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WASH. UT. & TP. COMM

February 2, 2007

Carole J. Washburn, Secretary
Washington Utilities and Transportation Commission
PO Box 47250
Olympia, WA 98504-7250

Attn: Alan Rathbun

RE: 2006 Report on Cast Iron Casing Remediation (Docket No UG-941394)

Dear Mr. Rathbun:

This letter reports the 2006 status of the program to replace steel pipe inserted in cast iron casing that was developed in response to the WUTC Audit of PSE's Central Division (UG-941394). This program was originally outlined in a letter to the WUTC dated May 19, 1995 with updates provided to the commission staff in annual status reports.

Prior to the implementation of WAC 480-93-115 in 1992, PSE had inserted approximately 11 miles of steel main into cast iron casings. WAC 480-93-115 specifies that new steel pipe shall only be encased in a bare steel casing. Of the original 11 miles, 9 miles were determined to be electrically continuous with the casing and required remediation. As of December 31, 2006, the final 0.16 miles of the 9 miles of steel pipelines in cast iron casing were replaced. The attached table provides a summary of the replacements completed for each year since the inception of the program.

The 2 miles that were determined to be electrically isolated from the casing are receiving adequate cathodic protection and will remain in service. These pipelines will continue to be monitored to ensure they remain cathodically protected and electrically isolated, and will be remediated if necessary.

This is our final report on this program. If you have any questions, please call me at 425-462-3957.

Sincerely,

Jim Hogan
Manager, Standards and Compliance

Cc: Kimberly Harris
Karl Karzmar
Sue McLain
Duane Henderson

Summary of Cast Iron Casing Remediation by Year

<u>Year</u>	<u>Miles Replaced</u>	<u>Miles Cathodically Protected</u>	<u>Annual Total</u>	<u>Cumulative Total</u>
Prior to 1999	4	0	4	4
1999	1	0	1	5
2000	0.5	0	0.5	5.5
2001	2.0	2.0	4.0	9.5
2002	1.3	0	1.3	10.8
2003	0.04	0	0.04	10.84
2004	0.0	0	0.0	10.84
2005	0.0	0	0.0	10.84
2006	0.16	0	0.16	11