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November 21, 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 Draft Master Meter Rules

Dear Ms. Washburn:

Thank you for the opportunity to review and comment on the Draft Master Meter Rules 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 Master Meter Rules for Chapter 480-93 WAC

Proposed WAC Rule	Content Comments	Grammar Comments
-005(17) "Master Meter System" (a)	<p>This part of the proposed definition is identical to the federal definition found in CFR 49 Part 191 with the exception of the inclusion of the word "underground". PSE understands this to mean that the WUTC definition is less stringent because it excludes above ground piping. Therefore, the proposed rules pertaining to Master Meter System in WAC 480-93 do not apply to a federally defined Master Meter System if the piping downstream of PSE's meter is all above ground, but all applicable federal rules will apply. PSE seeks clarification from the Commission on this issue.</p>	
-005 (17) "Master Meter System" (b)	<p>There are several components of this part of the proposed definition that PSE finds confusing. First, the use of the terms "non-public entities" and "private housing project". What is a private housing project? The use of this term implies resale of gas, yet the proposed definition only covers that which is not intended for resale.</p> <p>Second, PSE does not understand the distinction between public and private schools and hospitals that the proposed parts (a and b) of the definition appear to make.</p> <p>Third, the inclusion of municipal systems seems to conflict with the definition of gas company under 480-93-005 (12).</p> <p>PSE's understanding of this part is that the Commission desires jurisdiction over buried gas fuel piping that goes to more than one building. Systems captured under this part are not 'transporting' gas because it is not being resold and thus the distinction from part (a) of the</p>	

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	<p>definition. As such, this is an extremely broad definition and is of primary concern to PSE. It would be nearly impossible for gas companies to track how all customers use the gas or develop their system downstream of the meter when they are not categorically identifiable as master meter systems under part (a). This creates an incredible burden on gas companies given the proposed requirements under 480-93-WWW and -XXX.</p>	
<p>-WWW Service to New Master Meter Installation</p>	<p>This proposed rule introduces a new term that is not defined, namely, “private gas distribution system”. PSE does not understand this term nor why it is separate from Master Meter System. The introduction of another term is confusing and is used inconsistently in these rules (i.e. used in -WWW and -YYY but not in -XXX and -ZZZ). PSE recommends that this term be eliminated from final rules.</p> <p>PSE is also concerned about the use of the term “newly identified”. Does this mean just new construction and conversion installations or does it also include existing customers that may not previously been identified as a master meter system operator? Are gas companies expected to review their existing customer base to identify Master Meter Systems or are existing customers ‘grandfathered’?</p>	<p>PSE requests that the Commission divide those paragraphs containing multiple requirements into sections for clarity and ease of use. This comment applies to -WWW, -XXX, -YYY and -ZZZ.</p>
<p>-XXX Master Meter Notification</p>	<p>PSE disagrees with the requirement in this rule to provide master meter operators with a copy of WAC chapter 480-93; this is a huge burden to gas companies as mentioned above. Maintaining records to demonstrate compliance would also be burdensome. PSE is unclear on the following issues:</p>	

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	<ul style="list-style-type: none"> ▪ whether this requirement applies to all rule updates as long as the master meter system is in service; and ▪ what the expectations would be for identifying and providing copies of the rules to existing master meter operators versus newly identified. <p>PSE also seeks clarification on the referenced 'annual report' in this rule. Is this referring to RSPA F-7100.1-1 and F7100.2-1 that the Commission requests a copy of under 480-93-200?</p>	
<p>-- YYY Termination of Service</p>	<p>This rule again uses the term "private gas distribution system". PSE has the same concerns as mentioned above. Also, 'pipeline system' is used in the first sentence – another different term that should be 'master meter system'.</p> <p>PSE is concerned about the requirement regarding potentially hazardous conditions that may exist. How would a gas company find this when not responsible for maintaining these systems? This exposes gas companies to incredible liability for systems the master meter operator is required to maintain.</p>	
<p>-ZZZ Reinstatement of service</p>	<p>PSE is concerned that the evidence a master meter operator must show a gas company for reinstatement is unclear.</p>	