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State of Washington
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Pipeline Safety Program

May 27, 2011

David Danner, Executive Director
Washington Utilities and Transportation Commission
PO Box 47250
Olympia, WA 98504-7250

Attn: David Lykken, Pipeline Safety Director

RE: Cathcart Odorizer, Clearview, North Bothell and North Seattle Regulator Stations Temporary Pressure Increase

Dear Mr. Lykken:

Pursuant to Docket #UG-961298, Puget Sound Energy (PSE) hereby advises the Commission of its intent to temporarily operate the inlet piping to the Cathcart Odorizer, Clearview, North Bothell, and North Seattle town border station at a pressure up to 740 psig from the current operating pressure of 480 psig.

The Commission's order allows for these facilities to operate at pressures up to 809 psig with PSE to advise the Commission, in writing at least 60 days in advance, of any increase in operating pressure above 600 psig.

The odorizer and regulator stations are connected to the existing Williams Northwest Pipeline transmission lines (8-inch and 16-inch laterals). Williams plans on hydrotesting both of the laterals in the summer of 2011. The 8-inch line will be tested first to 740 psig MAOP.

During the hydrotest of the 16-inch line, PSE's facilities would be fed only by the 8-inch lateral. Obtaining adequate flow to maintain normal operations requires increasing pressure in the 8-inch line to 740 psig. This produces inlet pressures of the same magnitude at the above-listed PSE facilities.

The temporary increase in pressure would occur between August 4 and September 15, 2011.

Please do not hesitate to call me at (425) 462-3877 if any questions.

Sincerely,

Catherine Koch,
Puget Sound Energy
Director Compliance

cc: Jennifer Tada
Duane Henderson
Cheryl McGrath
Shamish Patel

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SERVICE DATE
DEC 30 1996

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

ID 238

6/10/96

In the Matter of the Request by)
)
 WASHINGTON NATURAL GAS COMPANY)
)
 for a Waiver to operate the inlet piping to the)
 Cathcart Odorizer, Clearview, N. Bothell, and)
 N. Seattle regulator stations at pressures up to)
 809 psig within five hundred feet of highways)
 and buildings intended for human occupancy)
 under WAC 480-93-020)
)

DOCKET UG-961298
 ORDER GRANTING
 WAIVER

On October 11, 1996, Washington Natural Gas Company (WNG), a Washington Corporation, filed a request for a waiver of WAC 480-93-020, Proximity Considerations, to set the maximum allowable operation pressure (MAOP) for the inlet piping to the Cathcart Odorizer, Clearview, North Bothell, and North Seattle regulator stations at 809 psig. The odorizer and regulator stations are connected to the existing Northwest Pipeline transmission lines (laterals) and are within five hundred feet of highways and buildings intended for human occupancy.

FINDING OF FACT

1. WNG has provided documentation for increased demand of natural gas within the greater North Seattle/Everett area due to population growth. WNG stations are currently served through the existing Northwest Pipeline Company (NWP) 8 inch and 16 inch North Seattle laterals.
2. NWP owns and operates the 11.11 miles of laterals that provide natural gas to WNG Cathcart Odorizer, Clearview, North Bothell, and North Seattle regulator stations.
3. NWP's laterals cannot provide adequate capacity to meet the existing gas load during cold weather conditions at the current operating pressure of 400 pounds per square inch gage (psig).
4. WNG evaluation of options has determined that the best method to augment supply is to request additional gas pressure from NWP rather than building another pipeline. It is not practical to select an alternative route in this area which would avoid proximity considerations as listed in WAC 480-93-020.

5. Commission staff recommended that NWP review the operating pressures of the laterals and confirm that the established MAOP of 809 psig is consistent with 49 CFR Part 192.619. NWP determined that the provisions of the code overrides the pressure test for segments tested prior to 1965 and agreed to follow the uprating requirement of 49 CFR Part 192. NWP has performed a comprehensive uprate including leak surveys in four pressure increments of 56.25 psig as required by 49 CFR, Part 192.555. NWP established a revised maximum allowable operating pressure of 600 psig for the North Seattle Laterals.

6. Because of the age, class location, and proposed increase in pressure of the laterals, Commission staff also recommended to NWP that the laterals be monitored for corrosion using a close interval WaveForm Analyzer/Pulse Generator corrosion control survey or equivalent system, and the laterals be inspected using an instrumented internal inspection devices (smart pig) within 24 months of this order. Any defects, abnormality, or condition found in the pipe, that could cause an unsafe condition, be repaired, replaced, or the segment involved be phased out.

7. NWP indicated that the laterals are part of the interstate transmission pipeline under Federal U.S. DOT-Office of Pipeline Safety jurisdiction. In 1990 a close interval survey was completed. The laterals are under cathodic protection and meet all federal safety requirements. The interstate lateral should not be subjected to additional state safety requirements. Additional testing and smart psig plans are tentatively scheduled for 1998 but implementation of NWP's risk management program may result in a change in this schedule.

8. WNG has completed modifications on the inlet piping, replaced the Clearview regulator station; and established a maximum allowable operating pressure on the inlet piping from 896 to 1000 psig.

9. WNG has submitted a request for a waiver of WAC 480-93-020 to allow WNG to set the maximum operating pressure for the inlet piping at 809 psig and operate the inlet pipeline at pressures up to 600 psig within five hundred feet of highways and buildings intended for human occupancy.

10. Staff has reviewed the requirements of WAC 480-93-020 and found nothing that would preclude the safe operation of the inlet piping to WNG's odor and regulator stations at pressure above five hundred psig.

ORDER

THE COMMISSION ORDERS:


1. The request by Washington Natural Gas Company for a waiver of WAC 480-93-020 Proximity Considerations, shall be granted to allow the operation of the inlet piping to Cathcart Odorizer, Clearview, North Bothell, and North Seattle regulator stations at pressures up to 809 psig within five hundred feet of any proximity area as defined in WAC 480-93-020 including highways and buildings intended for human occupancy.

2. Washington Natural Gas Company shall advise the Commission, in writing at least 60 days in advance, of any increase in operating pressure above 600 psig.

3. The Commission retains jurisdiction over this matter to effectuate the provisions of this order.

DATED at Olympia, Washington and effective this 30th day of December 1996.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION


STEVE McLELLAN
Secretary