

EXH. BTC-12
DOCKETS NOS. UE-240004/UG-240005
2024 PSE GENERAL RATE CASE
WITNESS: BRADLEY CEBULKO

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

DOCKET NOS. UE-240004 and UG-240005
(Consolidated)

**EXHIBIT BTC-12 (NONCONFIDENTIAL)
TO THE RESPONSE TESTIMONY OF**

BRADLEY CEBULKO

**ON BEHALF OF
JOINT ENVIRONMENTAL ADVOCATES**

August 6, 2024

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Dockets UE-240004 & UG-240005
Puget Sound Energy
2024 General Rate Case**

JEA Data Request No. 049

“CONFIDENTIAL” Table of Contents

	“CONFIDENTIAL” Material
Data Request No. 049	Shaded information is designated as CONFIDENTIAL per Protective Order in Dockets UE-240004 and UG-240005 as marked in Puget Sound Energy’s Response to JEA Data Request No. 049 Attachments A-C.

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Dockets UE-240004 & UG-240005
Puget Sound Energy
2024 General Rate Case**

JEA DATA REQUEST NO. 049:

Re: Decarbonization

Please refer to Landers Direct, Exh. DJL-1Tr, 32:14 – 18, where the witness writes, “Within this category, the highest priority work on the Delivery System is emergency repair, which is the repair and/or replacement of failed or compromised infrastructure, such as replacing a pole that has been damaged or has inspection results indicating imminent failure could occur.”

- a. Does PSE have a protocol, manual, framework, or other decision-making process that describes when PSE will repair, rather than replace, a segment of damaged or leaky pipe? If yes, please provide the relevant information. If not, please explain how PSE decides if it should repair or replace leaky or damaged pipe.
- b. Please identify the types of repair technologies the Company uses to address leaks or damaged pipelines. For example, grinding, deposit of weld material, sleeves, mechanical bolt on clamps, etc.
- c. Does PSE use sleeves to repair non-leaking pipes? If yes, which type of sleeve?
- d. Does PSE use sleeves to repair leaking pipes? If yes, which type of sleeve?
- e. Which material types of pipes will PSE consider for repair?
- f. When PSE repairs a pipe, what is the expected service life of the repair?
- g. Does PSE have generic estimates of costs for repair and replacement when it considers how to address a leaky or damaged pipe? If yes, please provide the relevant information.

Response:

- a) Attached as Attachments A - C are Puget Sound Energy’s (“PSE”) Gas Operating Standards (Sections 2575.1700, 2575.1710, and 2575.1800) that provide the framework for what is allowed for a given defect based on pipe material, operating pressure, defect type, extent of the damage, and whether the pipe has been structurally compromised. Engineering and field personnel evaluate and determine whether to perform a replacement or an appropriate repair method to effectively and efficiently make the system safe. Temporary repairs are typically a make safe solution such as a clamp, and permanent repairs follow a temporary repair as soon as feasible not to exceed 15 months (Attachment A, Gas Operating Standard

2575.1700, page 11, section 11.3). Permanent repair of steel pipe is done by cutting out the damaged section as a cylinder and replacing with new pipe, encapsulating the defect in a full encirclement welded split sleeve, or by installing a composite repair sleeve/seal/wrap (Attachment A, Gas Operating Standard 2575.1700, pages 5 through 10, sections 4 through 10 and Attachment B, Gas Operating Standard 2575.1710, pages 3 through 4, Tables 3.1 and 3.2). Permanent repair of polyethylene ("PE") pipe is only done by cutting out the damaged section as a cylinder and replacing with new pipe (Attachment C, Gas Operating Standard 2575.1800, page 1, section 3.3). Repair is done in accordance with the state, federal, and ASME codes.

- b) The appropriate repair method is determined based on the extent of the damage, the type of damage, and the operating pressure and material of the pipe. The only permanent repair option for PE pipe is replacement. The steel permanent repair options considered are cutting out the damaged portion as a cylinder and replacing, installing a full encirclement welded split sleeve, installing a repair clamp, installing a composite repair sleeve/seal/wrap (Clockspring, Trident), grinding out the defect, or installation of a rated fitting to encapsulate the damage (linestopper, sav-a-valve, service tee).
- c) PSE uses full encirclement welded split sleeves, bolt-on repair clamps (Plidco), and composite repair sleeve/seal/wraps (Clockspring, Trident) to repair non-leaking pipes.
- d) PSE uses leak clamps, bolt-on repair clamps, and full encirclement welded split sleeves to repair leaking pipes.
- e) For PE pipe, replacement is the only option for permanent repair. For steel, replacement or other repair options are considered.
- f) All repairs are designed to match the integrity of the pipeline and last the full service life of the asset that is being repaired.
- g) PSE does not have generic estimates of costs for repair or replacement. The cost of the repair is based on the severity of the defect, applicable repair types, operating pressure, pipe material, accessibility, and permitting/restoration costs.

Attachments A, B, and C to PSE's Response to JEA Data Request No. 49 are marked CONFIDENTIAL per the Protective Order in Dockets UE-240004 and UG-240005.

**ATTACHMENT A - C
to PSE's Response to
JEA Data Request No. 049**