Summary of Written Comments Rulemaking to Consider Amending WAC 480-93, Relating to Gas Companies Safety For April 25, 2008 Comments Docket PG-070975

Revision Date: 4/30/08

ISSUE	INTERESTED PERSON	COMMENTS	STAFF RESPONSE
1) WAC 480-93-005 (13) Definition	NORTHWEST GAS ASSOCIATION (NWGA)	13) "Gas Pipeline Company" NWGA Comment: - Last sentence. This definition should be identical to the definition set forth in RCW 81.88.010. Consequently, the word "gas" should be inserted before "pipeline company" in the last sentence. The sentence should read: "that contract with a gas pipeline company."	Agree – Rule has been amended to reflect the proposed change.
		19) "Master Meters System" NWGA Comment: Replacing the reference to 49 CFR § 191.3 with static language may compel future rulemakings to ensure consistency, should the federal code be changed. Why make the change?	No change to rule. The proposed rule is currently drafted in accordance with the suggested change.
2) WAC 480-93-185 Gas Leak Investigation	NWGA	3) NWGA Comment: Second sentence, lines 6-7. This section refers to the responsibility of a gas pipeline company to promptly report certain leaks to a third party owner or operator of the source facility. Therefore, the term "operator" in line 6 should be retained and not replaced with "gas pipeline company". The resulting language should read: "must be reported to the owner or operator gas pipeline company of the source facility"	Agree – Rule has been amended to reflect the proposed change.

ISSUE	INTERESTED PERSON	COMMENTS	STAFF RESPONSE
3) WAC 480-93-240 Annual Pipeline Safety Fee Methodology	NWGA	NWGA Comment: The term "gas pipeline" is defined in RCW 81.88.010 as pipe. "Gas pipeline company" would be a more appropriate term. Definitions for both terms (identical to those in RCW 81.88.010) are being added to WAC 480-93-005 under this rulemaking so it seems unnecessary to reference the RCW. Also, there is no need to refer to hazardous liquid pipelines in WAC 480-93. Therefore, the paragraph should read "regulatory fee paid by a gas pipelines pipeline company as that term is defined herein, and hazardous liquid pipelines as that term is defined in RCW 81.88.010. For the purposes of this section, these gas pipelines are a gas pipeline company is called "company" or "companies" and "	Agree with most of the proposed change – rule has been amended to include the proposed change except for ""herein" language.