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**PG-240560**  
Received  
Records Management  
Nov 15, 2024

November 25, 2024

***Filed Via Web Portal***

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

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

Dear Mr. Killip and Commission Members:

Thank you for the opportunity to comment on the proposed rulemaking to amend WAC 480-93-188 (1) Gas Leak Surveys, and 480-93-200 (1) Reporting Requirements. It is the Pipeline Safety Trust's (the Trust) position that these proposed changes would result in a lower level of safety and oversight for Washington State, whom in the past has prided itself on going above and beyond the minimum federal standards.

The Pipeline Safety Trust is the only national non-profit organization that focuses on pipeline safety. Our efforts focus on education and advocacy, increasing access to information, and building partnerships with residents, safety advocates, government, and industry to promote safe communities and a healthy environment. As part of this work, the Trust monitors state dockets and submits comments where its technical expertise may be beneficial.

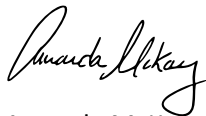
The Trust does not see the need for the consolidation of 480-93-200 (1)(a) and (b) to simply report "Incidents" as defined in 49 CFR 191.3. Washington has the opportunity to go beyond the federal standards by requiring operators to report incidents that cause lower levels of property damage, thus keeping operators accountable and providing more information about failures to help guide future efforts to improve safety. We understand that the code is redundant to the federal regulations because of the "whichever is higher" language in 480-93-200 (1)(b), however the Trust feels that it is important for states to have their own regulatory language as often as possible to provide resilience in the face of potential federal de-regulation efforts.

With regards to more narrowly defining what evacuations need to be reported to the Commission, the Trust has concerns around only requiring the reporting of evacuations in a "High Occupancy Area" as defined in WAC 480-93-005(14). This definition has the potential to exclude buildings and other areas that may not be occupied 5 days a week but do have the potential to occupy many people for a 1-4 days a week for up to 9 weeks in a year. This could include churches, concert venues, or other areas that could host hundreds or thousands of people in which a pipeline operator would not be required to notify the Commission of an evacuation of these types of buildings or spaces. The Trust would suggest altering the definition of "High Occupancy Area" to "*a building or outside area (such as a playground,*

*recreation area, outdoor theater, or other place of public assembly) which could reasonably be assumed to be occupied by 20 or more people at least weekly throughout the year.”*

Thank you again for the opportunity to comment on this important matter. If you would like to discuss this comment or have questions, feel free to contact me at (360) 543-5686 (x106) or [amanda@pstrust.org](mailto:amanda@pstrust.org).

Sincerely,

A handwritten signature in black ink that reads "Amanda McKay". The signature is written in a cursive style with a large, looped initial 'A'.

Amanda McKay  
Policy Manager  
Pipeline Safety Trust