design and Construction)</p>	<p>Kaaren Daugherty, P.E. Consulting Engineer, Standards & Work Practices Puget Sound Energy (PSE)</p>	<p>(3) <u>Steel Pipelines</u> operating at 60 pounds per square inch gauge (psig) or less and having a diameter of two inches or less <u>and plastic pipelines</u> may be moved or lowered if the operator can certify <u>determines</u> that...</p> <p>PSE requests the following changes to this proposed rule:</p> <p>(1) PSE recommends to delete the second sentence that begins with “The storage, handling, and installation...” and insert the new sentence that read, “These procedures must address the following:</p> <p>(a) The maximum cumulative ultraviolet light exposure limit. (PSE recommend deleting the rest of the sentence).</p> <p>(b) PSE recommends deleting the entire sentence and insert the new sentence that read, “Clearance from other structures and utilities.”</p> <p>(c) Backfill. (PSE recommends to include in the new proposed rule).</p> <p>(d) Pipe squeezing. (PSE recommends to include in the new proposed rule).</p>	<p>Staff disagrees.</p> <p>Staff agrees. Change has been made</p> <p>Staff is not clear on this comment.</p> <p>Backfill is addressed in section 5.</p> <p>Pipe squeezing is addressed in section 6.</p>

ISSUE	INTERESTED PERSON	COMMENTS	STAFF RESPONSE
		<p>(2) PSE recommends deleting this entire item and insert a new sentence that read, “When plastic pipe is pulled through the ground during the installation process and the pipe could potentially be exposed to excessive tensile stresses, a weak link, or other method of ensuring that the pipe will not be damaged, must be used.”</p> <p>(3) PSE recommends deleting this entire item.</p> <p>(4)(3) “...two weeks <u>years</u>.”</p> <p><u>PSE Comment:</u> This subsection is covered in 192.321(g)(1). PSE would like to know the basis for the proposed two week limitation. This time frame seems arbitrary and out of line with minimum federal safety standards.</p> <p>(4) PSE recommends deleting this entire item.</p> <p>(5) PSE recommends deleting this entire item.</p> <p>(6) PSE recommends deleting this entire item.</p> <p>(8)(4) PSE would like to discuss the proposed subsection.</p> <p>(9)(5) Every gas company...</p>	<p>Staff disagrees.</p> <p>Staff disagrees.</p> <p>Staff disagrees with two years. Staff proposes 30 days.</p>

ISSUE	INTERESTED PERSON	COMMENTS	STAFF RESPONSE
	<p>Keith A. Meissner Pipeline Safety Engineer Cascade Natural Gas (CNG)</p>	<p>(1a) We recommend the words “whichever is less” be deleted from the end of paragraph 1(a). Plastic pipe currently being used by CNGC has a manufacturer’s recommended exposure limit longer than 2 years. It is unnecessary to require an arbitrary limit of 2 years on pipe that has a longer manufacturer’s recommendation.</p> <p>(8) As written, the proposed rule ignores that it is often impractical to backfill the entire pipe. Activities such as the pressure test and final tie-in fusions require portions remain exposed. The proposal can also be interpreted to prohibit beginning the test, backfilling, and then finishing the test. That method would also accomplish this intent. Finally, a pressure test can ensure that no potentially significant damage occurred. Insignificant damage, that will not affect the safe operation of the pipeline, will not be revealed by the pressure test.</p> <p>We recommend Paragraph (8) be changed to read: “Plastic pipe must be pressure tested after installation and backfill to ensure no potentially significant damage occurred during the installation and backfill processes, unless it is impractical to do so.”</p>	<p>Staff agrees. Change has been made.</p> <p>Staff agrees that you can’t always backfill the entire pipeline. The intent is to have the majority of the pipeline installed and backfilled prior to pressure testing.</p>

ISSUE	INTERESTED PERSON	COMMENTS	STAFF RESPONSE
	<p>Joy C. Peery Codes & Standards Northwest Natural (NWN)</p>	<p>(1) (Last sentence). "...the company must be adhere to the following requirements:</p> <p>(a) NWN recommends to delete the words "whichever is less."</p> <p><u>NWN comment:</u> Performance Pipe™, a respected manufacturer of polyethylene pipe, specifies that PE pipe stored in exterior unprotected locations should be used within 4 years of the date of manufacture. Section (1)(a) as proposed would disallow the use of this pipe 2 years before the recommended expiration date.</p> <p>(b) NWN recommends to insert the words "the operator must use" after the word "tensile stresses." The words "must be used" at the end of the sentence is recommended to be deleted.</p> <p>(2) NWN recommends the words "if possible" to be inserted at the end of the first sentence.</p> <p>(3) NWN recommends the words "if possible" to be inserted at the end of the first sentence.</p> <p>(4) At the beginning of the sentence, NWN recommends to insert the words "Except as explicitly provided in this section,..."</p>	<p>Staff agrees. Change has been made.</p> <p>Staff agrees. Change has been made.</p> <p>Staff agrees.</p> <p>Staff disagrees.</p> <p>Staff disagrees. Rule as drafted allows for deviation as long as other precautions are taken. (Response to 2 and 3).</p> <p>Staff disagrees.</p>

ISSUE	INTERESTED PERSON	COMMENTS	STAFF RESPONSE
<p>20) WAC 480-93-185 Gas leak investigation. (O&M)</p>	<p>Michael J. Faulkenberry, P.E. Chief Gas Engineer, Avista Utilities</p> <p>Kaaren Daugherty, P.E. Consulting Engineer, Standards & Work Practices Puget Sound Energy (PSE)</p>	<p>At the end of the second sentence, NWN recommends to delete the words “a period of two weeks” and insert the words “the minimum length of time required to complete the permanent installation.”</p> <p><u><i>NWN comment:</i></u> Does this requirement apply to repairs and replacement due to damages as well as new installations?</p> <p>Avista Utilities would like to know what the basis for limiting item (1)(a) to 2 years. Why is it not based on the manufacturer’s recommendations?</p> <p>Avista would also like to discuss the intent of item (5) in regard to backfill material and item (8) for backfilling prior to pressure testing.</p> <p>PSE would like to discuss the legal issues associated with the proposed rule change highlighted in subsection (1) of this section. “...only when the commission and the lead investigative authority have designated the release of the gas facility. Once the situation is made safe, the facility must remain intact until directed by the lead investigative authority.”</p>	<p>Staff has changed the two weeks to 30 days.</p> <p>Yes.</p> <p>Staff has removed the language “whichever is less”.</p> <p>Section 5 refers to the manufacturers specifications. Section 8 refers to the ability to expose any damage to the pipe.</p> <p>The intent of this section is to assure that no one removes any gas facility prior to authorization by the authorized personnel such as the Fire Marshall.</p>

ISSUE	INTERESTED PERSON	COMMENTS	STAFF RESPONSE
	<p>Keith A. Meissner Pipeline Safety Engineer Cascade Natural Gas (CNG)</p>	<p>PSE also requests the following changes for clarity:</p> <p>(1) PSE recommends the second sentence in this paragraph to be separated to become item (1)(a).</p> <p>PSE recommends the fourth sentence in this paragraph to be separated to become item (1)(b).</p> <p>PSE recommends the last sentence that begins “Grade 1 or Grade 2...” is more appropriately located in section-186.</p> <p>(2) PSE would like to discuss this proposed revision – the intent is not clear.</p> <p>(1) The wording of this proposal should be changed so that “In the event of an explosion, fire, death, or injury, the gas company is required to preserve evidence, and to assist in the investigation.”</p>	<p>Staff disagrees.</p> <p>Staff disagrees.</p> <p>Staff agrees. Change has been made.</p> <p>The intent of the proposed rule language is to assure that there is documentation to verify that a company responded to a leak investigation.</p> <p>The intent of this section is to assure that no one removes any equipment prior to the inspection of the facility by the authorized personnel such as the Fire Marshall.</p>

ISSUE	INTERESTED PERSON	COMMENTS	STAFF RESPONSE
		<p>The proposal that “a physical repair” be “made to the pipeline facility” in order to regrade a leak is impractical. The gas company should instead be required to record full documentation of the reasons and data justifying the grade reduction. Further investigation may show that the leak is not as serious as first suspected and consequently should be downgraded. The proposal may also promote lowering of initial grading. If there is a chance that a leak should be graded as a one or a two, the operator should not hesitate to do so.</p> <p>(2) The proposal that the required letters be retained “for the life of the pipeline” is impractical and burdensome. Gas companies do not typically control and monitor a customer’s house piping and would be unaware of that pipeline’s retirement, making this requirement impractical. A record of leak investigations that are false should not have to be kept “for the life of the pipeline”, making this requirement burdensome. A shorter period such as two years will be sufficient for Commission review of records.</p> <p>The requirement that the letter be “kept with the leak report” is unnecessary. Other locations should be acceptable, such as an electronic record of the letter having been sent. Also, the letter itself should not be the only record allowed to prove the letter was sent. Electronic records or data should be sufficient. The proposal should be worded so all appropriate methods of compliance are allowed.</p>	<p>The intent on this part of the rule is to disallow the grade 2 repair time to continually be re-started by down grading leaks. (Staff solicits comments or proposed rule language to address the intent.)</p> <p>This proposed requirement is not for the life of the fuel line but for the life of the gas company’s pipeline facility.</p> <p>Staff has redrafted the rule language.</p>

ISSUE	INTERESTED PERSON	COMMENTS	STAFF RESPONSE
	<p>Joy C. Peery Codes & Standards Northwest Natural (NWN)</p>	<p>NWN recommends the title should be changed from “Gas Leak Investigation” to “Failure Investigation.”</p> <p>(1) NWN recommends changing the words “...from an outside source..” to “..from any outside source..”</p> <p>NWN recommends deleting sentence that begins with “..such as police or fire department,..”</p> <p>NWN recommends deleting the second, third and fifth sentences.</p> <p><u>NWN comment:</u></p> <p>(1) The above statement designating authority to the WUTC is contradictory to federal regulation. 49 CFR §192.617 states: "Each operator shall establish procedures for analyzing accidents and failures, including the selection of samples of the failed facility or equipment for laboratory examination, where appropriate, for the purpose of determining the causes of the failure and minimizing the possibility of recurrence."</p>	<p>Staff disagrees. Including the word “failure” you are identifying a pipeline that is not operable. This is a rule pertaining to leaks.</p> <p>Staff disagrees.</p> <p>Staff disagrees.</p> <p>Staff disagrees.</p> <p>Staff disagrees that this rule proposal is contradictory to 49 CRF Part 192.617</p>

ISSUE	INTERESTED PERSON	COMMENTS	STAFF RESPONSE
	<p data-bbox="426 1149 743 1287">Michael J. Faulkenberry, P.E. Chief Gas Engineer, Avista Utilities</p>	<p data-bbox="890 269 1533 375">This definition of jurisdiction may prevent the operator from complying with the requirements of §192.617.</p> <p data-bbox="890 383 1583 485">There is also a legal concern regarding preservation of evidence at the site until the Commission authorizes the release of the gas facility for failure analysis.</p> <p data-bbox="890 526 1589 777">The leak grading requirement should be addressed in WAC 480-93-186. However, we suggest this language be struck out. Under some circumstances, improved or additional information will legitimately support changing a Grade 1 or 2 leak to a Grade 3 leak without a physical repair having been made to the pipeline facility.</p> <p data-bbox="833 818 1589 1105">(2) Suggest deleting the odor sniff card requirement. Problems have occurred with the customer disposing of the card and creating false odor calls based on these cards. We also suggest deleting the requirement for the adult person occupying the premises to sign the gas company work order based on legal counsel's suggestion given that the customer is not usually aware of what they are signing and why</p> <p data-bbox="833 1149 1551 1214">Avista would still like to see that the requirement for the odor sniff cards be deleted.</p> <p data-bbox="833 1260 1589 1362">Avista would also like a clarification on the intent of why a Grade 1 or Grade 2 leak cannot be downgraded to a Grade 3 leak without a repair.</p>	<p data-bbox="1619 383 1923 448">Please explain the legal concern.</p> <p data-bbox="1619 526 1969 628">Staff agrees. Language has been moved to 480-93-186 section (d)</p> <p data-bbox="1619 818 1990 883">Staff agrees to remove “sniff cards.”</p> <p data-bbox="1619 1149 1944 1214">Staff agrees. Change has been made.</p> <p data-bbox="1619 1260 1997 1362">The intent on this part of the rule is to disallow the grade 2 repair time to continually be</p>

ISSUE	INTERESTED PERSON	COMMENTS	STAFF RESPONSE
<p>21) WAC 480-93-186 Leakage classification and action criteria. (O&M)</p>	<p>Kaaren Daugherty, P.E. Consulting Engineer, Standards & Work Practices Puget Sound Energy (PSE)</p>	<p>PSE requests the following changes for clarity:</p> <p>(1) PSE recommends inserting the words “Every gas company shall assign a grade to a leak..” at the beginning of the sentence.</p> <p>PSE recommends deleting the words “...of a leak, one of the following leak grade shall <u>must</u> be assigned,..”</p> <p>PSE recommends to insert the words “Leak grades shall be in accordance with subsection (3)” at the second sentence.</p> <p>PSE recommends to separate the sentence that begins with “The same criteria for initial leak grading...” to become item (1)(a).</p> <p>(2) PSE recommends deleting the words “Gas leak classification and repair. Each..” and begin the sentence with “Every gas company must..”</p> <p>(3) PSE recommends item (3) should read, “Leak grades are as follows:”</p>	<p>re-started by down grading leaks.</p> <p>Staff disagrees.</p> <p>Staff agrees.</p> <p>Staff disagrees.</p> <p>Staff disagrees.</p> <p>Staff disagrees.</p> <p>Staff disagrees.</p> <p>Staff disagrees.</p>

ISSUE	INTERESTED PERSON	COMMENTS	STAFF RESPONSE
<p>22) WAC 480-93-18601 Table 1--Leak classification and action criteria-- Grade--Definition-- Priority of leak repairs—Examples. (O&M)</p>	<p>Keith A. Meissner Pipeline Safety Engineer Cascade Natural Gas (CNG)</p> <p>Joy C. Peery Codes & Standards Northwest Natural (NWN)</p> <p>Kaaren Daugherty, P.E. Consulting Engineer, Standards & Work Practices Puget Sound Energy (PSE)</p> <p>Joy C. Peery Codes & Standards Northwest Natural (NWN)</p>	<p>The proposed rule’s grade definitions have the words “where gas is likely to migrate” changed to the words “where gas could potentially migrate”. The words “is likely” address the probability of migration. If a leak is not likely to migrate, then migration should not be a factor. The words “could potentially” allow no measurement of the probability of migration. It can be interpreted that all leaks “could potentially” migrate, even though it was not likely to occur.</p> <p>Defining the perimeter of the leak area is not necessary for small, Grade C leaks.</p> <p><u>Grade 2 table, Priority of Leak Repair.</u> PSE recommends the word “reinspection” be hyphenated.</p> <p>NWN recommends the word “Example” be changed to Grade 1,2 or 3 Criteria within each respective table. <u>NWN comment:</u> Examples become prescriptive criteria when performance language is used, such as 80% LEL.</p> <p><u>Grade 2, Priority of Leak Repair.</u> NWN recommends deleting the last sentence. <u>NWN comment:</u> The above statement is unnecessary.</p>	<p>Staff believes that leaks should be graded in a “worse case scenario.”</p> <p>Staff disagrees. Leak grades must be based in part on the spread of the gas.</p> <p>Staff believes that if you change the word Example to Criteria the rule will be more stringent. At this time staff does not agree to make this change.</p> <p>This is a column heading. Alignment is adjusted.</p>

ISSUE	INTERESTED PERSON	COMMENTS	STAFF RESPONSE
<p>23) WAC 480-93-187 Leak records and self audit. (O&M)</p>	<p>Kaaren Daugherty, P.E. Consulting Engineer, Standards & Work Practices Puget Sound Energy (PSE)</p>	<p><u>Grade 2, Examples.</u> The example in B indicates a shorter action time (6 months) than the proposed requirement in column 1, Priority of Leak Repair (1 year).</p> <p><u>Grade 2, Examples.</u> (3) Please define substructures.</p> <p>PSE requests the following changes for consistency with format changes proposed throughout these rules:</p> <p>(1) PSE recommends deleting the words at the beginning of the sentence that read “Gas leak records. Each..” and begins the sentence with “Every gas company must..”</p> <p>(2) PSE recommends item (2) should read, “Gas Leak Reports must include the following information. However, data...”</p> <p>PSE also recommends deleting the last sentence that read “but at a minimum must include the following:”</p> <p>(2e,j)PSE would like to know the difference between (e) and (j)?</p>	<p>Staff wishes to clarify that the proposed rule language that refers to the 6 months is a re-evaluation time frame. The 1-year is the repair time frame.</p> <p>Staff does not find this necessary.</p> <p>Staff disagrees.</p> <p>Staff disagrees.</p> <p>Staff has fixed the numbering on this rule.</p>

ISSUE	INTERESTED PERSON	COMMENTS	STAFF RESPONSE
<p>24) WAC 480-93-188 Gas leak surveys. (O&M)</p>	<p>Joy C. Peery Codes & Standards Northwest Natural (NWN)</p> <p>Kaaren Daugherty, P.E. Consulting Engineer, Standards & Work Practices Puget Sound Energy (PSE)</p>	<p>NWN recommends inserting the word “Gas” at the beginning of the title.</p> <p>PSE requests the following changes for consistency with format changes proposed throughout these rules:</p> <p>PSE recommends deleting the words “Types of gas leak surveys and test methods.”</p> <p>(1) Each <u>Every</u> gas company must have a leak control program. <u>Except as provided in subsection (2), a A gas leak survey must be conducted using a gas detection instrument covering for all mains, services, and transmission lines including the testing of the atmosphere at the following:</u></p> <p>(a) PSE recommends to delete the first section of this item and begin the sentence with “A utility (gas, electric, telephone...”</p> <p>(2) PSE recommends inserting the words “Service piping, riser piping, and meter(s) may be checked with either a gas detection instrument or with a soap solution.”</p> <p>PSE recommends deleting the words “Maintenance and calibration of instruments”.</p> <p>PSE also recommends separating the words “All instruments used in leak detection and...” to become item (3).</p>	<p>Staff agrees. Change has been made.</p> <p>Staff agrees. Change has been made.</p> <p>Staff disagrees. Section 2 addresses maintenance and calibration of instruments.</p> <p>Staff disagrees.</p> <p>Staff agrees. This language is proposed in section (4) (c)</p> <p>Staff agrees. Rule has been redrafted.</p> <p>Staff agrees. Rule has been redrafted.</p>

ISSUE	INTERESTED PERSON	COMMENTS	STAFF RESPONSE
		<p>(3) (4) Frequency of surveys in designated areas. Gas leakage surveys must be... <i>(PSE recommends to delete the first sentence and change the word "leakage" to "leak.")</i></p> <p>(c) Buildings of public assembly, <u>such as churches, schools, and hospitals</u> -...</p> <p>(4)(5) <u>Leak surveys for business areas and buildings of public assembly be conducted.</u> <i>(PSE recommends deleting the second sentence).</i></p> <p>(a) PSE recommends deleting the words "a survey must be conducted."</p> <p>(b) PSE recommends deleting the words "Surveys must be conducted" and begin the sentence with "Within all buildings..."</p> <p>(c) PSE recommends deleting this entire item. <u>PSE comments:</u> Is the subsection (c) only for business areas and buildings of public assembly? This seems to be a general statement that should be covered in it's own subsection. See (2) above.</p> <p>(5)(6) PSE recommends deleting the words "Special surveys" at the beginning of the sentence.</p>	

ISSUE	INTERESTED PERSON	COMMENTS	STAFF RESPONSE
	<p>Keith A. Meissner Pipeline Safety Engineer Cascade Natural Gas (CNG)</p>	<p>(d&e) PSE recommends deleting the entire items. <u>PSE comment:</u> Subsections (d) and (e) below are duplicates of information already in subsection (3)(c) and (d).</p> <p>(8) PSE recommends deleting the words “Self audits. Each..” and begin the sentence with “Every.”</p> <p>(a) PSE recommends deleting the words “must assure” and “must be taken into account.”</p> <p>(b) PSE recommends deleting words “Companies must evaluate survey results,.”</p> <p>(c) PSE recommends deleting the words “Companies must check the a..” and begin the sentence with “Adequacy..”</p> <p>(d) PSE recommends changing the duration to 5 years.</p> <p>(2) Some manufacturer’s do not make recommendations about calibration frequency. For these devices, experience and practice may show the device operates adequately on calibration period that is longer than one month.</p>	<p>Staff disagrees.</p>

ISSUE	INTERESTED PERSON	COMMENTS	STAFF RESPONSE
	<p data-bbox="426 1149 772 1252">Joy C. Peery Codes & Standards Northwest Natural (NWN)</p>	<p data-bbox="890 269 1583 553">The proposal should be modified to require that leak detection device accuracy is periodically checked, and calibration performed as needed. We recommend the last sentence be replaced with, “If there is no manufacturer’s recommendation, calibration must be performed periodically on a schedule devised by the gas company to ensure devices are accurate for their function.”</p> <p data-bbox="835 602 1583 813">(3) Federal proposed rule-making Docket No. RSPA-02-13208 is currently proposing adding leeway to the survey period for residential areas. This proposal may conflict with the federal rules if the federal rules are changed. We suggest this be considered during this rule making.</p> <p data-bbox="835 857 1591 1105">(9) We continuously review our leak detection program and record keeping. It is unnecessary to require record keeping for these audits. The component leak survey records are sufficient materials for gas companies to monitor leak survey and detection programs. Leak survey and detection records are reviewed by The Commission. Paragraph (9) should be deleted.</p> <p data-bbox="835 1149 1570 1214">(1) NWN recommends deleting the word “control” in the first sentence and replace it with “detection.”</p> <p data-bbox="835 1258 1570 1323">(2) In the last sentence, replace “is” with “are” and make “recommendation” plural.</p>	<p data-bbox="1619 269 1818 302">Staff disagrees.</p> <p data-bbox="1619 602 1818 634">Staff disagrees.</p> <p data-bbox="1619 857 1818 889">Staff disagrees.</p> <p data-bbox="1619 1149 1969 1214">Staff has changed “control” to “survey”.</p> <p data-bbox="1619 1258 1780 1291">Staff agrees.</p>

ISSUE	INTERESTED PERSON	COMMENTS	STAFF RESPONSE
<p>25) WAC 480-93-200 Reports associated with gas company facilities and operations. (Reporting)</p>	<p>Edward A. Finklea, Chad M. Stokes of Attorney for the Northwest Industrial Gas Users (NWIGU)</p>	<p>(4) In the second sentence, add the letter “s” to the word “companie.”</p> <p>(b) Add the word “could” in the sentence that read “..where escaping gas <u>could</u> potentially migrate into..”</p> <p>(5) In the second sentence, replace the word “in” with “under.”</p> <p>Have there been any cost estimates prepared for the revisions proposed to WAC 480-93-200? Safety is, of course the paramount concern. Requiring LDCs to report damages greater than \$1,000 within 2 hours, however, may be a very costly undertaking. Is that added expenditure justified as compared to continuing the current six hour reporting requirement for damage greater than \$5,000?</p> <p>(1) The reporting triggers in WAC 480-93-200(1) are separated by a semi-colon but need an “or” at the end of (l)(h). 1(k) and 1(l) should be in a separate section as the reporting appears to be intended as mandatory, and the current structure of the paragraph in the proposal is confusing.</p>	<p>Not at this time. A SBEIS questionnaire will be prepared and sent to all stakeholders to respond to. This will provide companies an opportunity to determine the cost effect of the proposed rule changes. The \$1,000 has been changed to \$5,000. The 2 hour time limit is consistent with Federal requirements.</p> <p>The rule has been re-numbered.</p>

ISSUE	INTERESTED PERSON	COMMENTS	STAFF RESPONSE
	<p>Kaaren Daugherty, P.E. Consulting Engineer, Standards & Work Practices Puget Sound Energy (PSE)</p>	<p>PSE would like to discuss the basis for the reduction in time for the telephonic notification to the commission. PSE disagrees with the reduction in property damage that triggers notification and would like to discuss the basis for this. PSE has made a few recommendations to better organize this section but requests that the commission re-review this section in entirety for clarity and format.</p> <p>(1b) PSE recommends the property damage amount be \$5,000 rather than \$1,000.</p> <p>(j) As a note, PSE believe that this is not a subsection of (1). They recommend to become item (2).</p> <p>PSE recommends inserting the words “in subsection (1)” in place of the word “above.”</p> <p>(k)(j) Change the subsection (k) to (j).</p> <p>(l)(k) Change the subsection (l) to (k).</p> <p>In the last sentence, the words “the commission shall <u>must</u> be notified” be deleted.</p> <p>(l) PSE proposes to add subsection (l) which states “Unscheduled interruptions to the service furnished by any gas company to an industrial customer, a master meter customer, or twenty-five or more distribution customers.”</p>	<p>The 2 hour time frame is consistent with Federal requirements.</p> <p>Staff agrees. Change has been made.</p> <p>Staff agrees. J is now number 2.</p> <p>Staff agrees. Change has been made.</p> <p>Staff has re-numbered the rule.</p> <p>Staff agrees. Change has been made.</p> <p>Staff agrees. Change has been made.</p>

ISSUE	INTERESTED PERSON	COMMENTS	STAFF RESPONSE
		<p>(3) PSE recommends beginning item (3) with the phrase “Reports required in subsection (1)...” also in the same sentence, make “Commission” a lower case “c”, and in the last sentence, add the word “written” before the word “reports.”</p> <p>(gh)(4) Change the subsection (h) to item (4).</p> <p>(4)<u>(5)</u> Change item (4) to item (5).</p> <p>PSE proposes deleting the sentence “In addition to the above required forms every” and begin the word with “Every.” PSE also recommends separating this sentence to become item (6).</p> <p>PSE proposes separating the sentence “The “Damage Prevention Statistics” will..” to become subsection (6a).</p> <p>(5)<u>(7)</u> Change item (5) to item (7).</p> <p>(6)<u>(8)</u> Change item (6) to item (8).</p> <p>(5)<u>(6)</u>(9) Change item (6) to item (9).</p> <p>PSE would like to discuss the requirement in item (9).</p> <p>(6)<u>(10)</u> Change item (6) to item (10).</p>	<p>Staff agrees. Change has been made.</p> <p>Rule has been renumbered</p>

ISSUE	INTERESTED PERSON	COMMENTS	STAFF RESPONSE
	<p>Keith A. Meissner Pipeline Safety Engineer Cascade Natural Gas (CNG)</p>	<p>(1) The rule should not require a specific time limit for reporting these occurrences. The proposal should be changed from “within two hours of occurrence” to “as soon as practical upon discovery”. Many of the occurrences may not be discovered within six hours of occurrence, such as media reports the next day.</p> <p>Paragraphs 1(c), 1(e), and 1(f) should be deleted. In the past, the Commission has only required the reporting of significant events. Adding these items will require gas companies to report insignificant events to the Commission. If evacuating a dwelling will result in the notification requirement, some operators could hesitate to do the right thing and properly make the situation safe. These additional reports would be a burden on gas companies and the Commission with no corresponding benefit to public safety.</p> <p>Paragraph 1(b) proposes the property damage threshold be lowered to one thousand dollars from five thousand dollars. We recommend this threshold remain at five thousand dollars. This reduction will exponentially increase the number of reports required, and many insignificant events would have to be reported.</p>	<p>Staff disagrees. The 2 hour time limit is from the time it is discovered not from the time it occurred.</p> <p>Staff disagrees.</p> <p>Staff agrees. The dollar amount is changed to \$5,000.</p>

ISSUE	INTERESTED PERSON	COMMENTS	STAFF RESPONSE
		<p>(2) We recommend paragraph (2) be amended to state “When a pipeline or system pressure exceeds maximum allowable operating pressure”.</p> <p>(3) We recommend paragraph (3) be amended to allow 45 days for the written report. This matches other proposed period extensions.</p> <p>(3d) We recommend that paragraph 3(d) be amended to say “maximum allowable operating pressure of the facilities involved.”</p> <p>(3g) The reason for reporting cost information should be discussed further. We would like to understand how this information will be used and what benefits may be derived.</p> <p>(3i) The placement of paragraph 3(i) should be examined. This requirement should probably be under paragraph (1). We have no objection to its placement here, but if it is moved to paragraph (1), it should be deleted from paragraph (3).</p> <p>(4) The information requested by the proposal in 4(b) and 4(c) is already submitted as part of the RSPA F-7100.1-1 and F-7100.2-1 forms.</p>	<p>Staff agrees. Change has been made.</p> <p>Staff disagrees.</p> <p>Staff agrees. Change has been made.</p> <p>Staff has redrafted this rule.</p> <p>Staff has redrafted this rule.</p> <p>Staff has redrafted this rule.</p>

ISSUE	INTERESTED PERSON	COMMENTS	STAFF RESPONSE
	<p data-bbox="426 1182 772 1287">Joy C. Peery Codes & Standards Northwest Natural (NWN)</p>	<p data-bbox="890 269 1577 448">We are interested in providing appropriate pipeline safety data to the Commission. We recommend further discussions of this proposed rule to achieve an appropriate wording for this change, and an understanding of the benefits derived.</p> <p data-bbox="835 492 1587 813">(6) It is a burden on gas companies to require reports of all construction and repair activities be sent to the Commission on a daily basis. We currently submit daily reports upon which no actions are taken. To our knowledge, there are no administrative rules requiring non-gas utilities to report similar information. The primary purpose of this data would appear to facilitate “surprise” inspection of gas company construction and repair activities.</p> <p data-bbox="890 857 1545 1146">Submitting reports should only be required if the reports are necessary. This information should be obtained by contacting the specific operations base, not by requiring all gas companies report every day regardless of the locations of inspection personnel. We recommend that suitable language allowing the reports to be submitted upon a specific and prudent demand replace this proposed rule.</p> <p data-bbox="835 1187 1583 1287">(1) The proposed \$1,000 notification criteria will result in a large number of reports of insignificance events to WUTC Staff.</p>	<p data-bbox="1619 492 1997 667">This information is used on a daily basis to conduct crew inspections. It provides the ability to respond to the public inquiries.</p> <p data-bbox="1619 857 1818 886">Staff disagrees.</p> <p data-bbox="1619 1187 1955 1255">Staff agrees. Amount has been changed to \$5,000.</p>

ISSUE	INTERESTED PERSON	COMMENTS	STAFF RESPONSE
26) WAC 480-93-210 Interruptions to service.	Michael J. Faulkenberry, P.E. Chief Gas Engineer, Avista Utilities Edward A. Finklea, Chad M. Stokes of Attorney for the Northwest Industrial Gas Users (NWIGU)	(3g) At the time of the report, operators may not have accurate cost information available. (3i) Operators may not be aware of all master meter customers in their service territories. Avista would like to know why there are different reporting timeframes within this code and why the change from 6 to 2 hours. We do not feel that 2 hours is a sufficient timeframe to collect the necessary information for a telephonic report. NWIGU is concerned with the deletion of WAC 480-93-210 as a reporting requirement. It appears that unscheduled industrial service interruption would no longer be reporting requirement, merely a report inclusion item if other events are the trigger. NWIGU would like to discuss this proposed deletion of WAC 480-93-210 at the upcoming workshop.	Companies have the opportunity to update reports when cost information is known. Staff disagrees. This is consistent with the Federal requirements. This requirement has been moved to 480-93-200 (1).
27) WAC 480-93-220 Rule of precedence.	Edward A. Finklea, Chad M. Stokes of Attorney for the Northwest Industrial	NWIGU recommends that WAC § 480-93-220 “Rule of precedence” not be deleted as it provides clarity. To the extent that any State of Washington rule standard is intended to exceed federal DOT standards, the particular rule should say so expressly, and the general interpretation standards of the current Rule of precedence should continue. NWIGU’s understanding is that the general intention of the rules revision process is to make state rules consistent with federal DOT standards, which NWIGU	

ISSUE	INTERESTED PERSON	COMMENTS	STAFF RESPONSE
<p>28) WAC 480-93-223 Civil penalties for violation of Chapter 80.28. (General)</p>	<p>Kaaren Daugherty, P.E. Consulting Engineer, Standards & Work Practices Puget Sound Energy (PSE)</p>	<p>supports.</p> <p>(1) PSE recommends separating the last sentence “This subsection applies to violations of...” to become item (2).</p> <p>In the sentence that read, “...WAC 480-93-200(1)(e).” PSE requests to verify the section cross reference.</p>	<p>This rule has been redrafted.</p>

Follow-up Comments from Puget Sound Energy dated May 16, 2003

ISSUE	COMMENTS	STAFF RESPONSE
<p>1) 480-03-005 Definitions “Company”, “Gas company.”</p>	<p><i>Application of rules</i>, provides no limitations on who is covered by the rules. PSE understands that the WUTC wants jurisdiction over master meter systems and recommends that this be explicitly stated. If the WUTC seeks jurisdiction over ‘others’ then the definition should include these ‘others’ in as specific language as possible, including specific examples of these ‘others’. PSE suggests the following amendment to the definition of “Gas company”:</p> <p>(8) “Company,” “Gas company” means the term “gas company” shall means:</p> <p>(a) every gas company otherwise subject to the jurisdiction of the commission under Title 80 RCW as to rates and service; and</p> <p>(b) every person, corporation, city, or town which owns or operates a master meter system.</p>	<p>Staff has redrafted the rules using the term “operator” instead of “gas company” and has defined the term as “operator” in the definition section.</p>
<p>2) 480-03-005 Definitions “Master Meter System.”</p>	<p>The last revision of this definition clarified that one building did not constitute a master meter system. However, the changes also enveloped a whole new class of master meter systems not previously identified. PSE recommends the following amendment to the definition of “master meter system” so that it matches the federal definition while retaining the ‘one building’ clarification:</p> <p>(13) “Master meter system” means a pipeline system for distributing gas to more than one building within, but not limited to, a definable area, such as a mobile home park, housing project, or apartment complex, where the operator purchases metered gas from an outside source for resale through a</p> <p>gas distribution system. The gas distribution pipeline system supplies the ultimate consumer who either purchases the gas directly through a meter or by other means, such as by rents.</p>	<p>Staff is continuing to work on this.</p>

Follow-up Comments from Puget Sound Energy dated May 16, 2003

ISSUE	COMMENTS	STAFF RESPONSE
<p>3) 480-93-005 Definitions “Transmission Line.”</p>	<p>PSE recommends that the commission delete “Transmission line” from WAC 480-93-005. Commission staff stated that the grammatical change proposed in the draft rules was for clarification. This ‘clarification’ has far-reaching impacts to facilities that otherwise would not be considered transmission according to the federal definition.</p> <p>Per 49 CFR 192.3, a pipeline may be a transmission line by function (as in (a) and (c)), or by the stress level at which it operates (as in (b)). WAC 480-93-005 expands the federal definition to “a gas pipeline which connects to an existing transmission line without pressure regulation to lower the pressure”. For pipelines classified as transmission by function, this seems to have no impact. However, for distribution <i>systems</i> that may have one or more <i>segments</i> that operate at or above 20% SMYS the impact is substantial. In effect, under the WAC rule, a small segment of pipe operating at or above 20% SMYS within a distribution system ‘contaminates’ the entire system such that every rule for transmission lines applies to each segment in the system. Federal interpretations would limit the transmission classification to the “terminus of the last segment operating at 20 percent or more of SMYS.” (ref. OPS letter 8/9/88). Furthermore, RCW 81.88.010 (14), enacted in 2000, defines transmission pipeline effectively the same as 49 CFR Part 192.</p> <p>PSE urges commission staff to examine the motivation for including a large pipeline population of low-stress pipelines under this classification. If it is perceived that this broad classification achieves a greater level of safety by</p> <p>imposing additional operations and maintenance requirements on “inter-station” pipelines, it is an unbalanced approach. Consider the following: a distribution</p>	<p>Staff disagrees.</p>

Follow-up Comments from Puget Sound Energy dated May 16, 2003

ISSUE	COMMENTS	STAFF RESPONSE
	<p>system downstream of a gate station (distribution center) with an MAOP of 250 psig that contains one pipeline segment operating above 20% SMYS. Under the WAC definition, the entire system from the gate station to the next regulator station is transmission. Now consider a system equal in length, with the same MAOP and made up of pipeline segments of equal pipe diameters but with <i>no</i> segments that operate at or above 20% SMYS either because of a wall thickness or pipe grade difference. No portion of this system is transmission by federal or state definitions. What makes the pipeline segments in the first system connected downstream of the transmission line segment different from the pipeline segments in the second system?</p> <p>PSE maintains that the WAC definition adds an unjustified burden to low-stress pipelines and imposes unbalanced preventive and mitigative safety measures among equivalent pipeline systems, therefore the definition should be deleted.</p>	
<p>4) 480-93-005 Definitions “Covered Task.”</p>	<p>PSE recommends deleting the definition of “Covered task” from the draft rules. As noted above, this definition is an expansion of the existing federal definition and does not appear in any rules contained within Chapter 480-93. PSE believes broadening the definition is premature. Operator’s OQ programs have yet to undergo an initial audit. In addition, work continues between OPS and industry through the development of a national consensus standard (proposed ASME B31Q) that will include clarified definitions to promote consistency. To expand the definition of “covered task” so significantly beyond that in the Part 192 is contrary to the expressed intent of OPS.</p>	<p>Staff disagrees.</p>
<p>5) 480-93-017 Filing Requirements for Design,</p>	<p>In the stakeholder workshop, commission staff clarified the intent of paragraph (2) of this rule as the opportunity to look at the safety of a non-standard pipeline. PSE</p>	

Follow-up Comments from Puget Sound Energy dated May 16, 2003

ISSUE	COMMENTS	STAFF RESPONSE
Specification, and Construction Procedures.	<p>submits the following suggested language to reinforce that the intent is not to micro-manage changes occurring under normal operations (i.e. the qualification of new weld procedures, revisions to standards based upon policy changes or industry best practices, acceptance of new commodities from competitive vendors, or construction variances necessary due to specific circumstances on a particular job.)</p> <p>PSE suggests the use of the term “pipeline” in this rule instead of “gas pipeline facility” or “pipeline facility”. The term “pipeline” is defined in 49CFR Part 192 and includes all “facilities through which gas moves . . .”.</p> <p>The timeline change proposed by staff could more than double the approval time if “all documentation necessary to evaluate . . .” is either not requested or not provided in a timely manner. PSE also believes it’s reasonable for commission response time to equal the time allowed operators to respond to commission requests.</p> <p>Minor changes to previously submitted edits of paragraph (1) are also suggested.</p> <p>480-93-017 Design, specification, and construction standards.</p> <p>(1) Every gas company must have on file with the commission all applicable design, specification, and construction standards used for pipelines in their system. The standards must detail the acceptable types of materials, fittings and components for all pipelines in the gas company’s system.</p> <p>(2) Every gas company must submit to the commission a complete set of project plans for any proposed pipeline whose design, specification, and construction standards are outside the scope of the gas company’s existing and accepted</p>	<p>Staff disagrees.</p> <p>Staff disagrees.</p>

Follow-up Comments from Puget Sound Energy dated May 16, 2003

ISSUE	COMMENTS	STAFF RESPONSE
	<p>standards on file with the commission. The plans must be submitted to the commission at least forty-five days prior to the initiation of pipeline construction. Written commission approval or rejection of the proposed design, specification, and construction standards will be made within thirty days of receipt of all documentation necessary to evaluate the proposed pipeline construction.</p>	
<p>6) 480-93-080 Welder and Joiner Identification and Qualification Certificates.</p>	<p>PSE submits the following alternate language for proposed paragraph (5) of this rule to allow flexibility on whether the qualification date or qualification expiration is shown on the card. [Note: PSE previously recommended that this paragraph be re-numbered to (1).]</p> <p>WAC 480-93-080 Welder and joiner qualification</p> <p>(1) Welders and joiners must carry appropriate qualification cards showing the name of the welder or joiner, their qualifications, date of last qualification or expiration of qualification, and the company whose procedures were followed for the qualification. Welders' and joiners' qualification cards will be subject to commission inspection at all times when qualified personnel are working on gas pipelines subject to commission jurisdiction.</p>	<p>Staff disagrees.</p>
<p>7) 480-93-115 Casing of Pipelines.</p>	<p>At the stakeholder workshop, commission staff clarified that the requirements of paragraph (3) of this draft rule apply to all casings, including PVC conduit. PSE suggests the following amendment to paragraph (3) for clarity:</p> <p>(3) Whenever a gas company installs a pipeline in a casing or conduit of any type material, the casing ends must be sealed.</p>	<p>Staff agrees, with the suggested language, except for the deletion of "to prevent the migration of gas" Staff proposed to retain this language.</p>

Follow-up Comments from Puget Sound Energy dated May 16, 2003

ISSUE	COMMENTS	STAFF RESPONSE
8) 480-93-140 Meter Regulators.	<p>At the stakeholder workshop, staff indicated that the proposed rule was in-line with regulator manufacturer's installation procedures. However, manufacturer's bulletins for residential service regulators recommend the use of a gauge for the purpose of monitoring downstream pressure during start-up and not explicitly for verifying the regulator outlet set pressure. For self-operated service regulators, the manufacturer inspects and tests 100% of the regulators for proper operating and relief set pressure based on the operator's specifications. PSE believes the draft proposed language for this rule is too prescriptive and, with regard to testing the regulator's outlet set pressure <i>at a specified flow rate</i> and testing associated safety devices, is not practical. PSE recommends the following performance based language for this rule:</p> <p>WAC 480-93-140 Service regulators.</p> <p>(1) Service regulators must be installed, operated, and maintained in accordance with federal and state regulations, and in accordance with the manufacturers recommended installation and maintenance practices.</p> <p>(2)</p> <p>Every gas company must have procedures for inspection and testing of service regulators prior to placing in service.</p>	Staff disagrees.
9) 480-93-155 Increasing Maximum Operating Pressure.	<p>Commission staff proposes to require an approval for uprates. As discussed at the stakeholder workshop, PSE does not believe this is necessary because of the strict requirements for uprating contained within part 192 and the extent of information provided to the commission pursuant to rule 480-93-155. PSE suggest the following alternate language:</p>	Staff agrees. Rule has been redrafted.

Follow-up Comments from Puget Sound Energy dated May 16, 2003

ISSUE

COMMENTS

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	<p>WAC 480-93-155 Increasing maximum allowable operating pressure</p> <p>Whenever a gas company proposes to uprate a pipeline to a maximum allowable operating pressure (MAOP) greater than sixty pounds per square inch gauge, the company must submit complete written plans and drawings to the commission for review at least 45 days before commencing the uprate. The commission shall review the plan for compliance and prepare a consent order, when applicable, within 30 days of receipt of the plan. The plan must include a review of the following:</p>	
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