



December 8, 2016

Alan Rathbun
Pipeline Safety Director
Washington Utilities and Transportation Commission
Pipeline Safety Section
1300 S. Evergreen Park Drive S.W.
PO Box 47250
Olympia, WA 98504-7250

RE: Frederickson Gate Station Pressure Authorization

Dear Mr. Rathbun,

Pursuant to WAC 480-93-020, Puget Sound Energy (PSE) requests approval to operate new piping at the Frederickson Gate Station at a pressure of up to 960psig. The improvements to this station will provide additional gas supply to the Tacoma area, ensuring reliability as growth increases.

Existing piping owned and operated by Williams Northwest Pipeline is being retired, and PSE plans to construct and operate a new station. The design, construction, operation and maintenance of the station will exceed the minimum federal safety regulations in the following areas:

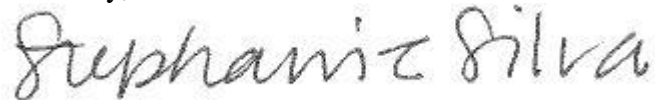
- **Class location:** The design and construction specifications meet or exceed the requirements for a Class 4 location. (192.5)
- **Design Factor:** PSE's design factor of 0.20 exceeds the 0.40 factor for Class 4 locations. (192.111)
- **Nondestructive Testing:** PSE's radiographic inspection plan for the new construction is identical to the Class 3 and Class 4 requirements for transmission lines. This exceeds the minimum federal safety regulations which do not require nondestructive testing of pipelines operating below 20% SMYS. (192.241 and 192.243)
- **Cover:** PSE's standards require a minimum cover of 36" over high-pressure distribution mains. This exceeds the minimum federal requirements of 24". (192.327(b))
- **Leakage Survey:** In accordance with PSE standards, the gate station piping is currently leak surveyed on an annual basis, which exceeds the federal and state requirement of 5 years for mains outside of business districts and places of public assembly. (192.723 and WAC 480-93-188)

There is a single commercial structure in proximity to the gate station site. PSE will provide notification to the identified property owner in advance of any scheduled open hearing with regard to this request.

Please see attached exhibit A for a description of the facilities, exhibit B for a station diagram and proximity map.

Please feel free to call me with any questions.

Sincerely,

A handwritten signature in black ink that reads "Stephanie Silva". The signature is written in a cursive, slightly slanted style.

Stephanie Silva
Gas Compliance Program Manager
425-462-3923

Enclosures:

Exhibit A – Facility Description
Exhibit B – Station Map/Diagram