

September 14, 2020

Washington Utilities and Transportation Commission  
Pipeline Safety Section  
621 Woodland Square Loop S.E.  
Lacey, WA 98503

Attn: Sean Mayo, Pipeline Safety Director

**RE: Wrapped Steel Service Assessment Program 2020 Risk Model Results (Dockets PG-041624)**

Dear Mr. Mayo,

Attached are the results of the 2020 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 2019. This decrease is due to services being mitigated through WSSAP and other operation and maintenance activities. A total of 16 services have been identified for priority replacement and will be included in the 2021 replacement plan. There are 71 services that are in the Scheduled Replacement category. These services will be planned for replacement or other risk mitigation in accordance with the requirements of the settlement agreement. 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) 424-7839.

Sincerely,

*Vidushi Raina*

Vidushi Raina  
Program Manager, Gas Compliance  
Puget Sound Energy  
Phone: 425-424-7839  
Cell: 404-558-8203

Summary of Wrapped Steel Service Assessment Mitigation Categories based on the 2020 WSSAP Risk 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	2014 Model Results	2015 Model Results	2016 Model Results	2017 Model Results	2018 Model Results	2019 Model Results	2020 Model Results
Priority	516	216	212	79	91	120	71	36	24	12	24	10	15	15	16
Scheduled Replacement	8,470	8,092	4,682	2,077	303	266	211	187	390	175	124	67	92	116	71
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	20,403
Standard Mitigation	69,281	69,742	68,660	68,280	67,658	66,719	66,698	66,724	66,334	64,802	63,767	63,156	62,454	61,827	61,469
Subtotal	101,367	101,308	96,467	93,196	90,783	89,345	89,352	89,228	88,707	86,403	85,023	84,209	83,273	82,437	81,959