

September 10, 2009

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

Attn: Anne Soiza, Pipeline Safety Director

Subject: Isolated Facilities Program Annual Progress Report (Docket ~~PG-030080~~ & PG- 030128)

Dear Ms. Soiza,

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 July 31, 2009.

The attached table shows that PSE made significant progress on riser inspections, mains, casings/bridges, and stubs with detailed information. Also, the table shows work elements that were extended to December 31, 2010 and to December 31, 2014.

WUTC approved the completion date of this program on July 01, 2009 to be extended to December 31, 2010, for eleven work elements and to December 31, 2014, for three element works - Order 04 (Order Granting Petition to Amend Order 03 and for Exemption from WAC 480-93-110(2), Subject to Conditions; Amending Orders 02 & 03). The extension work elements are:

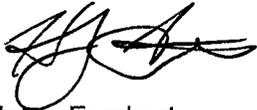
1. Completion by December 31, 2010
 - 1.1 Riser Inspections including EUF's and Unmetered Risers
 - 1.2 Mains
 - 1.3 Casings
 - 1.3.1 Railroad and Highway Casings
 - 1.4 Stubs
 - 1.5 Quality Controls
 - 1.6 Combination Services

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- 1.6.1 With steel installed between 1956 and 1970
- 1.6.2 With Test Sites installed after 1971
- 1.7 Mapping Corrections
- 2.2 Above Ground Regulators (Service Piping Downstream of Regulators) – Phase 1
- 2. Completion by December 31, 2014
 - 1.3.2 Service Casings
 - 2.1 Mobile Home Parks Buried Fuel Lines
 - 2.3 Sidewalk Regulators (Service Piping Downstream of 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

Isolated Facilities Program Semi-annual Status Report

Progress through July 31, 2009

Riser Inspections (including EUF's and meter less risers)					
	Number Completed	Percent Completed	Estimated Remaining Total	Extension Required	Proposed Completion Date
Initial Riser Inspections (Total number of risers inspected company wide)	735,473	100%	0	No	12/31/2010
Plat review (Total number identified from initial inspection that needed to be reviewed by MRT)	204,488	100.0%	0	No	
Follow-up inspection (Total number of risers identified from Plat review that needed additional field inspection)	42,316	98%	686*	Yes	
Resolved (Total number of risers identified from follow-up inspection that needed to be remediated)	19,508	93%	1,422**	Yes	

* This number will vary depending on the result of follow-up inspection review.

** This number will vary depending on the result of field inspection.

Progress Status of Unmetered Risers

	Number Completed	Percent Completed	Estimated Remaining Total	Extension Required	Proposed Completion Date
Initial Record Review (Total numbers to be identified/located)	37,926	100%	0	No	12/31/2010
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	No	
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	No	
Follow-up Field Inspection (Total number of risers needed to be identified)	24	96%	1	Yes	
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)	21	84%	4	Yes	

Mains

	Number Completed	Percent Completed	Estimated Remaining Total	Extension Required	Proposed Completion Date
Plat Review (Total number of locations identified from Plat review)	1,392	100%	0	No	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	No	
Resolved (Total number of segments remediated or otherwise ruled-out by SC&P)	1,387	99%	5	Yes	

Casings

RR and Highway Casings

	Number Completed	Percent Completed	Estimated Remaining Total	Extension Required	Proposed Completion Date
Plat Review (Total number of locations identified from Plat review)	144	100%	0	No	12/31/2010
Data Review (Total number identified from the Plat review were then reviewed by a combination of data sources)	144	100%	0	No	
Resolved (Total number of segments remediated or otherwise ruled-out by SC&P)	138	96%	6	Yes	

Service Casings

	Number Completed	Percent Completed	Estimated Remaining Total	Extension Required	Proposed Completion Date
Records Review (Total number identified)	5,730*	100%	0	No	12/31/2014
Resolved (Total number of segments remediated or otherwise ruled-out by SC&P)	0	0%	3,200	Yes	

The service casing works are being processed in conjunction with WSSAP and Bare Steel programs.

* A total of 5730 items will be remediated through the WSSAP, Bare Steel and IF programs: WSSAP - 2200, Bare Steel - 330, IF - 3200

Bridge Casings

	Number Completed	Percent Completed	Estimated Remaining Total	Extension Required	Proposed Completion Date
Data Review (Total number identified from Bridge and slide patrol data)	347	100%	0	No	N/A
Resolved (Total number of segments remediated or otherwise ruled-out by SC&P)	347	100%	0	No	

Stubs

	Number Completed	Percent Completed	Estimated Remaining Total	Extension Required	Proposed Completion Date
Plat Review (Total number of locations identified from Plat review)	589	100%	0	No	12/31/2010
Data Review (Total number identified from the Plat review were then reviewed by a combination of data sources)	589	100%	0	No	
Resolved (Total number of segments ruled-out by SC&P & MRT)	574	97%	15	Yes	

Quality Control

Mapping (Unplatted STW Services)

	Number Completed	Percent Completed	Estimated Remaining Total	Extension Required	Proposed Completion Date
Data Review (Total number identified from IGF data)	1,192	100%	0	No	12/31/2010
Records Review (Total number identified form records review)	0	0%	1,192	Yes	
Follow-up inspection (Total number of services identified from records review that needed additional field inspection)	0	0%	TBD	Yes	
Resolved (Total number of sampling segments remediated)	0	0%	TBD	Yes	

Combination Services

With Steel Installed between 1956 and 1970

	Number Completed	Percent Completed	Estimated Remaining Total	Extension Required	Proposed Completion Date
Records Review (Total number identified and reviewed)	704	98%	14	Yes	12/31/2010
Resolved (Total number remediated)	634	88%	84*	Yes	

* This number will vary depending on records review results.

With Test Sites Installed after 1971

	Number Completed	Percent Completed	Estimated Remaining Total	Extension Required	Proposed Completion Date
Records Review (Total number identified and reviewed)	1,832	99%	1	No	12/31/2010
Resolved (Total number remediated)	1,714	94%	118*	Yes	

* This number will vary depending on records review results.

Mapping Correction

	Number Completed	Percent Completed	Estimated Remaining Total	Extension Required	Proposed Completion Date
Mapping Correction (Total numbers being revised)	5,426	100%	*0	Yes	12/31/2010

* This number will increase as completing field remediation works which are scheduled to complete by 12/31/2010.

This work element will be completed in two phases:

- Phase 1: Complete mapping corrections on the works that are scheduled to complete by 12/31/2010.
- Phase 2: Complete mapping corrections on the works that are scheduled to complete by 12/31/2014.

Mobile Home Parks Buried Fuel Lines

	Number Completed	Percent Completed	Estimated Remaining Total	Extension Required	Proposed Completion Date
Records Review (Total numbers of Parks identified/located)	176 parks	100%	0	No	12/31/2010 (Systematic Assessment)
Initial Field Assessment (Total numbers of BFL's identified)	500*	100%	0	No	
Follow-up Field Inspection (Total number fully inspected/evaluated)	0	0%	500	Yes	12/31/2014 (Remediation)
Resolved (Total numbers remediated)	0	N/A	TBD	Yes	

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

* This number is estimated and may vary depending on full assessment results.

Above Ground Regulators (Service Piping Downstream of Regulators)

	Number Completed	Percent Completed	Estimated Remaining Total	Extension Required	Proposed Completion Date
Initial Candidates (Total numbers extracted from data base and identified)	888	N/A	N/A	N/A	Phase 1 – Assessment 12/31/2010
Records Review (Total numbers reviewed for field inspections)	0	0%	888	Yes	
Initial Field Assessment	0	0%	Unknown	Yes	Phase 2 – Remediation TBD
Resolved (Total numbers remediated)	0	0%	Unknown	Yes	

This work was discovered during the Sidewalk Regulators assessment.

Sidewalk Regulators (Service Piping Downstream of Regulators)					
	Number Completed	Percent Completed	Estimated Remaining Total	Extension Required	Proposed Completion Date
Initial Candidates (Total numbers extracted from data base)	750	N/A	N/A	N/A	12/31/2014
Preliminary Review (Total numbers that are identified from records review)	609	N/A	N/A	N/A	
Second Review (Total numbers identified/located for field inspections. Duplicates were identified and eliminated)	192	100%	0	No	
Initial Field Assessment (Total numbers of Inadequate CP services identified and inspected)	95	100%	0	Yes	
Resolved (Total numbers remediated)	46	49%	49	Yes	
This work was discovered during the Sidewalk Regulators assessment.					