



June 12, 2017

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

Dear Mr. Mayo,

RE: Bonney Lake HP Natural Gas Project, Pressure Authorization

Pursuant to WAC 480-93-020, Puget Sound Energy (PSE) requests approval to operate a new 12" Bonney Lake pipeline at a pressure of 500 psig. This system will provide additional natural gas supply to Bonney Lake and surrounding communities, ensuring reliability as growth increases.

The scope of this request is to operate the 12" pipeline at 500 psig. The project begins by tying into an existing 6" pipeline at the intersection of 190th Ave E and Edwards Rd in Lake Tapps, and will follow Edwards Rd approximately 1.75 miles to where it meets the existing 6" pipeline at 210th Ave NE. The 12" main will operate at a hoop stress below 20 percent SMYS at an operating pressure of 500 psig.

The design, construction, operation and maintenance of the existing and new pipelines subject of this request exceed the minimum federal safety regulations in the following areas:

- **Class location:** The design and construction specifications meet or exceed the requirements for a Class 4 location. (192.5)
- **Design Factor:** PSE's design factor of 0.20 exceeds the 0.40 factor for Class 4 locations. (192.111)
- **Valve Spacing:** Valves will be installed at a spacing less than 1 mile apart in accordance with PSE's standards. This spacing exceeds the 2-1/2 mile requirement for transmission line valves in Class 4 locations. (192.179). There are no specific valve spacing requirements for high-pressure distribution systems. (192.181)
- **Nondestructive Testing:** PSE's radiographic inspection plan for the new construction is identical to the Class 3 and Class 4 requirements for transmission lines. In addition, ten

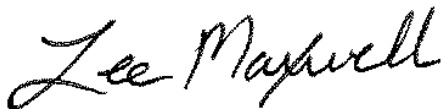
percent of welds on the proposed 12" line will be radiographically examined. This exceeds the minimum federal safety regulations which do not require nondestructive testing of pipelines operating below 20%SMYS. (192.241 and 192.243)

- **Cover:** PSE's standards require a minimum cover of 36" over high-pressure distribution mains. This exceeds the minimum federal requirements of 24". (192.327(b)) The proposed main will be installed with 48" of cover wherever possible.
- **Leakage Survey:** In accordance with PSE standards, the pipeline will be leak surveyed once every three calendar years not to exceed 39 months while it operates below 250 psig, and will be leak surveyed annually when it operates at 500 psig. In addition, any portions of the pipeline in business districts will be leak surveyed annually not to exceed 15 months. These are in excess of the 5-year frequencies required by 192.723 for distribution systems outside of business districts.

Please find attached Exhibits A, B, and C which provide general information about the project, a pipeline route map, and a survey of structures within 100' of the proposed route.

PSE is planning on providing notification to the identified property owners in advance of any scheduled open hearing with regard to this request. If you require any additional information, please call me at (425) 462-3575.

Sincerely,

A handwritten signature in cursive script that reads "Lee Maxwell".

Lee Maxwell

Enclosures: Exhibit A- General Information
Exhibit B- Map
Exhibit C- Structure Survey