

Avista Utilities
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September 30, 2005

Alan Rathbun
WUTC
1300 S. Evergreen Park Dr., S.W.
P.O. Box 47250
Olympia, WA 98504-8203

Re: Request to Rescind Waivers for PE Bridge Crossings in Washington UG-00866, UG-010405, ~~PG-021399~~

Dear Mr. Rathbun:

In recent discussions between Avista's staff and the Commission staff, regarding existing waivers granted to Avista to install plastic pipe aboveground on bridge crossings, it was determined that one requirement within the above referenced waivers was not intentionally meant to be open-ended. That requirement is regarding conducting continuous leak surveys with an approved CGI during regular bridge crossing patrols. It was intended that the requirement to conduct the leak survey patrols be for a specified amount of time and not for the remaining life of the facility.

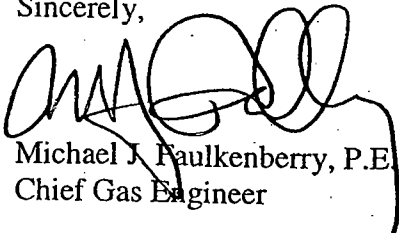
On July 14, 2004 a regulation was adopted as CFR 49 §192.321(h)(3), which allows the installation of plastic pipe on bridges provided that it is:

1. Installed with protection from mechanical damage, such as installation in a metallic casing;
2. Protected from ultraviolet radiation; and
3. Not allowed to exceed the pipe temperature limits specified in §192.123.

As CFR 49 §192.321(h)(3) is recognized by staff as the current standard in WA for plastic aboveground bridge crossings, Avista believes that the requirements of its existing waivers are excessive and requests that these waivers be rescinded.

We respectfully request your consideration of this matter. If you have any further questions regarding this issue, please contact me (509) 495-8499.

Sincerely,



Michael J. Faulkenberry, P.E.
Chief Gas Engineer

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Scott
Sondra
Dennis Moss
~~Re: PG-021399~~
File (3)

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