

Cascade Natural Gas Corporation
Response to Proposed WAC 480-93 Revision, Dated November 7, 2003
November 24, 2003

Text enclosed in boxes is proposed rule text.

Text outside of boxes is Cascade Natural Gas comments.



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.

We recommend paragraph (a) start: "A buried pipeline system for distributing..." The word underground includes pipes in underground tunnels.

We recommend paragraph (b) be restated to:

"A gas distribution system where;

- 1) The safety of the general public is affected and;
- 2) Gas is distributed to more than one building through buried pipes and;
- 3) The gas is not intended for resale and;
- 4) The gas distribution system is owned by a municipality or is owned by private entities such as private housing projects, private schools, churches, and private hospitals."

Distribution systems meeting the paragraph (b) definition have smaller impacts and concerns from operators of classic distribution systems. It is important for owners of such systems to know of the hazards, and take steps to maintain their pipe. We

recommend that the commission set up a program for these owners that only requires they meet specific requirements, not the total of DOT 192, or WAC 480-93.

We recommend these rules stipulate the specific requirements each owner must consider and provide guidance in how to evaluate those requirements. These requirements would have to be complete and documented for owners to understand and comply. Examples of requirements are: external corrosion control, leak surveys, damage prevention, emergency preparation and response, proper construction materials, pressure testing and documentation, etc.

Inspection staff should provide these requirements to the owners, help them understand the requirements, evaluate the steps taken to address the requirements, and take steps if the requirements are not met.

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.

We recommend the rule be restated to:

“The commission must approve delivery of gas to a potential master meter system. The commission shall inspect the system to determine if the potential master meter is subject to this chapter, and to ascertain compliance with this chapter has been implemented. The commission will inform the gas company of the results of their review.

No gas company shall deliver gas to a potential master meter system until the commission completes its review. Gas companies shall inform owners of potential master meter systems that they must seek approval from the commission. ”

It seems to us that the individual that is operating a potential master meter system should be informed of the commission's requirements, and seek approval for their system directly from the commission. This would not be very different from obtaining other permits for newly constructed buildings or piping systems. Gas companies should not be required to intercede or represent a master meter system to the commission.

Gas companies should not be required to determine whether or not a customer is truly a master meter. The commission should be responsible for imposing the requirements of DOT 192 and WAC 480-93. We recommend that gas companies only provide "potential" master meters to the commission. The commission should also inform gas companies whether or not the identified customer was deemed an official master meter system.

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.

We recommend that the commission be solely responsible for the list of master meters in the state. Gas companies should help the commission with generating the list of existing master meter systems by providing "potential" master meter systems, but once that is performed, the commission should maintain the information. Gas companies should not be required to intercede between master meters and the commission for reporting.

We recommend that the owners of master meter systems should inform the commission directly with any changes to the required data. This reporting would not be different from the report to the commission currently required of master meter owners.

We recommend that the paragraph be changed to read:

“Master meter systems shall file an annual report with the commission. The report must contain, at a minimum, the name, address, and telephone number of the owner and operator of the master meter system.”

WAC 480-93-YYY Termination of Service

In the event of a hazardous condition or potentially hazardous condition in the 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 owner and 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.

No comments.

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.

No comments.