

Summary of Written Comments
General Rules/Design & Construction
Gas Pipeline Safety Rulemaking
Docket No. UG-011073

Revised: March 27, 2002

ISSUE	INTERESTED PERSON	COMMENTS	STAFF RESPONSE
1) WAC 480-93-002 Application of rules.	Northwest Industrial Gas Users Avista Utilities Corp. Cascade Natural Gas Northwest Natural Gas Puget Sound Energy (LDCs)	NWIGU recommends that you restore “as that term defined” by WAC _____, and fill in the number when the definitions are completed, to qualify the term “gas company”. The rules should provide a clear internal cross-reference for something so fundamental to their scope. In addition, NWIGU would appreciate confirmation that removal of the word “exclusively” is not intended to change the actual scope of application in the second sentence. In this paragraph, within the first sentence, LDC’s propose to delete the word “that are”. In the second sentence, LDC’s also propose to delete the word “that are” and replace it with “exclusively”.	Staff agrees, rule will be redrafted to reflect the change. Staff agrees, rule will be redrafted to reflect the change.
2) WAC 480-93-003 Additional Requirements. (New Rule)	Northwest Industrial Gas Users	“Additional requirements” should be limited to section 1. NWIGU is concerned with the vagueness of section 2, as the purpose of this rules is to define the Commission’s requirements in a formal rulemaking with process. Proposed section 2 invites future controversy without actually expanding the Commission’s authority.	The purpose of section (2) is to preserve the scope of the Commission’s jurisdiction and to remind persons subject to the Commission’s jurisdiction under other provisions of law to take appropriate action.

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<p>3) WAC 480-93-017 Design, Specification, and Construction Procedures.</p>	<p>Avista Utilities Corp. Cascade Natural Gas Northwest Natural Gas Puget Sound Energy (LDCs)</p> <p>Avista Utilities Corp. Cascade Natural Gas Northwest Natural Gas Puget Sound Energy (LDCs)</p>	<p>(1) These rules do not relieve any gas company from any of its duties and obligations under the laws of the State of Washington. <u>(LDC’s recommend this paragraph be included in WAC 480-93-002 not WAC 480-93-003).</u></p> <p>(2) The Commission retains the authority to impose additional or different requirements on any gas company in appropriate circumstances, consistent with the requirements of law. <u>(LDC’s feel this paragraph is unnecessary because of the authority granted to the WUTC in the RCW).</u></p> <p>(1) Any gas company operating a gas pipeline facility in this state must have on file with the Commission all applicable design, specification and construction procedures. All procedures must detail the acceptable types of materials, fittings and components for the different types of facilities in the gas company’s system. <u>(LDC’s would like to discuss the intent of this draft proposed rule).</u></p> <p>(2) Any construction plans which do not conform with a gas company’s existing and accepted design, specification, construction procedures on file with the Commission, must be submitted to the Commission at least forty five days prior to the initiation of construction activity. Written Commission approval or rejection of the design, specification, and construction procedures to be utilized will be made within forty five days of receipt of all</p>	<p>Section (1) is consistent with other Chapter’s of rules. This is building consistency among all Commission rules.</p> <p>The purpose of section (2) is to preserve the scope of the Commission’s jurisdiction and to remind persons subject to the Commission’s jurisdiction under other provisions of law to take appropriate action.</p> <p>Discussion at the next stakeholder workshop. The intent of proposed section (1) is to clarify what procedures that are required to be on file.</p> <p>Staff needs additional information: – clarification on what the LDC’s are relating to “emergency response”.</p>

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<p>4) WAC 480-93-020 Proximity Considerations.</p>	<p>Avista Utilities Corp. Cascade Natural Gas Northwest Natural Gas Puget Sound Energy (LDCs)</p>	<p>documentation necessary to evaluate the proposed construction activity. <u>(LDC’s would like to discuss provisions for emergency response in this proposed rule).</u></p> <p>A gas company must submit a written request and receive written approval prior to operating any gas pipeline facility at the following pressures: <u>(LDC’s recommend a time frame associated with this process).</u></p> <p>(3) The petitioning gas company must provide documentation proving that it is not practical to select an alternative route that will avoid such locations and further development of the area and has designed their facility accordingly. Maps and records must be provided to the Commission showing the exact location of the pipeline and the shortest direct distance to the places listed above. Upon request of the Commission, the gas company must provide with the petition the maintenance, construction, and operational history of the pipeline system and an aerial photograph showing the exact location of the pipeline in reference to places listed above. <u>(LDC’s would like to discuss the intent and clarity of this paragraph and security issues pertaining to this section of the draft proposed rule).</u></p>	<p>(1) The timeframe must include the time when all documentation has been received by the Commission. Please provide what you believe the timeframe should be.</p> <p>(3) Staff needs clarification from the LDC’s what the security issues are?</p>

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<p>5) WAC 480-93-040 Location of Gas Compressor Stations on Gas Pipelines.</p>	<p>Northwest Industrial Gas Users</p> <p>Avista Utilities Corp. Cascade Natural Gas Northwest Natural Gas Puget Sound Energy (LDCs)</p>	<p>The revision of WAC 480-93-040 appears not to change the meaning of the current rule, but the separation of the exception clause on gas compressors into a separate subsection seems confusing. NWIGU would appreciate clarification of whether this change is intended to alter the meaning of the current rule.</p> <p>In section 1, LDC's propose the following changes for clarity:</p> <p>(a) At least 500 feet away from any existing building intended for human occupancy that is not under the control of the gas company if the installed capacity is equal to or greater than 1,000 horsepower.</p> <p>(b) At least 250 feet away from any existing building intended for human occupancy that is not under the control of the gas company if the installed capacity is less than 1,000 horsepower.</p> <p>LDC's propose to delete section 2 in its entirety.</p>	<p>The proposed draft is not intended to change any of the requirements of the current rule. Staff is unclear with the statement pertaining to "exemption clause". Staff request clarification.</p> <p>Staff needs clarification on the intent of deleting section 2 and proposed section (a) and (b).</p>
<p>6) WAC 480-93-115 Casing of Pipelines</p>	<p>Avista Utilities Corp. Cascade Natural Gas Northwest Natural Gas Puget Sound Energy (LDCs)</p>	<p>LDC's would like to discuss the intent and clarity of this draft proposed rule.</p> <p>Within the first sentence of the proposed rule, LDC's suggested to strike out the words "and pre-existing".</p> <p>For section 1, LDC's proposed to divide the paragraph into two sections:</p> <p>(1) Whenever a gas company installs pipeline casings, the casing must be designed to withstand the superimposed load.</p>	<p>Staff agrees. Pre-existing has been moved to section (2) only.</p> <p>Staff agrees.</p>

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7) WAC 480-93-130 Multistage pressure regulation.	Avista Utilities Corp. Cascade Natural Gas Northwest Natural Gas Puget Sound Energy (LDCs)	<p>(2) Steel pipe must <u>shall only</u> be encased in a bare steel casing.</p> <p>For Section 2 the suggested changes are: (3) (2) <u>Unless a gas company has an alternative procedure in their O&M Manual, a</u> A separate test lead wire must be attached to the casing and the steel gas pipeline to verify that no electric short exists between the two. Other testing methods may be acceptable if the gas company can demonstrate that the test lead wires are not necessary to monitor for electrical isolation and adequate cathodic protection levels. Tests must be performed annually not to exceed fifteen months, on all encased gas pipelines.</p> <p>LDC's recommend the following changes for clarity:</p> <p>Where gas pressures are reduced in two or more stages, the necessary regulators and auxiliary equipment will be installed in such a manner as to provide maximum protection between regulator systems <u>stages</u>.</p> <p>A minimum of fifty feet of separation will be provided between regulator systems <u>stages</u> when practical to do so.</p>	<p>Commission policy is to use the word must in rules and not shall.</p> <p>Further discussion of the intent of the proposed section (2) is needed.</p> <p>Staff agrees.</p>
8) WAC 480-93-140 Meter Regulators.	Avista Utilities Corp. Cascade Natural Gas Northwest Natural Gas Puget Sound Energy (LDCs)	LDCs would like to discuss the intent of this draft proposed rule.	Further discussion at the next stakeholder meeting.

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<p>9) WAC 480-93-160 Reporting Requirements for Proposed Construction.</p>	<p>Avista Utilities Corp. Cascade Natural Gas Northwest Natural Gas Puget Sound Energy (LDCs)</p>	<p>LDC's would like to discuss the clarity and intent of this draft proposed rule – primary sections for discussion are highlighted.</p> <p>(1) Every gas company must file a proposed construction report at least 45 days prior to a the construction or replacement of any gas transmission pipeline. The report must be filed with the commission setting forth the proposed route and the specifications for the pipeline and must include, but is not limited to the following items:</p> <p>(b) Location and specification of principal valves, regulators and other auxiliary equipment to be installed as a part of the pipeline system to be constructed.</p> <p>(e) Proposed corrosion control program to be followed including specifications for coating and wrapping, and ensuring the integrity of the coating. using a methodology such as jeeeping.</p>	<p>Further discussion at the next stakeholder meeting.</p>
<p>10) WAC 480-93-175 Moving and Lowering Gas Pipelines.</p>	<p>Northwest Industrial Gas Users</p>	<p>In proposed WAC 480-93-175, NWIGU requests clarification on why the current service line exception to moving pipelines has been removed.</p> <p>(1) Do we know the potential cost on the LDC's systems of such a change to evaluate the costs/benefits?</p> <p>(2) Is the new clause 3 intended to cover service lines?</p>	<p>Cost will be evaluated in the SBEIS Process.</p> <p>This is intended to cover service lines and mains.</p>

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	<p>Avista Utilities Corp. Cascade Natural Gas Northwest Natural Gas Puget Sound Energy (LDCs)</p>	<p>(3) What is the intended difference with the new clause 3, if any?</p> <p>(4) Is this change from a particular source?</p> <p>LDC's would like to discuss the effectiveness and efficiency of this draft proposed rule. The following is proposed language changes:</p> <p>(1) Every operator must prepare a study, prior to moving or lowering any gas pipeline, to determine whether proposed action will cause an unsafe condition. This study must be reviewed and approved by company's senior engineer a licensed professional engineer and retained in the company's files for the life of the pipeline. The study must include, but not <u>be</u> limited to the following criteria:</p> <p>(g) The toughness of the steel.</p> <p>(2) If the toughness of the pipeline is unknown, it must be considered to be brittle and must not be moved or lowered.</p>	<p>The intended difference is to allow a company to lower or relocate low stress small diameter mains and services without the required study.</p> <p>Clarification on this question is needed.</p> <p>Staff agrees.</p> <p>Discuss at the next stakeholder meeting.</p> <p>Discuss at the next stakeholder meeting.</p>

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<p>11) WAC 480-93-XXX Protection of Plastic Pipe. (New Rule)</p>	<p>Avista Utilities Corp. Cascade Natural Gas Northwest Natural Gas Puget Sound Energy (LDCs)</p>	<p>(3) <u>Steel p</u>Pipelines operating at 60 pounds per square inch gauge (psig) or less and having a diameter of two inches or less <u>and plastic pipelines</u> may be moved or lowered if the operator can certify that no undue stresses will be placed on the pipeline and that it can be moved or lowered in a safe manner.</p> <p>LDC’s would like to discuss the clarity and intent of this draft proposed rule – primary sections for discussion are highlighted.</p> <p>(2) The maximum cumulative ultraviolet light exposure limit for plastic pipe is 2 years or the manufacturer’s recommended exposure limit, whichever is less.</p> <p>In Section 4, LDC’s would like to discuss the clarity and intent of this draft proposed rule.</p> <p>(6) <u>Except as explicitly provided in this section,</u> pPlastic pipe must not be installed above ground. Where necessary to prevent customer outage and no other alternatives exists, plastic pipe may be temporarily installed above ground <u>for a period of two weeks.</u></p> <p>In Section 7, LDC’s would like to discuss the clarity and intent of this draft proposed rule.</p> <p>In Section 10, LDC’s would like to discuss the clarity and intent of this draft proposed rule.</p>	<p>Staff agrees.</p> <p>Staff agrees – further discussion at the next stakeholder workshop.</p> <p>Staff agrees – further discussion at the next stakeholder workshop.</p> <p>Staff does not understand the proposed suggested change “except as explicitly provided in this section”. Please provide clarification.</p> <p>Staff agrees – further discussion at the next stakeholder workshop.</p> <p>Staff agrees – further discussion at the next stakeholder workshop.</p>

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<p>12) WAC 480-93-220 Rule of Precedence. (Staff proposes to delete this rule).</p>	<p>Northwest Industrial Gas Users</p> <p>Avista Utilities Corp. Cascade Natural Gas Northwest Natural Gas Puget Sound Energy (LDCs)</p>	<p>NWIGU recommends that “Rule of precedence” not be deleted as it provides clarity. To the extent that any State of Washington rule standard is intended to exceed federal DOT standards, the particular rule should say so expressly, and the general interpretation standards of the current Rule of precedence should continue. NWIGU’s understanding is that the general intention of the rules revision process is to make state rules consistent with federal DOT standards, which NWIGU supports.</p> <p>LDC’s would like to discuss the intent for deletion of this rule.</p>	<p>Staff believes that this rule is redundant with the adoption by reference rule. This rule will be available prior to the next stakeholder meeting for your review. Further discussion at the next stakeholder workshop.</p> <p>Same response as above.</p>
<p>13) WAC 480-93-223 Civil Penalties for Violation of Chapter 80.28.</p>	<p>Northwest Industrial Gas Users</p> <p>Avista Utilities Corp. Cascade Natural Gas Northwest Natural Gas Puget Sound Energy (LDCs)</p>	<p>It appears that WAC 480-93-223 has potentially been revised to substantially increase penalties with the deletion of “for a related series of violations” and a change to a standard with a \$500,000 maximum “for each violation”. In the context of related violations, NWIGU would appreciate clarification of how the proposed rule is intended to work.</p> <p>LDC’s would like to discuss this draft proposed rule pertaining to the deletion of “related series of violations”.</p>	<p>Staff will redraft the proposed rule to include the current language “series of violations”.</p> <p>Staff will redraft the proposed rule to include the current language “series of violations”.</p>

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<p>14) WAC 480-93-230 Exemptions from Rules in Chapter 480-93 WAC.</p>	<p>Northwest Industrial Gas Users</p> <p>Avista Utilities Corp. Cascade Natural Gas Northwest Natural Gas Puget Sound Energy (LDCs)</p>	<p>In proposed WAC 93-230, new subparagraph 4, NWIGU is concerned that the standards for an exemption are expressed too narrowly, and suggests that the standard for exception be revised to allow the Commission to consider “all relevant information and circumstances, including but not limited to hardship,” etc. At the previous workshop, another participant suggested that the process be changed to one of “approval” of a modification, rather than a “waiver”. NWIGU would support incorporating the above referenced suggestion in revising this section.</p> <p>In section 1, 480-93-230, LDC’s propose to delete the word “purposes” and replace it with the words “intent of the”.</p> <p>In section 3, 480-93-230, LDC’s would like to discuss the inclusion of a time frame in this paragraph.</p> <p>In section 4, 480-93-230, LDC’s would like to discuss the clarity of this paragraph.</p>	<p>Section (1) is consistent with other Chapter’s of rules. This is building consistency among all Commission rules.</p> <p>Section (1) is consistent with other Chapter’s of rules. This is building consistency among all Commission rules.</p>