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Operations

April 8, 1992

Mr. Paul Curl, Secretary  
Washington Utilities and  
Transportation Commission  
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Olympia, WA 98504-7250

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STATE OF WASH.  
UTIL. AND TRANSP.  
COMMISSION

RE: Docket No. UG-911261  
(Revisions to Gas Safety Rules)

Dear Mr. Curl:

Washington Natural Gas Company (WNG) appreciates the opportunity to comment on the proposed revisions to WAC Chapter 480-93. We are pleased to present our thoughts on the proposal. Our comments are intended to offer a constructive perspective on the revisions. We hope they prove helpful in this proceeding.

Before stating our specific comments, we wish to make a general observation on the revisions. Many seem directed at bypass customers. If the Commission intends to make bypass activities jurisdictional, we feel that regulations should be developed which apply just to these customers and not to LDCs.

WAC 480-93-005

The revisions to this regulation include several definitions which differ from the definitions in the DOT rules (CFR 49, Section 192.3). The DOT definitions have been in place for many years. They provide continuity of understanding, application, and enforcement. We are concerned that this continuity will be upset if the Commission adopts the proposed definitions. Following are specific examples of our concerns.

The Natural Gas Pipeline Safety Act of 1968 (NGPSA) does not apply to gathering lines. Our Jackson Prairie storage facility is operated under federal jurisdiction and should be classified as a transmission facility. The Research and Special Programs Administration (RSPA) of DOT has concluded that "a variety of definitions at the state level would not be consistent with the policy of the NGPSA to get a minimum national floor for safety." See Notice of Proposed Rulemaking, 56 Fed. Reg. 48,509 (1991) (enclosed). For the same reason, we do not feel that the proposed state definition of gathering lines is consistent with the NGPSA.

The DOT definition defines a main as a distribution line that serves as a common source of supply for more than one service line. The proposed state definition would include lines which cross "public rights of way" and property "not owned by the gas company." The proposed definition would classify the vast majority of our service lines as mains since they cross public rights of way and property not owned by WNG. For that reason, we feel that the Commission should adopt the DOT definition.

It has been standard utility practice to run a "twin" service line from the service line of one building to another building. The proposed state definitions of main and service line will not allow this practice. The definitions should allow LDCs to continue running twin services consistent with standard practice. The distribution line which serves the buildings should not be categorized as a main. We will request a waiver if the definitions do not allow for twin services. (It should be noted that the DOT has already established precedent in granting waivers for twin service line installations.)

WAC 480-93-015

The federal regulation (CFR 49, Section 192.625) already requires gas in a distribution line to be odorized. We agree that odorant should be added to gas in a distribution system downstream of the point of receipt by an LDC. We do not feel, however, that gas in a transmission system which is operated under federal jurisdiction should be odorized.

Although the proposed state regulation would exempt gas transported for injection into storage, the regulation does not exempt gas which is delivered from storage. This implies that WNG must construct odorization facilities at Jackson Prairie for gas which may be transported intra-state or inter-state or returned to the storage field. We do not feel this is necessary or appropriate. Also, the use of odorant within Jackson Prairie could complicate storage operations. The scope of the regulation should be clarified to exempt pipeline facilities operated under federal jurisdiction.

WAC 480-93-017

It is unclear whether the Commission intends WNG to file design, specification, and construction procedures for storage activities at Jackson Prairie. These activities are under federal jurisdiction as stated above. The scope of the regulation should be clarified.

The regulation could also be interpreted to require formal acceptance of procedures now on file with the Commission. We feel that acceptance should be required for non-conforming procedures, but not for standard procedures. For that reason, we request that the regulation conclude as follows: "...all proposed construction plans not in conformance with a gas company's standard design,

specification, and construction procedures on file with the Commission. Facilities not in conformance with a gas company's standard design, specification, and construction procedures may not be constructed without first obtaining written Commission acceptance of the design, specification, and construction procedures to be utilized."

WAC 480-93-018

The term "maps and drawings" in the title and text should be changed to "maps, drawings, and records." We request this change because the information requested may be located in other records rather than maps and drawings. With this change, the regulation is acceptable as drafted.

WAC 480-93-030

If the Commission is concerned about the operating stress of a pipeline, we feel that a standard should be set based on a percentage of SMYS (specified minimum yield strength) rather than a MAOP range. Technology improvements in recent years (including higher yield strength pipe) allow pipelines to be designed for higher operating pressures while keeping the percentage of SMYS low. We would therefore request that the Commission define proscribed areas under the regulation as locations where a pipeline operates at a hoop stress of 20 percent or more of SMYS. Alternatively, if the Commission adheres to a MAOP range, we ask that the range be changed to 301-500 psig to allow for improved technology.

Because the proposed revisions change the definition of a proscribed area, and also change the operative verb "installed" to "operated", it is conceivable that a pipeline which is now in compliance with the existing regulation may not comply with the regulation once the revisions are adopted. Under current law, a pipeline may operate between 251 psig and 499 psig even if an outdoor theater (for example) is constructed within 100 feet of the pipeline. But under the proposed revisions, the same pipeline would have to reduce operating pressure to less than 251 psig if the theater were constructed. The Commission should specifically exempt pipelines now in operation and in compliance with the existing regulation from any need for re-authorization. We believe that pipelines which presently comply should not require re-authorization.

WAC 480-93-110

We request the Commission to clarify the scope of the revision. Does the reference to metallic gas pipelines include cast iron pipe? This pipe should be exempt from the cathodic requirement because cast iron pipe cannot be protected cathodically.

WAC 480-93-111

This regulation should exempt cast iron pipe for the reasons stated above. Also, the regulation may require WNG to replace all pipe which is not protected cathodically. If so, we have strong concerns about the financial impact of the regulation upon WNG's operations and, ultimately, upon the ratepayers. At a minimum, a reasonable and workable timetable should be developed whereby the pipe could be replaced over time. There should be some assurance of cost recovery for the significant costs involved in a replacement program.

As presently drafted, the regulation would require electrical testing to prove that facilities are not located in a corrosive environment. However, the GPTC guide for Gas Transmission and Distribution Piping Systems (1990-91) (excerpt enclosed) states that "the use of [electrical] surveys will generally be precluded in urban areas", and that "leak surveys and records review may be the most appropriate method to determine corrosion on distribution gas facilities and other facilities in urban areas." To provide more flexibility in determining a need for replacement, and to be consistent with the GPTC guide, the words "data and other means" in the last sentence should be changed to "data or other means."

WAC 480-93-120

We feel that the regulation already requires adequate protective measures be taken at any point where gas pipelines and any associated equipment are exposed, or where their location presents an unusually hazardous situation. For that reason, we request that the regulation retain the existing wording in the second line. The first sentence should begin as follows: "Proper warning signs shall be placed or other adequate protective measures taken..."

WAC 480-93-175

WNG can prepare a study on the moving or lowering of a transmission line. However, we do not believe that this requirement should be extended to other lines. There is no reason to perform studies on systems operating at 60 psig or less (which are not highly stressed). The regulation should be modified accordingly.

The study criteria include pipeline toughness. A material's ability to resist energy load up to fracture is called its toughness. This feature cannot be determined with any degree of reliability in an office environment. This requirement would essentially preclude all lowering of pipelines and moot the point of the regulation. We request that the toughness criterion be deleted from the regulation. The other study criteria are acceptable.

WAC 480-93-183

CFR 49, Section 192.201 sets acceptable limits above MAOP for pressure relieving devices. This rule allows tolerances in the operation of relief devices. In a low pressure distribution system, the pressure may not cause the unsafe operation of any connected and properly adjusted gas utilization equipment. For pipelines other than low pressure distribution systems, the tolerances are as follows: If the MAOP is 60 psig or more the pressure may not exceed the MAOP plus 10%. If the MAOP is between 12 psig and 60 psig the pressure may not exceed the MAOP plus 6 psig. If the MAOP is less than 12 psig the pressure may not exceed the MAOP plus 50%. An LDC should be allowed the same tolerances before reporting to the Commission.

We do not feel the 6 hour time frame is necessary and suggest the earliest reasonable opportunity following discovery (but not later than 24 hours). Section (2) of the proposed regulation should also be modified to read "above 300 psig" consistent with WNG's comments to WAC 480-93-030.

WAC 480-93-185

The word "methane" should read "natural gas." We also feel that the regulation should be modified to state a specific retention period for leak reports.

WAC 480-93-188

The mandatory inspection of the pipelines listed in Section (3)(e), at the proposed intervals, would result in significantly increased expense to WNG. We do not feel that inspections are necessary at the level of frequency proposed by the regulation. The DOT has issued a notice of proposed rulemaking which would amend CFR 49, Section 192.723(b)(2) as follows: "A gas detection survey must be conducted outside business districts as frequently as necessary, but at intervals not exceeding 5 years. However, for cathodically unprotected distribution lines subject to Section 192.465(e) on which electrical surveys for corrosion are impractical, survey intervals may not exceed 3 years." We therefore request that the Commission modify Section (3)(e) so that the regulation is consistent with the proposed federal amendment.

WAC 480-93-200

Notice should be provided at the earliest reasonable opportunity following discovery (but not later than 24 hours). Safety is not promoted by requiring a report under the circumstances specified in Section (1)(f).

A safety regulation should not be dictated by media reporting, for whatever reason, particularly when the "news media" includes a variety of radio, television, print, and other media located

throughout WNG's service area. We feel that Section 1(g) should be deleted.

We do not feel it is necessary or practical to provide a written report of every accident, incident, or hazardous condition (as proposed by Section 2(g)). We would be willing to make this report available upon request, consistent with the language in other regulations (including WAC 480-93-018, 480-93-082, and 480-93-111). For that reason we request that the words "upon request" be substituted for the words "within three months" in Section 2(g).

WAC 480-93-210

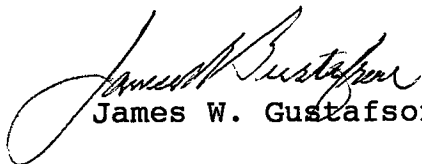
The six hour requirement should be changed to the earliest reasonable opportunity following discovery (but not later than 24 hours).

WAC 480-93-230

The last sentence in the regulation should be deleted. To the extent that the federal government provides a right of waiver but doesn't condition the exercise of that right, the proposal would infringe upon WNG's rights under federal law.

Please feel free to contact me or WNG's Director of Engineering, Clay Lofthus, should there be any questions concerning these comments.

Very truly yours,

  
James W. Gustafson

Enclosures