

Mr. Davis,

Thank you for your inquiry into the proposed rule making concerning protection of plastic pipe. Specifically, you have concerns with the proposed rule language regarding the minimum separation requirements between natural gas and other underground utilities. The proposed language was originally presented to stakeholders at a workshop on September 21, 2001. A copy of the proposed rules was sent out to interested parties to allow for comments prior to the scheduled workshop.

UTC staff believes that adequate separation of utilities is an important safety issue. Staff is capable of citing incidents associated with underground facilities having been installed in too close a proximity to one another. With the exception of transmission pipelines, Federal and State pipeline safety rules do not currently specify minimum separation requirements. Staff believes that current installation practices such as the ones utilized by PSE for the installation of gas main and road crossings in new residential developments, should also apply to gas services.

We do not believe that this will have a significant impact on current construction practices particularly with respect to trench dimensions. The proposed language does require a minimum of 12 inches of separation where possible. The rule language specifically allows operators to take alternative measures if the minimum separation requirements cannot be met. This can be as simple as installing a PVC conduit to protect the plastic gas service which is already a common practice. Because of this provision, staff does not believe that this will have a significant impact.

An adoption hearing has been scheduled for this Thursday, March 31 at 9:30 a.m. The public hearing process provides the opportunity to address the Commission. If you plan on attending the open meeting you will be asked to sign in and indicate if you wish to speak. I can offer one question you may be asked by the Commission and this could help you prepare for the meeting. The question you may be asked is "The Rulemaking process has been on going for a few years with many opportunities for stakeholders to participate, why have you chosen to participate at the adoption stage?" In addition, we do have information pertaining to the Rulemaking on the WUTC website.

The Rulemaking process also called for companies to submit cost to comply with the proposed rules. PSE did not submit any cost of compliance in relation to the 12 inch separation rule language.

I would be glad to talk with you further about this should you have additional questions prior to the hearing.

David Lykken
Senior Pipeline Safety Engineer
Washington Utilities and Transportation Commission
PO Box 47250
Olympia, WA 98504-7250
PH: (360) 664-1219
FAX: (360) 586-1172
dlykken@wutc.wa.gov

Alan Rathbun/WUTC

Sent by: ALan Rathbun

03/28/2005 11:48 AM

To

Sondra Walsh/WUTC@WUTC, David Lykken/WUTC@WUTC,
Ann Rendahl/WUTC@WUTC

cc

Subje
ct

Fw: changes in trench dimensions for homebuilders

Will someone please respond to this inquiry concerning our Gas Safety Rules? Please copy me with the response.

Alan E. Rathbun
Pipeline Safety Director
Washington Utilities and Transportation Commission
(360) 664-1254

----- Forwarded by ALan Rathbun/WUTC on 03/28/2005 11:46 AM -----

"Don Davis" <DDavis@mbaks.com>

03/28/2005 11:44 AM

To

<arathbun@wutc.wa.gov>

cc

Subje
ct

changes in trench dimensions for homebuilders

I am the Government Affairs director for the Master Builders Association of King and Snohomish Counties. I have been alerted by local PSE representatives that the UTC is recommending changes in trench dimensions relative to separation of gas pipelines from all utilities from 6 inches to 12 inches.

Can we get some background on this, the reason for change, hearing dates, etc.? Has the UTC researched the impact of the change?

I am simply trying to get up to speed on this in a short period of time. If you are not the correct individual to address this could you forward this to him/her please?

Thank you.

Don Davis

----- Forwarded by Sondra Walsh/WUTC on 03/29/2005 11:16 AM -----

Scott Rukke/WUTC

03/29/2005 10:44 AM

To David Lykken/WUTC@WUTC
cc Sondra Walsh/WUTC@WUTC
Subject Re: Fw: changes in trench dimensions for homebuilders

Looks good to me.

Scott Rukke
Pipeline Safety Engineer
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. SW
PO Box 47250
Olympia, WA 98504-7250
Office 360-664-1241
Cell 360-870-4923

David Lykken/WUTC

03/29/2005 10:41 AM

To Sondra Walsh/WUTC@WUTC, Scott Rukke/WUTC@WUTC
cc
Subject Fw: changes in trench dimensions for homebuilders

One more look please.

----- Forwarded by David Lykken/WUTC on 03/29/2005 10:41 AM -----

David Lykken/WUTC

03/28/2005 01:32 PM

To DDavis@mbaks.com
cc Alan Rathbun/WUTC, Sondra Walsh/WUTC@wutc
Subject
ct
Re: Fw: changes in trench dimensions for homebuilders

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