

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Docket Nos. UG-110723
Puget Sound Energy, Inc.'s
Tariff filing for Pipeline Integrity Program**

PUBLIC COUNSEL DATA REQUEST NO. 002

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Regarding the facets of pipeline integrity management discussed on page 2, lines 8-13 of Mr. Henderson's testimony, please confirm that all of these activities were performed prior to the issuance of the DIMP final rule in December 2009. If any of these activities were not performed prior to the issuance of the DIMP final rule, then please identify which activities were not performed previously.

Response:

Yes, all of the activities discussed on page 2, lines 8-13 of the Prefiled Direct Testimony of Duane A. Henderson, Exhibit No. ____ (DAH-1T), had been performed for many years prior to the issuance of the Distribution Integrity Management Program ("DIMP") final rule in December 2009. With the exception of when gas pipe that has demonstrated integrity issues will be replaced, Puget Sound Energy, Inc.'s ("PSE") Gas Operating Standards and Field Procedures document how PSE will accomplish all of the activities discussed in Exhibit No. ____ (DAH-1T). Regarding pipe replacement, PSE has replaced pipe with integrity issues for many years. Since 1992, PSE has been focused on the programmatic replacement of certain types of pipe, initially focusing on cast iron pipe, then focusing on bare steel, and in recent years adding a focus on older vintage polyethylene and wrapped steel mains and services.