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September 12, 2019

Sean Mayo, Pipeline Safety Director Washington Utilities and Transportation Commission P.O. Box 47250 Olympia, WA 98504-7250

Attn: Sean Mayo, Pipeline Safety Director

RE: Wrapped Steel Service Assessment Program 2019 Risk Model Results (Dockets PG-041624)

Dear Mr. Mayo,

Attached are the results of the 2019 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.

Overall we have a decrease in the number of this vintage and type (pre-1972 wrapped and cathodically protected steel) since the model was run in 2018. This decrease is due to services being mitigated through WSSAP and other operation and maintenance activities. A total of 15 services have been identified for priority replacement and will be included in the 2020 replacement plan. There are 116 services that are in the Scheduled Replacement category. The majority of these services will be planned for replacement in 2020. 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) 462-3575.

Sincerely,

Lee Mayhuell

Lee Maxwell Sr. Regulatory Compliance Analyst Compliance Programs Puget Sound Energy Phone: 425-462-3575 Cell: 425-417-5256

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Summary of Wrapped Steel Service Assessment Mitigation Categories based on the 2019 WSSAP Risk Model Results

WUTC

| 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 | 2014 Model Results | 2015 Model Results | 2016 Model Results | 2017 Model Results | 2018 Model Results | 2019 Model Results |
|------------------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| Priority | 516 | 216 | 212 | 79 | 91 | 120 | 71 | 36 | 24 | 12 | 24 | 10 | 15 | 15 |
| Scheduled Replacement | 8,470 | 8,092 | 4,682 | 2,077 | 303 | 266 | 211 | 187 | 390 | 175 | 124 | 67 | 92 | 116 |
| Increased Leak Survey | 23,100 | 23,258 | 22,913 | 22,760 | 22,731 | 22,240 | 22,372 | 22,281 | 21,959 | 21,414 | 21,108 | 20,976 | 20,712 | 20,479 |
| Standard Mitigation Subtotal | 69,281 101,367 | 69,742 101,308 | 68,660 96,467 | 68,280 93,196 | 67,658 90,783 | 66,719 89,345 | 66,698 89,352 | 66,724 89,228 | 66,334 88,707 | 64,802 86,403 | 63,767 85,023 | 63,156 84,209 | 62,454 83,273 | 61,827 82,437 |