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August 11, 2011

David Danner, Executive Director
Washington Utilities and Transportation Commission
PO Box 47250
Olympia, WA 98504-7250

Attn: David Lykken, Pipeline Safety Director

RE: Temporary Pressure Authorization for the North Tacoma Supply, Sumner Supply, Salishan Supply, and Pierce Transit Supply

Dear Mr. Lykken:

Pursuant to WAC 480-93-020, Puget Sound Energy (PSE) requests approval to temporarily operate the North Tacoma Gate Station outlet piping, North Tacoma Supply, Sumner Supply, Salishan Supply, and Pierce Transit Supply at a pressure in excess of 250 psig but not to exceed 275 psig for a total of 48 hours within a 30 day period.

The Salishan HP Uprate Project is scheduled to be completed between August 15th and September 30th, 2011. The purpose of the uprate project is to increase the Maximum Allowable Operating Pressure (MAOP) in the Salishan HP Supply system from the current 150 psig to 250 psig. This increase in pressure will improve reliability to the south Tacoma area, including the Pierce Transit supply system. Timing of this project is in part necessitated by a Washington Department of Transportation freeway project involving the I-5 bridge widening at Portland Street in Tacoma, which will require the rerouting of a portion of the Salishan system. This rerouting project will result in the Salishan system connecting directly to the North Tacoma Supply system upstream of the existing North Tacoma Limit Station (LS-2661).

To ensure that the entirety of the Salishan system will be subjected to a pressure no less than 250 psig during the fourth and final incremental pressure increase and subsequent leak survey, the pressure of the North Tacoma Supply system may need to be raised above its current 250 psig operating pressure. Pressures into the system will be controlled via the North Tacoma Gate Station (GS-1349). Best efforts, including time of day and possible curtailment of loads, will be taken to minimize the elevated pressure required to achieve a successful uprate. At no time will the pressure exceed 275 psig. PSE Gas Control will monitor system pressures continuously throughout the process and maintain direct communication with on-site pressure control personnel.

In addition to the Salishan and North Tacoma Supply systems, piping in the Sumner and Pierce Transit supply systems may also experience elevated pressures during the final pressure increment.

Following completion of the uprate process, a leak survey will be conducted on all piping in the four systems impacted by this procedure.

All other connected supply systems will be isolated or regulated by either closing or throttling a valve as reflected in Appendix A.

The North Tacoma Supply subject of this request consists of approximately 9.4 miles of 16" HP main, 0.5 miles of 8" HP main, and 0.1 miles of 2" HP main. An uprate procedure was conducted on this piping in May 1971, raising the MAOP to 300 psig. Each pipe segment in the North Tacoma Supply has been previously tested to a pressure that would qualify the supply for 300 psig operation.

The Sumner Supply consists of approximately 3.5 miles of 6" HP main and 0.3 Miles of 8" HP main. An uprate procedure was conducted on this supply in October 2002, raising the MAOP to 250 psig. Each pipe segment in the Sumner Supply has been previously tested to a pressure that would qualify the supply for 300 psig operation.

The Salishan Supply consists of 6.1 miles of 8" HP main. The MAOP of this supply is currently limited to the highest operating pressure between 1965 and 1970 to 150 psig. The pipeline has been previously tested to a pressure that would qualify the supply for 300 psig operation when each main segment was originally installed. This supply will be uprated from 150 psig to 250 psig in accordance with the written uprate plan.

The Pierce Transit Supply consists of approximately 3.5 miles of 6" HP main. Piping in this system was pressure tested in November 1999 to a pressure that would qualify the system for 268 psig operation. However, the MAOP of this system is limited by several components that are rated for 250 psig.

While a detailed survey on the number of structures that are located within 100 ft in proximity of the four HP systems was not conducted, PSE is taking a more conservative approach to sent out a written notification regarding the temporary system pressure increase to 1481 addresses which their parcels are within 100 ft in proximity to the four systems. Appendix C contains a list of these addresses.

The four HP systems that are included in this request are below a Design Factor of 0.20 which exceed the 0.4 factor for Class 4 locations per CFR 49 192.111.

Sincerely,

Cheryl A McGrath

Cheryl McGrath,
Puget Sound Energy
Manager Gas Compliance and Regulatory Audits

Enclosures:

cc: Cathy Koch, Director Compliance
Jennifer Tada, Director Planning
Greg Zeller, Director Engineering
Duane Henderson, Manager Gas System Integrity
Scott Bradshaw, Manager Engineering