**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**Docket No. PG-160924**

**Puget Sound Energy**

**Greenwood Complaint**

**PUBLIC COUNSEL DATA REQUEST NO. 030**

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**Refer to WUTC Staff Informal Data Request No. 22.**

* 1. According to Fireman Nathan Buck (Interview #1, page 2-3, with Timothy Riddle), the service line at 8409-8411 Greenwood Ave N. was leaking at approximately a “foot or foot and half from the ground” and the “lead was approximately seven or eight feet from the end of Mr. Gyros” into the gap. According to Buck, “…there was a valve right at my feet where this pipe I am describing to you came out and stubbed out.” On page 5 of interview #2, Mr. Buck also states, “…this pipe in, that we’re talking about, came out and was roughly in the area of…the meter. And another shut off that was close to the ground.”

Based on the initial service line installation at this location, subsequent service work, cut and cap records and current PSE knowledge, please answer the following questions and provide the requested information:

* + - 1. Identify how many feet of pipe from the main to the building were below grade and how many feet were above grade.
			2. Explain how the service line was abandoned from which building and wall to just below the meter.
			3. Explain how the service line was capped and if it was capped.
			4. Explain why the riser had a female union fitting where the break occurred and the purpose for this fitting.
			5. Provide a diagram or illustration showing how the service line was installed and in place from the main to the buildings at 8409-8411 and 8413/8415 Greenwood Ave N, the pipe portions below grade and pipe portions above grade, the split service lines to each building/service location, the location of the meters, the portion of pipe along the wall and its length, any related valves or assembly and location of the cap. A three dimensional diagram or illustration would be helpful.
			6. Explain if leaving an abandoned service line with a stub above ground was an acceptable operating procedure in September 2004. Explain how long this practice has lasted and if continues today.
			7. Is PSE aware of other abandoned service line locations where a capped service line pipe stub was left above ground? If yes, provide a list of known locations. If no, has PSE done any surveys to ascertain no such other situations exist?

**Response:**

Puget Sound Energy (“PSE”) responds as follows:

1. Identify how many feet of pipe from the main to the building were below grade and how many feet were above grade.

**According to the D4 for the service installation in 1969 (see PSE’s Response to Public Counsel Data Request No. 042), the entire service length was 92 feet. The service stub (buried service piping from the main to the property line) was 30 feet. The service extension (service piping from the property line to the meter location) was 62 feet. Based solely from photos taken following the incident, it appears that the entire length of the service extension was above grade.**

1. Explain how the service line was abandoned from which building and wall to just below the meter.

**The service was to be cut and capped 22 feet west of the centerline of Greenwood Avenue North at a location approximately in the middle of the parking lane of Greenwood Avenue North. This would have resulted in all but the first 10 feet of the service line being abandoned (the main is located 12 feet west of the centerline).**

1. Explain how the service line was capped and if it was capped.

**The typical method of implementing a cut and cap to retire steel pipe is to perform a pinch and weld. In a pinch and weld, the steel pipe is squeezed flat utilizing a pneumatic squeezer. The pipe is then separated at the squeeze location and welded closed. Upon excavation at the cut and cap location, it was discovered that an unidentified section of pipe located several inches above the gas service line had been pinched and welded, and the gas service line itself remained intact. When the gas service line was initially disconnected at the meter location, a threaded plug was installed in the outlet of the service valve.**

1. Explain why the riser had a female union fitting where the break occurred and the purpose for this fitting.

**The above ground portion of the service line contained a threaded coupling at a location approximately 7-10 feet from the meter location. This coupling joined two lengths of threaded ¾” steel pipe used in the service extension.**

1. Provide a diagram or illustration showing how the service line was installed and in place from the main to the buildings at 8409-8411 and 8413/8415 Greenwood Ave N, the pipe portions below grade and pipe portions above grade, the split service lines to each building/service location, the location of the meters, the portion of pipe along the wall and its length, any related valves or assembly and location of the cap. A three dimensional diagram or illustration would be helpful.

**Please see Attachment A to Public Counsel Data Request No. 030 which contains a higher resolution image of the 1969 D4 card.**

1. Explain if leaving an abandoned service line with a stub above ground was an acceptable operating procedure in September 2004. Explain how long this practice has lasted and if continues today.

**PSE Operating Standard 2525.2100, Section 6 – Service Deactivation, requires that exposed service piping be removed at the building.**

1. Is PSE aware of other abandoned service line locations where a capped service line pipe stub was left above ground? If yes, provide a list of known locations. If no, has PSE done any surveys to ascertain no such other situations exist?

**PSE has identified locations where a capped service line pipe stub was left above ground; however, PSE has not maintained a comprehensive list of these locations. PSE’s compliance plan is, in part, intended to identify such locations.**

1. According to Fireman Nathan Buck (Interview #1, page 4, with Timothy Riddle), regarding the gas leak at the service line at 8409-8411 Greenwood Ave N, Mr. Riddle asked, “So the pipe was NOT connect to the natural gas riser or the manifold?” Mr. Buck’s response: “It was not…as far as I could tell…it was not connected or associated with that…it was not connected to that meter that was right there at the back…at the northwest corner of Mr. Gyros.” Please explain why there would still be a gas meter at that location when the service line had been cut and capped. Explain why the meter was not removed.

**Explained in PSE’s oral response to Public Counsel Data Request No. 25 on January 20, 2017.**

**ATTACHMENT A to PSE’s Response to PUBLIC COUNSEL Data Request No. 030.**