

From: Dan Kirschner [mailto:dkirschner@nwga.org]

Sent: Friday, April 20, 2012 2:05 PM

To: Lykken, David (UTC)

Cc: Danner, Dave (UTC); Scott Farris; Nancy Atwood; Gary Hyatt; Steve Kessie; Scott Sammons; Dustin Wallis; David Howell; Jason Lambert

Subject: Re: Notice Of Opportunity To File Written Comments and Workshop

Dear Dave,

Our members are working through how best to respond to the UTC's queries in PG-120345. We believe our written comments will be of greater value to the UTC if submitted after the May 10 work shop. Then, we will have a clearer notion of just what information the UTC needs and how to provide it.

In short, please consider extending the deadline for written comments to some time after the May 10 work shop.

I have a related question for you: In general, is it possible for stakeholders to visit with UTC staff in advance of filing a CR-101 of this sort, either informally or in a public forum? We believe the UTC can benefit from an this type of exchange; that it will have more context and that affected stakeholders can help formulate queries that will deliver to the UTC the information it requires. We know that we will have a better understanding of just what kind of information the UTC is seeking and how to develop our responses accordingly.

Feel free to give me a call if you like Dave. I would be happy to discuss this matter with you directly.

Thanks in advance for your consideration.

Best,

*Dan Kirschner, Executive Director
Northwest Gas Association
1914 Willamette Falls Drive, #255
West Linn, OR 97068
O - (503) 344-6637
M - (503) 880-7269
dkirschner@nwqa.org*

On Mar 28, 2012, at 4:23 PM, DLykken@wutc.wa.gov wrote:

On March 21, 2012, the Washington Utilities and Transportation Commission (Commission) filed with the Code Reviser a Preproposal Statement of Inquiry (CR-101) to consider establishing requirements for gas pipeline operators to report data and documentation to the Commission of damage to pipeline facilities in violation of Chapter 19.122 RCW. The Commission filed the CR-101 under Docket PG-120345.

The Commission initiated this rulemaking to determine whether it needs to amend its reporting rules if it is to enforce violations of RCW 19.122.055, .075 and .090 in an efficient and timely manner.

To assist in determining whether to establish additional incident reporting requirements, as well as the specifics of such requirements, the Commission requests that interested persons provide written comments on the benefits and costs associated with additional incident reporting requirements generally and address the questions outlined in the attached notice.

Written comments on the CR-101 and the questions listed above to consider damage reporting rules for intrastate gas pipeline operators must be filed with the Commission no later than **5:00 p.m., Monday, April 23, 2012.**

In addition to filing written comments, interested persons are invited to attend a stakeholder workshop on **Thursday, May 10, 2012, beginning at 1:30 p.m., in Room 206, Richard Hemstad Building, 1300 S. Evergreen Park Drive S.W., Olympia, Washington.** At the workshop, Commission staff will review and discuss comments with the stakeholders.

If you have questions regarding this rulemaking, you may contact me at 360-664-1219 or by email at dlykken@utc.wa.gov.

David Lykken
Pipeline Safety Director
Washington Utilities and Transportation Commission
Office: 360-664-1219
dlykken@utc.wa.gov
<http://www.utc.wa.gov>

<PG-120345 CR-101 Notice - Gas Damage Reporting.pdf>