



Puget Sound Energy, Inc.  
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March 7, 2006

Carole J. Washburn, Secretary  
Washington Utilities and Transportation Commission  
PO Box 47250  
Olympia, WA 98504-7250

Attn: Alan Rathbun

Re: 2005 Report on Cast Iron Casing Remediation  
(Re WUTC Audit of PSE Central Division - Docket No. UG-941394)

Dear Mr. Rathbun:

This letter reports the 2005 status of the program to replace steel pipe inserted in cast iron casing that was developed in response to the WUTC Audit of Puget Sound Energy's (PSE) Central Division (UG-941394). This program was originally outlined in a letter to the WUTC dated May 19, 1995 and updates are provided to commission staff in annual status reports. Previously, the casing program status has been reported in conjunction with the status for the Critical Bond Program. Beginning with the 2005 reports, these programs will be reported separately.

Prior to the implementation of WAC 480-93-115 in 1992, PSE had inserted approximately 11 miles of steel main into cast iron casings. WAC 480-93-115 specifies that steel pipe shall only be encased in a bare steel casing. Of the original 11 miles, 2 miles were determined to be electrically isolated from the casing and are receiving adequate cathodic protection and therefore will remain in service. These pipelines are monitored annually to ensure they remain cathodically protected and electrically isolated. To date, approximately 8.84 miles of the remaining 9 miles of steel pipelines in cast iron casing have been replaced. Replacement of approximately 0.16 miles was delayed due to a paving moratorium as explained in previous status reports. This pipe is scheduled for replacement in 2006. PSE continues to leak survey these pipeline segments every ninety days until they are replaced.

The following is a summary of the miles of main remediated by year:

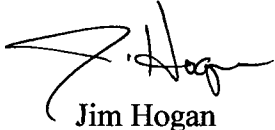
<u>Year</u>	<u>Replaced</u>	<u>Cathodically Protected</u>	<u>Annual Total (mi.)</u>	<u>Cumulative Total</u>
prior to 1999	4	0	4	4
1999	1	0	1	5
2000	0.5	0	0.5	5.5
2001	2.0	2.0	4.0	9.5
2002	1.3	0	1.3	10.8
2003	0.04	0	0.4	10.84
2004	0.0	0	0.0	10.84
2005	0.0	0	0.0	10.84

RMS  
MA

With remediation of the final 0.16 miles in 2006, we expect this program to be completed.

Please contact me at 425-462-3957 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Hogan". The signature is stylized with a large initial "J" and a cursive "Hogan".

Jim Hogan  
Manager, Standards and Compliance

cc: Kimberly Harris  
Karl Karzmar  
Sue McLain  
Booga Gilbertson  
Duane Henderson