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April 12, 2006

Carole J. Washburn, Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. SW
P. O. Box 47250
Olympia, Washington 98504-7250

Re: *Washington Utilities and Transportation Commission* v. *Puget Sound Energy, Inc.*
Docket Nos. PG-030080 and PG-030128

Dear Ms. Washburn:

Enclosed for filing in the above-referenced docket are the original and (12) copies of the Joint Motion to Amend Order No. 02, and Certificate of Service.

Sincerely,

DONALD T. TROTTER
Senior Counsel

DTT:klg
Enclosures
cc: Parties

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION Complainant, v. PUGET SOUND ENERGY, INC., Respondent.	DOCKET NOS. PG-030080 PG-030128 JOINT MOTION TO AMEND ORDER 02

Overview

1 Puget Sound Energy, Inc. (PSE) and Commission Staff (Staff) (collectively, the Parties) move the Commission for an order amending Order 02 in this docket to better reflect deadline dates for certain specific PSE reports required under that order. The Parties request the Commission issue an order amending Order 02, to the extent it prescribes deadlines for compliance with report filing deadlines for the Isolated Facilities Program and the Bare Steel Replacement Program that were accepted by the Commission in that Order.

2 Nothing in this motion affects the completion dates of either program.

Discussion

3 This docket involves a Commission complaint against PSE alleging violation of Commission pipeline safety rules. The complaint was resolved by the Commission when it issued Order 02 on January 31, 2005. In that Order, the Commission approved and adopted

the Settlement Agreement filed by PSE and Staff.

4 Among the terms of the approved Settlement Agreement is PSE's agreement to complete various programs designed to address the matters at issue in the complaint. Two of these programs are the "Isolated Facilities Program" and the "Bare Steel Replacement Program." *Order 02 at 6, ¶¶ 26 and 28, and at 10, ¶ 49(2).*

5 The terms of the Isolated Facilities Program and the Bare Steel Replacement Program are contained in Order 02, as Appendix B and C, respectively, of the Settlement Agreement that is appended to that Order.

6 The Isolated Facilities Program and the Bare Steel Replacement Program prescribe various dates by which PSE is to file certain progress reports. Based on the experience of the Parties to date, some of those dates should be clarified and/or refined to reflect more specific dates by which PSE will complete and submit these reports to the Commission.

7 **Isolated Facilities Program.** Section 7 of the Isolated Facilities Program currently requires PSE to file reports with the Commission "upon conclusion of the pilot program and annually until the program is completed. Annual Reports shall be submitted to the WUTC by April 1st of the following year." *Order 02, Settlement Agreement Appendix B at 3, ¶ 7.*

Section 10 requires PSE to meet with Staff to work on developing a report called the "2006 Report." The 2006 Report was to be filed by January 30, 2006, and it was to contain a report on the pilot program plus "a detailed plan to identify and remediate isolated facilities ...," including a time estimate for completing the program. *Order 02, Appendix B at 3, ¶ 10.*

8 PSE met with Staff in July, 2005 as required, to brief Staff and seek Staff's input on the development of this program, and on preparation of the required reports. On January 25,

2006, PSE filed the 2006 Report as required.

9 Based on PSE's experience to date, PSE can commit to file future semi-annual reports by September 15 of each year (beginning in 2006) and to file future annual reports by March 15 of each year (beginning March 15, 2007).

10 Having specific filing dates for the semi-annual and annual reports is a benefit to PSE and the Commission because it provides more certainty as to when the reports will be prepared and filed, and permits the Parties to better plan activities around the filing of these reports. Therefore, the Isolated Facilities Program should be amended to adopt these more specific reporting protocols.

11 Appendix 1 to this Motion is an edited version of Appendix B to the Settlement Agreement: "Isolated Facilities Program." It contains the precise wording of these refined reporting requirements in Sections 7 and 10, and it shows how Sections 7 and 10 are proposed to be reorganized, supplanted or changed. No other sections are affected.

12 As a review of Appendix 1 shows, the seventh and last paragraph of current Section 10 is the only program language that is actually proposed to be changed. This paragraph is moved to new Section 7.3, and it is reworded to reflect the more precise reporting deadlines described above.

13 The remaining original language of the Isolated Facilities Program is unchanged, although some sentences and paragraphs in current Section 10 are proposed to be relocated as follows: 1) the first four paragraphs of current Section 10 are reordered and moved to Section 7, becoming new Sections 7.1 and 7.2. The exception regards the last sentence of current Section 10, third paragraph, which reads: "In no event will the program be completed later than July 1, 2009." This sentence remains in Section 10, and it is

renumbered paragraph 10.1; 2) The fifth paragraph of current Section 10 becomes the first paragraph of Section 10; and 3) The sixth paragraph of current Section 10 is renumbered paragraph 10.2.

14 **Bare Steel Replacement Program.** Section 5.5.2 of the Bare Steel Replacement Program currently requires PSE to conduct a system risk assessment "by December 31 of each calendar year." *Order 02, Settlement Agreement Appendix C, ¶ 5.5.2.* Section 7.7.2 requires PSE to submit to the Commission the results "within 30 days of completion" of that risk assessment. *Order 02, Settlement Agreement Appendix C, ¶ 7.7.2.*

15 PSE and Staff agree that this deadline should be changed to require the filing "by October 1 of each calendar year." PSE now has experience conducting the risk assessment analysis and can commit to conducting the assessment each year and filing the results by October 1 each year. In other words, this change would specify the actual date that PSE will file the annual risk model report with the Commission.

16 Appendix 2 to this Motion is an edited version of Settlement Agreement Appendix C: "Bare Steel Replacement Program." It contains the precise wording of these refined reporting requirements, and it shows how existing requirements in Sections 5.5.2 and 7.7.2 are proposed to be supplanted or changed. No other sections are affected.

RELIEF SOUGHT

17 For the reasons stated above, the Parties request the Commission to issue an order amending Appendix B and Appendix C to Order 02, consistent with Appendix 1 and 2 to this Motion.

DATED this 7th day of April, 2006.

PUGET SOUND ENERGY, INC.

Duane A. Henderson, PE

Director, Safety and Operations Services
For Puget Sound Energy, Inc.

ROB McKENNA
Attorney General

Donald T. Trotter

Senior Counsel
Counsel for Washington Utilities and
Transportation Commission Staff

Appendix 1

Proposed Revisions to Isolated Facilities Program

Isolated Facilities Program

1. Scope

This document defines the requirements for the Isolated Facilities Identification Program. For this program, an isolated facility is defined as a short segment of steel pipe that requires cathodic protection (CP) and cathodically protected steel pipe that is inserted in a casing.

The program will:

1.1 Identify electrically isolated steel facilities that require cathodic protection including extended utility facilities.

1.2 Identify cathodically protected steel inserted in casings.

1.3 Update maintenance records to ensure these facilities are monitored.

1.4 Develop and implement a process for ensuring new isolated steel facilities requiring CP are identified and maintained.

1.5 Develop and implement a process for ensuring new gas carrying steel pipes installed in casings are identified and maintained.

This program does not include larger cathodically protected systems, as these facilities are being addressed through the Critical Bond Program. The program will not include cast iron or unprotected bare steel or wrought iron facilities, as those are addressed through the Cast Iron Replacement Program and the Bare Steel Replacement Program.

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 3.6.

2.2 *Manager Meter Network Services* is responsible for:

2.2.1 Conducting field checks to identify the presence of an isolated facility on a metered service in conjunction with atmospheric corrosion inspections.

2.3 *Manager System Control and Protection* is responsible for:

2.3.1 Conducting field checks to identify the presence of an isolated facility on non-metered services as well as mains. The inspection of the non-metered riser shall include an atmospheric corrosion inspection.

2.3.2 Updating records to ensure isolated facilities will continue to be monitored.

2.3.3 Ensuring that pipe to soil potential (PSP) reads are taken for isolated facilities and documented in SAP.

2.3.4 Ensuring that records research and the field investigation are completed to confirm whether there are casings at locations that have been identified as likely candidates for casing installation (i.e. railroad crossings, highway crossings, etc.).

2.3.5 Remediating any low CP reads or shorted casings in accordance with the current Operating Standards.

2.4 *Consulting Engineer, Corrosion Control* is responsible for:

2.4.1 Developing a process for ensuring any new isolated facilities are identified and added to the maintenance database (SAP) for monitoring.

3. General Requirements

Draft processes shall be developed and documented for each of the elements in this section prior to beginning the pilot program. These processes will be refined as part of the pilot program and incorporated into the program upon completion of the pilot.

3.1 Process for New or Newly Isolated Facilities

3.1.1. A process to ensure that all new or newly isolated facilities and casings are cathodically protected and monitored shall be developed and documented. This process shall address any new facility or modifications to existing facilities that are not currently isolated, but become isolated through future projects; such as CP steel services that are isolated due to the replacement of a cathodically protected steel main with polyethylene (PE). It shall also include the appropriate steps to ensure public improvements (PI) projects do not impact access to casing test sites.

3.2 Records Review

3.2.1 Non-metered risers

3.2.1.1 Processes shall be developed and documented to review records to identify services that are active (gas carrying) but not currently metered.

3.2.2 Casings

3.2.2.1 Processes shall be developed and documented to review the plats and other maps as necessary to determine where casings exist or are likely to exist, such as railroad and State highway crossings. The documentation shall include the review process, including reviewing as-installed and potholing, as appropriate, for locations that are likely to have casings, but where the casing is not platted.

3.2.3 Mains

3.2.3.1 Processes shall be developed and documented to review relevant records to identify locations where isolated sections of cathodically protected steel main exist and require a CP test site.

3.3 Field Inspections

Field inspection processes shall be developed and documented to ensure metered and non-metered facilities identified through the records review process are inspected, and the results of the inspection are recorded and reported. The inspection shall determine whether there is an isolated facility. Isolated facilities shall be tested to verify adequate CP or work orders created to remediate.

4. Training

4.1 Personnel taking PSP reads shall be qualified as required by PSE's Operator Qualification Program.

4.2 Personnel performing other work required by this program shall be trained on the documented processes and procedures.

5. Quality Assurance

A quality assurance process shall be developed and documented to determine that:

5.1 The records review and field inspection processes are accomplishing the objectives specified in the General Requirements section of this program.

5.2 Personnel performing the work have been trained on, have a thorough understanding of, and are consistently following these processes.

6. Records

This element of the program will be developed based on the results of the pilot program.

7. Reporting Requirements

~~Reports shall be submitted to the Commission upon conclusion of the pilot program and annually until the program is completed. Annual reports shall be submitted to the WUTC by April 1st of the following year.~~

7.1 PSE will meet with Staff no later than July 1, 2005 to brief Staff on progress, and to receive any Staff input on program development.

7.2 On or before January 30, 2006, PSE will file with the Commission a Report ("2006 Report") containing a detailed plan to identify and remediate isolated facilities in order to bring isolated facilities into compliance with Commission rules.

7.2.2 The 2006 Report will identify the types of facilities found during pilot activities in 2005, the status of remediating those facilities, the estimated scope of the problem (geographic areas involved, number of sites, etc.) throughout PSE's service territory, and a timeline for identifying and remediating the remaining facilities throughout PSE's service territory. The 2006 Report will also provide a best estimate schedule for accomplishing the remaining inspection and remediation throughout PSE's service territory.

7.2.3 PSE will work with Staff in developing the 2006 Report, particularly how the Company will identify and locate the facilities involved.

7.3 Beginning in 2006, PSE shall file semi-annual and annual reports with the Commission until the program is completed. These reports shall identify the type and location of the isolated facilities that were inspected, what was remediated and PSE's plan for the next 6 months.

7.3.1 The semi-annual report shall be filed by September 15 for progress during the first six months of the year.

7.3.2 The annual report shall be filed by March 15 for progress for the prior calendar year.

8. Remediation

Any low cathodic protection readings or shorted casings will be remediated in accordance with PSE Operating Standards 2600.1400, "Electrical Isolation and Grounding Requirements" and 2600.1500, "Monitoring Cathodic Protection."

9. Pilot Program

To ensure these processes are effective and efficient, the processes identified in this program under the General Requirements section of this program will be tested in selected areas before system wide implementation. This pilot program will provide an opportunity to assess the processes and make adjustments before system wide implementation. It will also provide data that will be useful in establishing time frames for completing the program as well as Quality Assurance, record keeping, and reporting requirements.

10. Schedule

~~On or before January 30, 2006, PSE will file with the Commission a Report ("2006 Report") containing a detailed plan to identify and remediate isolated facilities in order to bring isolated facilities into compliance with Commission rules.~~

~~The 2006 Report will identify the types of facilities found during pilot activities in 2005, the status of remediating those facilities, the estimated scope of the problem (geographic areas involved, number of sites, etc.) throughout PSE's service territory, and a timeline for identifying and remediating the remaining facilities throughout PSE's service territory.~~

~~The 2006 Report will also provide a best estimate schedule for accomplishing the remaining inspection and remediation throughout PSE's service territory.~~

The parties understand that the isolated facilities involved are often located next to buildings, sometimes without proper cathodic protection, and therefore, this program is a priority. PSE will use due diligence to locate these facilities and remediate as required by 480-93 WAC as currently codified or as hereafter amended by docket UG-011073. PSE understands that 480-93-110 requires remediation within 90 days after discovery of a specific facility that requires remediation.

10.1 In no event will the program be completed later than July 1, 2009.

~~PSE will work with Staff in developing the 2006 Report, particularly how the Company will identify and locate the facilities involved. PSE will meet with Staff no later than July 1, 2005 to brief Staff on progress, and to receive any Staff input on program development.~~

~~The parties understand that the isolated facilities involved are often located next to buildings, sometimes without proper cathodic protection, and therefore, this program is a priority. PSE will use due diligence to locate these facilities and remediate as required by 480-93 WAC as currently codified or as hereafter amended by docket UG-011073. PSE understands that 480-93-110 requires remediation within 90 days after discovery of a specific facility that requires remediation.~~

10.2 The parties also understand Commission Staff may, after the filing of the 2006 Report, file a motion with the Commission asking the Commission to set a different completion date, and PSE may support or oppose that motion.

~~On July 1, 2006, and every six months thereafter until the program is completed, PSE shall file with the Commission a Progress Report, identifying the type and location of the isolated facilities that were inspected, what was remediated, a map of completed area and PSE's plan for the next 6 months.~~

Appendix 2

Proposed Revisions to Bare Steel Program

Bare Steel Replacement Program

1. Scope

This document defines the guiding principles for the replacement of unprotected metallic pipelines. This includes bare steel and wrought iron pipe; it does not include cast iron - which is addressed by the Cast Iron Replacement Program.

2. Responsibilities

2.1 The *Manager Total Energy System Planning* (TESP) is responsible for:

2.1.1. The active corrosion review, risk assessment and prioritization of replacement work; and,

2.1.2 Reviewing leak repair data on cathodically protected bare steel pipelines to ensure the segment is replaced in accordance with Section 3 of this program.

2.2 The *Manager Contract Management* is responsible for ensuring that work orders for replacements are completed in accordance with this program plan.

2.3 The *Manager Standards & Compliance* is responsible for submitting the reports required under Section 7 of this program.

3. General

3.1 The bare steel replacement program is a 10-year program beginning in 2005 and ending in 2014. During this period all existing unprotected bare steel and wrought iron pipe will be replaced.

3.1.1 Except for the first year of the program, the total replacement footage shall be divided equally over each year of the program.

3.1.2 See Table 1 for an outline of the 10-year plan and the annual target replacement footage.

3.2 Annual replacement footage shall be prioritized based upon the results of the active corrosion review conducted in accordance with Section 4 and the comprehensive risk model described in Section 5.

3.3 Corrosion leaks on unprotected steel mains shall be cathodically protected and monitored in accordance with Gas Operating Standard 2600.1900 and 2600.1500, respectively.

3.4 Corrosion leaks on cathodically protected bare steel mains shall require replacement of the segment of pipe no later than 15 months following the leak repair.

3.5 Corrosion leaks on cathodically protected and unprotected steel services shall require replacement of the service in accordance with Gas Operating Standard 2600.1900.

3.6 All unprotected bare steel pipe shall be leak surveyed twice each calendar year in accordance with Gas Operating Standard 2625.1100 until replaced.

3.7 All protected bare steel pipe shall be leak surveyed twice each calendar year in accordance with Gas Operating Standard 2625.1100.

3.8 Unprotected bare steel pipe shall be replaced in accordance with the replacement schedule shown in Table 1.

Table 1
Replacement Schedule

Year	Plan Year	Replace Unprotected Bare - Target	Replace Protected Bare*	Total
2005	Year 1	46,995		46,995
2006	Year 2	99,205		99,205
2007	Year 3	99,205		99,205
2008	Year 4	99,205		99,205
2009	Year 5	99,205		99,205
2010	Year 6	99,205		99,205
2011	Year 7	99,205	38,280	137,485
2012	Year 8	99,205	38,280	137,485
2013	Year 9	99,205	38,280	137,485
2014	Year 10	99,205	38,280	137,485
Total Footage		**939,840**	**153,120**	**1,092,960**
Total Mileage		**178**	**29**	**207**

3.9.1 Evaluation of existing cathodically protected bare steel, including the methodology applied for cp suitability and the cp system performance, shall be completed by December 31, 2005.

3.9.2 PSE and staff will review the results of this evaluation, determine if replacement of some or all of these pipelines is warranted, and adjust PSE's Bare Steel Replacement program as required by June 2006.

4. Active Corrosion Review

4.1 Active corrosion means continuing corrosion which, unless controlled, could result in a condition that is detrimental to public safety. (CFR 49 192.457(c))

4.2 Active corrosion reviews of unprotected pipelines shall be conducted every three years.

4.3 Exposed pipe condition reports, leak history, and active leaks shall be documented on the Active Corrosion Database (Individual Form) – see Form 1. Where a concentration of leaks or pitting is found within any one- block area of a system, that area shall be further evaluated using the matrix on the Active Corrosion Review form – see Form 2.

4.4 Where it is determined that active corrosion exists, one of the following corrective measures shall be taken within 90 days in accordance with Operating Standard 2600.1900:

4.4.1 Replacement with coated and cathodically protected steel pipe

4.4.2 Replacement with plastic pipe

4.4.3 Abandonment

5. Prioritizing Pipeline Replacements

5.1 A comprehensive risk model shall be used to perform a system risk assessment in order to prioritize replacement segments in addition to segments identified for replacement through the active corrosion review.

5.1.1 The risk model calculates the risk score based upon the following factors:

5.1.1.1 Leak history;

5.1.1.2 Type of corrosion;

5.1.1.3 Condition of pipe from exposed pipe condition reports; and,

5.1.1.4 Proximity to high occupancy structures.

5.1.2 The risk factors are assigned a relative weighting in accordance with Table 2.

5.1.3 The risk score is determined using the Relative Weighting value, number of occurrences of an event, and main footage in accordance with the following formula:

Σ ([Relative Weighting] x [# of occurrences]) ÷ [Main footage] = [Risk Score]

5.2 A system risk assessment utilizing the risk model shall be performed ~~by December 31 of~~ each calendar year.

5.2.1 The initial system risk assessment shall be completed by April 30, 2005.

5.3 The risk assessment shall be performed on electrically continuous systems resulting in a risk score for the system.

5.4 Electrically continuous systems may be further segmented based upon an evaluation of the following:

5.4.1 Coincident public improvement projects if significantly smaller in scope than the system;

5.4.2 Right-of-way use restrictions or paving cut moratoriums; and,

5.4.3 Concentrations of active leaks, repaired leaks and records of severe pipe conditions within a limited area of an electrically continuous system.

5.5 Prioritization of replacement footage may be adjusted based upon the following three categories:

5.5.1 Public Improvement

5.5.1.1 Coincident public improvement projects;

5.5.1.2 Right-of-way use restrictions;

5.5.2 Field Identified

5.5.3 Coordination with cast iron replacement projects

5.6 No more than 20% of the annual replacement footage shall be adjusted for Public Improvement and Field Identified priorities.

5.7 Re-evaluation of selected segments will occur on an on-going basis to incorporate new data.

5.8 Certain public improvement (PI) projects mandate the relocation of existing gas pipelines. Where bare steel is required to be relocated due to a PI project, the pipeline shall be replaced. This required replacement is performed under a separate PI budget and shall be referred to as "non-program" footage.

5.9 Non-program footage shall not impact replacement footage targets for the program.

5.10 Risk Factor Relative Weighting

Table 2
Bare Steel Replacement Risk Ranking Matrix

THREAT		CONSEQUENCE	RELATIVE WEIGHTING
Active Leak	B1	HOS	0.37587
		NO HOS	0.06633
	B2	HOS	0.06561
		NO HOS	0.01158
	C	HOS	0.01230
		NO HOS	0.00217
	0	HOS	0.00182
		NO HOS	0.00032
Historic Leak	A,BA	HOS	0.16057
		NO HOS	0.02834
	B1	HOS	0.07704
		NO HOS	0.01360
	B2	HOS	0.03330
		NO HOS	0.00588
	C	HOS	0.01101
		NO HOS	0.00194
EPCR Condition	Deep/Frequent	HOS	0.10165
		NO HOS	0.01794
	Deep/Isolated	HOS	0.00651
		NO HOS	0.00115
	Shallow/Frequent	HOS	0.00348
		NO HOS	0.00061
	Shallow/Isolated	HOS	0.00045
		NO HOS	0.00008

6. Training and Qualification

6.1 Personnel completing Exposed Pipe Condition Reports (EPCR) shall be qualified as required by PSE's Operator Qualification Program.

7. Reports

7.1 Semi annual progress reports must be submitted to the Commission for the duration of the replacement program by March 1 and September 1 of each year.

7.1.1 Reports shall include planned footage, completed program footage, and completed non-program footage. Non-program footage is described in Section 5.

7.2 An annual report showing the results of the risk assessment performed in accordance with Section 5 must be submitted to the commission ~~within 30 days of completion of the risk assessment~~by October 1 of each calendar year.

8. Records

8.1 Maps shall be maintained showing the location, size and material of unprotected facilities.

8.2 Maps shall be maintained showing the location, size and material of protected bare steel facilities.

8.3 Records of each review of unprotected facilities for active corrosion shall be maintained for as long as the pipeline remains in service.

FORM 1 – ACTIVE CORROSION DATABASE (INDIVIDUAL FORM)

ACTIVE CORROSION DATABASE (INDIVIDUAL FORM)

ID #:_____ **NAME:**_____

REVIEW DATE	OP#	SYSTM #	SYSTEM FOOTAGE	LEAKAGE								CORROSION REPORTS						REQUIRES FOCUSED REVIEW (ACTIVE CORROSION REVIEW FORM ATTACHED)	ADDRESS(ES) OF LOCATION(S) REVIEWED
				ACTIVE					REPAIRED LEAKS	CLASS A HISTORY		SEV		MOD		GOOD			
				A	BA	B1	B2	C		ACTIVE	REPAIRED	OVERLAY	DATABASE	OVERLAY	DATABASE	OVERLAY	DATABASE		

SEV - is the number of pipe condition reports with deep pitting (includes red dots from the corrosion overlay map)

MOD - is the number of pipe condition reports with shallow pitting (includes orange dots from the corrosion overlay map)

GOOD - is the number of pipe condition reports with no pitting (includes green dots from the corrosion overlay map)

FORM 2 – ACTIVE CORROSION REVIEW

ID #	Address	Footage

Based on 1 block = 400' **Replace active corrosion areas at least 100' on either side

Criteria	YES	MAYBE	NO
B-leakage only (per block)	3+	2	1-
Past Class A Leakage (per block)	3+ (in the last 3 years)	2 (in the last 3 years)	1-
C-leakage only (per block)			Any amount
Severe Corrosion Reports	2 reports + 2 active leaks	3 reports	<3 reports
Moderate Corrosion Reports		2 reports frequent pitting +1 active B-1 leak	isolated pitting + C leak
Past Leakage	2+ active B leaks + 3 repaired B leaks (in the last three years)	3+ repaired B leaks (in the last three years) or 1 active B leak and 2+ repaired B leaks	< 2 leaks
Comments			

Docket Nos. PG-030080 and PG-030128
CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the persons and entities listed on the Service List below by depositing a copy of said document in the United States mail, addressed as shown on said Service List, with first class postage prepaid.

DATED at Olympia, Washington this 12th day of April, 2006.

KRISTA L. GROSS

For Puget Sound Energy, Inc.:

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