

December 28, 2017

Sean Mayo 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

Dear Mr. Mayo,

RE: Golden Give 12-inch Natural Gas Pipeline Project - Pressure Authorization

Pursuant to WAC 480-93-020, Puget Sound Energy (PSE) requests approval to operate a new 12" pipeline at a pressure in excess of 250 psig. This pipeline along with the new Golden Given Limit Station will provide additional natural gas supply to the general Tacoma gas distribution system. The project will ensure reliability as growth increases.

The scope of this request is to operate a new 12" pipeline up to 490 psig. This pipeline will tie in to an existing 12" pipeline near the intersection of 112th Street E and Golden Given Road. The pipeline will follow Golden Given Road north to the intersection of 99th Street E, then continue west on 99th Street E approximately 500 feet into the new Golden Given Limit Station at 964 99th Street E. Refer to Exhibits A through C for a project description, facilities map, and list of nearby structures.

The 12" main and Limit Station will operate at a hoop stress below 20 percent SMYS at an operating pressure of 490 psig.

The design, construction, operation and maintenance of the new pipelines 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)

• **Valve Spacing**: Valves will be installed at a spacing less than 1 mile apart in accordance with PSE's standards. This spacing exceeds the 2-1/2 mile maximum spacing requirement for transmission line valves in Class 4 locations. (192.179). There are no specific valve spacing requirements for high-pressure distribution systems. (192.181)

• **Nondestructive Testing**: PSE's radiographic inspection plan for the proposed 12" line is identical to the Class 3 and Class 4 requirements for transmission mains. 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)) The proposed main will be installed with 48" of cover wherever possible.

• Leakage Survey: In accordance with PSE standards, the pipeline will be leak surveyed annually since it operates at 490 psig. This is in excess of the 5-year frequency required by 192.723 for distribution systems outside of business districts.

PSE is planning on providing notification to the identified property owners in advance of any scheduled open hearing with regard to this request. Please inform us of the date of the open meeting under which this request will appear so that we can include the meeting time and location in our letters to the property owners.

If you require any additional information, please call me at (425) 462-3575.

Sincerely,

Lee Mayhuell

Lee Maxwell Sr. Regulatory Compliance Analyst

- Enclosures: Exhibit A- General Information Exhibit B- Map Exhibit C- Structure Survey
- Cc: Booga Gilbertson, Senior VP Operations Cara Peterman, Director Enterprise Risk Management Cheryl McGrath, Manager Compliance Programs Jennifer Boyer, Manager Engineering Duane Henderson, Manager Gas System Integrity David Landers, Director Engineering