



**PUGET SOUND ENERGY**

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

September 27, 2012

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**SEP 28 2012**

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 2012 Risk Assessment for the 2013 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 140,713 feet of bare steel is scheduled for replacement in 2013.

If you have any questions, please call me at 425-462-3207.

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

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Footage by Risk Model		138,893	Total 2013 Planned Replacement Footage	140,713							
"Other" Footage		-	Planned versus Target	140,000							
PI Opportunity Footage		1,820	Total Non-Program Footage	713							
Field Identified Footage		-	Total 2013 Footage	140,713							
UN AREA #	SUB AREA #	Notification #	Prioritization Method	Status	Field Completion Date	Approval Date	BS & WI Footage	Cumulative Feet	Score /Mile	Planned Replacement Year	Comments
131	12	11018012	model	development		9/18/2012	545	54965	0.874	2013	Released to Service Provider
029	12	10947384	model	permit		9/1/2010	3200	58165	0.794	2013	Released to Service Provider
130	15	11010584	model	permit		2/27/2012	200	58365	0.474	2013	Released to Service Provider
071	4	11010590	model	permit		2/27/2012	605	58970	0.424	2013	Released to Service Provider
144	1	10947364	model	permit		4/12/2012	1050	60020	0.397	2013	Released to Service Provider
030	4	11016414	model	permit		1/6/2012	2219	62239	0.382	2013	Released to Service Provider
173	18	11017913	model	development		9/18/2012	1500	63739	0.360	2013	Released to Service Provider
187	11	11016436	model	development		9/18/2012	1145	64884	0.321	2013	Released to Service Provider
025	6	11010607	model	permit		9/26/2011	1850	66734	0.278	2013	Released to Service Provider
158	1	11017874	model	development		9/18/2012	250	66984	0.269	2013	Released to Service Provider
036	1	11016415	model	design		1/12/2012	6900	73984	0.225	2013	Released to Service Provider
131	1	11010583	model	development		2011	451	74335	0.211	2013	Released to Service Provider
124	5	11016416	model	development			895	75230	0.182	2013	PSE scoping
014	2	11010606	model	design		2011	3690	78920	0.175	2013	Released to Service Provider
119	3	11016424	model	development		7/5/2012	805	79725	0.156	2013	Released to Service Provider
121	2	11016417	model	development		7/5/2012	800	80525	0.142	2013	Released to Service Provider
038	1		model				1250	81775	0.136	2013	
133	2		model				700	82475	0.135	2013	
030	6		model				110	82585	0.122	2013	
017	5	11016446	model	permit		3/14/2012	600	83185	0.121	2013	
050	11	11017821	model	permit		3/26/2012	917	84102	0.119	2013	Released to Service Provider
187	2	11016419	model	permit		1/26/2012	800	84902	0.118	2013	
210	5	11010604	model	permit		2/24/2012	100	85002	0.115	2013	
184	6	11016434	model	development		8/17/2012	300	85302	0.115	2013	Released to Service Provider
206	2		model				100	85402	0.115	2013	
187	1	11016420	model	development		9/18/2012	1700	87102	0.112	2013	Released to Service Provider
190	1	11010610	model	development		9/18/2012	3715	90817	0.109	2013	Released to Service Provider
045	3	11016426	model	permit		3/26/2012	1650	92467	0.093	2013	Released to Service Provider
173	3rem	11016396	model	permit		2011	9824	102291	0.092	2013	Released to Service Provider

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017	4	11016422	model	permit		3/14/2012	1450	103741	0.091	2013	
023	3	11017937	pi	permit		4/25/2012	220	103961	0.084	2013	Released to Service Provider
022	2	11016429	model	permit		7/3/1905	1000	104961	0.083	2013	
158	10		model				140	105101	0.082	2013	
034	2		model				1200	106301	0.081	2013	
011	6	11016423	model	development		9/18/2012	4679	110980	0.081	2013	Released to Service Provider
999	8		model				775	111755	0.079	2013	
045	1	11016437	model	permit		3/26/2012	1356	113111	0.078	2013	Released to Service Provider
055	1		model				150	113261	0.076	2013	
203	3		model				150	113411	0.076	2013	
163	3		model				155	113566	0.074	2013	
016	2		model				1292	114858	0.073	2013	
186	5		model				150	115008	0.068	2013	
028	4	11016439	model	permit		3/14/2012	1550	116558	0.067	2013	Released to Service Provider
156	13		model				175	116733	0.065	2013	
020	2	11016442	model	permit		3/14/2012	650	117383	0.065	2013	Released to Service Provider
206	1		model				100	117483	0.064	2013	
153	2		model				950	118433	0.064	2013	
104	12		model				1675	120108	0.062	2013	
135	2	11016430	model				2642	122750	0.061	2013	PSE scoping
187	7	11010611	model	development			7960	130710	0.060	2013	PSE scoping
123	2	11016427	model	development		8/17/2012	450	131160	0.058	2013	Released to Service Provider
094	2		model				200	131360	0.057	2013	
083	1		model				1920	133280	0.051	2013	
131	6	11017866	model	development		9/18/2012	1400	134680	0.051	2013	Released to Service Provider
208	5	11017865	model	development		7/5/2012	600	135280	0.050	2013	Released to Service Provider
129	1	11016425	pi				1600	136880	0.049	2013	PSE scoping
190	3	11016450	model	development		9/18/2012	3150	140030	0.049	2013	Released to Service Provider
156	42		model				1700	141730	0.046	2013	
074	1	11017956	model	development			250	141980	0.046	2013	Released to Service Provider
111	8	11017989	model	development		7/5/2012	510	142490	0.045	2013	Released to Service Provider
125	2	11017924	model	development		8/17/2012	466	142956	0.039	2013	Released to Service Provider
070	3	11010603	model	permit		3/14/2012	300	143256	0.038	2013	
184	4	11016449	model	development		8/17/2012	300	143556	0.038	2013	Released to Service Provider

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187	10	11018040	model	development		2/24/2012	300	143856	0.038	2013	Released to Service Provider
014	3	11018006	model	permit		2011	2100	145956	0.035	2013	Released to Service Provider
150	1		model				700	146656	0.033	2013	
138	2		model				100	146756	0.032	2013	
173	30		model				3238	149994	0.031	2013	
135	3		model				1200	151194	0.031	2013	
104	1		model				500	151694	0.029	2013	
134	2		model				2350	154044	0.029	2013	
136	2		model				2599	156643	0.028	2013	
019	6	11017844	model	permit		3/14/2012	3900	160543	0.026	2013	Released to Service Provider
198	2		model				375	160918	0.026	2013	
165	3		model				690	161608	0.025	2013	
209	3		model				1021	162629	0.022	2013	
124	1	11017797	model	development			4200	166829	0.022	2013	PSE scoping
111	4	11017936	model	permit		5/17/2012	1050	167879	0.022	2013	
187	23	11017820	model	development			4450	172329	0.022	2013	PSE scoping
104	8rem	11016433	model	development		7/5/2012	1117	173446	0.021	2013	Released to Service Provider
050	2	11017799	model	permit		3/26/2012	600	174046	0.020	2013	Released to Service Provider
134	1		model				950	174996	0.019	2013	
156	10		model				2559	177555	0.018	2013	
142	6		model				200	177755	0.016	2013	
201	4		model				725	178480	0.016	2013	
131	7	11017827	model	development		9/18/2012	1500	179980	0.014	2013	Released to Service Provider
094	1		model				1392	181372	0.013	2013	
210	7		model				900	182272	0.013	2013	
122	1	11017842	model	development		7/5/2012	282	182554	0.011	2013	Released to Service Provider
194	2		model				300	182854	0.011	2013	
198	1		model				1150	184004	0.010	2013	
044	3		model				1200	185204	0.010	2013	
153	5		model				700	185904	0.009	2013	
173	24		model				2000	187904	0.009	2013	
044	2		model				1268	189172	0.009	2013	
050	8		model				3361	192533	0.009	2013	
999	11		model				2600	195133	0.009	2013	

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130	11						1370	196503	0.008	2014	
083	2						400	196903	0.008	2014	
142	7						450	197353	0.007	2014	
208	4						920	198273	0.007	2014	
156	22						2350	200623	0.006	2014	
209	1						1148	201771	0.006	2014	
999	1						4582	206353	0.006	2014	
156	28						600	206953	0.005	2014	
107	3						1250	208203	0.005	2014	
156	36						85	208288	0.005	2014	
999	10						2350	210638	0.005	2014	
100	1						7585	218223	0.005	2014	
011	2						800	219023	0.004	2014	
144	3						3000	222023	0.004	2014	
999	9						3120	225143	0.004	2014	
132	2						975	226118	0.003	2014	
005	3						2013	228131	0.003	2014	
186	9						5000	233131	0.003	2014	
999	3						4391	237522	0.003	2014	
024	2						820	238342	0.003	2014	
014	1						626	238968	0.001	2014	
086	2						684	239652	0.001	2014	
090	3						700	240352	0.001	2014	
999	2						700	241052	0.001	2014	
021	4						1910	242962	0.000	2014	
003	1						275	243237	0.000	2014	
005	5						300	243537	0.000	2014	
006	1						200	243737	0.000	2014	
019	9						2800	246537	0.000	2014	
019	10						200	246737	0.000	2014	
021	3						100	246837	0.000	2014	
022	3						280	247117	0.000	2014	
023	2						550	247667	0.000	2014	
041	7						230	247897	0.000	2014	

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050	10						1330	249227	0.000	2014	
011	4						225	249452	0.000	2014	
011	8						50	249502	0.000	2014	
011	9						140	249642	0.000	2014	
012	5						590	250232	0.000	2014	
012	6						450	250682	0.000	2014	
012	7						750	251432	0.000	2014	
013	1						350	251782	0.000	2014	
025	8						525	252307	0.000	2014	
029	10						220	252527	0.000	2014	
029	11						800	253327	0.000	2014	
030	7						140	253467	0.000	2014	
031	13						150	253617	0.000	2014	
033	1						220	253837	0.000	2014	
037	4						90	253927	0.000	2014	
066	3						400	254327	0.000	2014	
066	4						140	254467	0.000	2014	
067	1						150	254617	0.000	2014	
068	1						250	254867	0.000	2014	
070	4						250	255117	0.000	2014	
071	5						300	255417	0.000	2014	
084	1						10	255427	0.000	2014	
085	4						600	256027	0.000	2014	
086	3						200	256227	0.000	2014	
087	3						160	256387	0.000	2014	
088	1						340	256727	0.000	2014	
091	2						320	257047	0.000	2014	
092	2						140	257187	0.000	2014	
092	3						160	257347	0.000	2014	
096	1						500	257847	0.000	2014	
099	5						800	258647	0.000	2014	
100	2						650	259297	0.000	2014	
102	4						220	259517	0.000	2014	
103	6						500	260017	0.000	2014	

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103	10						439	260456	0.000	2014	
104	6						214	260670	0.000	2014	
104	9						400	261070	0.000	2014	
104	10						200	261270	0.000	2014	
107	1						300	261570	0.000	2014	
108	1						500	262070	0.000	2014	
108	2						250	262320	0.000	2014	
111	9						200	262520	0.000	2014	
114	2						170	262690	0.000	2014	
114	3						150	262840	0.000	2014	
124	6						170	263010	0.000	2014	
125	3						1100	264110	0.000	2014	
129	5						180	264290	0.000	2014	
130	7						300	264590	0.000	2014	
130	12						200	264790	0.000	2014	
130	13						100	264890	0.000	2014	
130	14						200	265090	0.000	2014	
133	4						160	265250	0.000	2014	
133	5						650	265900	0.000	2014	
135	4						220	266120	0.000	2014	
136	4						450	266570	0.000	2014	
137	4						175	266745	0.000	2014	
140	2						200	266945	0.000	2014	
142	1						1050	267995	0.000	2014	
142	5						300	268295	0.000	2014	
142	23						800	269095	0.000	2014	
142	24						140	269235	0.000	2014	
142	25						200	269435	0.000	2014	
142	27						150	269585	0.000	2014	
142	28						200	269785	0.000	2014	
142	29						300	270085	0.000	2014	
147	1						50	270135	0.000	2014	
149	3						200	270335	0.000	2014	
151	6						150	270485	0.000	2014	

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153	4						600	271085	0.000	2014	
156	29						100	271185	0.000	2014	
156	30						220	271405	0.000	2014	
156	37						200	271605	0.000	2014	
156	38						100	271705	0.000	2014	
156	39						50	271755	0.000	2014	
156	41						140	271895	0.000	2014	
156	43						85	271980	0.000	2014	
158	12						75	272055	0.000	2014	
158	13						700	272755	0.000	2014	
158	14						180	272935	0.000	2014	
160	1						300	273235	0.000	2014	
163	1						100	273335	0.000	2014	
163	4						125	273460	0.000	2014	
164	3						80	273540	0.000	2014	
164	4						65	273605	0.000	2014	
165	5						250	273855	0.000	2014	
168	2						704	274559	0.000	2014	
171	1						225	274784	0.000	2014	
172	3						130	274914	0.000	2014	
172	4						300	275214	0.000	2014	
173	7						400	275614	0.000	2014	
173	8						400	276014	0.000	2014	
173	9						250	276264	0.000	2014	
173	11						450	276714	0.000	2014	
173	15						300	277014	0.000	2014	
173	17						250	277264	0.000	2014	
173	23						900	278164	0.000	2014	
173	25						104	278268	0.000	2014	
173	27						300	278568	0.000	2014	
173	29						100	278668	0.000	2014	
173	31						20	278688	0.000	2014	
173	32						20	278708	0.000	2014	
176	1						125	278833	0.000	2014	



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179	2						200	279033	0.000	2014	
179	3						50	279083	0.000	2014	
181	1						450	279533	0.000	2014	
182	6						100	279633	0.000	2014	
184	1						150	279783	0.000	2014	
184	5						600	280383	0.000	2014	
186	10						70	280453	0.000	2014	
186	11						1200	281653	0.000	2014	
187	3						375	282028	0.000	2014	
187	24						990	283018	0.000	2014	
187	25						21	283039	0.000	2014	
187	26						80	283119	0.000	2014	
187	27						180	283299	0.000	2014	
187	28						100	283399	0.000	2014	
190	2						700	284099	0.000	2014	
190	4						600	284699	0.000	2014	
193	4						700	285399	0.000	2014	
194	1						300	285699	0.000	2014	
195	5						200	285899	0.000	2014	
195	6						135	286034	0.000	2014	
196	1						200	286234	0.000	2014	
196	2						250	286484	0.000	2014	
196	3						200	286684	0.000	2014	
197	1						250	286934	0.000	2014	
197	2						50	286984	0.000	2014	
197	3						200	287184	0.000	2014	
199	1						225	287409	0.000	2014	
199	2						650	288059	0.000	2014	
199	3						700	288759	0.000	2014	
201	5						100	288859	0.000	2014	
204	1						230	289089	0.000	2014	
205	4						100	289189	0.000	2014	
205	6						50	289239	0.000	2014	
205	7						300	289539	0.000	2014	

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205	9						450	289989	0.000	2014	
206	4						500	290489	0.000	2014	
210	1						1100	291589	0.000	2014	
210	2						650	292239	0.000	2014	
210	3						1450	293689	0.000	2014	
210	4						100	293789	0.000	2014	
210	6						350	294139	0.000	2014	
210	8						250	294389	0.000	2014	
210	9						100	294489	0.000	2014	
210	10						20	294509	0.000	2014	
999	4						795	295304	0.000	2014	
999	5						900	296204	0.000	2014	
999	7						885	297089	0.000	2014	