Avista Utilities

1411 East Mission P.O. Box 3727 Spokane, Washington 99220-3727 Telephone 509-489-0500 Toll Free 800-727-9170



June 1, 2000

Mr. Scott Rukke WA Utilities & Transportation Commission P.O. Box 47250 Olympia, WA 98504-7250

Re: Waiver for above ground plastic pipe in steel casing DOT §192.321(a)

Dear Scott:

In response to your questions about the PE pipe we are installing across the Rock Creek Bridge in Stevenson, Washington, I have enclosed a copy of the job. I have calculated the thermal contraction of 190 feet of PE pipe for a temperature differential of 65°F to be 14.82 inches. This is, of course, for pipe that is fully exposed to the elements, and that is not experiencing the cooling effect of flowing gas.

Our position is that the carrier pipe will never see the full swing in temperature for several reasons. It is fully encased in a casing, and isolated from the casing wall by 3.875 inches with thinsulators spaced every 5 feet minimum. The casing is vented to allow for air circulation, and is tucked up underneath the bridge so it will never be exposed to any sunlight. The gas is flowing at temperatures around 40°F to 50°F, which will tend to keep the temperature of the pipe relatively constant. Conservatively, if the pipe is installed at 65°F, and experiences temperature differentials of 30°F, the expansion will be 6.84 inches. We believe the movement can easily be absorbed in the soil since the pipe is fully padded with sand.

If you have any comments or questions, please give me a call. I will be out of the office from June 9 – July 5; our chief gas engineer, Mike Faulkenberry, will be available to you if you need to speak to someone. His number is (509) 495-8499.

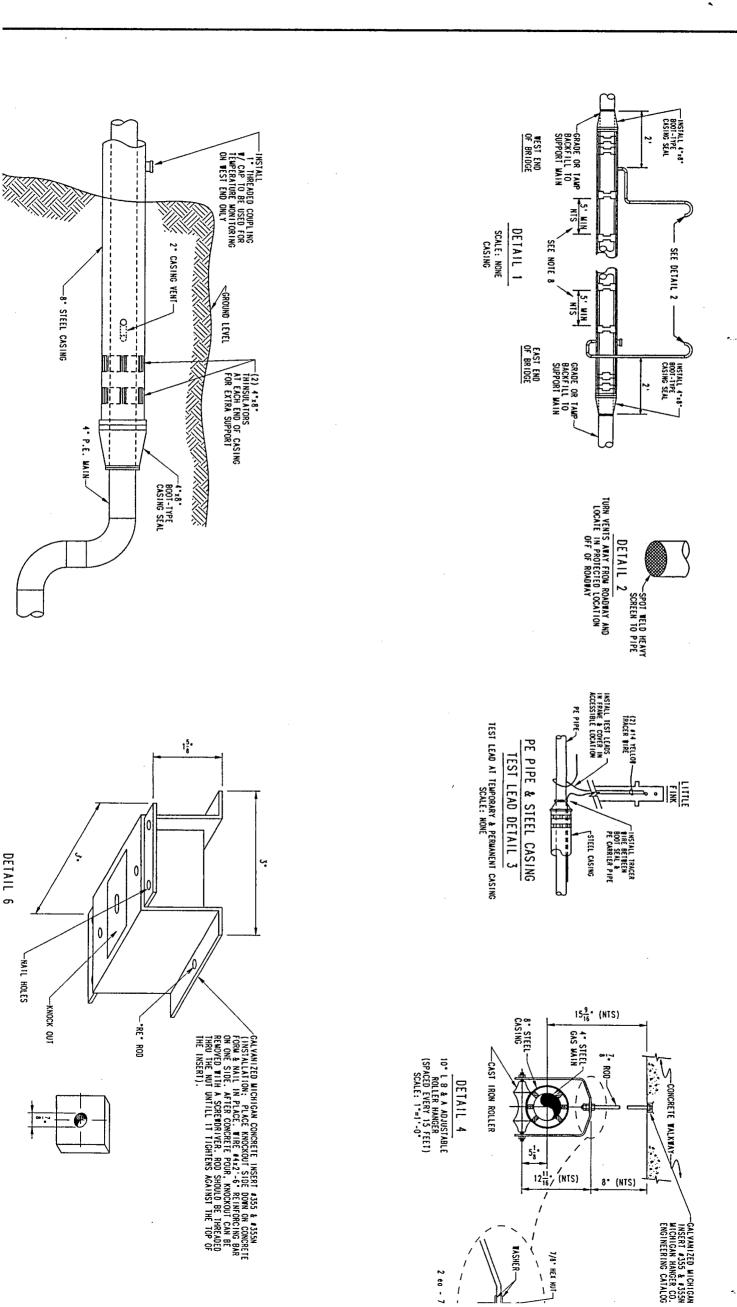
Sincerely,

Jenny Gruenen felder

Jenny Gruenen felder

Associate Gas Engineer





1-35956

1-35956 1.3N.,R7EWW SLIMIT ALIS NATURAL GAS ATTACHMENT TO OLD SR #8 BRIDGE AT ROCK CREEK LOCATION PLAN SCALE: 1" = 400" I.3N.,R7EWN OLD 58 8 IETTERSON: - INSTALL 4"x2" RED-SKAWANIA COUNTY, WASHINGTON SEC 1, T2N, R7EWN ~4"x2" RED -INSTALL
2" PE VALVE
3-FT FROM
TIE-IN TO
EXISTING PE LEXISTING

1. 4" P.E. CARRIER PIPE TO BE I WITH SPECIFIED PIPE HANGER: WINIMUM PAST END OF BRIDGE.

2. WORK TO BE PERFORMED AS PER GIVEN BY CITY OF STEVENSON I CORP GAS ENGINEERING, PH #41

4. PIPE SPECIFICATIONS:
4. PE PIPE, SDR 11.5
8. STL CASING, GRADE 8, 0 3. PRESSURE TEST 4" PE MAIN TO A SPRING GAUGE.

6. INSTALL BOOT-TYPE CASING SECASING (BOTH ENDS). INSTALL SHEET 3 OF 3.

8. SAND PAD ALL PIPE IN DITCH 7. IF NEEDED, ELBOW DOWN AS SOI COVER. 5. INSTALL PIPELINE WARNING SIG

2° 2° 4'x8' 4'x8' 1'