



Puget Sound Energy, Inc.
P.O. Box 90868
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STATE OF WASH.
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COMMISSION

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January 31, 2006

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

Attn: Alan Rathbun, Pipeline Safety Director

Subject: Bare Steel Replacement Program Annual Risk Assessment (Docket No. PG-030080 and No. ~~PG-030128~~)

Dear Mr. Rathbun:

Pursuant to the King/Pierce County Settlement Agreement reached under Dockets PG-030128 and PG-030080, Puget Sound Energy (PSE) is required to complete an annual system risk assessment of bare steel pipeline segments utilizing the revised matrix detailed in the Bare Steel Replacement Program document. Please find enclosed a copy of PSE's 2005 Risk Assessment that was completed in December 2005.

For ease of reference, a breakdown and a summary of the planned replacement footage are provided at the top of page 1 of the Risk Assessment. A total of 99,246 feet of bare steel is scheduled for replacement in 2006. The program document specifies that replacement footage based upon public improvement opportunities and field-identified priorities shall be limited to 20% of the annual replacement footage. As seen in the summary, the PI opportunity footage for 2006 is estimated to be 9,315 feet and the field-identified footage is 850 feet (in total, approximately 10% of the total planned replacement footage for the year).

If you have any questions, please feel free to call me at 425-462-3957.

Sincerely,

Jim Hogan
Manager, Standards and Compliance

Cc: Kimberly Harris
Karl Karzmar
Sue McLain
Duane Henderson
Booga Gilbertson

Enclosures

RMS
AA

Annual Risk Assessment
December, 2005

UN AREA #	SUB AREA #	Notification #	Prioritization Method	Status	Field Completion Date	Approval Date	BS & WI Footage	Cumulative Feet	Score /Mile	Planned Replacement Year	Comments	
Footage by Risk Model				82,406	Total 2006 Planned Replacement Footage				99,246			
Cast Iron Coordination Footage				6,000	Target 2006 Replacement Footage				99,205			
"Other" Footage				675	Planned versus Target				41			
PI Opportunity Footage				9,315	Total Non-Program Footage				-			
Field Identified Footage				850	Total 2006 Footage				99,246			
201	8	10603976	Model	Construction		4/30/2005	50	50	105.600	2006	Carryover from 2005 due to permitting issues	
156	27	10527475	Model	Design		3/23/2004	175	225	7.912	2006	Carryover from 2005 due to easement issues	
156	2	10603999	Model	Design		9/12/2005	800	1025	5.192	2006		
021	2	10604000	Model	Construction		9/12/2005	200	1225	4.239	2006		
149	2	10565511	Model	Design		4/30/2005	900	2125	3.456	2006	Carryover from 2005 due to permitting issues	
184	2	TBD	Model	Planning		12/30/2005	370	2495	2.836	2006		
098	1	10565689	Model	Construction		4/30/2005	300	2795	2.826	2006	Carryover from 2005 due to permitting issues	
079	1	10565915	Model	Construction		4/30/2005	1300	4095	2.659	2006	Carryover from 2005 due to permitting issues	
203	2	10611281	Model	Design		11/18/2005	350	4445	2.521	2006		
095	1	10611576	Model	Design		11/22/2005	200	4645	2.458	2006		
140	1	TBD	Model	Planning		12/30/2005	150	4795	2.261	2006		
057	1	10611577	Model	Design		11/22/2005	201	4996	2.233	2006		
165	2	10611558	Model	Design		11/22/2005	850	5846	2.176	2006		
021	1	10604000	Model	Design		9/12/2005	400	6246	2.120	2006		
086	1	10611560	Model	Design		11/22/2005	750	6996	1.974	2006		
005	7	10611321	Model	Design		11/18/2005	1800	8796	1.897	2006		
187	22	10610494	Model	Design		11/9/2005	600	9396	1.850	2006		
187	17	10611512	Model	Design		11/22/2005	800	10196	1.785	2006		
120	2	10611596	Model	Design		11/22/2005	500	10696	1.627	2006		
163	5	TBD	Model	Planning		12/30/2005	175	10871	1.624	2006		
156	24	TBD	Model	Planning		12/30/2005	2400	13271	1.587	2006		
175	2	10611578	Model	Design		11/22/2005	600	13871	1.572	2006		
031	1	10611476	Model	Design		11/21/2005	5390	19261	1.571	2006		
192	1	10611446	Model	Design		11/21/2005	800	20061	1.568	2006		
158	8	10609411	Model	Design		10/28/2005	4050	24111	1.556	2006		
091	1	TBD	Model	Planning		12/30/2005	250	24361	1.538	2006		

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072	2	TBD	Model	Planning		12/30/2005	600	24961	1.521	2006	
185	1	TBD	Model	Planning		12/30/2005	600	25561	1.521	2006	
187	6	TBD	Model	Planning		12/30/2005	850	26411	1.476	2006	
103	9	10549024	Model	Construction		4/30/2005	1050	27461	1.414	2006	Carryover from 2005 due to permitting issues
108	6	TBD	Model	Planning		12/30/2005	800	28261	1.375	2006	
187	12	TBD	Model	Planning		12/30/2005	400	28661	1.360	2006	
142	2	TBD	Model	Planning		12/30/2005	650	29311	1.304	2006	
205	1	TBD	Model	Planning		12/30/2005	650	29961	1.304	2006	
032	1	TBD	Model	Planning		12/30/2005	850	30811	1.195	2006	
020	1	TBD	Model	Planning		12/30/2005	4300	35111	1.189	2006	
034	4	TBD	Model	Planning		12/30/2005	150	35261	1.153	2006	
117	1	TBD	Model	Planning		12/30/2005	650	35911	1.149	2006	
112	2	TBD	Model	Planning		12/30/2005	1450	37361	1.066	2006	
187	14	TBD	Model	Planning		12/30/2005	1425	38786	1.048	2006	
156	11	TBD	Model	Planning		12/30/2005	1200	39986	1.041	2006	
080	3	TBD	Model	Planning		12/30/2005	2850	42836	1.030	2006	
053	2	TBD	Model	Planning		12/30/2005	400	43236	1.025	2006	
156	6	TBD	Model	Planning		12/30/2005	24845	68081	1.016	2006	
030	2	TBD	Model	Planning		12/30/2005	1200	69281	0.995	2006	
153	6	TBD	Model	Planning		12/30/2005	7975	77256	0.937	2006	
175	3	TBD	Model	Planning		12/30/2005	1050	78306	0.898	2006	
136	2	TBD	Model	Planning		12/30/2005	4100	82406	0.869	2006	
204	3	10555017	Other	Design		2/11/2005	500	82906	0.599	2006	Carryover from 2005 due to permitting issues
107	2	10566408	PI	Design		5/18/2005	2100	85006	0.225	2006	
158	6	10608802	PI	Design		10/21/2005	800	85806	0.104	2006	
145	1	10617993	Field Planned	Design		12/30/2005	850	86656	0.076	2006	
142	18Part	TBD	CI Coord	Planning		12/30/2005	6000	92656	0.000	2006	
158	5 Part	10608802	PI	Design		10/21/2005	5755	98411	0.000	2006	
029	1 Part	10609790	PI	Design		11/11/2005	660	99071	0.000	2006	
187	19	10611512	Other	Design		11/22/2005	175	99246	0.000	2006	Replace in conjunction with 187
080	2						395	99641	4.663	2007	17 nearby
173	20						650	100291	0.829	2007	

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UN AREA #	SUB AREA #	Notification #	Prioritization Method	Status	Field Completion Date	Approval Date	BS & WI Footage	Cumulative Feet	Score /Mile	Planned Replacement Year	Comments
142	18						34000	134291	0.828	2007	
010	4						1300	135591	0.826	2007	
029	4						2350	137941	0.790	2007	
147	2						1500	139441	0.773	2007	
031	8						1500	140941	0.760	2007	
158	9						125	141066	0.758	2007	
065	1						300	141366	0.742	2007	
077	2						8720	150086	0.734	2007	
173	16						29780	179866	0.727	2007	
018	1						1250	181116	0.702	2007	
078	6						600	181716	0.678	2007	
137	1						650	182366	0.675	2007	
156	19						1900	184266	0.669	2007	
103	2						1350	185616	0.660	2007	
182	5						4500	190116	0.656	2007	
201	3						4600	194716	0.652	2007	
182	6						100	194816	0.649	2007	
156	9						8950	203766	0.642	2007	
130	4						4350	208116	0.638	2008	
124	1						5200	213316	0.605	2008	
011	1						1830	215146	0.584	2008	
090	1						800	215946	0.554	2008	
080	2						3500	219446	0.526	2008	
110	2						3925	223371	0.524	2008	
099	1						2600	225971	0.520	2008	
066	2						450	226421	0.518	2008	
029	5						350	226771	0.516	2008	
156	26						350	227121	0.509	2008	
174	1						2400	229521	0.508	2008	
129	3						1435	230956	0.504	2008	
130	5						4600	235556	0.489	2008	
156	7						1100	236656	0.488	2008	
148	1						575	237231	0.480	2008	
157	1						850	238081	0.479	2008	
017	3						1500	239581	0.477	2008	
031	9						350	239931	0.460	2008	

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005	2						4200	244131	0.460	2008	
078	7						400	244531	0.440	2008	
173	2						800	245331	0.438	2008	
156	1						800	246131	0.437	2008	
024	3						1055	247186	0.433	2008	
168	1						150	247336	0.433	2008	
011	4						300	247636	0.430	2008	
154	1						2000	249636	0.430	2008	
142	22						2730	252366	0.427	2008	
085	3						4610	256976	0.417	2008	
058	1						1100	258076	0.407	2008	
023	1						1550	259626	0.400	2008	
156	25						700	260326	0.396	2008	
008	3						3975	264301	0.386	2008	
195	1						175	264476	0.385	2008	
078	3						450	264926	0.383	2008	
187	20						275	265201	0.382	2008	
051	2						400	265601	0.374	2008	
123	1						665	266266	0.373	2008	
151	2						700	266966	0.365	2008	
142	17						200	267166	0.361	2008	
193	1						1600	268766	0.347	2008	
030	3						3750	272516	0.344	2008	
076	1						2510	275026	0.330	2008	
111	1						200	275226	0.325	2008	
053	1						2700	277926	0.322	2008	
001	4						600	278526	0.321	2008	
017	2						9720	288246	0.318	2008	
099	2						1300	289546	0.317	2008	
187	4						3100	292646	0.317	2008	
158	7						4250	296896	0.313	2008	
019	7						350	297246	0.303	2008	
142	4						53150	350396	0.301	2009	
142	10						1300	351696	0.301	2009	
052	1						1030	352726	0.294	2009	
034	1						3450	356176	0.290	2009	

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177		1					250	356426	0.287	2009	
080		4					5300	361726	0.278	2009	
031		7					5700	367426	0.278	2009	
111		5					1300	368726	0.266	2009	
124		2					2115	370841	0.266	2009	
031		6					715	371556	0.265	2009	
151		5					2200	373756	0.265	2009	
186		3					1250	375006	0.261	2009	
205		8					250	375256	0.260	2009	
173		10					1350	376606	0.251	2009	
110		1					7050	383656	0.249	2009	
031		12					600	384256	0.249	2009	
016		1					6950	391206	0.248	2009	
011		3					2250	393456	0.247	2009	
130		2					3050	396506	0.246	2009	
119		1					265	396771	0.245	2009	
014		1					1350	398121	0.245	2009	
031		11					2350	400471	0.243	2010	
018		2					2450	402921	0.242	2010	
027		1					400	403321	0.237	2010	
153		3					4925	408246	0.236	2010	
108		5					1550	409796	0.236	2010	
103		5					1000	410796	0.233	2010	
025		5					4700	415496	0.232	2010	
102		2					4385	419881	0.230	2010	
201		1					1600	421481	0.228	2010	
125		1					3700	425181	0.225	2010	
100		1					7585	432766	0.224	2010	
130		1					46480	479246	0.223	2010	
173		14					2550	481796	0.219	2010	
153		1					1150	482946	0.218	2010	
031		10					540	483486	0.218	2010	
013		2					1210	484696	0.216	2010	
029		2					800	485496	0.216	2010	
043		3					400	485896	0.214	2010	
142		14					750	486646	0.213	2010	

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129	4						150	486796	0.207	2010	
156	12						300	487096	0.204	2010	
158	5						36375	523471	0.203	2011	
017	1						1150	524621	0.203	2011	
040	1						2350	526971	0.201	2011	
151	3						700	527671	0.201	2011	
081	1						2785	530456	0.196	2011	
097	1						1400	531856	0.185	2011	
165	1						2350	534206	0.184	2011	
103	1						9050	543256	0.182	2011	
201	2						2450	545706	0.177	2011	
012	1						600	546306	0.177	2011	
025	10						1400	547706	0.177	2011	
071	2						3800	551506	0.172	2011	
038	1						1250	552756	0.172	2011	
156	17						1250	554006	0.171	2011	
029	1						10800	564806	0.170	2011	
024	1						2050	566856	0.169	2011	
122	2						1050	567906	0.167	2011	
005	4						1550	569456	0.167	2011	
156	14						7975	577431	0.166	2011	
102	3						1850	579281	0.166	2011	
187	15						600	579881	0.158	2011	
186	7						4050	583931	0.157	2011	
154	4						1600	585531	0.153	2011	
129	1						1600	587131	0.138	2011	
142	3						1000	588131	0.137	2011	
009	1						2800	590931	0.133	2011	
154	3						760	591691	0.125	2011	
156	18						12000	603691	0.122	2011	
019	1						6500	610191	0.121	2012	
156	15						1750	611941	0.120	2012	
173	1						1400	613341	0.119	2012	
187	2						800	614141	0.118	2012	
019	3						550	614691	0.111	2012	
066	1						250	614941	0.111	2012	

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182	8						1180	616121	0.110	2012	
005	1						600	616721	0.108	2012	
103	4						24355	641076	0.108	2012	
103	3						5465	646541	0.107	2012	
001	2						700	647241	0.107	2012	
173	12						900	648141	0.105	2012	
111	3						950	649091	0.105	2012	
173	3						22400	671491	0.104	2012	
011	5						1450	672941	0.103	2012	
109	1						1150	674091	0.102	2012	
012	4						8330	682421	0.100	2012	
187	21						750	683171	0.087	2012	
025	11						1150	684321	0.087	2012	
085	2						6525	690846	0.085	2012	
126	1						1250	692096	0.085	2012	
023	3						220	692316	0.084	2012	
187	7						14900	707216	0.081	2013	
187	13						1900	709116	0.079	2013	
071	1						950	710066	0.077	2013	
029	8						2350	712416	0.076	2013	
186	5						150	712566	0.068	2013	
008	2						3200	715766	0.068	2013	
083	1						2950	718716	0.065	2013	
019	5						1100	719816	0.065	2013	
188	1						4500	724316	0.063	2013	
005	8						3100	727416	0.061	2013	
108	9						1370	728786	0.060	2013	
190	1						9365	738151	0.058	2013	
204	4						400	738551	0.057	2013	
198	1						1150	739701	0.056	2013	
050	4						3700	743401	0.054	2013	
108	8						450	743851	0.053	2013	
063	3						650	744501	0.051	2013	
136	3						1900	746401	0.050	2013	
187	11						1550	747951	0.042	2013	
155	1						900	748851	0.038	2013	

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187	10						300	749151	0.038	2013	
205	12						300	749451	0.038	2013	
034	5						2200	751651	0.038	2013	
136	1						2900	754551	0.038	2013	
111	4						1050	755601	0.038	2013	
005	3						2850	758451	0.036	2013	
131	1						6915	765366	0.034	2013	
156	22						2350	767716	0.033	2013	
001	3						6790	774506	0.031	2013	
010	1						620	775126	0.030	2013	
034	3						450	775576	0.025	2013	
123	2						450	776026	0.025	2013	
205	9						450	776476	0.025	2013	
019	6						3900	780376	0.025	2013	
025	2						500	780876	0.023	2013	
205	11						550	781426	0.021	2013	
019	2						600	782026	0.019	2013	
022	2						1000	783026	0.018	2013	
166	1						650	783676	0.018	2013	
156	10						4400	788076	0.017	2013	
130	3						1400	789476	0.017	2013	
090	3						700	790176	0.016	2013	
142	6						200	790376	0.016	2013	
102	1						750	791126	0.015	2013	
036	1						7150	798276	0.015	2013	
187	23						4450	802726	0.014	2014	
046	1						900	803626	0.013	2014	
025	6						1850	805476	0.012	2014	
119	3						1020	806496	0.011	2014	
103	7						1050	807546	0.011	2014	
173	5						1100	808646	0.010	2014	
043	4						1200	809846	0.010	2014	
187	5						700	810546	0.009	2014	
142	7						450	810996	0.007	2014	
151	1						650	811646	0.006	2014	
144	1						750	812396	0.004	2014	

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005	6						800	813196	0.004	2014	
011	2						800	813996	0.004	2014	
138	1						1300	815296	0.002	2014	
034	2						1200	816496	0.002	2014	
173	18						1500	817996	0.002	2014	
173	19						1500	819496	0.002	2014	
075	1						1500	820996	0.001	2014	
164	1						400	821396	0.001	2014	
173	6						800	822196	0.001	2014	
024	2						820	823016	0.001	2014	
121	2						850	823866	0.000	2014	
039	1						900	824766	0.000	2014	
142	21						950	825716	0.000	2014	
153	2						950	826666	0.000	2014	
108	4						1715	828381	0.000	2014	
003	1						275	828656	0.000	2014	
005	5						300	828956	0.000	2014	
006	1						200	829156	0.000	2014	
010	2						1250	830406	0.000	2014	
010	3						1800	832206	0.000	2014	
012	5						590	832796	0.000	2014	
013	1						350	833146	0.000	2014	
016	2						1290	834436	0.000	2014	
019	4						170	834606	0.000	2014	
020	2						650	835256	0.000	2014	
021	3						100	835356	0.000	2014	
023	2						550	835906	0.000	2014	
025	3						100	836006	0.000	2014	
030	1						150	836156	0.000	2014	
030	4						1650	837806	0.000	2014	
030	5						400	838206	0.000	2014	
030	6						110	838316	0.000	2014	
031	13						150	838466	0.000	2014	
032	2						600	839066	0.000	2014	
032	3						300	839366	0.000	2014	
032	4						150	839516	0.000	2014	

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032	5						550	840066	0.000	2014	
041	7						230	840296	0.000	2014	
050	1						600	840896	0.000	2014	
050	2						600	841496	0.000	2014	
050	3						700	842196	0.000	2014	
050	5						2275	844471	0.000	2014	
051	1						150	844621	0.000	2014	
055	1						150	844771	0.000	2014	
063	6						225	844996	0.000	2014	
064	1						400	845396	0.000	2014	
067	1						230	845626	0.000	2014	
068	1						250	845876	0.000	2014	
069	1						800	846676	0.000	2014	
071	4						605	847281	0.000	2014	
074	1						250	847531	0.000	2014	
077	4						300	847831	0.000	2014	
078	1						300	848131	0.000	2014	
080	5						405	848536	0.000	2014	
081	2						400	848936	0.000	2014	
084	1						10	848946	0.000	2014	
085	1						1300	850246	0.000	2014	
087	2						380	850626	0.000	2014	
088	1						340	850966	0.000	2014	
095	2						300	851266	0.000	2014	
096	1						500	851766	0.000	2014	
100	2						650	852416	0.000	2014	
102	4						220	852636	0.000	2014	
103	6						200	852836	0.000	2014	
103	8						340	853176	0.000	2014	
103	10						850	854026	0.000	2014	
104	1						500	854526	0.000	2014	
104	4						200	854726	0.000	2014	
107	1						300	855026	0.000	2014	
108	1						500	855526	0.000	2014	
108	2						250	855776	0.000	2014	
111	8						510	856286	0.000	2014	

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UN AREA #	SUB AREA #	Notification #	Prioritization Method	Status	Field Completion Date	Approval Date	BS & WI Footage	Cumulative Feet	Score /Mile	Planned Replacement Year	Comments
112	3						200	856486	0.000	2014	
118	1						300	856786	0.000	2014	
119	2						600	857386	0.000	2014	
120	1						800	858186	0.000	2014	
122	1						700	858886	0.000	2014	
122	3						450	859336	0.000	2014	
122	4						400	859736	0.000	2014	
124	5						1145	860881	0.000	2014	
127	1						300	861181	0.000	2014	
132	2						975	862156	0.000	2014	
133	2						700	862856	0.000	2014	
134	1						1650	864506	0.000	2014	
134	2						850	865356	0.000	2014	
138	2						100	865456	0.000	2014	
139	1						950	866406	0.000	2014	
141	1						150	866556	0.000	2014	
142	1						1050	867606	0.000	2014	
142	5						300	867906	0.000	2014	
142	8						400	868306	0.000	2014	
142	9						550	868856	0.000	2014	
142	12						300	869156	0.000	2014	
142	13						350	869506	0.000	2014	
142	20						275	869781	0.000	2014	
143	1						350	870131	0.000	2014	
147	1						50	870181	0.000	2014	
151	4						550	870731	0.000	2014	
151	6						150	870881	0.000	2014	
151	7						200	871081	0.000	2014	
152	1						1200	872281	0.000	2014	
152	2						150	872431	0.000	2014	
153	4						600	873031	0.000	2014	
153	5						700	873731	0.000	2014	
154	2						250	873981	0.000	2014	
156	3						200	874181	0.000	2014	
156	4						300	874481	0.000	2014	
156	5						275	874756	0.000	2014	

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UN AREA #	SUB AREA #	Notification #	Prioritization Method	Status	Field Completion Date	Approval Date	BS & WI Footage	Cumulative Feet	Score /Mile	Planned Replacement Year	Comments
156	13						175	874931	0.000	2014	
156	21						1050	875981	0.000	2014	
156	28						600	876581	0.000	2014	
158	1						450	877031	0.000	2014	
163	1						100	877131	0.000	2014	
163	3						155	877286	0.000	2014	
163	4						125	877411	0.000	2014	
171	1						225	877636	0.000	2014	
172	1						350	877986	0.000	2014	
173	7						400	878386	0.000	2014	
173	8						400	878786	0.000	2014	
173	9						250	879036	0.000	2014	
173	11						450	879486	0.000	2014	
173	13						200	879686	0.000	2014	
173	15						300	879986	0.000	2014	
173	17						250	880236	0.000	2014	
173	23						900	881136	0.000	2014	
173	24						2000	883136	0.000	2014	
176	1						125	883261	0.000	2014	
178	1						750	884011	0.000	2014	
181	1						1550	885561	0.000	2014	
181	2						175	885736	0.000	2014	
182	1						450	886186	0.000	2014	
182	3						700	886886	0.000	2014	
182	4						300	887186	0.000	2014	
182	9						350	887536	0.000	2014	
184	1						150	887686	0.000	2014	
186	1						650	888336	0.000	2014	
186	2						1650	889986	0.000	2014	
186	4						750	890736	0.000	2014	
186	6						350	891086	0.000	2014	
187	3						375	891461	0.000	2014	
187	8						300	891761	0.000	2014	
187	9						300	892061	0.000	2014	
187	16						250	892311	0.000	2014	
187	18						400	892711	0.000	2014	

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UN AREA #	SUB AREA #	Notification #	Prioritization Method	Status	Field Completion Date	Approval Date	BS & WI Footage	Cumulative Feet	Score /Mile	Planned Replacement Year	Comments
189	1						550	893261	0.000	2014	
191	1						700	893961	0.000	2014	
194	1						300	894261	0.000	2014	
195	3						350	894611	0.000	2014	
195	4						400	895011	0.000	2014	
196	1						200	895211	0.000	2014	
197	1						250	895461	0.000	2014	
197	2						50	895511	0.000	2014	
198	2						375	895886	0.000	2014	
199	1						225	896111	0.000	2014	
199	2						650	896761	0.000	2014	
200	2						400	897161	0.000	2014	
201	4						725	897886	0.000	2014	
201	5						100	897986	0.000	2014	
201	7						950	898936	0.000	2014	
203	1						1000	899936	0.000	2014	
203	3						150	900086	0.000	2014	
204	2						1300	901386	0.000	2014	
205	3						250	901636	0.000	2014	
205	4						100	901736	0.000	2014	
205	5						650	902386	0.000	2014	
205	6						350	902736	0.000	2014	
205	7						300	903036	0.000	2014	
205	10						150	903186	0.000	2014	
205	13						2250	905436	0.000	2014	