



PUGET SOUND ENERGY

The Energy To Do Great Things

February 28, 2011

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

2011 FEB 28 AM 10:20

Attn: Dave Lykken, Pipeline Safety Director.

RE: Bare Steel Replacement Program Semi-Annual Progress Report (Docket No. PG-030128)

Dear Mr. Lykken,

Pursuant to Docket No. PG-030128 and PG-030080, Puget Sound Energy (PSE) is required to submit progress reports pertaining to the Bare Steel Replacement Program. This letter provides progress through December 31, 2010.

PSE completed the retirement of 111,127 feet of bare steel main during the calendar year of 2010. The attached table shows program targets and actual retired footage.

If you have any questions regarding this report, please contact me at 425-462-3877.

Sincerely,

Catherine Koch
Manager, Gas Compliance and Regulatory Audits

cc: Bert Valdman
Karl Karzmar
Tom DeBoer
Sue McLain
Mike Hobbs
Duane Henderson
Booga Gilbertson

Enclosure

Bare Steel Replacement Program Replacement Schedule

<i>Year</i>	<i>Plan Year</i>	Replace Unprotected Bare Target	Replace Protected Bare Target	Target Totals	Running Target Totals	Actual Program Reported Footage	Non Program Footage
2005*	Year 1	46,995		46,995	46,995	48,078	0
2006*	Year 2	99,205		99,205	99,205	88,624	1648
2007**	Year 3	99,205		99,205	99,205	165,504	9,882
2008	Year 4	99,205		99,205	99,205	109,552	2,701
2009	Year 5	99,205		99,205	99,205	104,210	5,165
2010	Year 6	99,205		99,205	99,205	111,127	
2011***	Year 7	99,205	38,280	137,485			
2012	Year 8	99,205	38,280	137,485			
2013	Year 9	99,205	38,280	137,485			
2014	Year 10	99,205	38,280	137,485			
Total Footage		939,840	153,120	1,092,960	543,020	627,095	19,396
Total Mileage		178	29	207	102.8	118.8	3.7

1. *2/9/2008 reconciled WUTC reported footages for year 2005 & 2006 to match program tracking documents.
2. **Carry over of 10,852' of remaining target footage was completed by 02/12/2007.
3. Prior to 2010, Non Program Retirement included protected Bare and unprotected Bare replacements not originally identified in the program or being done prior to getting 'program' credit. Starting in 2010, Non Program Retirement footage will only include replacements not originally identified in the program.
4. ***Target footage will be afforded more discretion to allow more consideration to overall project efficiency as recorded per 12/01/2010 Letter of Understanding with WUTC.