



PUGET SOUND ENERGY

Puget Sound Energy
P.O. Box 97034
Bellevue, WA 98009-9734
PSE.com

September 30, 2011

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State of Washington
UTC
Pipeline Safety Program

Washington Utilities and Transportation Commission
Pipeline Safety Section
PO Box 47250
Olympia, WA 98504-7250

RE: Bare Steel Replacement Program annual Risk Assessment (Docket PG-030128)

Dear Mr. Lykken;

Pursuant to the King/Pierce County Settlement Agreement reached under Dockets PG-030080 and PG-030128, Puget Sound Energy (PSE) is required to complete an annual system risk assessment of bare steel pipeline segments utilizing a risk model as detailed in the Bare Steel Replacement Program document. Please find enclosed a copy of PSE's 2011 Risk Assessment for the 2012 Bare Steel Replacement Program.

For ease of reference, a breakdown and a summary of the planned replacement footage are provided at the top of page 1 of the Risk Assessment. A total of 138,501 feet of bare steel is scheduled for replacement in 2012.

If you have any questions, please call me at 425-462-3967.

Sincerely,

Cheryl McGrath
Manager of Compliance & Regulatory Audits - Gas

Enc.

cc: Steve Secrist
Sue McLain
Booga Gilbertson
Cathy Koch
Jenifer Tada
Carol Wallace
Duane Henderson

2011 Risk Assessment
For the 2012 Bare Steel Program

Footage by Risk Model		137,051		Total 2012 Planned Replacement Footage		138,501					
Cast Iron Coordination Footage		-		Target 2012 Replacement Footage		137,485					
"Other" Footage		-		Planned versus Target		1,016					
PI Opportunity Footage		1,450		Total Non-Program Footage		-					
Field Identified Footage		-		Total 2012 Footage		138,501					
UN AREA #	SUB AREA #	Notification #	Prioritization Method	Status	Field Completion Date	Approval Date	BS & WI Footage	Cumulative Feet	Score /Mile	Planned Replacement Year	Comments
120	1	11010568	model	dev		8/2011	800	136222	2.643	2012	Released to Service Provider
193	3	11010140	model	dev		8/2011	250	136472	0.758	2012	Released to Service Provider
131	1	11010583	model	dev		8/2011	2451	138923	0.478	2012	Released to Service Provider
130	15	11010584	model				200	139123	0.474	2012	80%
104	5	11010588	model				950	140073	0.433	2012	80%
165	4	11010586	model				350	140423	0.428	2012	80%
071	4	11010590	model				605	141028	0.424	2012	80%
187	8	11010601	model				300	141328	0.365	2012	80%
128	2	11010602	model				420	141748	0.356	2012	80%
070	3	11010603	model				300	142048	0.242	2012	80%
210	5	11010604	model				100	142148	0.229	2012	80%
118	1	11010605	model				300	142448	0.216	2012	80%
014	2rem	11010606	model				3390	145838	0.210	2012	80%
025	6	11010607	model	dev		8/2011	1850	147688	0.204	2012	Released to Service Provider
005	8	11010608	model	dev		8/2011	2930	150618	0.198	2012	Released to Service Provider
136	1rem	11010609	model	dev		8/2011	2650	153268	0.196	2012	Released to Service Provider
173	3rem	11010587	model	dev		8/2011	11273	164541	0.191	2012	Released to Service Provider
144	1	10947364	model				2625	167166	0.182	2012	80%
103	4	10998331	model	dev		8/2011	16610	183776	0.175	2012	Released to Service Provider
030	4rem	11016414	model				5140	188916	0.165	2012	80%
036	1	11016415	model				6900	195816	0.160	2012	80%
124	5	11016416	model				1145	196961	0.142	2012	80%
121	2	11016417	model				800	197761	0.142	2012	80%
038	1	11016418	model				1250	199011	0.136	2012	80%
187	2	11016419	model				800	199811	0.118	2012	80%
187	1	11016420	model				1700	201511	0.112	2012	80%
103	3	11016421	model				5065	206576	0.101	2012	80%
017	4	11016422	model				1450	208026	0.097	2012	80%
011	6	11016423	model				4679	212705	0.096	2012	80%
034	2	11016424	model				1200	213905	0.091	2012	80%

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129	1	11016425	model				1600	215505	0.087	2012	80%
045	3	11016426	model				1650	217155	0.086	2012	80%
123	2	11016427	model				450	217605	0.084	2012	80%
023	3	11016428	model				220	217825	0.084	2012	80%
022	2	11016429	model				1000	218825	0.083	2012	80%
135	2	11016430	model				2077	220902	0.083	2012	80%
158	10	11016431	model				140	221042	0.082	2012	80%
057	2	11016432	model				230	221272	0.078	2012	80%
103	12	11016433	model				3340	224612	0.078	2012	80%
184	6	11016434	model				300	224912	0.076	2012	80%
203	3	11016435	model				150	225062	0.076	2012	80%
187	11	11016436	model				1145	226207	0.075	2012	80%
045	1	11016437	model				1356	227563	0.070	2012	80%
186	5	11016438	model				150	227713	0.068	2012	80%
028	4	11016439	model				1550	229263	0.067	2012	80%
137	4	11016440	model				175	229438	0.065	2012	80%
156	13	11016441	model				175	229613	0.065	2012	80%
020	2	11016442	model				650	230263	0.065	2012	80%
206	1	11016443	model				100	230363	0.064	2012	80%
190	1	11010610	model				6215	236578	0.063	2012	80%
108	9	11016444	model				1370	237948	0.063	2012	80%
104	12	11016445	model				1675	239623	0.060	2012	80%
017	5	11016446	model				600	240223	0.057	2012	80%
104	1	11016447	model				500	240723	0.052	2012	80%
083	1	11016448	model				1920	242643	0.051	2012	80%
208	5	11016449	model				600	243243	0.050	2012	80%
190	3	11016450	model				3150	246393	0.049	2012	80%
187	7	11010611	model				7960	254353	0.047	2012	20%
156	42		model				1700	256053	0.046	2012	20%
125	2		model				466	256519	0.039	2012	20%
107	1		model				300	256819	0.038	2012	20%
142	5		model				300	257119	0.038	2012	20%
184	4		model				300	257419	0.038	2012	20%
187	10		model				300	257719	0.038	2012	20%
136	2		model				2599	260318	0.034	2012	20%

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119		3	model				805	261123	0.032	2012	20%
138		2	model				100	261223	0.032	2012	20%
135		3	model				1200	262423	0.031	2012	20%
134		2	model				2350	264773	0.029	2012	20%
104		9	model				400	265173	0.029	2012	20%
103		7	model				1050	266223	0.028	2012	20%
111		4	model				1050	267273	0.027	2012	20%
019		6	model				3900	271173	0.026	2012	20%
104	8rem		model				1300	272473	0.026	2012	20%
156	34	11010139	pi	dev		8/2011	575	273048	0.006	2012	Released to Service Provider
152	1	11010137	pi	dev		8/2011	75	273123	0.000	2012	Released to Service Provider
156	32	11010138	pi	dev		8/2011	800	273923	0.000	2012	Released to Service Provider
075	1	11010569	field	dev		8/2011	1500	365265	0.002	2012	Released to Service Provider
029		11					800	276223	0.026	2013	
198		2					375	276598	0.026	2013	
164		1					450	277048	0.025	2013	
165		3					690	277738	0.025	2013	
173		30					4200	281938	0.025	2013	
999		9					3120	285058	0.023	2013	
124		1					4200	289258	0.022	2013	
025		8					525	289783	0.022	2013	
050		2					600	290383	0.020	2013	
134		1					950	291333	0.019	2013	
187	23						4450	295783	0.019	2013	
050		11					1250	297033	0.018	2013	
209		1					1148	298181	0.017	2013	
999		2					700	298881	0.017	2013	
142		6					200	299081	0.016	2013	
201		4					725	299806	0.016	2013	
999		8					775	300581	0.015	2013	
131		7					1500	302081	0.014	2013	
999		11					2600	304681	0.013	2013	
094		1					1392	306073	0.013	2013	
156		10					2559	308632	0.013	2013	
210		7					900	309532	0.013	2013	

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122	1						282	309814	0.011	2013	
209	3						1021	310835	0.011	2013	
014	3						2100	312935	0.011	2013	
194	2						300	313235	0.011	2013	
044	3						1200	314435	0.010	2013	
158	1						250	314685	0.010	2013	
153	5						700	315385	0.009	2013	
173	24						2000	317385	0.009	2013	
044	2						1268	318653	0.009	2013	
050	8						3361	322014	0.009	2013	
085	1						1300	323314	0.009	2013	
083	2						400	323714	0.008	2013	
142	7						450	324164	0.007	2013	
208	4						920	325084	0.007	2013	
131	6						1400	326484	0.007	2013	
156	22						2350	328834	0.006	2013	
999	1						4582	333416	0.006	2013	
156	28						600	334016	0.005	2013	
107	3						1250	335266	0.005	2013	
156	36						85	335351	0.005	2013	
999	10						2350	337701	0.005	2013	
100	1						7585	345286	0.005	2013	
186	9						6000	351286	0.004	2013	
019	9						2800	354086	0.004	2013	
011	2						800	354886	0.004	2013	
144	3						3000	357886	0.004	2013	
132	2						975	358861	0.003	2013	
005	3						2013	360874	0.003	2013	
999	3						4391	365265	0.003	2013	
173	18						1500	366765	0.002	2013	
014	1						626	367391	0.001	2013	
086	2						684	368075	0.001	2013	
090	3						700	368775	0.001	2013	
024	2						820	369595	0.001	2013	
021	4						1910	371505	0.000	2013	

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003	1						275	371780	0.000	2013	
005	5						300	372080	0.000	2013	
006	1						200	372280	0.000	2013	
011	4						225	372505	0.000	2013	
011	8						50	372555	0.000	2013	
011	9						140	372695	0.000	2013	
012	5						590	373285	0.000	2013	
012	6						450	373735	0.000	2013	
012	7						750	374485	0.000	2013	
013	1						350	374835	0.000	2013	
016	2						1292	376127	0.000	2013	
019	4						170	376297	0.000	2013	
019	10						200	376497	0.000	2013	
021	3						100	376597	0.000	2013	
022	3						280	376877	0.000	2013	
023	2						550	377427	0.000	2013	
025	3						100	377527	0.000	2013	
029	10						220	377747	0.000	2013	
030	6						110	377857	0.000	2013	
030	7						140	377997	0.000	2013	
031	10						540	378537	0.000	2013	
031	13						150	378687	0.000	2013	
033	1						220	378907	0.000	2013	
037	4						90	378997	0.000	2013	
041	7						230	379227	0.000	2013	
046	1						160	379387	0.000	2013	
047	2						200	379587	0.000	2013	
055	1						150	379737	0.000	2013	
066	3						400	380137	0.000	2013	
066	4						140	380277	0.000	2013	
067	1						150	380427	0.000	2013	
068	1						250	380677	0.000	2013	
070	4						250	380927	0.000	2013	
071	5						300	381227	0.000	2013	
074	1						250	381477	0.000	2013	

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UN AREA #	SUB AREA #	Notification #	Prioritization Method	Status	Field Completion Date	Approval Date	BS & Wt Footage	Cumulative Feet	Score /Mile	Planned Replacement Year	Comments
084	1						10	381487	0.000	2013	
085	4						600	382087	0.000	2013	
086	3						200	382287	0.000	2013	
087	3						160	382447	0.000	2013	
088	1						340	382787	0.000	2013	
091	2						320	383107	0.000	2013	
092	2						140	383247	0.000	2013	
092	3						160	383407	0.000	2013	
094	2						200	383607	0.000	2013	
096	1						500	384107	0.000	2013	
099	4						580	384687	0.000	2013	
099	5						800	385487	0.000	2013	
100	2						650	386137	0.000	2013	
102	4						220	386357	0.000	2013	
103	6						500	386857	0.000	2013	
103	10						439	387296	0.000	2013	
104	4						200	387496	0.000	2013	
104	6						214	387710	0.000	2013	
104	10						200	387910	0.000	2013	
108	1						500	388410	0.000	2013	
108	2						250	388660	0.000	2013	
111	8						510	389170	0.000	2013	
111	9rem						240	389410	0.000	2013	
114	2						170	389580	0.000	2013	
114	3						150	389730	0.000	2013	
124	6						170	389900	0.000	2013	
125	3						1100	391000	0.000	2013	
129	5						180	391180	0.000	2013	
130	7						300	391480	0.000	2013	
130	11						1370	392850	0.000	2013	
130	12						200	393050	0.000	2013	
130	13						100	393150	0.000	2013	
130	14						200	393350	0.000	2013	
131	9						160	393510	0.000	2013	
131	12						1700	395210	0.000	2013	

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UN AREA #	SUB AREA #	Notification #	Prioritization Method	Status	Field Completion Date	Approval Date	BS & WI Footage	Cumulative Feet	Score /Mile	Planned Replacement Year	Comments
133	2						700	395910	0.000	2013	
133	4						160	396070	0.000	2013	
133	5						650	396720	0.000	2013	
135	4						220	396940	0.000	2013	
136	4						450	397390	0.000	2013	
138	3						120	397510	0.000	2013	
140	2						200	397710	0.000	2013	
142	1						1050	398760	0.000	2013	
142	23						800	399560	0.000	2013	
142	24						140	399700	0.000	2013	
142	25						200	399900	0.000	2013	
142	27						150	400050	0.000	2013	
142	28						200	400250	0.000	2013	
142	29						300	400550	0.000	2013	
144	4						100	400650	0.000	2013	
147	1						50	400700	0.000	2013	
149	3						200	400900	0.000	2013	
151	4						550	401450	0.000	2013	
151	6						150	401600	0.000	2013	
153	2						950	402550	0.000	2013	
153	4						600	403150	0.000	2013	
156	29						100	403250	0.000	2013	
156	30						220	403470	0.000	2013	
156	37						200	403670	0.000	2013	
156	38						100	403770	0.000	2013	
156	39						50	403820	0.000	2013	
156	41						140	403960	0.000	2013	
158	12						75	404035	0.000	2013	
158	13						700	404735	0.000	2013	
158	14						180	404915	0.000	2013	
160	1						300	405215	0.000	2013	
163	1						100	405315	0.000	2013	
163	3						155	405470	0.000	2013	
163	4						125	405595	0.000	2013	
164	3						150	405745	0.000	2013	

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165	5						250	405995	0.000	2013	
167	2						100	406095	0.000	2013	
168	2						704	406799	0.000	2013	
171	1						225	407024	0.000	2013	
172	3						130	407154	0.000	2013	
172	4						300	407454	0.000	2013	
173	7						400	407854	0.000	2013	
173	8						400	408254	0.000	2013	
173	9						250	408504	0.000	2013	
173	11						450	408954	0.000	2013	
173	15						300	409254	0.000	2013	
173	17						250	409504	0.000	2013	
173	23						900	410404	0.000	2013	
173	25						104	410508	0.000	2014	
173	27						300	410808	0.000	2014	
173	29						100	410908	0.000	2014	
173	31						20	410928	0.000	2014	
173	32						20	410948	0.000	2014	
176	1						125	411073	0.000	2014	
179	2						200	411273	0.000	2014	
179	3						50	411323	0.000	2014	
181	1						450	411773	0.000	2014	
182	6						100	411873	0.000	2014	
184	1						150	412023	0.000	2014	
184	5						600	412623	0.000	2014	
186	6						350	412973	0.000	2014	
186	10						70	413043	0.000	2014	
186	11						1200	414243	0.000	2014	
187	3						375	414618	0.000	2014	
187	24						990	415608	0.000	2014	
187	25						21	415629	0.000	2014	
187	26						80	415709	0.000	2014	
187	27						180	415889	0.000	2014	
187	28						100	415989	0.000	2014	
190	2						700	416689	0.000	2014	

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194	1						300	416989	0.000	2014	
195	5						200	417189	0.000	2014	
195	6						135	417324	0.000	2014	
196	1						200	417524	0.000	2014	
196	2						250	417774	0.000	2014	
196	3						200	417974	0.000	2014	
197	1						250	418224	0.000	2014	
197	2						50	418274	0.000	2014	
197	3						200	418474	0.000	2014	
198	1						1150	419624	0.000	2014	
199	1						225	419849	0.000	2014	
199	2						650	420499	0.000	2014	
199	3						700	421199	0.000	2014	
201	5						100	421299	0.000	2014	
205	3						250	421549	0.000	2014	
205	4						100	421649	0.000	2014	
205	6						350	421999	0.000	2014	
205	7						300	422299	0.000	2014	
205	9						450	422749	0.000	2014	
205	12						300	423049	0.000	2014	
206	2						100	423149	0.000	2014	
206	4						500	423649	0.000	2014	
210	1						1100	424749	0.000	2014	
210	2						650	425399	0.000	2014	
210	3						1450	426849	0.000	2014	
210	4						100	426949	0.000	2014	
210	6						350	427299	0.000	2014	
210	8						250	427549	0.000	2014	
210	9						100	427649	0.000	2014	
210	10						20	427669	0.000	2014	
999	4						795	428464	0.000	2014	
999	5						900	429364	0.000	2014	
999	7						885	430249	0.000	2014	