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UG-010019



December 20, 2000

Douglas Kilpatrick, P.E.
Pipeline Safety Director
WA Utilities and Transportation Commission
PO Box 47250
Olympia, WA 98504-7250

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WASH. UT. & TP. COMM

RE: Request for Waiver

Attn: Mr. Scott Rutke

Avista Utilities petitions the Washington Utilities and Transportation Commission for a waiver for certain pipeline facilities from the regulatory definitions of the term "main." This request concerns the definition of "main" as prescribed by federal law in the Title 49, Code of Federal Regulations, Part 192.3. This request also addresses the definition of a "main" as prescribed by state law in WAC 480-93-005(12).

After the installation of a service line to a building a prospective customer at an adjacent building often requests gas service. There are two methods to provide service to this adjacent building: 1) Install a new parallel service line with a new connection to the main. 2) Install a "branch" service by making a connection to the existing service line and branching to the prospective customer. The branching of the service is usually a more economical means of providing service.

Once the split service is installed, that portion of the original service that serves "As a common source of supply for more than one service" would need to be re-classified as main under both the federal and state definitions. If this waiver is not granted, Avista might need to incur additional cost to bring that portion of the existing service to the standards for a main. This might include lowering the line or installing a new line at required depths. Also, initial costs would be higher to install single service lines that may or may not be split off from in the future. Both of these costs will ultimately be borne by Avista customers.

Avista often prefers to install split services for the following reasons: 1) The installation is more economical if the line is not required to meet the standards of a main. 2) The branch service eliminates construction within the road right-of-way and thereby reduces exposure to conflicts and possible hazardous exposure with existing utilities. 3) Most jurisdictions implement a moratorium on cutting new streets and overlays restricting

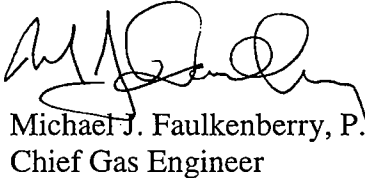
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access to our existing main. 4) Less pipe installed to serve load equates to less exposure to future dig-ins.

For these afore mentioned reasons, Avista requests a waiver which exempts it from the definition of the term "main" as prescribed in 49CFR part 192.3 and WAC 480-93-005(12) and which instead classifies as service line, any existing or future pipelines which serve buildings on a single parcel of property or which serve buildings on an adjacent or abutting property.

Sincerely

A handwritten signature in black ink, appearing to read "Michael J. Faulkenberry". The signature is fluid and cursive, with a large initial "M" and "F".

Michael J. Faulkenberry, P.E.
Chief Gas Engineer

MJF:sg