

February 18, 2010

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

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, 2009.

PSE completed the retirement of 104,210 feet of bare steel main during the calendar year of 2009. The retirement of 5,165 feet of non-program footage was also completed during the calendar year of 2009. The attached table shows program targets and actual retired footage.

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  
Harry Shapiro  
Tom DeBoer  
Sue McLain  
Mike Hobbs  
Duane Henderson  
Erik Markell

Enclosure

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## Bare Steel Replacement Program Replacement Schedule

<b>Year</b>	<b>Plan Year</b>	<b>Replace Unprotected Bare Target</b>	<b>Replace Protected Bare Target</b>	<b>Target Totals</b>	<b>Running Target Totals</b>	<b>Actual Program Reported Footage</b>	<b>Non Program Footage</b>
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			
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			
<b>Total Footage</b>		<b>939,840</b>	<b>153,120</b>	<b>1,092,960</b>	<b>443,815</b>	<b>515,968</b>	<b>19,396</b>
<b>Total Mileage</b>		<b>178</b>	<b>29</b>	<b>207</b>	<b>84</b>	<b>97.7</b>	<b>3.7</b>

\* Reconciled WUTC reported footages for year 2005 & 2006 to match program tracking documents.

Non Program Retirement included protected bare and unprotected bare steel main replacements not originally identified in the program or being done prior to getting 'program' credit.