Isolated Facilities Program

1. Scope

This document defines the requirements for the Isolated Facilities Identification Program. For this program, an isolated facility is defined as a short segment of steel pipe that requires cathodic protection (CP) and cathodically protected steel pipe that is inserted in a casing.

The program will:

1.1 Identify electrically isolated steel facilities that require cathodic protection including extended utility facilities.

1.2 Identify cathodically protected steel inserted in casings.

1.3 Update maintenance records to ensure these facilities are monitored.

1.4 Develop and implement a process for ensuring new isolated steel facilities requiring CP are identified and maintained.

1.5 Develop and implement a process for ensuring new gas carrying steel pipes installed in casings are identified and maintained.

This program does not include larger cathodically protected systems, as these facilities are being addressed through the Critical Bond Program. The program will not include cast iron or unprotected bare steel or wrought iron facilities, as those are addressed through the Cast Iron Replacement Program and the Bare Steel Replacement Program.

2. Responsibilities

2.1 *Manager Standards and Compliance* is responsible for:

2.1.1 Ensuring that the requirements of the program are met.

2.1.2 Submitting reports, as required under Section 3.6.

2.2 *Manager Meter Network Services* is responsible for:

2.2.1 Conducting field checks to identify the presence of an isolated facility on a metered service in conjunction with atmospheric corrosion inspections.

2.3 *Manager System Control and Protection* is responsible for:

2.3.1 Conducting field checks to identify the presence of an isolated facility on non-metered services as well as mains. The inspection of the non-metered riser shall include an atmospheric corrosion inspection.

2.3.2 Updating records to ensure isolated facilities will continue to be monitored.

2.3.3 Ensuring that pipe to soil potential (PSP) reads are taken for isolated facilities and documented in SAP.

2.3.4 Ensuring that records research and the field investigation are completed to confirm whether there are casings at locations that have been identified as likely candidates for casing installation (i.e. railroad crossings, highway crossings, etc.).

2.3.5 Remediating any low CP reads or shorted casings in accordance with the current Operating Standards.

2.4 *Consulting Engineer, Corrosion Control* is responsible for:

2.4.1 Developing a process for ensuring any new isolated facilities are identified and added to the maintenance database (SAP) for monitoring.

3. General Requirements

Draft processes shall be developed and documented for each of the elements in this section prior to beginning the pilot program. These processes will be refined as part of the pilot program and incorporated into the program upon completion of the pilot.

3.1 Process for New or Newly Isolated Facilities

3.1.1. A process to ensure that all new or newly isolated facilities and casings are cathodically protected and monitored shall be developed and documented. This process shall address any new facility or modifications to existing facilities that are not currently isolated, but become isolated through future projects; such as CP steel services that are isolated due to the replacement of a cathodically protected steel main with polyethylene (PE). It shall also include the appropriate steps to ensure public improvements (PI) projects do not impact access to casing test sites.

3.2 Records Review

3.2.1 Non-metered risers

3.2.1.1 Processes shall be developed and documented to review records to identify services that are active (gas carrying) but not currently metered.

3.2.2 Casings

3.2.2.1 Processes shall be developed and documented to review the plats and other maps as necessary to determine where casings exist or are likely to exist, such as railroad and State highway crossings. The documentation shall include the review process, including reviewing as-installed and potholing, as appropriate, for locations that are likely to have casings, but where the casing is not platted.

3.2.3 Mains

3.2.3.1 Processes shall be developed and documented to review relevant records to identify locations where isolated sections of cathodically protected steel main exist and require a CP test site.

3.3 Field Inspections

Field inspection processes shall be developed and documented to ensure metered and non-metered facilities identified through the records review process are inspected, and the results of the inspection are recorded and reported. The inspection shall determine whether there is an isolated facility. Isolated facilities shall be tested to verify adequate CP or work orders created to remediate.

4. Training

4.1 Personnel taking PSP reads shall be qualified as required by PSE's Operator Qualification Program.

4.2 Personnel performing other work required by this program shall be trained on the documented processes and procedures.

5. Quality Assurance

A quality assurance process shall be developed and documented to determine that:

5.1 The records review and field inspection processes are accomplishing the objectives specified in the General Requirements section of this program.

5.2 Personnel performing the work have been trained on, have a thorough understanding of, and are consistently following these processes.

6. Records

This element of the program will be developed based on the results of the pilot program.

7. Reporting Requirements

7.1 PSE will meet with Staff no later than July 1, 2005 to brief Staff on progress, and to receive any Staff input on program development.

7.2 On or before January 30, 2006, PSE will file with the Commission a Report ("2006 Report") containing a detailed plan to identify and remediate isolated facilities in order to bring isolated facilities into compliance with Commission rules.

7.2.2 The 2006 Report will identify the types of facilities found during pilot activities in 2005, the status of remediating those facilities, the estimated scope of the problem (geographic areas involved, number of sites, etc.) throughout PSE's service territory, and a timeline for identifying and remediating the remaining facilities throughout PSE's service territory. The 2006 Report will also provide a best estimate schedule for accomplishing the remaining inspection and remediation throughout PSE's service territory.

7.2.3 PSE will work with Staff in developing the 2006 Report, particularly how the Company will identify and locate the facilities involved.

7.3 Beginning in 2006, PSE shall file semi-annual and annual reports with the Commission until the program is completed. These reports shall identify the type and location of the isolated facilities that were inspected, what was remediated and PSE's plan for the next 6 months.

7.3.1 The semi-annual report shall be filed by September 15 for progress during the first six months of the year.

7.3.2 The annual report shall be filed by March 15 for progress for the prior calendar year.

8. Remediation

Any low cathodic protection readings or shorted casings will be remediated in accordance with PSE Operating Standards 2600.1400, "Electrical Isolation and Grounding Requirements" and 2600.1500, "Monitoring Cathodic Protection."

9. Pilot Program

To ensure these processes are effective and efficient, the processes identified in this program under the General Requirements section of this program will be tested in selected areas before system wide implementation. This pilot program will provide an opportunity to assess the processes and make adjustments before system wide implementation. It will also provide data that will be useful in establishing time frames for completing the program as well as Quality Assurance, record keeping, and reporting requirements.

10. Schedule

The parties understand that the isolated facilities involved are often located next to buildings, sometimes without proper cathodic protection, and therefore, this program is a priority. PSE will use due diligence to locate these facilities and remediate as required by 480-93 WAC as currently codified or as hereafter amended by docket UG-011073. PSE understands that 480-93-110 requires remediation within 90 days after discovery of a specific facility that requires remediation.

10.1 PSE will complete the following work elements by December 31, 2010:

1.1 Riser Inspections including EUF's and Unmetered Risers

1.2 Mains

1.3 Casings

1.3.1 Railroad and Highway Casings

1.4 Stubs

1.5 Quality Controls

1.6 Combination Services;

1.6.1 With steel installed between 1956 and 1970

1.6.2 With Test Sites installed after 1971

1.7 Mapping Corrections

2.2 Above Ground Regulators (Service Piping Downstream of Regulators) – Phase 1

PSE will complete the following work elements by December 31, 2014:

1.3.2 Service Casings

2.1 Mobile Home Parks Buried Fuel Lines

2.3 Sidewalk Regulators (Service Piping Downstream of Regulators)

10.2 The parties also understand Commission Staff may, after the filing of the 2006 Report, file a motion with the Commission asking the Commission to set a different completion date, and PSE may support or oppose that motion.