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August 27, 2004

Carole J. Washburn
Executive Secretary
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive SW
Olympia, Washington 98504-7250

Subject: Comments regarding proposed revisions to Washington gas pipeline safety rules,
WAC Chapter 480-93 (Docket No. UG-011073)

Dear Ms. Washburn:

Thank you for providing NW Natural the opportunity to comment on the proposed gas pipeline safety rules (WAC Chapter 480-93). NW Natural is strongly committed to pipeline safety and the safe and reliable delivery of natural gas to our customers. We have carefully reviewed the proposed changes and respectfully submit the attached comments.

NW Natural strongly suggests that the effective date of any revision to the Washington gas pipeline safety rules be a minimum of 6 months after adoption of the final rules. This time is critical to allow operators to revise operations and maintenance manuals and procedures, as necessary, and update training and qualification of operating personnel.

We look forward to the opportunity to discuss these comments at the public hearing for adoption of the proposed rules scheduled for 9:30 a.m. on Wednesday, October 27, 2004, at the Washington Utilities & Transportation Commission's headquarters in Olympia.

Sincerely,

Bruce L. Paskett
Chief Engineer

Attachment

NW Natural's Comments Regarding the Proposed Changes to the WUTC Gas Pipeline Safety Rulemaking

August 27, 2004

WAC 480-93-005 Definitions.

- (3) "**Business district**" means an area where the public congregates for economic, industrial, religious, educational, health, or recreational purposes, and where two or more buildings within one hundred yards of each other are used for these purposes.

NWN comment: Overly broad definition. It would be nearly impossible to identify all instances pertaining to this broad definition. Further, this definition would result in a significant increase in costs without a corresponding improvement in pipeline safety.

- (16) "**Building of public assembly**" means a building that is occupied by twenty or more people for sixty days in any twelve-month period.

NWN comment: The proposed definition is overly broad and would include a large number of unintended "buildings of public assembly." We suggest that the definition incorporated in the Gas Piping Technology Committee (GPTC) Guide Material be considered.

GPTC Guide Material 192.3 Definitions (Amendment 192.93, 10/15/03):

Public place is a place that is generally open to all persons in a community as opposed to being restricted to specific persons. A public place includes churches, schools, and commercial property, as well as any publicly owned right-of-way or property that is frequented by people.

WAC 480-93-080 Welder and plastic joiner identification and qualification.

- (2) Personnel qualified to join plastic pipe must be requalified at least once annually, but not to exceed fifteen months between qualifications.
- (c) In order to ensure compliance with (b) of this subsection, each operator must have a method of tracking production fuses. This method must be outlined in the operator's procedures manual.

NWN comment: This requirement, (2)(c), would impose an extraordinary recordkeeping burden on operators with no corresponding safety benefit. NW Natural suggests that (2) and (2)(b) are redundant, and (2)(c) is unnecessary and burdensome since, under (2), personnel are to be qualified annually regardless of whether or not they have performed a production fuse (fusion).

WAC 480-93-100 Valves.

- (3) The following service line installations, over twenty feet in length, must have a shut-off valve installed far enough away from the building to be accessible in an emergency.
- (a) Services to churches, schools, hospitals.
 - (b) Services to commercial buildings within business districts.

NWN comment: As previously commented, the proposed definition of "business district" in WAC 480-93-005 (3) is overly broad, nearly impossible to identify, and will result in an excessively large inventory of commercial buildings within "business districts." This large inventory will require an extensive number of valves that are not, and were never intended to be, used to isolate segments of pipe during emergency situations.

The proposed new requirement to make the inventory of nonessential valves accessible and maintained will have a material impact on the operation and maintenance costs for operators with a negligible safety benefit. Suggest that only key emergency operating valves, as designated by the operator, "be accessible and maintained in proper working order," as required by CFR 192.745 and 192.747.

If this rule is adopted as proposed, NW Natural strongly suggests that the requirement be limited to new services installed after the effective date of the rule.

WAC 480-93-186 Leakage classification and action criteria.

- (2) Gas leak classification and repair. Each operator must establish a procedure for evaluating the concentration and extent of gas leakage. When evaluating any leak, the operator must determine and document the perimeter of the leak area. If the perimeter of the leak extends to a building wall, the operator must extend the investigation inside the building. Where the reading is in an unvented, confined space, the operator must consider the rate of dissipation when the space is ventilated and the rate of accumulation when the space is resealed.

NWN comment: If the leak does not extend to a building wall, documenting the perimeter of every leak area would be a significant burden that does not materially contribute to pipeline safety. During any follow-up inspection, NW Natural evaluates a previously identified Class B or Class C leak on an absolute basis, not a comparison basis. Each inspection is based on a new review of current conditions such as the CGI reading, distance from structures, and odor.

- (4) Leak grades.
- (d) Grade 1 and 2 leaks can only be downgraded once to a Grade 3 leak without a physical repair. After a leak has been downgraded once, the maximum repair time for that leak is twenty-one months.

NWN comment: NW Natural believes this proposed requirement is unnecessary. Under some circumstances, improved or additional information will legitimately support changing a Grade 1 or 2 leak to a Grade 3 leak without a physical repair. Federal regulations do not require repair of Grade 3 leaks. Alternatively, if this rule is adopted as proposed, NW Natural suggests that the maximum 21-month repair time is defined from the date the leak is downgraded to Grade 3.

WAC 480-93-187 Gas leak records.

- (15) Magnitude and location of CGI readings left;
- (16) Magnitude and location of CGI readings as found (showing spread of gas); and

NWN comment regarding items 15 and 16: If the leak does not extend to a building wall, documenting the perimeter of a leak area and the magnitude and location of CGI readings would be a significant recordkeeping burden that does not materially contribute to pipeline safety.

If a follow-up inspection is performed before a leak is repaired, NW Natural evaluates a previously identified Class B or Class C leak on an absolute basis, not a comparison basis. Each inspection is based on a new review of current conditions such as the CGI reading, distance from structures, and odor.

- (17) Unique identification numbers (such as serial numbers) of leak detection equipment.

NWN comment: This proposed requirement is unnecessary. Operators have programs in place to ensure the ongoing accuracy and calibration of all equipment used for leakage detection.

WAC 480-93-188 Gas leak surveys.

- (1) Operators must perform gas leak surveys using a gas detection instrument covering the following areas:
 - (a) Over all mains, services, and transmission lines including the testing of the atmosphere near other utility (gas, electric, telephone, sewer, or water) boxes or manholes, and other underground structures;
 - (c) Along walls of businesses and buildings of public assembly that are within one hundred feet of an active pipeline facility;

NWN comment: The proposed new requirements in (1)(a) and (c) are exceptionally burdensome without adding a corresponding improvement in pipeline safety. The logistics of performing leakage inspections on the property of non-customers is untenable. Company personnel will likely not have access to all walls of buildings, especially for non-customers.

- (4) Special leak surveys must be conducted under the following circumstances:
 - (a) Prior to paving or resurfacing, following street alterations or repairs where gas facilities are under the area to be paved, and where there is potential that damage could have occurred to gas facilities;
 - (b) In areas where substructure construction occurs adjacent to underground gas facilities, and there is potential that damage could have occurred to the gas facilities, operators must perform a gas leak survey following the completion of construction, but prior to paving;
 - (e) After third-party excavation damage to services, operators must perform a gas leak survey from the point of damage to the service tie-in.

NWN comment: Suggest that the proposed new requirements are broad, unnecessary, costly, and burdensome.

WAC 480-93-200 Reports associated with operator gas company facilities and operations.

(1) Every operator must give notice to the commission by telephone within two hours of discovering an incident or hazardous condition arising out of its operations that:

(c) Results in the evacuation of a dwelling, building, or area of public assembly;

NWN comment: Notification related to the evacuation of every dwelling, building, or area of public assembly will result in a untenable number of notifications to Staff.

(2) Operators must give notice to the commission by telephone within twenty-four hours of occurrence of every incident or hazardous condition arising out of its operations that:

(a) Results from construction defects or material failure;

NWN comment: Suggest that this provision be limited to only significant construction defects or material failures.