

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

February 29, 2012

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

Subject: Bare Steel Replacement Program Semi-Annual Progress Report (Docket 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 31st, 2011.

PSE completed the retirement of 98,580 feet of bare steel main during the calendar year of 2011. The attached table shows program targets and actual retired footage.

If you have any questions regarding this report, please contact me at (425) 462-3207.

Sincerely, Cheugh A. Mr. Shoth

Cheryl McGrath

Manager of Compliance and Regulatory Audits - Gas

CC:

Steve Secrist

Tom DeBoer

Sue McLain

Booga Gilbertson

Cathy Koch

Jenifer Tada

Carol Wallace

Harry Shapiro

Duane Henderson

Enclosure

## Bare Steel Replacement Program Semi-Annual Report

Progress Status through December 31st, 2011

Year	Plan Year	Replace Unprotected Bare - Target	Replace Protected Bare - Target	Target Totals	Running Target Totals	Actual Reported Program Footage	Non - Program Footage
2005*	Year 1	46,995		46,995	46,995	48,078	0
2006*	Year 2	99,205		99,205	99,205	88,624	1,648
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	99,205	111,127	0
2011***	Year 7	99,205	38,280	137,485	120,000	98,580	188
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	-		
Total Footage		939,840	153,120	1,092,960	663,020	725,675	19,584
Total Mileage		178	29	207	125.6	137.4	3.7

<sup>1. \*2/9/2008</sup> reconciled WUTC reported footages for year 2005 & 2006 to match program tracking documents.

<sup>2. \*\*</sup>Carry over of 10,852' of remaining target footage was completed by 02/12/2007.

<sup>3.</sup> Prior to 2010, Non Program Retirement included protected Bare and unprotected Bare replacements not originally identified in the program or being done prior to getting 'program' credit. Starting in 2010, Non Program Retirement footage will only include replacements not originally identified in the program.

<sup>4. \*\*\*</sup>Target footage will be afforded more discretion to allow more consideration to overall project efficiency as recorded per 12/01/2010 Letter of Understanding with WUTC.