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PUGET SOUND ENERGY

Puget Sound Energy, Inc.
P.O. Box 90868
Bellevue, WA 98009-0868

July 7, 2005

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

Attn: Alan Rathbun, Pipeline Safety Director

RE: Request for Interpretation of WAC 480-93-110 Subsection 6

Dear Mr. Rathbun:

Puget Sound Energy (PSE) is requesting a formal interpretation of WAC 480-93-110 Subsection 6, effective June 2, 2005. The interpretation is in reference to the requirement that operators record the condition of underground metallic facilities anytime the facilities are exposed.

49 CFR 192.459 requires that when operators have *knowledge* that any portion of a buried pipeline is exposed it must be examined for evidence of external corrosion or coating deterioration. In addition, in 49 CFR 192.491(c) operators are required to maintain records of each inspection demonstrating the adequacy of corrosion control methods or that a corrosive condition does not exist.

PSE is requesting clarification on whether WAC 480-93-110 Subsection 6 is intended to be a duplication of the above referenced federal rules, or is it intended to exceed the federal rule by requiring operators to record the condition of underground metallic facilities *anytime* the facilities are exposed (i.e. every 3rd party excavation with a locate ticket)?

Can WAC 480-93-110 Subsection 6 be interpreted to read as follows:

> "Operators must record the condition of all underground metallic facilities each time an employee or representative of the operator exposes the facility"?

Thank you for your attention to this matter. Please contact me at 425-462-3957 if you have any questions.

Sincerely,

Jim Hogan
Manager, Standards and Compliance

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

Posted

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PUGET SOUND ENERGY

Puget Sound Energy, Inc.
P.O. Box 90868
Bellevue, WA 98009-0868

July 11, 2005

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

Attn: Alan Rathbun, Pipeline Safety Director

RE: Request for Interpretation of WAC 480-93-124 Subsection (1)

Dear Mr. Rathbun:

Puget Sound Energy (PSE) is requesting a formal interpretation of WAC 480-93-124 Subsection (1), effective June 2, 2005. The interpretation is in reference to the requirements for operators to place pipeline markers "where a pipeline or pipeline facility is exposed".

PSE understands that the incorporation of pipeline markers for exposed pipelines into 480-93-124 occurred during the recent pipeline safety rule revisions whereas previously, markers for exposed pipelines were covered under a separate rule section. Throughout the rulemaking process, operators commented on the broad implications for inclusion of pipeline markers for exposed pipelines in subsection (1) of the revised rule. Staff's responses indicated that they intended for the state rule to be more stringent than the federal regulations that require pipeline markers for exposed *mains* and *transmission lines* that are *accessible to the public*. (Ref. 49 CFR Part 192.707 (c)). In the December 2003 Staff response to November 2003 comments by operators, Staff states, "The intent of this rule is to place markers on all exposed pipes not only those that are potentially a hazardous situation." In the same set of responses, to another operator's comments, Staff states, "The intent of this rule is not to have companies place markers at risers."

PSE seeks clarification on what specific types of exposed pipelines or pipeline facilities the rule is intending to cover. From Staff's responses, PSE understands that the rule covers exposed mains, transmission lines, and service lines, whether or not these exposed facilities are accessible to the public. PSE understands that the rule does not require operators to place pipeline markers at service risers and meter sets. Is this a correct interpretation?

Thank you for your attention to this matter. Please contact me at 425-462-3957 if you have any questions.

Sincerely,

J. Hogan

Jim Hogan
Manager, Standards and Compliance

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

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PUGET SOUND ENERGY

Puget Sound Energy, Inc.
P.O. Box 90868
Bellevue, WA 98009-0868

August 22, 2005

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

Attn: Alan Rathbun, Pipeline Safety Director

RE: Request for Interpretation of WAC 480-93-124

Dear Mr. Rathbun:

Puget Sound Energy (PSE) is requesting a formal interpretation of WAC 480-93-124, effective June 2, 2005. The interpretation is in reference to the requirements for operators to place pipeline markers at certain locations for buried pipelines. PSE previously requested an interpretation on this rule as it pertains to exposed pipelines.

Prior to June 2, 2005, WAC 480-93-124 applied only to mains as transmission lines per the requirements set forth in 49 CFR Part 192.707. During the rulemaking process, PSE expressed concern regarding the wording of this rule and it was discussed at the December 9, 2003 stakeholder workshop. At that time, Staff indicated that the intent was simply to combine two rules (480-93-120 and 480-93-124) because Staff felt that the requirements for signage for exposed pipelines was unclear. PSE noted that the proposed rule language significantly broadened the scope and Staff agreed to review and reword the rule. The revised wording still did not address the scope change of the rule and PSE subsequently requested that the cross-reference to 192.707 remain in the rule text to clarify that the requirements for markers on buried pipelines apply only to mains in Class 1 or 2 locations and transmission lines.

PSE does not believe it was Staff's intent to require pipeline markers over gas services at all road crossings and at fence lines where a service crosses private property. Likewise, we do not believe it was Staff's intent to require pipeline markers over gas mains that cross roads in every class location. PSE seeks clarification on whether this a correct interpretation and further clarification on what services, if any, require pipeline markers.

Thank you for your attention to this matter. Please contact me at 425-462-3957 if you have any questions.

Sincerely,

Jim Hogan
Manager, Standards and Compliance

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

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PUGET SOUND ENERGY

Puget Sound Energy, Inc.
P.O. Box 90868
Bellevue, WA 98009-0868

June 14, 2005

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

Attn: Alan Rathbun, Pipeline Safety Director

RE: Request for Interpretation of WAC 480-93-178 Subsection 4

Dear Mr. Rathbun :

Puget Sound Energy (PSE) is requesting a formal interpretation of WAC 480-93-178 Subsection 4, effective June 2, 2005. The interpretation is in reference to the separation requirements between plastic pipelines parallel to other underground utilities.

PSE's Gas Operating Standard 2525.1700, "Excavation, Underground Clearance, Cover and Restoration" governs PSE's separation requirements for gas pipelines from other underground utilities. A copy of this standard is attached for your convenience.

In previous communications with Staff regarding the specific wording of Subsection 4, PSE was assured by Staff that the PSE Standard for clearance requirements from other utilities is prudent and achieves a high level of safety, thereby meeting the requirement set forth in WAC 480-93-178, Subsection 4 (noted below).

> (4) When installing plastic pipelines parallel to other underground utilities, operators must ensure there is a minimum of twelve inches of separation from the other utilities. Where a minimum twelve inches of separation is not possible, operators must take adequate precautions, such as inserting the plastic pipeline in conduit, to minimize any potential hazards resulting from the close proximity to the other utilities.

Per our discussions with Staff on how to clarify their position, PSE is requesting a formal interpretation indicating that PSE's Gas Operating Standard 2525.1700 Subsections 5.5 and 5.6 meet the requirements set forth in WAC 480-93-178 Subsection 4.

Thank you for your attention to this matter. Please contact me at 425-462-3957 if you have any questions.

Sincerely,

Jim Hogan
Manager, Standards and Compliance

Attachment

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

1. Scope

This Operating Standard establishes the requirements for excavation, underground clearance, cover, and restoration for new gas pipeline facilities.

2. Responsibilities

The *Manager First Response, Manager Contract Management, Manager System Control and Protection, Manager Major Projects,* and *Manager Jackson Prairie* shall be responsible for ensuring that Company facilities are installed in accordance with this Operating Standard.

3. General

(RCW 19.122 and WAC 296–155–655)

The ONE-CALL center serving the area of the excavation shall be notified at least two working days prior to any excavation activities and requested to locate all underground facilities in the immediate area.

4. Excavation

(WAC 296–155–655 and WAC 296–155–657)

4.1 The right-of-way shall be clear of all trees, stumps, and brush before excavating or trenching. This debris shall be removed from the trench line in the most effective method possible, based on the permitting requirements of the local municipality.

4.2 Trenches shall be excavated wide enough to allow proper installation of the pipe and deep enough to provide a minimum cover as specified in Section 6 of this Operating Standard.

4.3 The trench bottom shall be evenly graded to provide firm support along the entire length of the pipeline.

4.4 Employees shall be aware of the following potential hazards while working in an excavated area:

4.4.1 Materials and equipment placed too close to the excavated edge may cause a cave in. Keep materials and equipment at least 2 feet away from the edge, and secure if appropriate.

4.4.2 Cave-ins may also occur due to inadequate slope protection. Shoring is required for all excavations 4 feet or greater in depth, and in certain unstable soils in trenches less than 4 feet in depth. Refer to Operating Standard 0100.3100, "Excavation and Shoring Requirements," for Company requirements for trench protective systems.

4.5 Excavating through paved areas:

4.5.1 Undercutting of paving shall be limited to 12 inches.

4.5.2 Pneumatic or hydraulic punching or boring is preferred to open cutting, whenever practical. Water boring is generally not recommended, nor is it allowed in many jurisdictions.

4.5.3 All excavated materials shall be removed and temporary steel plating or paving shall be provided and maintained at pavement openings at all times that work is not in progress.

4.6 Excavating through unpaved areas:

4.6.1 When excavating through lawn areas, the sod shall be carefully removed from the area and laid aside for replacement after the pipe is installed. The sod shall be protected from damage and replaced in a manner satisfactory to the customer.

4.6.2 Where trees and shrubs are situated along the area to be excavated, care shall be taken to protect the tree or shrub and the main root structure from damage. Main roots encountered in the excavation shall be tunneled under and protected, if possible. Roots that lie directly in the path of the pipe may be cut.

5. Underground Clearances

(CFR 192.325)

5.1 Sufficient clearance should be maintained between pipelines and other underground structures to:

5.1.1 Permit installation and operation of maintenance and emergency control devices such as leak clamps, pressure control fittings, and pinching (squeezing) equipment.

5.1.2 Permit installation of service laterals to both the mains and to other underground structures as might be required.

5.1.3 Provide heat damage protection from other underground facilities (such as steam, electric power lines, communication lines, or cable TV), particularly where PE piping is installed in common trenches with such sources of heat.

5.2 Adjacent underground structures such as existing conduits, ducts, sewer lines, and similar structures; either active or abandoned; shall be considered when installing new mains or replacing existing mains. These and similar facilities have the potential to:

5.2.1 Provide a path for the migration of leaking gas.

5.2.2 Provide a path for leaking gas to migrate into nearby buildings.

5.2.3 Increase the susceptibility to excavator (third party) damage due to reduced excavation clearances.

5.2.4 Subject gas facilities to superimposed loads due to shifting or settlement.

5.3 Pipelines crossing under stream crossing culverts shall maintain a 12-inch clearance from the bottom of the culvert to prevent damage to the culvert during the installation activity.

5.3.1 Additional clearance may be required by the permitting agency.

5.4 Pipelines in proximity to building and structure footings and foundations shall maintain the following clearances:

5.4.1 Mains shall be separated at least 12 inches from building and structure footings or foundations when the pipe runs parallel to the building. If 12-inch separation cannot be maintained, the pipe shall be shallower than the bottom of the footing or foundation.

5.4.2 Services should be separated at least 12 inches from the building and structure when the pipe runs parallel to the building. Where 12 inches of separation is not maintained, the pipe shall be shallower than the bottom of the footing or foundation.

5.4.3 Mains and services shall not be installed in or through building footings or foundations except where necessary to provide service to the building.

5.4.3.1 Mains and services shall have a design specific to that installation and approved by a Professional Engineer, if the mains and services will be located in or through a structure.

5.5 Intermediate pressure (IP) and low pressure (LP) mains shall be installed with the following clearance from other utilities:

5.5.1 When facilities are parallel:

5.5.1.1 12-inch horizontal separation from all utilities.

5.5.2 When facilities are crossing:

5.5.2.1 6-inch vertical separation from power, if power is in conduit.

5.5.2.2 12-inch vertical separation from power, if power is direct buried.

5.5.2.3 6-inch vertical separation from all other utilities.

5.5.3 Where these separations cannot be obtained, the gas facility shall be protected from possible damage caused by proximity to the other structures or utilities by using bare-steel casing, PVC or PE pipe (whole conduit or split sleeve), or a fiberglass shield.

5.5.3.1 This exception does not apply to clearances from power.

5.5.3.2 In no case shall gas facilities be in direct contact with non-gas structures.

5.6 IP and LP services shall be installed with the following clearance from other utilities:

5.6.1 When facilities are parallel:

5.6.1.1 12-inch horizontal separation from power.

5.6.1.2 6-inch horizontal separation from all other utilities.

5.6.2 When facilities are crossing:

5.6.2.1 6-inch vertical separation from power, if power is in conduit.

5.6.2.2 12-inch vertical separation from power, if power is direct buried.

5.6.2.3 6-inch vertical separation from all other utilities.

5.6.3 Where these separations cannot be obtained, the requirements of Section 5.5.3 apply.

5.7 Other utilities may not be placed above gas piping (with the exception of crossing utilities) anywhere in the clearance zone.

5.8 Transmission lines and high pressure (HP) mains and services should be installed with the following clearance:

5.8.1 When facilities are parallel:

5.8.1.1 36-inch horizontal separation from other utilities and underground structures should be obtained to allow for the possible future need to install a high pressure repair clamp.

5.8.2 When facilities are crossing:

5.8.2.1 36-inch minimum vertical separation should be obtained from all utilities.

5.8.3 If 36 inches of separation is not possible, the maximum possible clearance shall be attained.

5.8.4 If at least 12 inches of separation is not possible, the gas facility shall be protected from possible damage caused by proximity to the other structures or utilities by using bare-steel casing, a split PVC or PE pipe, or a fiberglass shield.

5.8.4.1 This exception does not apply to clearances from power.

5.8.4.2 In no case shall gas facilities be in direct contact with non-gas structures.

5.9 Polyethylene gas mains and services (either direct burial or in casing) shall not be closer than 50 feet from any active steam lines under any circumstances.

5.10 All references to power in this section include ground rods and ground wires.

6. Cover

(CFR 192.317, CFR 192.327, and CFR 192.361)

6.1 The cover requirements in this Operating Standard are minimum Company standards. Municipalities within PSE's service area may have additional depth requirements, which must be adhered to.

6.2 Encased or conduit-inserted gas lines shall comply with the requirements in this Operating Standard.

6.3 Mains, district regulators, and related components:

6.3.1 Transmission lines and supply mains (as defined by Operating Standard 2400.1000, "Definitions") shall be buried with a minimum cover of 36 inches.

6.3.1.1 For mains that may be operated above 250 psig in the future, consideration shall be given to providing 48 inches of cover over the main.

6.3.2 Facilities that are a part of either the intermediate pressure (IP) or low pressure (LP) distribution systems should be buried with 30 inches of cover, and shall be buried with a minimum cover of 24 inches.

6.3.3 Facilities installed in a river, stream, or harbor shall have a minimum cover of 48 inches in soil or 24 inches in consolidated rock.

6.3.3.1 All pipe installed under water (that is not a river, harbor, or stream), must be installed as follows:

6.3.3.1.1 Pipe under water less than 12 feet deep must be installed with a minimum cover of 36 inches in soil or 18 inches in consolidated rock between the top of the pipe and the natural bottom.

6.3.3.1.2 Pipe under water 12 feet deep or more must be installed so that the top of the pipe is below the natural bottom, unless the pipe is supported by stanchions, held in place by anchors or heavy concrete coating, or protected by an equivalent means.

6.3.4 For gas mains under drainage/bar ditches, 36 inches of cover is required. Cover shall be measured from the lowest point of the ditch.

6.4 Service Lines

6.4.1 Service lines in rights-of-way shall be buried with a minimum cover of 18 inches.

6.4.2 The portion of a service line on private property should be buried with a minimum cover of 18 inches, and shall be buried with a minimum cover of 12 inches from final grade.

6.4.3 For service lines under drainage/bar ditches, 24 inches of cover is required. Cover shall be measured from the lowest point of the ditch.

6.4.4 Services installed in a river, stream, or harbor shall meet the cover requirements specified in Section 6.3.3.

6.5 Additional cover should be provided where the potential for damage by outside forces is greater than normal. Consideration should be given to the following:

6.5.1 Other utility crossings, see Section 5 of this Operating Standard.

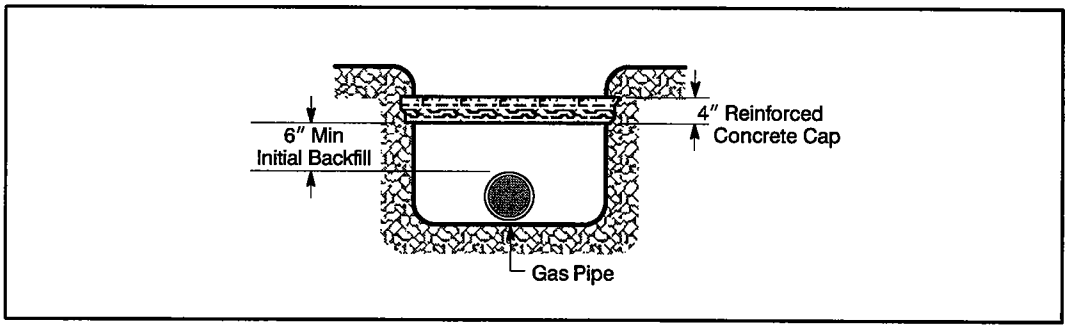
6.5.2 Locations where erosion due to wind, water, or vehicular activity may affect the grade.

6.5.3 Street locations where future street work is a possibility.

6.6 The minimum cover over any buried gas facility shall not be less than 12 inches without the specific approval of the *Manager Standards and Compliance*, even if a protective cap could be installed.

6.7 If an underground structure or formation prevents a small portion of the main or service from being installed with the minimum cover required by this Operating Standard, a protective cap shall be installed. (See Figure 6.7.)

Figure 6.7: Cover for gas pipe with a reinforced concrete cap



NOTE: Whenever the trench cover is shallower than the requirements in this Operating Standard, the foreman shall note this information on the as-built work sketch.

6.7.1 The purpose of the cap is to protect the facility from external loading from the surface and from third party damage.

6.7.2 The cap shall be separated from the carrier pipe by 6 inches of select, well-compacted backfill material that meets the initial backfill requirements of Operating Standard 2525.1800, "Backfill for Pipelines."

6.7.3 The preferred protective cap is cast-in-place concrete with a minimum compressive strength of 3000 psi, in accordance with PSE Specification 1275.1130, "Structural Concrete." The concrete shall be placed in a layer at least 4 inches thick and contain a red dye.

6.7.3.1 A split bare-steel pipe is also an acceptable protective cap.

6.7.3.2 Controlled density fill (CDF) is not an approved cap material.

6.7.3.3 Cap material and methods other than those listed shall be reviewed and approved by the *Manager Standards and Compliance* before use.

6.8 All practical steps must be taken to protect each transmission line or main from washouts, floods, unstable soil, landslides, or other hazards that may cause the pipeline to move or to sustain abnormal loads.

6.9 All aboveground gas facilities shall be protected from accidental damage by vehicular traffic or other similar causes either by being placed at a safe distance from traffic or by installing protective barriers. Refer to Operating Standard 2550.2000, "Installing Residential and Commercial/Industrial Service and Meter Set Assembly," for guard post requirements.

6.10 Cover requirements indicate the minimum cover over buried gassed up pipelines.

7. Restoration

7.1 All areas where earth has been moved, equipment has operated, or material was stored shall be restored as close to their original profile and condition as practical.

7.1.1 Grading of unimproved rights-of-way shall minimize interference with existing drainage. All grading shall be finished to restore the drainage or water flow conditions as close to the original condition as practical, and shall conform to regulations of governmental authorities having legal jurisdiction.

7.1.2 All surplus excavated material, debris, or construction material shall be removed from the job and the site left in a clean and neat condition. All paved areas shall be washed or swept to remove spoils.

7.1.3 Lawn areas shall be graded and sod replaced at the original ground level. In areas where the turf has been destroyed, sufficient top soil shall be added to bring the area to its original grade and the area shall be re-seeded with a good grade of lawn seed.

7.1.4 The surface of all roads and streets shall be restored to a condition that is similar to the original surface. Drainage ditches, drain tile, and culverts that were impacted by the construction shall be restored or relocated to the satisfaction of the agency providing the permit.

7.1.5 All damaged paving, sidewalks, curbs, and paved driveways shall be replaced to the satisfaction of the permitting agency and the Company representative.

7.2 The excavator, whether Company or contractor crew, shall be responsible for controlling or repairing settlement of backfill for a period of time, which varies for different jurisdictions in PSE's service territory. This includes the cost of any paving repair necessary due to failure of backfill.

7.2.1 If a PSE contractor is found to be responsible for any failure, the contractor shall be given written notice to repair the observed defects. If not corrected within three days, the Company may make the repairs, either with its own crews or by others, and charge the repair cost back to the contractor.

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PUGET SOUND ENERGY

Puget Sound Energy, Inc.
P.O. Box 90868
Bellevue, WA 98009-0868

August 22, 2005

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

Attn: Alan Rathbun, Pipeline Safety Director

RE: Request for Interpretation of WAC 480-93-186 Subsection (4)

Dear Mr. Rathbun:

Puget Sound Energy (PSE) is requesting a formal interpretation of WAC 480-93-186 Subsection (4) effective June 2, 2005. The interpretation is in reference to the downgrading of leaks and the repair time requirements.

WAC 480-93-186 Subsection (4) stipulates that, "Grade 1 and 2 leaks can only be downgraded once to a Grade 3 leak without a physical repair. After a leak has been downgraded once, the maximum repair time for that leak is twenty-one months."

Through the rulemaking process Staff stated:

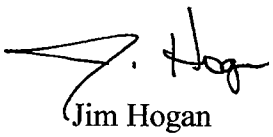
- "The intent on this part of the rule is to disallow the grade 2 repair time to continually be re-started by down grading leaks." (*June 25, 2003 Response to comments on the January 17, 2003 draft rules*)
- "The proposed rule requires companies to fix leaks and not regrade leaks numerous times. When a leak has been regraded and the same leak is later found at a more severe grade, the leak must be repaired." (*CR-102 notice filed July 21, 2004 WSR 04-15-141*)
- "The intent of the proposed rule is to eliminate the continual regrading of leaks without repair." (*March 11, 2005 Response to comments on the January 7, 2005 draft*)

Based upon Staff's stated intent during the rulemaking process, PSE understands that the rule allows a Grade 1 or Grade 2 leak to be downgraded to a Grade 3 leak once without any physical modification to the pipeline. If the same leak is later 'upgraded' during a subsequent reevaluation [reevaluated within 15 months per 480-93-18601 (3)(a)] the leak must be repaired and the maximum repair time is 21 months. The leak cannot be downgraded again without a physical repair. However, as long as the 'downgraded' leak remains a Grade 3 (downgraded with or without a repair), no repair is required, per 480-93-18601 Table 1.

Is this interpretation correct?

Thank you for your attention to this matter. Please contact me at 425-462-3957 if you have any questions.

Sincerely,



Jim Hogan
Manager, Standards and Compliance

cc: Sue McLain
Booga Gilbertson
Duane Henderson
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Karl Karzmar

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PSE PUGET SOUND ENERGY

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July 14, 2005

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

Attn: Alan Rathbun, Pipeline Safety Director

RE: Request for Interpretation of WAC 480-93-200 Subsection (1)(d)

Dear Mr. Rathbun:

Puget Sound Energy (PSE) is requesting a formal interpretation of WAC 480-93-200 Subsection (1)(d) effective June 2, 2005. The interpretation is in reference to the telephonic notification requirements for incidents resulting in unintentional ignition of gas.

PSE seeks clarification on whether "fire first" incidents that result in damage to PSE gas facilities are reportable under this rule. PSE considers a "fire first" event to be an incident in which a building is on fire and subsequently ignites PSE's gas facilities, but the fire was not caused by a gas leak. In many cases, the gas supply system in the building and/or PSE's meter assembly may be compromised or damaged by the fire and contributes to its intensity until the gas can be shut off.

It is PSE's understanding that "fire first" incidents would not be reportable under this rule. Whereas, we would consider an event that causes damage to PSE's facilities resulting in a release of gas, such as a vehicle striking a meter assembly, to be reportable if the leaking gas subsequently ignites. Is this interpretation correct?

Thank you for your attention to this matter. Please contact me at 425-462-3957 if you have any questions.

Sincerely,

J. Hogan

Jim Hogan
Manager, Standards and Compliance

cc: Sue McLain
Booga Gilbertson
Duane Henderson
Kimberly Harris
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PSE PUGET SOUND ENERGY

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July 7, 2005

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

Attn: Alan Rathbun, Pipeline Safety Director

RE: Request for Interpretation of WAC 480-93-200 Subsection (1)(h)

Dear Mr. Rathbun:

Puget Sound Energy (PSE) is requesting a formal interpretation of WAC 480-93-200 Subsection (1)(h), effective June 2, 2005. The interpretation is in reference to the telephonic notification requirements for incidents resulting in news media reporting the occurrence.

PSE seeks clarification on whether the rule requires operators to notify the Commission based on a determination of whether news media *intends to report or has already reported* the occurrence of an incident, or whether the intent was that operators only notify the Commission of the incidents where media has actually *contacted* the operator.

Thank you for your attention to this matter. Please contact me at 425-462-3957 if you have any questions.

Sincerely,

Jim Hogan
Manager, Standards and Compliance

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