

September 12, 2001

Ms. Carole J. Washburn
Executive Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. S.W.
P.O. Box 47250
Olympia, WA 98504 – 7250

Re: Notice of Opportunity to File Written Comments
Pipeline Safety Chapter 480-93
Docket No. UG-011073

Dear Ms. Washburn:

Avista Utilities, Cascade Natural Gas Corp., Northwest Natural and Puget Sound Energy submit the following sections of “WAC 480-93 Gas Companies – Safety” as examples of the potential changes to be reviewed based on the criteria in your August 10, 2001 letter:

WAC 480-93-005 Definitions - Clarify the application of the “Transmission line” definition for distribution operations within Washington. Further clarify definitions for “Master Meter” and “Business Area” to ensure consistent and intended application.

WAC 480-93-020 Proximity considerations – Base the requirements of this section on percent of specified minimum yield strength (SMYS) as determined by hoop stress, instead of pressure. Regardless of a pipeline’s operating pressure, pipeline safety can be improved by designing pipe to operate at a set stress level, optimizing wall thickness and/or the yield strength of the steel. Determine appropriate criteria for pipe design within these areas.

WAC 480-93-030 Proscribed areas – See comments associated with WAC 480-93-020 above.

WAC 480-93-110 Corrosion Control – Revise this section to require action to be initiated, but not necessarily completed within ninety days to correct any deficiencies with cathodic protection. The current requirement to complete the work in ninety days is not always achievable due to the time required to determine the cause of the deficiency, obtaining the required permits to perform remediation and allowing for weather conditions.

WAC 480-93-115 Casing of Pipelines – Clarify that this rule does not apply for previously installed casing installations. Modify rule to recognize testing methods other than directly installed test leads such as use of an adjacent steel service and a casing vent or other appropriate methods filed as part of the required Operations and Maintenance Plan.

WAC 480-93-150 Station Maintenance – Revise this section to clarify that equipment no longer being maintained shall be removed from operation.

WAC 480-93-183 Pipeline and system pressure reporting – Again, as addressed in 480-93-020, we believe that stress is more important than pressure. We advocate that the reporting guidelines in this section be based on percent of SMYS as determined by hoop stress or other design-based criteria, instead of pressure.

WAC 480-93-200 Reports associated with gas company facilities and operations – The reporting of events or incidents solely based on media coverage is difficult to accomplish and does not appear to improve information availability for Commission staff. Gas company personnel cannot monitor all media sources, but can determine if an incident should be reported based on the facts of the incident. We suggest that a telephonic report not be necessary if the incident only meets the criteria of “results in news media reporting the occurrence”. We propose that unless the incident also involves significant damage to the property of the company and others or involves injury or death, we would not telephonically report incidents that “result in news media reporting the occurrence”.

We appreciate the opportunity to be involved in this review process. We look forward to meeting with you in the future to continue work on this effort.

Respectfully yours,

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