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SENT VIA ELECTRONIC MAIL 09/19/05 TO: records@wutc.wa.gov

September 19, 2005

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

**Subject: Notice of Opportunity to File Written Comments on Docket PG-050933
Rulemaking to Consider Possible Correction and Changes to Selected Rules
in Chapter 480-93 WAC, Gas Companies - Safety**

Dear Ms. Washburn:

Thank you for the opportunity to comment on the gas safety draft rules in Chapter 480-93 WAC. PSE has reviewed the draft rules that are posted on the Commission's web site and agrees with the proposed corrections and clarifications.

PSE requests an additional clarification to WAC 480-93-200(6)(b). This code section states,
“(6)Operators must file with the commission the following **annual** [emphasis added]
reports:

(b) A report titled, “Damage Prevention Statistics,” with the corresponding PHMSA
fiscal year.”

PSE understood this requirement to mean that on a calendar year basis operators would prepare a damage prevention statistics report and submit this report to the Commission by March 15 of the following year, similar to the DOT annual reports required by PHMSA (F-7100.1-1 and F-7100.2-1) that are also required to be submitted to the commission under 480-93-200(6)(a).

In an e-mail dated August 17, 2005, operators were provided a standardized form for reporting the damage prevention statistics as required by the code. This form indicates that the report data covers a period of October 1 through September 30 of each year; this time frame apparently represents the ‘PHMSA fiscal year’. PSE is unclear about the significance of reporting this data over such a time period rather than the calendar year, especially when the report is not required to be submitted until March 15 of the following year, almost six months after the end of the data period. For consistency with the reports required under 480-93-200(6)(a) and (c), PSE requests that the data for this report cover a calendar year period and be submitted to the commission with the annual report. PSE requests the following change to the rule:

(b) A report titled, “Damage Prevention Statistics,” ~~with the corresponding PHMSA
fiscal year.”~~

(iv) The report must be submitted with the operator's DOT annual report.

We appreciate this opportunity to comment on these changes and look forward to working with Staff to clarify the additional code interpretation issues that have been raised.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Hogan". The signature is stylized with a large, sweeping initial "J" and a cursive "Hogan".

Jim Hogan
Manager, Standards and Compliance

Cc: Kimberly Harris
Karl Karzmar
Sue McLain
Booga Gilbertson
Duane Henderson