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Pipeline Safety Division

April 3, 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 January 25, 2007, PSE provided a copy of the Relief Vent Program that was developed to identify and remediate both PVC and horizontal relief vent piping. This version of the program was revised to incorporate a requirement to remediate PVC and horizontal vents within 90 days of identification.

Subsequently, PSE has identified significantly more horizontal vents than were anticipated. Currently, we are projecting that approximately 4,000 locations may be identified with horizontal vent piping, out of our total meter population of over 700,000.

As a result of the significant increase in the number of regulators with horizontal relief vent terminations, we are proposing a revision to the program to allow more flexibility in horizontal relief vent remediation timeframes, while not substantially altering the end result of the program. A revised program document is attached. The revisions include:

- Horizontal Vents - Eliminating the requirement to remediate regulator vents that terminate horizontally within 90 days. Specifying that all regulators with relief vents that terminate horizontally will be remediated within 6 months of the date the inspections are required to be completed by.
- PVC Vents - The requirement to remediate all PVC vents within 90 days of identification remains and the end date for PVC remediation has been modified to align with this requirement.

We appreciate Staff's review and comments on this revised program document 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

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# Relief Vent Program

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## 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 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. The remediation of PVC vent piping shall be completed by April 1, 2008 and the remediation of horizontal vent piping shall be completed by July 1, 2008.
- 7.2 The inspection of Large MSAs of this program shall be completed by the March 1, 2008. The remediation of PVC vent piping shall be completed by June 1, 2008 and the remediation of horizontal vent piping shall be completed by September 1, 2008.
- 7.3 The inspection of Small MSAs and Idle Risers shall be completed by May 1, 2010 and the remediation of PVC vent piping shall be completed by August 1, 2010 and the remediation of horizontal vent piping shall be completed by November 1, 2010.

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## 8. Reporting Requirements

- 8.1 PSE shall file annual reports by March 15<sup>th</sup> 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.