

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. 045

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**Re: PSE's Response to Public Counsel Data Request No. 15.**

Please explain why no annual report was prepared for 2008 documenting PSE gas system performance data and analysis. Please provide any data in PSE's possession of the type presented in Attachments A-H for the year 2008

**Response:**

In 2008, Puget Sound Energy, Inc. ("PSE") began evaluating revisions to the format of the system performance report. The system performance data were gathered and analyzed but the new format of the report was not formalized. As a result, the report was not formally published in 2008.

Attached as Attachment A to PSE's Response to Public Counsel Data Request No. 045 is the draft report with the gas system performance data for 2008.

Attachment A to PSE's Response to Public Counsel Data Request No. 045 is CONFIDENTIAL per WAC 480-07-160.

## Leakage Reduction

Figure 2 identifies the major causes of gas system leaks requiring repair in 2008.

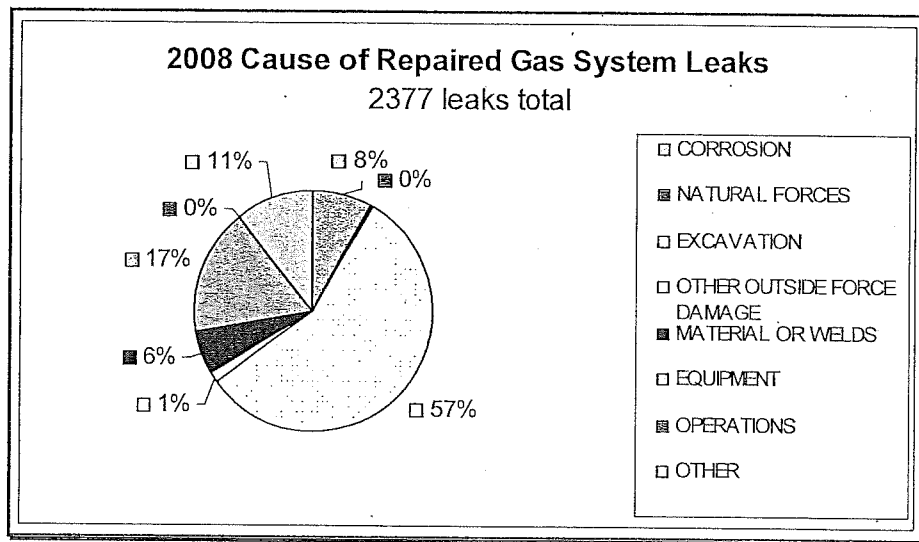


Figure 2: Causes of repaired gas system leaks

Third party damage (excavation) remains the leading cause of leaks on the system in 2008. PSE's damage prevention program is working to reduce the damage caused by excavation.

PSE proactively evaluates its active and repaired leak history trends, to monitor that an appropriate balance of leak repair versus system replacement is achieved. The Distribution Integrity Management Program (DIMP) is assisting in proactively identifying these trends. A trend where active leaks steadily decreased and repaired leaks steadily increased would typically indicate that too many leaks were repaired by addressing the individual leak rather than proactively replacing leak-prone areas or facilities.

Leakage reduction is achieved by multiple programs, which are discussed in the pages that follow.