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September 17, 2013

Washington Utilities and Transportation Commission
Pipeline Safety Section
1300 S. Evergreen Park Drive S.W.
P.O. Box 47250
Olympia, WA 98504-7250

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Pipeline Safety Program

Attn: Dave Lykken, Pipeline Safety Director

**RE: Wrapped Steel Service Assessment Program 2013 Risk Model Results
(Dockets PG-041624)**

Dear Mr. Lykken,

Attached are the results of the 2013 risk model run for PSE's Wrapped Steel Service Assessment Program (WSSAP). This information is provided in accordance with the requirements of the settlement agreement contained in docket PG-041624. Provided below is a brief discussion of some of the major drivers to the changes in the number of services reported.

Overall we have a slight decrease in the number of this vintage and type (pre-1972 wrapped and cathodically protected steel) since the model was run in 2012. This decrease is due to services being mitigated through WSSAP, bare steel replacement, and other operation and maintenance activities.

Priority Replacement

A total of 36 services have been identified for priority replacement and will be included in the 2014 replacement effort. These priority replacement services are mostly the result of either disbonded coating or new active leaks.

Scheduled Replacement

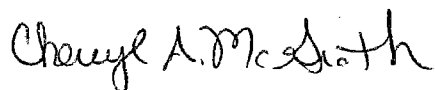
A total of 187 services have been identified for scheduled replacement. The majority of these services are off of bare steel mains and will be replaced in conjunction with the main replacements that will be completed in 2014.

Increased Leak Survey

This category has also seen a slight decrease in the number of services due to services being mitigated through WSSAP, bare steel replacement, and other operation and maintenance activities.

PSE appreciates the opportunity to continue to work with Staff on this program. Should you have any additional questions, please call me at (425) 462-3207.

Sincerely,



Cheryl McGrath
Manger, Gas Compliance and Regulatory Audits

cc: Booga Gilbertson
Steve Secrist
Jennifer Tada
Catherine Koch
Tom DeBoer
Duane Henderson

2013 WSSAP Model Results

Mitigation Category	2006 Model Results	2007 Model Results	2008 Model Results	2009 Model Results	2010 Model Results	2011 Model Results	2012 Model Results	2013 Model Results
Priority	516	216	212	79	91	120	71	36
Scheduled Replacement	8,470	8,092	4,682	2,077	303	266	211	187
Increased Leak Survey	23,100	23,258	22,913	22,760	22,731	22,240	22,372	22,281
Standard Mitigation	69,281	69,742	68,660	68,280	67,658	66,719	66,698	66,724
Subtotal	101,367	101,308	96,467	93,196	90,783	89,345	89,352	89,228