



August 27, 2004

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

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STATE OF WASHINGTON
UTILITY AND TRANSPORTATION
COMMISSION

Subject: Comments on Proposed Rule Making, Chapter 480-93 WAC

Dear Ms. Washburn:

The following are comments from the City of Renton regarding the proposed changes to the Gas Pipeline Safety Rule, Chapter 480-93 WAC.

1) Valve Maintenance Program (WAC 480-93-100 (5))

This section deals with requirements for a written valve maintenance program. The effective date of the rule is January 1, 2008. This gives the pipeline companies more than three years to comply, which seems like an extended period of time for a program that should already be in place. We feel that the time frame should be reduced to 2006 or 2007 at the latest.

2) Pipeline Markers (WAC 480-93-124)

We feel that there should be a time frame for an initial survey of pipeline markers and then a corrective action schedule to install new markers or replace missing or damaged markers. By conducting an initial survey, the pipeline company can verify the locations of existing markers and update maps that are required in section (6).

3) Increasing Maximum Allowable Operating Pressure (WAC 480-93-155)

In addition to submitting a written plan to the commission prior to increasing the maximum allowable operating pressure (MAOP), local fire and building officials should also be notified. If the increase in MAOP causes problems down the line, the fire departments will be the first ones to respond. It would be beneficial to know that the system has been checked thoroughly before pressures are increased.

4) Reporting Requirements of Proposed Construction (WAC 480-93-160)

The amendatory section does not state to whom the gas companies must report. It is assumed that the report must be submitted to the commission, but it should also be submitted to the local building and fire departments. The section includes exemptions for emergency repairs. This exemption is understandable, but local fire and building officials should be notified of every repair, either in writing or verbally.

5) Tests and Reports for Pipelines (WAC 480-93-170)

Section (1)(b) states that the operator must notify the appropriate public officials when the test medium is to be a gas or compressible fluid. We feel that it is important to name the officials,

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such as building or fire, so that there is no confusion about who should be notified. It would also be advisable to notify the local 911 dispatch in case calls are received during the test.

6) *Leakage Classifications and Action Criteria (WAC 480-93-186)*

We understand the need to classify leaks and prioritize repairs, but it is our feeling that no leaks are acceptable. The local fire department should be notified when leaks are identified and, in addition, should be supplied with the plans and schedule for repair of these leaks.

We appreciate the opportunity to comment.

Sincerely,



Kathy Keolker-Wheeler
Mayor

04-126/KKW:mp

cc: Jay Covington, CAO
Gregg Zimmerman, PBPW Administrator
Fire Chief A. Lee Wheeler
Deputy Chief Art Larson
Deputy Chief Larry Rude
Fire Marshal Stan Engler