



November 26, 2012

David Danner, Executive Director and Secretary  
Washington Utilities & Transportation Commission  
1300 South Evergreen Park Drive S.W.  
P.O. Box 47250  
Olympia, Washington 98504-7250

1914 Willamette Falls Drive, Suite 255  
West Linn, Oregon 97068  
Phone: 503-344-6637  
Fax: 503-344-6693  
www.nwga.org

(Transmitted via email to [records@utc.wa.gov](mailto:records@utc.wa.gov))

**RE: Rulemaking to Consider Damage Reporting Requirements for Gas Pipeline Companies in WAC 480-93, Docket PG-120345**

Dear Mr. Danner,

Thank you for the opportunity to comment on Docket PG-120345, considering damage reporting requirements in WAC 480-93.

The Northwest Gas Association (NWGA) is a trade organization of the Pacific Northwest natural gas industry. Its members include the four natural gas utilities serving communities throughout Washington State and the two transmission pipelines that transport natural gas from production areas into and through the state.

We appreciate the Commission's consideration of the NWGA comments on this docket dated August 17<sup>th</sup>, 2012. The Commission has adequately clarified many of our concerns in the CR-102 language dated October 26<sup>th</sup>, 2012.

The NWGA submits the following comments concerning section 8 of the proposed language:

- In order to ensure that the information to be disseminated is consistent regardless of location or parties involved, the Commission should provide guidance as to the form this material should take.
- The Commission should provide guidance in the rule concerning how an operator is to demonstrate compliance. For instance, would documenting the distribution of the Recommended Digging Guidelines booklet designed and written by the Washington Utilities Coordinating Council (or similar resource) constitute compliance?
- Subsection (c) of Section 8 requires the operator to provide information about the Safety Committee including its process for filing complaints. The Adoption Hearing for this rule is scheduled for December 19, 2012 yet the Safety Committee has not yet published its process for filing complaints. This creates a timing misalignment and the potential for non-compliance.

Finally, as noted in our original comments, the DIRT website does not yet allow for all of the information requested in the RCW 19.122.053 thereby creating another timing misalignment.

Therefore, we ask that the Commission consider postponing adoption until such a time that:

- The Commission has advised pipeline operators on what form the notification to excavators should take and how to demonstrate compliance with the requirement;
- The Safety Committee has published procedures by which a party may submit a complaint;
- The DIRT website is able to receive all of the damage data as stated in RCW 19.122.053.

Perhaps the rule could be adopted with an effective date of June 30, 2013 to provide adequate time to work through the issues we note above.

The NWGA appreciates the value of good data and the opportunity to provide our perspective on Docket PG-120345. Please don't hesitate to contact us if you have any questions, Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Dan Kirschner", with a stylized flourish at the end.

DAN KIRSCHNER  
Executive Director