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November 7, 2003

Carole J. Washburn
Executive Secretary
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive SW
Olympia, Washington 98504-7250

Subject: Comments regarding proposed revisions to Washington pipeline safety rules, WAC Chapter 480-93 (Docket No. UG-011073)

Dear Ms. Washburn:

Thank you for the opportunity to comment on the proposed draft rules for WAC Chapter 480-93. We have carefully reviewed the proposed changes and our comments are based on our mutual commitment to pipeline safety and the safe and reliable delivery of natural gas to our customers.

We look forward to the opportunity to discuss the comments in the attached file and any additional comments at the workshop scheduled for 9:00 a.m. on Tuesday, December 9, 2003, at the Washington Utilities & Transportation Commission's headquarters in Olympia.

Sincerely,

Bruce L. Paskett, P.E.
Chief Engineer

jcp270

Chapter 480-93 WAC
GAS COMPANIES—SAFETY

[DRAFT]

WAC 480-93-005 Definitions

(4) **"Business district"** means an area where the public congregate for economic, industrial, religious, educational, health, or recreational purposes, and two or more buildings used for these purposes are located within 100 yards of each other.

NWN comment: Overly broad definition. It would be impossible to identify all instances pertaining to this broad definition.

(7) **"Confined space"** means any space having a limited means of egress, which is subject to the accumulation of toxic or flammable contaminants or has an oxygen deficient atmosphere. Confined spaces include, but are not limited to, storage tanks, process vessels, bins, boilers, ventilation or exhaust ducts, sewers, underground utility vaults, tunnels, pipelines, and open top spaces more than 4 feet in depth such as pits, tubs, vaults, and vessels.

NWN comment: This broad definition would create an infinite number of confined-space issues potentially subject to OSHA requirements.

(8) **"Covered Task"** means an activity identified by the operator, that:

(b) Is an operations, maintenance, or new construction activity;

NWN comment: Including new construction activity as a covered task will have significant impact on the Operator Qualification program. NW Natural suggests that Staff defers this issue until the ASME B31Q standard is released.

(16) **"Main"** means a gas pipeline, not a gathering or transmission line:

(a) Which serves as a common source of gas for more than one service line; or

NWN comment: This definition is inconsistent with the 192.3 definition of a service line (amended 10/15/03), which includes the following:

"Service line means a distribution line that transports gas . . .to two adjacent or adjoining residential or small commercial customers, ..."

(b) Which crosses property not owned by the customer or the gas company.

NWN comment: Conflicts with WAC 480-93 definition of service line (24):

"which traverse a public right of way or an easement immediately adjacent to a public right of way or another easement."

(18) "Operator"

(a) For purposes of Chapter 480-93 WAC, the term "operator" means

(iii) every other person or corporation transporting natural gas by pipeline, or having for one or more of its principal purposes the construction, maintenance, or operation of pipelines for transporting natural gas in this state; even though such person or corporation does not deliver, sell, or furnish any such gas to any person or corporation within this state. The terms "person" and "corporation" are defined in RCW 80.04.010. "Transporting natural gas by pipeline" means transmission or distribution of natural gas through a pipe.

NWN comment: This definition is overly broad. Under this definition, a construction company that only installs the pipeline would be considered an operator and subject to all the rules and reporting requirements of 49 CFR 192 and WAC 480-93. The same holds true for a contractor who might only be hired to paint a section of pipe.

(24) **"Service line"** means a gas pipeline, not a main, gathering, or transmission line, which provides service to one building. Service lines shall include gas pipelines extended from a main to provide service to one building, which traverse a public right of way or an easement immediately adjacent to a public right of way or another easement.

NWN comment: This definition is inconsistent with the 192.3 definition for service line (amended 10/15/03), which includes the following:

"Service line means a distribution line that transports gas . . .to two adjacent or adjoining residential or small commercial customers, ..."

~~**WAC 480-93-010 Compliance with federal standards**~~

~~Gas companies' gathering, storage, distribution, and transmission facilities must be designed, constructed, maintained, and operated in compliance with the provisions of Title 49 Code of Federal Regulations (CFR), Parts 191, 192, 193 and 199 in effect on the date specified in WAC 480-93-999. The provisions of this chapter shall govern to the extent that the standards in the state regulations are compatible with the federal standards.~~

NWN comment: Please review the existing WAC 480-93-010 language. If there is a conflict between state and federal regulations, which rule takes precedence?

480-93-017 Filing requirements for design, specification, and construction procedures

(1) Any operator operating a gas pipeline facility in this state must file with the commission all applicable design, specification, and construction procedures used for each pipeline facility prior to operating the pipeline. All procedures must detail the acceptable types of materials, fittings, and components for the different types of facilities in the operator's system.

NWN comment: This requirement is excessively burdensome. Suggest that alternative language be incorporated to require operators to use materials, fittings, and components that are appropriate for natural gas applications, as approved by the operator's lead engineer.

WAC 480-93-080 Welder and joiner identification and qualification certificates

NWN comment: Suggest the language for this section, including (2) below, specifically defines what is meant by "joiner" (mechanical, fusion?). Suggest replacing the term "joiner" with "polyethylene fusion joiner."

(2) Written qualified polyethylene fusion joining procedures must be on site where joining is being performed by means other than welding.

WAC 480-93-100 ~~Automatic~~ Valves

All underground main or transmission line valves not covered under CFR 192.745 or CFR 192.747 and valves installed on service lines to buildings or places of public assembly, or commercial buildings within business districts, must be accessible and maintained in proper working order.

NWN comment: This language includes a large inventory of valves that are not, and were never intended to be, used to isolate segments of pipe during emergency situations.

This new requirement to make the inventory of nonessential valves accessible and maintained will have a material impact on the operation and maintenance costs for operators with a negligible safety benefit.

Suggest that only key operating valves, as designated by the operator, "be accessible and maintained in proper working order," as required by CFR 192.745 and 192.747.

WAC 480-93-110 Corrosion control

(3) Operators must complete remedial action within 90 days to correct any cathodic protection deficiencies known and indicated by the operator's records.

NWN comment: Based on Staff's response (6/25/03), suggest that language be incorporated to reflect that operators must, at a minimum, submit requests for permits within 90 days.

(7) Operators that have metallic gas facilities that are not now, or have never been, under cathodic protection or are not under adequate cathodic protection must provide to . . .

(b) Short segment of the pipeline, less than 100 feet in length, that have been cathodically protected to meet the requirements of section (5) must be tested once each calendar year, not to exceed 15 months, to determine whether the facility has adequate levels of cathodic protection.

NWN comment: Operators currently sample a minimum of 10% of the population each year so that the entire system is tested in each 10-year period (per 192.465).

The new requirement in section 7(b) would require a 900% increase in inspection frequency, resulting in a significant impact on O&M costs.

(6) Whenever an operator finds the presence of active corrosion on its pipeline facilities, the operator must investigate further to determine the extent of the corrosion. The operator must retain a record of this investigation for the life of the facility.

(b) On all cathodically protected pipelines, the operator must take a cathodic protection test reading each time an employee or representative of the operator exposes the facility and the protective coating is removed.

NWN comment: This provision is unnecessarily costly and burdensome. An effective corrosion control program is achievable without these requirements.

WAC 480-93-115 Casing of pipelines

(3) Whenever an operator installs a pipeline in a casing or conduit of any type material, the operator must seal the casing ends to prevent the migration of gas.

NWN comment: Suggest that this provision be limited to casings that terminate near a building intended for human occupancy and that only the end near the building be sealed.

WAC 480-93-124 Pipeline markers

(1) Operators must place pipeline markers at all railroad, road, irrigation, and drainage ditch crossings, and at all fence lines where a pipeline crosses private property, or where a pipeline is exposed. Operators must place pipeline markers approximately 500 yards apart if practical, and at points of horizontal deflection of the pipeline.

NWN comment: Suggest this requirement is overly broad. The phrase "where a pipeline is exposed" applies to a great number of applications, such as service risers. Suggest this provision excludes Class 3 and Class 4 locations.

(2) Where gas pipelines are attached to bridges or otherwise span an area, operators must place pipeline markers at both ends of the suspended pipeline. Each operator must conduct inspections once each calendar year, not to exceed 15 months of suspended pipelines, and maintain the markers to ensure that they are visible and legible.

NWN comment: This requirement presents a security risk.

(3)
(4)
(5) Surveys of pipeline markers not associated with section (2) above must be conducted once every three calendar years, not to exceed 39 months between surveys. The survey records must be kept for a minimum of five years.

NWN comment: Suggest the time frame associated with this requirement be defined as once every 5 calendar years to coincide with existing main survey requirements.

WAC 480-93-130 Multistage pressure regulation

Where gas pressures are reduced in two or more stages, an operator must install the necessary regulators and equipment in such a manner as to provide ~~maximum~~ protection between regulator stages. The purpose is to minimize the potential dangers from the failure of one stage of regulator equipment due to fire, explosion, or damage of any kind from adversely affecting the operation of the other stage or stages of regulation. A minimum of 50 feet of separation must be provided between regulator stages when feasible.

NWN comment: Suggest the term "maximum" be deleted since it is subject to individual interpretation.

WAC 480-93-140 ~~Meter~~ Service regulators

(2) Operators must inspect and test service regulators and associated safety devices installed on services each time the regulators and devices are turned on, to determine whether they are in proper operating condition. Testing must include determining the gas regulator's outlet set pressure at a specified flow rate. Operators must use pressure gauges downstream of the regulator during testing. Safety devices such as fracture discs are not required to be tested each time the device is turned on.

NWN comment: Suggest this apply only to the initial turn-on and "a specified flow rate" be deleted, since this cannot be accomplished without disassembling the meter set and venting the gas to atmosphere.

WAC 480-93-155 Increasing maximum allowable operating pressure

(2) Uprates must be based on a previous pressure test that would substantiate the maximum allowable operating pressure. When there is no documented history of a pressure test, an operator must conduct a pressure test in conjunction with the uprate.

NWN comment: Suggest that uprates be allowed for distribution systems with MAOPs of ≤60 psig by conducting an in-service pressure test up to the new MAOP using natural gas as the test medium.

WAC 480-93-160 ~~Reports~~ Reporting requirements of proposed construction

(1) Every operator must file a proposed construction report at least 45 days prior to construction or replacement of any gas transmission pipeline. The report must describe the proposed route and the specifications for the pipeline and must include, but is not limited to, the following items:

NWN comment: Strongly suggest emergency repairs and replacements or new construction less than 100 feet be exempted from this section.

WAC 480-93-170 Tests and reports thereof for pipelines

(2) Operators must perform pressure tests for all new or replacement pipeline installations.

(a) All services that are damaged during excavation must be pressure tested from the point of damage to the service termination valve prior to being placed back into service.

NWN comment: Suggest pretested pipe be allowed for repairs to damaged service lines without retesting the service to the termination valve.