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November 7, 2003

Carole J. Washburn, Secretary
Washington Utilities and Transportation Commission
P.O. Box 47250
Olympia, WA 98504-7250

Subject: Notice of Opportunity to File Written Comments on WAC 480-93, Docket UG-011073

Dear Ms. Washburn:

Thank you for the opportunity to review and comment on the proposed rules for Chapter 480-93 WAC. Enclosed please find Puget Sound Energy's (PSE) comments. PSE looks forward to the stakeholder workshop scheduled for Monday, December 9, 2003 to discuss these comments with commission staff.

Sincerely,

Kaaren Daugherty, PE
Consulting Engineer, Standards and Compliance

Cc: Kimberly Harris
Karl Karzmar
Sue McLain
Greg Zeller
Jim Hogan

Enclosure

PSE's Comments on Proposed Draft Rules Chapter 480-93 WAC

Proposed WAC Rule	Content Comments	Grammar Comments
-005(1) "Active corrosion"	<p>PSE is concerned about the broad impact of a state defined term for 'active corrosion' because this term is defined and used in CFR Part 192. It is PSE's understanding that the state's definition would also apply to any federal rules pertaining to active corrosion in addition to the WAC rule (480-93-110) that incorporates this term. In 192.465(e) active corrosion means "continuing corrosion, which, unless controlled, could result in a condition that is <u>detrimental to public safety</u>". The proposed WAC definition (continuing corrosion, which, unless controlled, <u>could result in leakage</u>") can be interpreted as meaning <i>any</i> corrosion, because corrosion which is not controlled <i>will</i> eventually result in leakage (this may not occur for many years depending on the corrosion rate). PSE requests an explanation of why the commission finds it necessary to separately define active corrosion. PSE believes rules should be written in a manner that facilitates operator success in compliance; duplicative definitions hinder compliance.</p>	
-005 (4) Business district	<p>PSE is concerned that this proposed definition expands the historical understanding of a business district, namely an area generally with wall to wall paving and a series of attached, high occupancy buildings. The definition as proposed could be interpreted to include strip malls. As such, this will significantly increase the amount of annual leakage surveys based upon the requirements set forth in 480-93-188. PSE requests discussion and clarification regarding this proposed definition, including an explanation from the</p>	

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	commission on what areas they are trying to capture.	
-005 (8) Covered Task	<p>PSE disagrees with the commission proposal to expand the covered task definition to include new construction activity. This will have a dramatic impact on an operator's ability to attract competition for construction bidding. Contractors that work outside the state of Washington would have reduced 'portability' and simply may choose not to do business in this state. Welders and PE joiners already require qualification, and contractors are required by contract to follow an operator's design and construction specifications. PSE believes the cost for both the operator and an operator's contractor outweighs any perceived benefit. In addition, OQ activity at the federal level and the development of ASME B31Q as a guideline for operator qualification, should be completed and tested before Washington State develops new and incompatible OQ regulations.</p>	
-005 (13) Gathering line	<p>PSE disagrees with the commission's inclusion of a definition of gathering line in these rules. This term is not used in any rule contained within this chapter. In addition, the proposed definition is based upon an advisory bulletin issued by RSPA in 2002, yet RSPA has struggled with re-defining this term for several years and just recently issued a notice of public meeting and request for comments (Docket No. RSPA-98-4868; Notice 2 FR November 5, 2003) on the gathering line definition.</p>	
-005 (16) Main	<p>It appears that subsection (b), "Which crosses property not owned by the customer or the gas company.", conflicts with the part of the service line definition (-</p>	

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	<p>005 (24)) that reads, “Service lines shall include gas pipelines extended from a main . . . which traverse a public right of way or an easement immediately adjacent to a public right of way or another easement.” PSE would like to discuss the possibility of eliminating the definition of ‘main’ from these rules.</p>	
<p>-005 (18) Operator</p>	<p>PSE disagrees with the broad definition for “operator” as proposed. Specifically, subsection (a) (iii) as written would mean a contractor providing construction or maintenance activities for a natural gas distribution company is now an operator, and therefore subject to all of the WAC requirements for such an entity. PSE believes this is inappropriate and would like to discuss this with the commission.</p>	
<p>-005 (19) Place or buildings of public assembly</p>	<p>The verbiage for this definition is nearly verbatim from 192.5 (b)(3)(ii), which explains a class 3 location unit. PSE finds this proposed definition confusing in the context for which it is used within these rules. First, it does not seem necessary to include the word ‘buildings’ in the title because building is separately defined in these rules. Second, the inclusion of a distance as part what defines a place of public assembly is incongruous with the use of the term in 480-93-020 (Proximity considerations.), 480-93-170 (Tests and reports thereof for pipelines), and 480-93-188 (1)(c) because these rules include distance criteria.</p> <p>It appears that a place of public assembly is a subset of a business district, in that a business district includes places of public assembly but a place of public assembly may not necessarily be in a business district</p>	

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	because there may not be two or more “located within 100 yards of each other.” PSE would like to discuss this proposed definition with the commission.	
-005 (20) Prompt action	It appears that the word “consistently” in this proposed definition was inadvertently included when the phrase “shall consist of” from the existing definition was changed to “means to”. PSE recommends deleting this for clarity.	(20) “ <i>Prompt action</i> ” means to consistently dispatch qualified personnel without undue delay for the purpose of evaluating and, where necessary, abating an existing or probable hazard.
-005 (24) Service line	PSE previously recommended that the Commission delete this definition because of a proposed change to the federal definition. Staff apparently did not agree. The change to <i>Service line</i> in 192.3 is now final (effective 10/15/03) and PSE would like to discuss with the commission the reason why they believe having a separately defined term for service line improves pipeline safety.	
-010 Compliance with federal standards.	The commission moved most of this rule into 480-93-999. However, the last sentence, “The provisions of this chapter shall govern to the extent that the standards in the state regulations are compatible with the federal standards.”, was completely eliminated from the proposed rules. In addition, 480-93-220 (Rule of precedence) was also deleted. PSE requests an explanation of these deletions.	
-017 Design, specification, and construction procedures	The commission added, “All procedures must detail the acceptable types of materials, fittings, and components for the different types of facilities in the operator’s system.”, to this rule. PSE is unsure what the commission wants – materials catalogues, purchase specifications? This requirement is very broad and would create an undue burden on operators and	PSE requests the following change for clarity. “ Any Each operator operating a gas pipeline facility in this state must file . . . “. The requested deletion is because this is redundant to the definition of operator.

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	<p>eliminate flexibility in day to day operations if each time a non-stock material item was required the commission had to be notified. The commission already has the authority to request this information under 480-93-017. PSE requests further discussion on this rule.</p>	
<p>-017 Maps, drawings, and records of gas facilities.</p>		<p>PSE suggest the following revisions: “. . . <i>The maps, drawings, and records must show the size and type of material for all facilities, the corrosion control system, and . . . The maps and drawings must indicate the location of all district regulators, . . .</i>”</p>
<p>-020 Proximity considerations</p>		<p>PSE finds some of the language in the rule awkward and requests the following revision for clarity. “<i>Each operator must submit . . . prior to operating any gas pipeline facility that has the following characteristics at a pressure: (a) Greater than five hundred pounds per square inch gauge (psig) <u>500 psig</u> that is operated within 500 feet of the places described below: (i) A building <u>intended for human occupancy</u> . . .</i>” And, “(b) <i>Greater than 250 psig, up to and including 500 psig, that is operated within 100 feet of the places described below: (i) A building <u>intended for human occupancy</u> . . .</i>” And in subsection (4), “<i>Upon request of the commission, the operator must provide with its request the construction,</i></p>

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		<p><i>maintenance, construction, and . . .”</i>. PSIG is defined in 480-93-005; and ‘operated’ is already understood from the lead-in paragraph of subsection (1). Is “intended for human occupancy” redundant to the definition of building or is there a distinction necessary to be made?</p>
<p>-040 Location of gas compressor stations on gas pipelines</p>	<p>In response to PSE’s previous comments, the commission requested clarification on why PSE believed the reformatting of this rule also changed the intent. The current rule refers exclusively to compressor stations designed to operate at pressures in excess of 250 psig – namely, they need to be 500 feet from a building <u>except</u> if they have a reduced capacity (1,000 hp) they only need to be 250 feet away. The proposed wording in subsection (2) does not convey that the requirements only apply to compressors operating in excess of 250 psig.</p>	<p>PSE suggests the following for clarity. <i>“(1) <u>Gas compressor stations that are designed to operate at pressures in excess of 250 pounds per square inch gauge (psig), and having an installed capacity equal to or greater than 1,000 horsepower, must be located at least 500 feet away from any existing buildings intended for human occupancy that are not under the control of the operator.</u></i> <i>(2) <u>Gas compressor stations that are designed to operate at pressures in excess of 250 psig, and having an installed capacity of less than 1,000 horsepower must be located at least 250 feet away from any existing buildings intended for human occupancy that are not under the control of the operator.</u></i>” Again, is “intended for human occupancy redundant to the definition of building or is there a distinction necessary to be made?</p>
<p>-080 Welder and joiner identification and qualification certificates</p>	<ul style="list-style-type: none"> ▪ PSE finds the first and second sentences in subsection (1) to be in conflict with each other because there is no exception provided in the first 	<p>PSE suggests the following alternative for subsection (1). <i>“All welding procedures and welders must be qualified to API</i></p>

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	<p>sentence for the allowance given in the second sentence. In addition, the first sentence is redundant to 192 requirements and adds no value. Duplicating Part 192, and later incorporating the API and ASME documents by reference in 480-93-999, is confusing to operators because the editions between WAC and CFR Part 192 may not match. PSE requests clarification on why the commission finds it necessary to repeat Part 192 in this rule.</p> <ul style="list-style-type: none">▪ PSE requests clarification on the language in subsection (1) that states “. . . <i>may only perform fillet and butt welds on nominal two-inch or smaller diameter pipe.</i>” For a fillet weld, it is unclear whether this is restricting the branch connection only or also the main line pipe that the branch is connected to.▪ PSE believes the testing requirements for Appendix C welders set forth in the proposed rule is excessive and would like clarification from the commission on the pipeline safety concern they are trying to address. In accordance with 192.229 (b), welders may not use a particular welding process unless they have performed a weld within the previous 6 months. Increasing qualification testing to a 6-month cycle creates a loss in productivity and will double current costs associated with testing and record keeping.▪ PSE requests clarification on subsection (2) regarding ‘joining by means other than welding’. Does the commission intend for this to include mechanical joining of steel pipelines (i.e. threading	<p><i>Standard 1104 (18th edition) or section IX of the ASME Boiler and Pressure Vessel Code (1995 edition). Oxyacetylene welders may qualify <u>qualified</u> under 49 CFR Part 192 Appendix C, and may only perform fillet and butt welds on nominal two-inch or smaller diameter pipe. . . “</i></p>
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	<p>and flanging) or is it meant to cover only PE joining as in mechanical, electrofusion, and fusion joining of PE pipelines?</p>	
<p>-100 Valves</p>	<p>PSE strongly disagrees with this proposed rule. This rule will cost millions of dollars to implement and comply with, but does nothing to increase pipeline safety. Valves are installed in a gas distribution system for a variety of reasons, including construction convenience to help with purging a new line into service. Not every valve installed is instrumental to the safe operation of a system. The burden to identify and maintain these non-essential valves far outweighs any perceived benefit to public safety that this rule might provide. In complying with 192.747, an operator must identify those valves necessary for the safe operation of the system. If the commission is concerned with what valves an operator is identifying then PSE asks that the commission work with that operator under the authority granted in 480-93-180 rather than dictate in regulations what valves must be maintained.</p>	
<p>-110 Corrosion control</p>	<ul style="list-style-type: none"> ▪ As stated in previously submitted comments, PSE believes it is prudent to include language in subsection (1) that acknowledges the exclusion provided for in subsection (7). (e.g. “Except as provided in subsection (7), . . .”) ▪ PSE finds subsection (2) redundant to the requirements of 192.491 (c). Operators must comply with 192.491 and in doing so meet the commission’s requirements. This redundancy creates confusion because it is unclear if there is 	

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	<p>intended to be some additional requirement. PSE requests that this subsection be deleted.</p> <ul style="list-style-type: none"> ▪ In a meeting on October 8, 2003, the Commission agreed to work with PSE on revised language for subsection (7). PSE is currently waiting for the Commission to complete its review of our proposed bare steel replacement program. ▪ PSE requests clarification on the requirements set forth in subsection (8). The use of the term 'active corrosion', by the commissions proposed definition, would require further investigation of any corrosion. ▪ PSE also requests clarification on whether the requirements of subsection (8) apply to both underground and exposed metallic pipelines or just underground (as subsection (8)(a) and (b) would imply). ▪ There are record requirements in subsections (2) [requested to be deleted due to duplicity], (6)(b), (8), and (9). PSE finds that subsection (2) and (9) are not unique and are covered by Part 192 and therefore should be deleted. 	
<p>-115 Casing of pipelines.</p>	<p>PSE is concerned with subsection (3) of this rule because there are no restrictions to differentiate between "casing" a pipe for structural reasons versus placing a pipe in conduit for construction convenience or to guarantee separation. Conduit, such as PVC, is used frequently in new plat work to facilitate construction of road crossings and services. It is also used to provide a barrier between gas and other utilities at congested joint trench crossings. At a minimum,</p>	

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	<p>PSE believes conduit used for separation at utility crossings should not be subject to the proposed rule. PSE recommends including some specific criteria that exempts 'sleeves' used at crossings. In addition, PSE requests further discussion to establish criteria for only sealing casings that come within a certain distance from a building.</p>	
<p>-124 Pipeline markers.</p>	<p>PSE strongly disagrees with this proposed rule. As drafted, the rule omits the currently allowed exceptions by excluding the language, "Exceptions to this rule must conform with 49 CFR, Part 192.707(b)." Without this exclusion, pipeline markers would be required on all exposed piping, including service lines, with no regard for accessibility by the public, and on all mains in class 3 and 4 locations even though a damage prevention program is in effect. This has a huge impact to PSE operations and the expense far outweighs the perceived public safety benefit. PSE believes the remediation time for replacement of damaged or missing markers should be 90 days for consistency with remediation times contained in other rules within this chapter. PSE would like to discuss this rule further with the Commission.</p>	<p>PSE recommends the following revisions.</p> <p><i>"(1)<u>Each operator must place pipeline markers over each main and transmission line 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. Exceptions to this rule must conform with 49 CFR, Part 192.707 (b), however, mains operating above 250 psig are not excluded.</u></i></p> <p><i>(2)For buried pipelines, operators must place pipeline markers approximately 500 yards apart if practical, and at points of horizontal deflection.</i></p> <p><i>(2)(3)Where gas pipelines are attached to bridges or otherwise span an area, operators must place pipeline markers at both ends of the suspended pipeline.</i></p> <p><i>(4)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.</i></p> <p><i>(5)Surveys of pipeline markers not</i></p>

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		<p><i>associated with section subsection (2) (4) above must be conducted once every three calendar years, not to exceed 39 months between surveys.</i></p> <p><i>(4)(6)Each operator must replace markers that are reported damaged and <u>or</u> missing within 45 <u>90</u> days of discovery.</i></p> <p><i>(7)The survey records must be kept for a minimum of five years.</i></p>
<p>-140 Service regulators.</p>	<p>PSE believes it is not necessary to check the regulator set pressure “each time” they are turned on. Performing this activity at initial start-up or when a customer has a pressure problem is sufficient. There is significant operational impact and cost to PSE if the requirement remains “each time”.</p>	<p>PSE requests the following revision to subsection (2). “(2) <u>Each</u> operator must inspect and test service regulators and associated safety devices installed on services <u>lines each time when</u> the regulators and devices are turned on initially, to . . . Safety devices such as fracture discs are not required to be tested <u>each time the device is turned on.</u>”</p>
<p>-155 Increasing maximum allowable operating pressure.</p>	<p>PSE finds subsection (1)(h) confusing and recommends it be deleted. In accordance with the rule, an operator is required to review certain design, operation, construction and maintenance records. At the time the plan is submitted to the Commission, there is no way for an operator to know what other “records deemed necessary by commission staff to evaluate the pressure increase” would be required. The Commission can always request additional information, but subsections (1) (a) through (g) are extremely comprehensive.</p>	<p>Based upon our comment PSE recommends that subsection (1)(h) be deleted in entirety. In addition, PSE recommends the following revisions for clarity. “(1) <i>Each operator . . . greater than sixty pounds per square inch gauge (psig). . . .</i>”</p> <p>And, “(1)(e) <i>Original welding standards and records if the pipeline will operate at 20 percent of the specified minimum yield strength or greater at the new pressure. If the pipeline is being uprated to a specified minimum yield strength of over 20 percent,</i></p>

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		<i>then the original welding standards and records must be provided.”</i>
-170 Tests and reports thereof for pipelines.	It appears that the Commission was considering creating a new rule on testing but decided to keep 480-93-170 for this purpose. PSE recommends a revision to the title to more appropriately reflect what is in this rule. PSE is concerned about subsection (2)(c) requiring the soap testing of joints to occur at some pressure other than ‘normal operating pressure’.	PSE requests the following revision to subsection (2)(c). “Operators must soap test at tie-in joints at not less than the <u>operating pressure when placed into service to which the pipeline will be subjected.</u>
-175 Moving and lowering metallic gas pipelines.	PSE previously requested clarification from the commission for the basis of this rule change as it relates to plastic pipelines and no response was provided. The proposed rule limits moving or lowering to pipelines 2 inch diameter and smaller, regardless of the material type. PSE again requests an explanation for this revision.	
--yyy Protection of plastic pipe.	<ul style="list-style-type: none"> ▪ PSE requests clarification under subsection (1) that an operator can use the manufacturers limit if it is greater than 2 years. The proposed language is awkward. (1) (a) and its lead-in sentence do not seem related to (1)(b). ▪ PSE believes (1)(b) should only apply when mechanical means are used to pull PE through the ground. ▪ PSE is concerned that the requirements set forth in subsection (2) are impractical for joint trench applications. PSE already requires 12 inch separation from power and requests clarification on why the same separation is needed from all utilities. ▪ PSE disagrees with the requirements set forth in subsection (4). Proposed federal rules will allow 	

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	<p>PE installations on bridges. This proposed rule will preclude that and PSE believes this is significant to warrant further discussion.</p> <ul style="list-style-type: none"> ▪ In addition, PSE believes the 30 day limitation on above ground installations is too prohibitive and reduces operator flexibility. In some cases more time is needed for permitting or because construction of a permanent structure is not yet complete. PSE requests an explanation of what pipeline safety problem this proposed subsection is trying to address that the federal limitations do not cover. 	
<p>-185 Gas leak investigation.</p>	<p>For clarification, PSE requests that the commission divide this rule into more sections. There is a lot of information/requirements included in the current subsection (especially subsection (3)) that is sufficient to create additional subsections.</p>	
<p>-186 Leakage classification and action criteria.</p>	<p>In subsection (5) the proposed rule now requires follow-up inspections for all leak grades. PSE requests an explanation for this change. PSE also requests an exception to this requirement if the leak was repaired by replacement. PSE would like further discussion with the commission on this subsection.</p>	
<p>-187 Gas leak records and self audit.</p>	<ul style="list-style-type: none"> ▪ PSE understands that subsection (4) is referring to follow-up inspections and recommends that this be stated as such. ▪ The requirements set forth in subsection (15) will be difficult to comply with because the person making the repair will not know the type of cathodic protection. In addition, a cp reading is required under 480-93-110 each time a facility is exposed so 	<p>PSE recommends the following changes for consistency in format. <i>“(1) Each operator must prepare and maintain permanent gas leak records. The leak records must contain sufficient data and information to permit the commission to assess the adequacy of the operator’s leakage program, and to provide the data</i></p>

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	<p>the requirement stated in this rule is redundant. PSE requests that the Commission delete this subsection from the proposed rule for these reasons.</p> <ul style="list-style-type: none"> ▪ The commission is proposing to delete the self-audit requirements currently contained within this rule and incorporate them into 480-93-188 because it also currently contains a self-audit requirement. However, 480-93-187 deals with leak classification and repair records, whereas 480-93-188 deals specifically with leak survey records. PSE requests that the Commission reconcile the records and record audit requirements and either put them all in one rule (-187) or keep in the sections they currently are (leakage classification and repair in –187 and leakage survey in –188). ▪ PSE finds the format of the proposed rule inconsistent with the new format in all other proposed rules. In addition to making format changes, PSE requests that the commission consider grouping the leak records separately from the leak repair records for clarity. 	<p><i>and information required by RSPA F-7100.1, F 7100.1 1, F 7100.2, and F-7100.2 1 leak reports. Gas leak records must that contain, at a minimum, the following information: (a)(1)Date and time the leak was detected, investigated and reported, and the name of the employee(s) conducting the investigation; (b)(2)Date and time the leak was reevaluated before repair, and the name of the employee(s) involved; (c)(3)Date and time of repair and the name of the employee(s) in charge of the repair; (d)(4)Date and time of any rechecks performed follow-up inspections, and the employee(s) involved; (e)(5). . . (15)If cathodically protected, type of protection and cathodic protection test reading; . . . (m)(18). . . “</i></p>
<p>-188 Gas leak surveys.</p>	<ul style="list-style-type: none"> ▪ PSE finds the language in subsection (1) confusing. As stated previously PSE would like to discuss the definitions for business district and places of public assembly and the use of those terms in the context of this rule. ▪ In subsection (1)(e) the additional wording that “within business districts the entire service length must be surveyed” is unnecessary because <u>all</u> services have to be surveyed per (1)(a). The emphasis here is confusing and redundant. 	<p>Based upon our comments, PSE requests the following revisions: <i>“(1) Operators must perform gas leak surveys using a gas detection instrument covering the following areas: (a)Over all mains, services, and transmission lines including the testing of the atmosphere near a other utility (gas, electric, telephone, sewer, or water) <u>boxes or manholes, and other underground</u></i></p>

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	<ul style="list-style-type: none"> ▪ PSE would like to discuss the new requirement in subsection (3)(f) as it relates to PSE's proposed bare steel replacement program. ▪ PSE would like to discuss the new requirement of subsection (4)(e) because it appears to overlap the follow-up inspection requirements set forth in 480-93-186. ▪ As stated above, PSE also recommends that the self-audit requirements pertaining to leak repair records remain in 480-93-187. 	<p><i>structures;</i></p> <p><i>(b)Through cracks in paving,in wall to wall paved areas, and in sidewalks;</i></p> <p><i>(c)Along the walls of businesses and buildings of public assembly that are within 100 feet of an active pipeline a <u>business district, whether or not served with gas;</u></i></p> <p><i>(d)On all above ground piping (may be checked with either a gas detection instrument or with a soap solution);</i></p> <p><i>(e)Where a gas service line exists, at the building wall point of entrance, using a bar hole where necessary (within business districts the entire service length must be surveyed);</i></p> <p><i>(f)Within all buildings, where gas leakage has been detected at the outside wall, and, at all points locations where escaping gas could potentially migrate into and accumulate inside the building;.”</i></p> <p><i>And, “(4)(b)<u>Following completion of construction but prior to paving,</u> in areas where substructure construction occurs adjacent to underground gas facilities, and there is potential that damage could have occurred to the gas facilities, operators must perform a gas leak survey following the completion of construction, but prior to paving; . . .”</i></p>
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<p>-200 Reports associated with operator facilities.</p>	<ul style="list-style-type: none">▪ The Commission has added more items for operators to report on. PSE requests an explanation for the need of these additional reporting requirements. PSE believes (1)(d) and (e) as requested would be extremely difficult to track and finds these to be out of context with the other requirements because they are causes and not effects.▪ PSE is concerned about (1)(c) because often evacuations are performed as a precautionary measure rather than a necessity.▪ PSE believes (1)(k) is covered under the requirements of (1)(h) and therefore is not necessary to list separately.▪ PSE disagrees with the new requirement set forth in (1)(m) and would like to discuss this further with the commission.▪ In the information required in the report, subsection (4)(d) requires “the system operating pressure at that time”. The exact pressure may not be known, depending upon how pressure in a given system is monitored. PSE requests that this be replaced with “normal operating pressure”.▪ PSE believes the revision to the requirements in subsection (5) are burdensome. At the very least, an operator should be afforded 45 days to submit the report.▪ PSE is extremely concerned over the requirement	

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	<p>set forth in subsection (8) and requests an explanation of the pipeline safety issue that the commission is trying to address. Operators are already required to submit to the commission records upon request and PSE already submits daily crew logs for our service providers. PSE believes it is unnecessary and overly burdensome to regulate this issue.</p>	
-999 Adoption by reference	<ul style="list-style-type: none">▪ PSE finds a discrepancy between subsection (2) of this rule and 480-93-080 with respect to the edition referenced.▪ PSE requests an explanation of how the Commission expects operators to deal with potential conflicts between WAC 480-93 and Appendix A to Part 192 – Incorporated by Reference when Part 192 is revised.▪ PSE requests that the effected date in subsection (1)(a) be October 15, 2003 to reflect the most current amendments to CFR Part 192.	