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WASH. UT. & TP. COMM

January 25, 2007

Carole J. Washburn, Secretary
Washington Utilities and Transportation Commission
P.O. Box 47250
Olympia, WA 98504-7250

Attn: Alan Rathbun, Pipeline Safety Director

RE: 2005 Standard Inspection of King County Distribution System PG-050516

Dear Mr. Rathbun,

In a letter dated October 25, 2006, PSE provided information regarding the review we had undertaken to determine the root cause of PVC vents that were not remediated under the original PVC vent program. On December 1, 2006 PSE met with Staff to review our findings and presented a program to address the deficiencies identified in our review ("Relief Vent Program").

Subsequent to this meeting, Staff requested clarification on the remediation timeframe as well as additional information on the training and process used to identify PVC vents. Attached is a revised copy of the Relief Vent Program document. Paragraph 4.1 in this document was revised to clarify that PVC and horizontal vents shall be remediated within 90 days of identification.

Training to identify PVC vents focuses on using a magnet to distinguish PVC or other non-metallic material from steel vent piping. It also includes information to ensure the inspectors are aware of the visual indicators of PVC vent piping as well as the acoustic difference when the pipe is tapped. By using all three indicators, our inspectors should be successful in accurately identifying PVC vent piping.

Staff also indicated they will request a provision in the settlement that PSE maintain a separate accounting for the costs for the identification and remediation of PVC vent piping. To address this issue, PSE has initiated steps to ensure any incremental costs for identification and remediation will be tracked.

We appreciate Staff's review and comments on this program and will continue to work collaboratively with Staff to incorporate this program into a formal settlement agreement. If you have any questions or would like to discuss next steps, please call me at (425) 462-3957.

Sincerely,

Jim Hogan
Manager, Standards & Compliance

Attachment

cc: Sue McLain
Duane Henderson
Kimberly Harris
Karl Karzmar

Relief Vent Program

1. Scope

- 1.1 This document defines the requirements for the inspection of relief vents at PSE meter set assemblies (MSA) to identify relief vents that require remediation and ensure they are remediated. The inspection includes relief vents on service regulators with internal relief, relief vents on external relief valves, and relief vents of service regulators on idle risers.

2. Responsibilities

- 2.1 *Manager Standards and Compliance* is responsible for:
 - 2.1.1 Ensuring that the requirements of the program are met.
 - 2.1.2 Submitting reports, as required under Section 8.
- 2.2 *Manager Gas System Operations* is responsible for:
 - 2.2.1 Ensuring field inspections of Fixed Factor, Permanent ID, Large and Small MSAs and Idle Risers are performed and documented to identify the presence of vent piping requiring remediation.
 - 2.2.2 Ensuring vent piping requiring remediation on Large and Small MSAs and Idle Risers is completed as required by this program.
- 2.3 *Manager System Control and Protection* is responsible for:
 - 2.3.1 Ensuring vent piping requiring remediation on Fixed Factor and Permanent ID MSAs is completed as required by this program.

3. Inspection Requirements

- 3.1 For Fixed Factor MSAs (including both those that have met the fixed factor criteria and those that have not yet met the criteria), the vent inspection shall be done in conjunction with the annual fixed factor check.
- 3.2 For Permanent ID MSAs, the vent inspection will be done in conjunction with the annual instrument accuracy check.
- 3.3 For Large MSAs, the vent inspection shall be performed as a dedicated inspection.
- 3.4 For Small MSAs and Idle Risers, the vent inspection shall be performed in conjunction with the atmospheric corrosion inspection.

4. Remediation

- 4.1 Relief vents that are constructed of PVC piping and/or relief vents that terminate horizontally shall be remediated within 90 days of identification.
- 4.2 Relief vents constructed of PVC piping shall be remediated by one of the following methods:
 - 4.2.1 Replace the PVC vent piping with steel pipe;
 - 4.2.2 Remove the PVC vent piping and do not replace it if vent piping is not required by PSE Gas Operating Standards; or

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4.2.3 Remove the PVC vent piping and relocate the MSA to eliminate the need for vent piping.

4.3 Relief vents that terminate horizontally shall be remediated by one of the following methods:

4.3.1 Install a 90 degree elbow that terminates downward; or

4.3.2 Install vent piping and terminate in accordance with PSE Gas Operating Standards.

5. Training

5.1 Inspection personnel shall be trained to identify relief vents constructed of PVC piping and relief vents that terminate horizontally.

5.2 Inspection personnel shall be trained on the processes for documenting the findings to ensure locations requiring remediation are appropriately identified.

6. Records

6.1 The inspection of each Fixed Factor MSA, Permanent ID MSA, and Large MSA shall be documented.

6.1.1 The inspection records shall indicate the results of each inspection including the address, meter number, date of inspection, whether any PVC vent piping was found, and whether any vents terminate horizontally.

6.2 The inspection of each Small MSA and Idle Riser that identified a relief vent constructed of PVC piping or a relief vent that terminates horizontally shall be documented.

6.2.1 The inspection records shall include the address, meter number, date of inspection and the vent configuration that requires remediation (PVC vent piping or horizontal vent termination).

6.3 A record indicating the date remediation was performed and the remediation method shall be kept for all locations requiring remediation.

7. Schedule

7.1 The inspection of Fixed Factor and Permanent ID MSAs shall be completed by December 31, 2007 and the remediation shall be completed by March 1, 2008.

7.2 The inspection of Large MSAs of this program shall be completed by the March 1, 2008 and the remediation shall be completed by June 1, 2008.

7.3 The inspection of Small MSAs and Idle Risers shall be completed by May 1, 2010 and the remediation shall be completed by June 1, 2010.

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8. Reporting Requirements

8.1 PSE shall file annual reports by March 15th of each calendar year, starting in 2008, for progress during the prior calendar year.

8.1.1 The report shall include the number of MSAs inspected, the number of PVC vents found and remediated, and the number of horizontal vents found and remediated.

9. Definitions

9.1 *Fixed Factor MSA* means a meter set assembly with a meter size larger than an A425 but less than a D16,000 that delivers pressures from 2 psig to 15 psig inclusive.

9.2 *Permanent ID MSA* means a meter set assembly with a meter size equal to or greater than a D16,000 and any meter set assembly that delivers pressures greater than 15 psig as well as some fixed factor accounts that have been assigned a permanent ID as they have not met the criteria to be a fixed factor account.

9.3 *Large MSA* means all MSAs with A1000 meters and larger that are not inspected as part of the Fixed Factor or Permanent ID inspection.

9.4 *Small MSA* means a MSA not classified as Fixed Factor, Permanent ID, or Large MSA.

9.5 *Idle Riser* means an inactive account where the meter has been removed but the riser and regulator are still present.