



Puget Sound Energy
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September 15, 2015

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

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Pipeline Safety Program

Attn: Alan Rathbun, Pipeline Safety Director

**RE: Wrapped Steel Service Assessment Program 2015 Risk Model Results
(Docket PG-041624)**

Dear Mr. Rathbun,

Attached are the results of the 2015 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.

In 2015 we replaced vintage STW services through the WSSAP, DIMP, and other operation and maintenance activities. The 2015 population reflects a net increase in the total number of this vintage and type (pre-1972 wrapped and cathodically protected steel) since the model was run in 2014. This net increase is due to ongoing refinement of model data. A total of 76 services have been identified for priority replacement and will be included in the 2016 replacement plan. There are 535 services that are in the Scheduled Replacement category. The majority of these services will be planned for mitigation in 2016. The remaining services are either Increased Leak Survey or Standard Mitigation and will be operated and maintained in accordance with the settlement agreement requirements based on their mitigation category.

PSE appreciates the opportunity to continue to work with Staff on this program. Should you have any additional questions, please call me at (425) 462-3923.

Sincerely,

Stephanie Silva
Gas Compliance Program Manager, Compliance Programs

cc: Steve Secrist
Booga Gilbertson
Cathy Koch
Harry Shapiro
Duane Henderson
Cara Peterman



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Summary of Wrapped Steel Service Assessment Mitigation Categories
 based on the 2015 WSSAP Risk Model Results

Mitigation Category	Action	2006 Model Results	2007 Model Results	2008 Model Results	2009 Model Results	2010 Model Results	2011 Model Results	2012 Model Results	2013 Model Results	2014 Model Results	2015 Model Results
Priority	Service Replacement	516	216	212	79	91	120	71	36	24	76
Scheduled	Service Replacement	8,470	8,092	4,682	2,077	303	266	211	187	390	535
Increased Leak Survey	Annual Leak survey	23,100	23,258	22,913	22,760	22,731	22,240	22,372	22,281	21,959	21,742
Standard Mitigation	Standard Operation and Maintenance	69,281	69,742	68,660	68,280	67,658	66,719	66,698	66,724	66,334	67,057
Subtotal		101,367	101,308	96,467	93,196	90,783	89,345	89,352	89,228	88,707	89,410