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January 28, 2005

Carole J. Washburn, Secretary
Washington Utilities & Transportation Commission
1300 S. Evergreen Park Drive S.W.
P.O. Box 47250
Olympia, Washington 98504-7250

Subject: Docket No. UG-011073 – Gas Pipeline Safety Proposed Rulemaking – Chapter 480-93, Supplemental CR-102

Dear Ms. Washburn:

Thank you for the opportunity to comment upon the subject proposed rules.

Cascade Natural Gas Corporation (Cascade) submitted comments regarding the content of the proposed rules during earlier phases of the proposed rulemaking. We now offer the following additional comments:

General: Cascade requests that the effective date for all modified rules include consideration for the effort required by all operators to implement practices which conform to the new requirements. Compliance with all the proposed rules will take considerable resources to implement considering the number and scope of the proposed rule changes. Operators should be given explicit instruction on the implementation date for all rules as a whole, or individually. We suggest that the effective date for all proposed rules be no sooner than one year from the final order in the docket, unless otherwise specifically designated, so that each operator can comply with the requirements.

General: Cascade requests that the “retroactivity” of all design rules be stated as part of the final rule. Some of the proposed design and construction rules state applicable dates, such as 480-93-115 Casing of pipelines. Other proposed design and construction rules do not state applicable dates, such as 480-93-100 Valves. The inclusion of the applicable date in 480-93-115 Casing of pipelines is a proposed change. This change was incorporated to clarify the interpretation of the rule. We suggest that all proposed design and construction rules explicitly state the applicable dates so operators can comply with the requirements.

WAC 480-93-005 (3) Business District:

The proposed rule is too vague to apply effectively. Does a single building of any of the listed uses constitute a “majority” of the buildings regardless of the size of number of persons regularly in the building? It will be very difficult to effectively identify the use of every building that may be used for the listed purposes.

We make warm neighbors

WAC 480-93-080 Welder and joiner identification and qualification certificates:

Paragraph (2) should be clarified to indicate that it is intended to apply to heat fusion joining only and not to joining of plastic pipe with mechanical fittings.

WAC 480-93-100 Valves:

It is unclear if the intent of this rule is to require the retroactive installation of service valves in accordance with the program established in subsection (2). This must be clarified to allow operators to comply with the rule. If the rule is intended to require retroactive installation, additional time should be allowed after the program is established to install the valves.

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

The term ‘confined space’ in subsection 2 should be replaced with ‘enclosed space’ or similar term. Due to the existing use and definitions of confined space in worker safety regulations, the definition of confined space was removed from these rules. This subsection should also be changed.

WAC 480-93-18601 Leak classification and action criteria—Grade-Definition—Priority of leak repair--Examples:

The term ‘confined space’ in subsections (2) (e) and (8) (d) should be replaced with ‘enclosed space’ or similar term. Due to the existing use and definitions of confined space in worker safety regulations, the definition of confined space was removed from these rules. This subsection should also be changed.

WAC 480-93-200 Reports associated with operator facilities and operations:

The requirement of daily construction activity reports should be eliminated. This process is administratively and financially burdensome to pipeline operators with year-round construction obligations. The location and activity of any construction project or maintenance activity can be acquired by WUTC staff at any time and without prior notice to the operator. The frequency with which this information is routinely used does not appear to justify the substantial ongoing cost.

If you have questions regarding the report, please contact Keith Meissner at (206) 381-6734 or Dan Meredith at (206) 381-6720.

Sincerely,
CASCADE NATURAL GAS CORPORATION

Dan Meredith
Senior Director, Safety & Engineering