

BRUCE L. PASKETT, P.E.
Chief Engineer
(503) 226-4211 Ext. 4300
FAX (503) 273-4822
blp@nwnatural.com



November 20, 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 master meter rules, WAC Chapter 480-93 (Docket No. UG-011073)

Dear Ms. Washburn:

Thank you for the opportunity to comment on the proposed draft master meter rules for WAC Chapter 480-93. NW Natural has carefully reviewed the proposed changes and the attached comments are based on our commitment to pipeline safety and the safe and reliable delivery of natural gas to our customers.

We look forward to the opportunity to discuss these 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
Chief Engineer

Attachment

dtm272

DOCKET NO. UG-011073
Pipeline Safety Rulemaking

Draft Master Meter Rules
November 7, 2003

Definition

WAC 480-93-005 Definitions

"**Master Meter System**" means

(a) An underground pipeline system for distributing gas within, **but not limited to**, a definable area, such as a mobile home park, housing project, or apartment complex, where the operator purchases metered gas from an outside source for resale through a gas distribution pipeline system, and the gas distribution pipeline system supplies the ultimate consumer who either purchases the gas directly through a meter or by other means, such as rents; or

(b) An underground pipeline system for distributing gas to more than one building not intended for resale or distribution to non-public entities but not limited to a definable area, such as a private housing project, private schools, churches, private hospitals. For purposes of this subsection, municipal systems are included.

NWN comment: This entire definition is extremely confusing and Staff's intent is unclear. NWN suggests that the language in paragraph (a) could be interpreted to include LDCs as master meter operators.

Master Meter Rules

WAC 480-93-WWW Service to New Master Meter Installation

Gas companies must receive approval from the commission to connect service to a newly identified master meter system or private gas distribution system.

Before the commission approves service to the master meter or private gas distribution system, the commission will inspect the system to determine if the requirements of this chapter have been complied with.

NWN comment: This requirement could result in unacceptably long delays for customers while the gas company applies for approval, Commission Staff inspects, and then Commission Staff either accepts or rejects operator's application to serve the master meter operator.

WAC 480-93-XXX Master Meter Notification

Gas companies must record all identified master meter systems on the annual report filed with the commission. The report must contain the name, address, and telephone number of the owner and operator of the master meter system. Gas companies must also provide to the master meter operator a copy of this chapter, which master meter operators must follow to ensure that all pipeline safety rules are followed when owning and operating a master meter system.

NWN comment: Identifying all master meter systems and maintaining records to reflect ownership changes is extremely difficult and burdensome.

WAC 480-93-YYY Termination of Service

In the event of a hazardous condition or potentially hazardous condition in the **master meter** pipeline system, the commission will take either of the following actions: (a) order service to the master meter system or private gas distribution system be interrupted, or (b) order the hazard remedied at **the master meter owner's or master meter** operator's expense. If a gas company representative identifies a hazardous or potentially hazardous condition on a master meter or private gas distribution system, the gas companies must interrupt natural gas service to the pipeline system until the system is repaired and the commission deems the system safe.

NWN comment: Suggest adding language specifying this rule applies to a master meter pipeline system. Under (b), suggest adding clarifying language identifying the master meter owner or master meter operator bears the expense of remedying a hazardous condition.

WAC 480-93-ZZZ Reinstatement of service

If actions are required to interrupt gas service to the master meter system, the master meter operator must demonstrate to the commission that the hazardous or potentially hazardous condition in the pipeline system has been corrected before service can be reinstated. The gas company may reinstate service to a master meter operator only after the master meter operator has demonstrated to the commission that the hazardous or potentially hazardous condition in the master meter system has been corrected.