August 19, 2009

Dave Danner, Secretary Washington Utilities and Transportation Commission PO Box 47250 Olympia, WA 98504-7250

Attn: Anne F Soiza, Pipeline Safety Director

Subject: Bare Steel Replacement Program Semi-Annual Progress Report (Docket No. PG-030128)

Dear Ms. Soiza:

Pursuant to Docket No. PG-030128 and PG-030080, Puget Sound Energy (PSE) is required to submit progress reports pertaining to the Bare Steel Replacement Program. This letter provides progress through June 30, 2009.

PSE completed the retirement of 55,580 feet of bare steel main during the first six months of the calendar year of 2009. The retirement of 3,469 feet of non-program footage was also completed during the first six months of the calendar year of 2009. The attached table shows program targets and actual retired footage.

If you have any questions, please call me at 425-462-3967

Sincerely,

Helge Ferchert

Manager, Compliance and Regulatory Audits, Gas

Cc:

Sue McLain

Harry Shapiro

Mike Hobbs

Duane Henderson

Bert Valdman

Tom DeBoer

Eric Markell

2009 Bare Steel Replacement Program Semi Annual Report 6 months ending 06/30/2009

Year	Plan Year	Replace Unprotected Bare Target	Replace Protected Bare Target	Target Totals	Running Target Totals	Actual Program Reported Footage	Non Program Footage
2005	Year 1	46,995		46,995	46,995	48,078	0
2006*	Year 2	99,205		99,205	99,205	88,624	1648
2007	Year 3	99,205		99,205	99,205	165,504	9,882
2008	Year 4	99,205		99,205	99,205	109,552	2,701
2009!	Year 5	99,205		99,205	99,205	55,580	3,469
2010	Year 6	99,205		99,205			
2011**	Year 7	99,205	38,280	137,485			
2012	Year 8	99,205	38,280	137,485			
2013	Year 9	99,205	38,280	137,485			
2014	Year 10	99,205	38,280	137,485			
Total Footage		939,840	153,120	1,092,960	438,815	467,338	17,700
Total Mileage		178	29	207	84.1	88.5	3.4

[!] Semi Annual Rpt July 2009

Addition of bare steel services (from Isolated Facilities), quantity is being researched at this time.

Non Program Retirement included protected Bare and unprotected Bare replacements not originally identified in the program or being done prior to getting 'program' credit..

2/9/2008 reconciled WUTC reported footages for year 2005 & 2006 to match program tracking documents.

^{*} Carry over of 10,581' of remaining target footage was completed by Feb 12, 2007.

^{**} Addition of Protected Bare Steel pipe to report as Program footage.