



December 31, 2014

David Lykken  
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. Lykken,

**RE: Tolt 16-inch Natural Gas Project, Phase 1- Pressure Authorization**

Pursuant to WAC 480-93-020, Puget Sound Energy (PSE) requests approval to operate Phase 1 of a new 16" Tolt pipeline at a pressure of 500 psig. This system will provide additional natural gas supply to North King County, ensuring reliability as growth increases.

There are three phases to this project. The scope of this request is to operate Phase 1 of the 16" pipeline at 500 psig. Phase 1 will begin by tying in to an existing 8" pipeline at the intersection of the Tolt Pipeline corridor and 155<sup>th</sup> Ave NE, and will follow the corridor approximately 2.8 miles east until Mink Rd NE, where it will tie in with another existing 8" pipeline. The scope of this request includes all pipeline facilities associated with and constructed between the two existing 8" pipelines. Refer to Exhibits A through C for a project description, facilities map, and list of nearby structures.

The 16" main will operate at a hoop stress below 20 percent SMYS at an operating pressure of 500 psig.

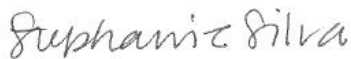
The design, construction, operation and maintenance of the existing and new pipelines subject of this request exceed the minimum federal safety regulations in the following areas:

- **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 16" 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.

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) 462-3923.

Sincerely,



Stephanie Silva  
Gas Compliance Program Manager

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

Cc: Booga Gilbertson, VP Operations Services  
Cathy Koch, Director Compliance  
Cheryl McGrath, Manager Compliance Programs  
David Landers, Manager Engineering  
Duane Henderson, Manager Gas System Integrity  
Doug Loreen, Director Project Delivery