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September 13, 2010

Washington Utilities & Transportation Commission
Pipeline Safety Section
1300 S. Evergreen Park Drive S.W.
PO Box 47250
Olympia, WA 98504-7250

Attn: Dave Lykken, Pipeline Safety Director

Subject: Isolated Facilities Program Semi-Annual Progress Report (Docket PG-030080 & [REDACTED])

Dear Mr. Lykken,

Pursuant to Dockets PG-030080 and PG-030128, Puget Sound Energy (PSE) is providing the semi-annual status report on the Isolated Facilities program for progress through June 30, 2010.

The attached table shows that PSE made significant progress on riser inspections, mains, casings, stubs, combination services, mapping corrections, sidewalk regulators and aboveground regulators.

If you have any questions regarding this report, please contact me at 425-462-3967.

Sincerely,

Helge Ferchert
Manager, Gas Compliance and Regulatory Audits

- cc: Bert Valdman
- Tom DeBoer
- Sue McLain
- Mike Hobbs
- Duane Henderson

Enclosure

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Isolated Facilities Program Semi-annual Status Report

Progress Status through June 30, 2010

| Riser Inspections (including EUF's and meter less risers) | | | | |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|--------------------------|----------------------------------|-------------------------------|
| | Number Completed | Percent Completed | Estimated Remaining Total | Target Completion Date |
| Initial Riser Inspections (Total number of risers inspected company wide) | 735,473 | 100% | 0 | 12/31/2010 |
| Plat review (Total number identified from initial inspection that needed to be reviewed by MRT) | 204,688 | 100.0% | 0 | |
| Follow-up inspection (Total number of risers identified as low PSP reads by Pilchuck that needed field re-inspection) | 42,935 | 99.9% | 55 | |
| Resolved (Total number of risers identified that needed to be remediated) | 20,835 | 97% | 637 | |
| Progress Status of Unmetered Risers | | | | |
| | Number Completed | Percent Completed | Estimated Remaining Total | Target Completion Date |
| Initial Record Review (Total numbers to be identified/located) | 37,926 | 100% | 0 | N/A Complete |
| Field Inspection (Total numbers needed to be identified/located; if unfound or no evidence of removal/nonexistence, it goes to MRT) | 21,309 | 100% | 0 | |
| Record review (Total number needed to be reviewed in depth to locate by MRT; if not found, it goes back to field inspection) | 3,815 | 100% | 0 | |
| Follow-up Field Inspection (Total number of risers needed to be identified) | 25 | 100% | 0 | |
| Resolved (Total number of risers identified from follow-up inspection that needed to be remediated - cut&cap of found risers and removal of unfound items off the record) | 25 | 100% | 0 | |

| Mains | | | | |
|------------------------------------------------------------------------------------------------------------------------|-------------------------|--------------------------|----------------------------------|-------------------------------|
| | Number Completed | Percent Completed | Estimated Remaining Total | Target Completion Date |
| Plat Review (Total number of locations identified from Plat review) | 1,392 | 100% | 0 | 12/31/2010 |
| Data Review (Total number identified from the Plat review were then reviewed by a combination of data sources) | 1,392 | 100% | 0 | |
| Resolved (Total number of segments remediated or otherwise ruled-out by SC&P) | 1,390 | 99.9% | 2 | |

| Casings | | | | |
|------------------------------------------------------------------------------------------------------------------------|-------------------------|--------------------------|----------------------------------|-------------------------------|
| <i>RR and Highway Casings</i> | | | | |
| | Number Completed | Percent Completed | Estimated Remaining Total | Target Completion Date |
| Plat Review (Total number of locations identified from Plat review) | 144 | 100% | 0 | 12/31/2010 |
| Data Review (Total number identified from the Plat review were then reviewed by a combination of data sources) | 144 | 100% | 0 | |
| Resolved (Total number of segments remediated or otherwise ruled-out by SC&P) | 140 | 97.2% | 4 | |

| <i>Service Casings</i> | | | | |
|---------------------------------------------------------------------------------------|-------------------------|--------------------------|----------------------------------|-------------------------------|
| | Number Completed | Percent Completed | Estimated Remaining Total | Target Completion Date |
| Records Review (Total number identified) | 4,524 | 100% | 0 | 12/31/2014 |
| Resolved (Total number of segments remediated or otherwise ruled-out by SC&P) | 4,007 | 89% | 517 | |

The IF service casing work was processed in conjunction with the WSSAP and Bare Steel programs.

The numbers in this table include only the IF services that were reviewed and do not include WSSAP or Bare Steel vintages.

| Bridge Casings | | | | |
|---------------------------------------------------------------------------------------|-------------------------|--------------------------|----------------------------------|-------------------------------|
| | Number Completed | Percent Completed | Estimated Remaining Total | Target Completion Date |
| Data Review (Total number identified from Bridge and slide patrol data) | 347 | 100% | 0 | N/A Complete |
| Resolved (Total number of segments remediated or otherwise ruled-out by SC&P) | 347 | 100% | 0 | |

| Stubs | | | | |
|------------------------------------------------------------------------------------------------------------------------|-------------------------|--------------------------|----------------------------------|-------------------------------|
| | Number Completed | Percent Completed | Estimated Remaining Total | Target Completion Date |
| Plat Review (Total number of locations identified from Plat review) | 589 | 100% | 0 | 12/31/2010 |
| Data Review (Total number identified from the Plat review were then reviewed by a combination of data sources) | 589 | 100% | 0 | |
| Resolved (Total number of segments ruled-out by SC&P & MRT) | 587 | 99% | 2 | |

| Quality Control | | | | |
|--------------------------------------------------------------------------------------------------------------------------------|-------------------------|--------------------------|----------------------------------|-------------------------------|
| Mapping (Unplatted STW Services) | | | | |
| | Number Completed | Percent Completed | Estimated Remaining Total | Target Completion Date |
| Data Review (Total number identified from IGF data) | 1,192 | 100% | 0 | 12/31/2010 |
| Records Review (Total number identified from records review) | 1,192 | 100% | 0 | |
| Follow-up inspection (Total number of services identified from records review that needed additional field inspection) | 397 | 99% | 2 | |
| Resolved (Total number of sampling segments remediated) | 397 | 99% | 2 | |

| Combination Services | | | | |
|---------------------------------------------------------------|-------------------------|--------------------------|----------------------------------|-------------------------------|
| <i>With Steel Installed between 1956 and 1970</i> | | | | |
| | Number Completed | Percent Completed | Estimated Remaining Total | Target Completion Date |
| Records Review (Total number identified and reviewed) | 719 | 100% | 0 | 12/31/2010 |
| Resolved (Total number remediated) | 710 | 98.7% | 9 | |
| <i>With Test Sites Installed after 1971</i> | | | | |
| | Number Completed | Percent Completed | Estimated Remaining Total | Target Completion Date |
| Records Review (Total number identified and reviewed) | 1,833 | 100% | 0 | 12/31/2010 |
| Resolved (Total number remediated) | 1,788 | 97.5% | 45 | |

| Mapping Correction | | | | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|--------------------------|----------------------------------|-------------------------------|
| | Number Completed | Percent Completed | Estimated Remaining Total | Target Completion Date |
| Phase 1 (Total numbers identified by original IF review and revised) | 5,426 | 100% | 0 | Complete |
| Phase 1 (Total additional numbers revised) | 4,974* | 100% | 0 | Complete |
| Phase 1 (Total additional numbers revised from EUF) | 1,228 | 73% | 447 | 12/31/2010 |
| * A progress of Phase 2 was reported in the 2009 annual report in March 2010. However, the progress was part of this Phase 1 for additional revisions and was completed. | | | | |

Mobile Home Parks Buried Fuel Lines (ESL - Extended Service Lines)

| | Number Completed | Percent Completed | Estimated Remaining Total | Target Completion Date |
|------------------------------------------------------------------------------|---------------------|-------------------|---------------------------|---------------------------------------|
| Records Review (Total numbers of Parks identified/located) | 176 parks | 100% | 0 | 12/31/2010 (Systematic Assessment) |
| Initial Field Assessment (Total numbers of BFL's identified) | 500 | 100% | 0 | |
| Follow-up Field Inspection (Total number fully inspected/evaluated) | 11 parks /262 sites | 4% | 165 | 12/31/2014 (Remediation) |
| Number of ESL's Identified | 24 | N/A | N/A | |
| Resolved (Total numbers remediated) | 0 | N/A | TBD | |

The remediation work will be completed in conjunction with the PSE's ongoing Mobile Home Encroachment Program which is scheduled to complete in 2014.

Above Ground Regulators (Service Piping Downstream of Regulators)

| | Number Completed | Percent Completed | Estimated Remaining Total | Target Completion Date |
|---------------------------------------------------------------------------------------------------------------------------------------------|------------------|-------------------|---------------------------|------------------------------------|
| Initial Candidates (Total numbers extracted from data base and identified) | 888 | N/A | N/A | Phase 1 – Assessment 12/31/2010 |
| Records Review (Total numbers reviewed for field inspections) | 888 | 100% | 0 | |
| Field Inspection (Total numbers needed to be identified/located; if unfound or no evidence of removal/nonexistence, it goes to MRT) | 523 | 61% | 368 | Phase 2 – Remediation TBD |
| Resolved (Total numbers remediated) | 371* | 41% | 417 | |

This work was discovered during the Sidewalk Regulators assessment.

Sidewalk Regulators (Service Piping Downstream of Regulators)*Progress Status of Sidewalk Regulators*

| | Number Completed | Percent Completed | Estimated Remaining Total | Target Completion Date |
|--------------------------------------------------------------------------------------------------------------------------|-------------------------|--------------------------|----------------------------------|-------------------------------|
| Initial Record Review (Total numbers to be identified/located) | 750 | 100% | 0 | 12/31/2014 |
| Preliminary Review (Total numbers that are identified from records review) | 609 | 100% | 0 | |
| Second Review (Total numbers identified/located for field inspections. Duplicates were identified and eliminated) | 192 | 100% | 0 | |
| Initial Field Assessment (Total numbers of Inadequate CP services identified and inspected) | 157 | 100% | 0 | |
| Follow-up Field Inspection (Project Plan developed) | 157 | 100% | 0 | |
| Resolved (Total numbers remediated) | 0 | 0% | 157 | |