

**Cascade Natural Gas Corporation**  
**Comments to WUTC Proposed Rulemaking - Docket No. UG-011073**  
**February 14, 2002**

“**Maximum operating pressure**” means a maximum pressure selected by a gas company for operation of a pipeline or segment of a pipeline, which is less than or equal to or less than the maximum allowable operating pressure derived pursuant to 49 CFR, Part 192 on the date as specified in WAC 480-93-999. **Rule 020, 155, 183, 200**

**CNG:**

**We are concerned that this term is not being used consistently in these proposed rules. Maximum Operating Pressure (MOP) is used interchangeably with MAOP. MOP as it is defined here has a significantly different meaning from MAOP. The two are not interchangeable. In most locations MOP is used in these proposed rules, MAOP should have been used. This issue should be discussed.**

**A proposed version of WAC 480-93-999 was not released with this package for comments. We are concerned about this proposed rule and would appreciate the opportunity to comment.**

“**Service line**” means a gas pipeline, not a main, gathering or transmission line, which provides service to one building. Service lines shall must include gas pipelines extended from a main to provide service to one building, which traverse a public right of way or an easement immediately adjacent to a public right of way or another easement. **Rule 155, 188**

**CNG:**

**We recommend this definition incorporate “split services” or that “split services” as it pertains to existing Commission waivers be added as a definition.**

**WAC 480-93-010 Compliance with federal standards. (General)**

**This rule will be incorporated in rule 480-93-999**

**CNG:**

**A proposed version of WAC 480-93-999 was not released with this package for comments. We are concerned about this proposed rule and would appreciate the opportunity to comment.**

**WAC 480-93-020 Proximity Considerations. (Design and Construction)**

A gas company must submit a written request and receive commission approval prior to operating any gas pipeline facility at the following pressures:

- (1) Gas pipeline facilities having a maximum **allowable** operating pressure greater than five hundred pounds per square inch gauge (psig) that operate within five hundred feet of the places described below:
  - (a) A building intended for human occupancy that is in existence or under construction prior to the date authorization for construction is filed with the commission, and that is not owned and used by the petitioning gas company in its gas operations.
  - (b) A well-defined outside area, such as a playground, recreation area, outdoor theater, or other place of public assembly, that may be occupied by twenty or more people and that is in existence or under construction prior to the date authorization for construction is filed with the commission.
  - (c) A public highway, as defined in RCW 81.80.010(3).
- (2) Gas pipeline facilities having a maximum operating pressure from two hundred fifty one psig up to and including five hundred psig that operate within 100 feet of the places described below:
  - (a) A building intended for human occupancy that is in existence or under construction prior to the date authorization for construction is filed with the commission, and that is not owned and used by the petitioning gas company in its gas operations.
  - (b) A well-defined outside area, such as a playground, recreation area, outdoor theater, or other place of public assembly, that may be occupied by twenty or more people and that is in existence or under construction prior to the date authorization for construction is filed with the commission.
- (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

document that management has considered the possibility of the future development of the area and has designed their pipeline facilities 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 in subsection (1) and (2).

**CNG:**

**We are concerned that no proposal was made that incorporates engineering design and strength criteria into this rule. The draft rule ignores factors besides internal pressure that affect the strength of pipelines, such as pipe diameter, pipe material strength, and pipe wall thickness. These proximity rules should require Commission approval if the engineering stress of a pipeline exceeds established criteria, such as a percent of material specified minimum yield stress.**

**We note that this rule contains confusion regarding MOP and MAOP. Paragraph (1) contains MAOP, but paragraph (2) contains MOP. It is unclear if this is intentional. We cannot fully comment until this is clarified.**

**480-93-xxx Corrosion control.**

- (5) Tests for electrical isolation between casings and carrier pipe must be performed annually not to exceed 15 months but at least once each calendar year.
  - a. For each casing that does not have test leads installed other testing methods may be acceptable if the company can demonstrate that test lead wires are not necessary to monitor for electrical isolation and adequate cathodic protection levels.
  - b. Whenever tests indicate that a shorted condition exists between a casing and carrier pipe the condition must be evaluated within 90 days to determine whether a potentially corrosive condition exists. Records of this evaluation must be kept for the duration the facility is in service.
  - c. The shorted condition must be cleared if practical.

- d. Where it is not practical to clear the shorted condition, the company must use other industry recognized methods of inhibiting any potentially corrosive conditions found under the requirements of subsection (5)(b).
- e. Whenever a short exists between a pipeline and casing, leak surveys must be performed within 30 days of discovery and thereafter every 6 months until the shorted condition is eliminated or any potential corrosive condition has been inhibited.

**CNG:**

**We recommend that paragraph (5)(b) be changed. The appropriate language of the current 480-93-115 should be retained, “the condition shall be evaluated within ninety days to determine whether a hazardous condition exists.” Searching for “potential corrosion conditions” inside casings is not necessary as long as the condition is determined to pose no hazard.**

(7) Whenever a company finds the presence of corrosion on its facilities, the operator must investigate further to determine the extent of the corrosion. A record of this investigation must be maintained for the life of the facility.

- (a) The company must record the condition of all underground metallic facilities each time the facility is exposed.
- (b) On all cathodically protected pipelines, the company must take a cathodic protection test reading each time a company employee or representative exposes the facility.

**CNG:**

**We recommend paragraph (7)(b) be deleted. Such tests are unnecessary with an adequately maintained cathodic protection system. The existing surveys required by 49 CFR 192 and WAC 480-93 are sufficient to determine the adequacy of a cathodic protection system.**

**The proposal requires the removal of the protective coating to take the readings, and then a coating replacement. The integrity of the coating is the first step in corrosion protection and its integrity should not be compromised without a demonstrateable benefit.**

**WAC 480-93-115 Casing of pipelines. (Design and Construction)**

- (1) Whenever a gas company installs pipeline casing, the casing must be designed to withstand the superimposed load. Steel pipe must be encased in a bare steel casing.
- (2) 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.
- (3) Casings must be sealed to prevent the migration of gas.

**CNG:**

**The first sentence of Paragraph (1) is redundant information to 49 CFR 192.323 and should be deleted. The second sentence should state, "Steel pipe must not be encased in a coated steel casing."**

**We recommend paragraph (3) be deleted. Migration of gas should not be addressed by requiring the casings be sealed. Gas migrating out of casings is not a common problem, and can be addressed by taking appropriate precautions in the design and installation of casings.**

**WAC 480-93-124 Pipeline markers. (O&M)**

- (1) Pipeline markers must be placed at all railroad, road, irrigation, drainage ditch crossings, ~~and~~ at all fence lines where a pipeline crosses private property or where a pipeline is exposed. Pipeline markers must be placed approximately five hundred yards apart if practical, and at points of horizontal deflection of the pipeline. Exceptions to this rule must comply with 49 CFR, Part 192.707(b).
- (2) All gas pipelines attached to bridges or otherwise spanning an area must have pipeline markers at both ends of the suspended pipeline. Each gas company must annually inspect and maintain the bridge markers to ensure they are visible and legible. Companies must replace markers that are reported damaged and missing within 30 days.
- (3) Pipeline marker surveys must be conducted every three years and the recorded results of the surveys must be kept for a minimum of 6 years.

**CNG:**

**We are concerned that the period for replacing missing markers within 30 days is too short. We suggest that markers that are reported damaged and missing be replaced within 45 days. This matches other proposed period extensions.**

**The prescribed marker survey periods in Paragraphs (2) and (3) should be "at a minimum, annually not to exceed 15 months" and "at a minimum, every three years not to exceed 42 months" respectively.**

**The requirement to keep records for marker surveys should be changed to two years. Marker survey records are not essential safety records and gas companies should not be burdened with keeping them for extended periods.**

**WAC 480-93-140 Meter regulators. (Design and Construction)**

Meter regulators must be installed, operated, and maintained in accordance with federal and state regulations, and in accordance with the manufacturers recommended installation and maintenance practices. Meter regulators and associated safety devices installed on services must be inspected and tested during each start-up to determine whether they are in proper operating condition. Testing must include determining the gas regulator's outlet set pressure at a specified flow rate. Pressure gauges must be used downstream of the regulator during testing.

**CNG:**

**This is our normal procedure, but it is not a significant safety concern. The error that can occur with the springs used for 7 in. w.c. delivery is very small, roughly 1 in. w.c. These tests should not be required for every start-up.**

**WAC 480-93-155 Increasing maximum operating pressure. (O&M)**

Each gas company must submit to the commission for approval complete written plans and drawings at least 45 days before uprating to a maximum allowable operating pressure (MAOP) greater than sixty pounds per square inch gauge. The plan must include a review of the following:

- (1) All affected gas facilities, including pipe, fittings, valves, and other affected equipment, with their manufactured design operating pressure and specifications;
- (2) Original design and construction standards;
- (3) All previous operating pressures and length of time at that pressure;

- (4) All leaks, regardless of cause, and the date and method of repair;
- (5) All upstream and downstream regulators and relief valves;
- (6) All cathodic protection readings on mains for the past three years or three most recent inspections, whichever is longer, and the most recent inspection on each attached service line, that is electrically isolated; and
- (7) Records deemed necessary by Commission Staff to evaluate the pressure increase.
- (8) Uprates must be based on a previous strength test that would substantiate the maximum allowable operating pressure. When there is no documented history of strength tests, one must be conducted in conjunction with the uprate.

**CNG:**

**The title of the rule should be changed to “Increasing Maximum Allowable Operating Pressure”.**

**This rule is being changed from a notification requirement to an approval request. If an uprate is planned according to WAC 480-93-155, and 49 CFR Part 192, no approval from the Commission should be necessary. The plan conforming to these rules will conform to established safety standards and guidelines. Automatically requiring Commission approval would be unnecessary for many projects.**

**We recommend that Paragraph (8) be deleted. In the past uprates have been approved by the Commission without pressure tests conforming to a predetermined specification. These pipelines were evaluated by the gas company; an uprate report and request submitted to the Commission for review; discussed; and permission granted to perform the uprate. This proposed rule should not restrict the Commission from granting its permission for a pipeline to be uprated based upon review of the uprate study and discussion of the uprate procedure.**

**WAC 480-93-175 Moving and lowering gas pipelines. (Design and Construction)**

- (1) Every gas company must prepare a study, prior to moving or lowering any gas pipeline, to determine whether the proposed action will cause an unsafe condition. This study must be reviewed and approved by the company's senior

engineer and retained in the company's files for the life of the pipeline. The study must include, but is not limited to the following criteria:

- (a) The required deflection of the pipe;
  - (b) The diameter, wall thickness, and grade of pipe;
  - (c) The characteristics of the pipeline;
  - (d) The terrain and class location;
  - (e) The present condition of the pipeline;
  - (f) The anticipated stresses of the pipeline including the safe allowable stress limits;
  - (g) The toughness of the steel.
- (2) If the toughness of the pipeline is unknown it must be considered to be brittle and must not be moved or lowered. Pipelines with mechanical joints must not be moved or lowered.
- (3) Pipelines operating at 60 pounds per square inch gauge (psig) or less and having a diameter of two inches or less 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. Factors such as type of materials, proximity to fittings, joints, and welds, and any other factors that could place undue stress on the pipeline or create an unsafe condition must be considered.

**CNG:**

**It is not clear that paragraphs (1) and (2) do not apply if the criteria in paragraph (3) are met. As written, paragraphs (1) and (2) always apply.**

**The word "nominal" should be added before the word "diameter" in paragraph (3).**

**WAC 480-93-yyy Protection of Plastic Pipe. (New Rule) (Design and Construction)**



- (1) Every gas company must have detailed written procedures for the storage, handling, and installation of plastic pipelines. The storage, handling, and installation of all plastic pipelines other than joining procedures, must be in accordance with the latest applicable manufacturers' recommended practices. Unless a more stringent requirement is specified by the manufacturer, the company must adhere to the following requirements:
  - (a) The maximum cumulative ultraviolet light exposure limit for plastic pipe is 2 years or the manufacturer's recommended exposure limit, whichever is less.
  - (b) When plastic pipe is pulled through the ground during the installation process and the pipe could potentially be exposed to excessive tensile stresses, a weak link or other method of ensuring that the pipe will not be damaged must be used.

**CNG:**

**We recommend the words "whichever is less" be deleted from the end of paragraph 1(a). Plastic pipe currently being used by CNGC has a manufacturer's recommended exposure limit longer than 2 years. It is unnecessary to require an arbitrary limit of 2 years on pipe that has a longer manufacturer's recommendation.**

- (8) Plastic pipe must be installed and backfilled prior to being pressure tested to expose any potential damage that could have occurred during the installation and backfilling process.

**CNG:**

**As written, the proposed rule ignores that it is often impractical to backfill the entire pipe. Activities such as the pressure test and final tie-in fusions require portions remain exposed. The proposal can also be interpreted to prohibit beginning the test, backfilling, and then finishing the test. That method would also accomplish this intent. Finally, a pressure test can ensure that no potentially significant damage occurred. Insignificant damage, that will not affect the safe operation of the pipeline, will not be revealed by the pressure test.**

**We recommend Paragraph (8) be changed to read:**

**"Plastic pipe must be pressure tested after installation and backfill to ensure no potentially significant damage occurred during the installation and backfill processes, unless it is impractical to do so."**

**WAC 480-93-185 Gas leak investigation. (O&M)**

- (1) Each gas company must promptly investigate any notification of a leak, explosion, or fire, which may involve gas pipelines or other gas facilities, received from an outside source such as a police or fire department, other utility, contractor, customer, or the general public. In the event of an explosion, fire, death, or injury, the gas company may remove any suspected gas facility only when the commission and the lead investigative authority have designated the release of the gas facility. Once the situation is made safe, the facility must remain intact until directed by the lead investigative authority. Where the investigation reveals a leak, the leak must be graded in accordance with ~~to~~ WAC 480-93-186, and appropriate action must be taken in accordance with the rule. Grade 1 or Grade 2 leaks may not be downgraded to a Grade 3 leak without a physical repair ~~having been~~ made to the pipeline facility.

**CNG:**

**The wording of this proposal should be changed so that “In the event of an explosion, fire, death, or injury, the gas company is required to preserve evidence, and to assist in the investigation.”**

**The proposal that “a physical repair” be “made to the pipeline facility” in order to regrade a leak is impractical. The gas company should instead be required to record full documentation of the reasons and data justifying the grade reduction. Further investigation may show that the leak is not as serious as first suspected and consequently should be downgraded. The proposal may also promote lowering of initial grading. If there is a chance that a leak should be graded as a one or a two, the operator should not hesitate to do so.**

- (2) When leak indications are found to originate from a foreign source or facility, such as gasoline vapors, sewer or marsh gas, or customer-owned piping, prompt action must be taken to protect life and property. All leaks that represent an ongoing, potentially hazardous situation must be reported promptly to the owner or operator of the source facility and, where appropriate, to the police department, or other appropriate governmental agency. In all cases, the property owner or the adult person occupying the premises must be notified of the leak conditions. If no methane (or propane) indication is found, the gas company employee on-site must inform the property owner or the adult person occupying the premises, and must request the adult person occupying the

premises to sign the gas company work order. The gas company employee must provide the adult person occupying the premises an odor sniff card that identifies the odor of gas (or propane) and indicates the name, address, and telephone number of the gas company representative to be contacted if the leak indications are again noticed. If the property owner or an adult person occupying the premises is not available, the gas company must, within twenty-four hours of the leak notification, send by first-class mail, addressed to the person occupying the premises, a letter explaining the results of the investigation. A copy of the letter must be retained **for the life of the pipeline** by the gas company and kept with the leak report. A leak investigation report form must be maintained in the gas company's leak report files for all leaks investigated, and identifying the gas company employee who made the initial leak evaluation.

**CNG:**

**The proposal that the required letters be retained “for the life of the pipeline” is impractical and burdensome. Gas companies do not typically control and monitor a customer’s house piping and would be unaware of that pipeline’s retirement, making this requirement impractical. A record of leak investigations that are false should not have to be kept “for the life of the pipeline”, making this requirement burdensome. A shorter period such as two years will be sufficient for Commission review of records.**

**The requirement that the letter be “kept with the leak report” is unnecessary. Other locations should be acceptable, such as an electronic record of the letter having been sent. Also, the letter itself should not be the only record allowed to prove the letter was sent. Electronic records or data should be sufficient. The proposal should be worded so all appropriate methods of compliance are allowed.**

**WAC 480-93-186 Leakage classification and action criteria (O&M)**

**CNG:**

**The proposed rule’s grade definitions have the words “where gas is likely to migrate” changed to the words “where gas could potentially migrate”. The words “is likely” address the probability of migration. If a leak is not likely to migrate, then migration should not be a factor. The words “could potentially” allow no measurement of the probability of migration. It can be interpreted that all leaks “could potentially” migrate, even though it was not likely to occur.**

**WAC 480-93-188 Gas leak surveys. (O&M)**

Types of gas leak surveys and test methods.

- (2) ~~Maintenance and calibration of instruments. All instruments used in leak detection and evaluation shall must be maintained, calibrated, and operated in accordance with the recommended latest manufacturers' specifications and methods. If there is no manufacture' recommendation, calibration must be done monthly.~~ Maintenance and calibration of instruments. All instruments used in leak detection and evaluation shall must be maintained, calibrated, and operated in accordance with the latest manufacturers' recommended specifications and methods. If there is no manufactures' recommendation, calibration must be done monthly.

**CNG:**

**Some manufacturer's do not make recommendations about calibration frequency. For these devices, experience and practice may show the device operates adequately on calibration period that is longer than one month.**

**The proposal should be modified to require that leak detection device accuracy is periodically checked, and calibration performed as needed. We recommend the last sentence be replaced with, "If there is no manufacturer's recommendation, calibration must be performed periodically on a schedule devised by the gas company to ensure devices are accurate for their function."**

- (3) Frequency of surveys in designated areas. Gas leakage surveys must be conducted according to the following specified frequencies:
- (a) Business areas - once each calendar year, not to exceed fifteen months;
  - (b) Residential areas - as frequently as necessary, not to exceed five years;
  - (c) Buildings of public assembly - once each calendar year, not to exceed fifteen months;
  - (d) Special surveys such as floods, earthquake, land movement, as required;  
~~and~~

- (e) Where the gas system has cast iron, wrought iron, or ductile iron, or non-cathodically protected bare steel, galvanized steel, or coated steel pipe twice each calendar year not to exceed eight months.

**CNG:**

**Federal proposed rule-making Docket No. RSPA-02-13208 is currently proposing adding leeway to the survey period for residential areas. This proposal may conflict with the federal rules if the federal rules are changed. We suggest this be considered during this rule making.**

- (8) Self audits. Each gas company is required to perform self audits of the effectiveness of its leak detection program. The following self audits must be performed as frequently as necessary, not to exceed three years:
  - (a) ~~Leak survey schedule must assure that it is commensurate with the minimum federal safety standards for gas pipelines, Subpart M-Maintenance, and the general condition of the pipeline system as required by other applicable regulations;~~ Leak survey schedules must assure that they are commensurate with the minimum federal and state safety standards for gas pipelines, and the general condition of the pipeline system must be taken into account as required by other applicable regulations;
  - ~~(b)~~(a) Survey effectiveness. Companies must evaluate survey results to assure that a consistent evaluation of leaks is being made throughout the system; and
  - (c) Companies must check the adequacy of records.
- (9) Records of the self audits must be maintained for 6 years.

**CNG:**

**We continuously review our leak detection program and record keeping. It is unnecessary to require record keeping for these audits. The component leak survey records are sufficient materials for gas companies to monitor leak survey and detection programs. Leak survey and detection records are reviewed by The Commission. Paragraph (9) should be deleted.**

**WAC 480-93-200 Reports associated with gas company facilities and operations.  
(Reporting)**

- (1) Every gas company ~~shall~~ must give ~~prompt~~ telephonic notice to the commission, within ~~six~~ two hours of occurrence, of every ~~accident~~, incident, or hazardous condition, arising out of its operations which:
  - (a) Results in a fatality or personal injury requiring hospitalization;
  - (b) Results in damage to the property of the company and others of a combined total exceeding one ~~five~~ thousand dollars (automobile collisions and other equipment accidents not involving gas or gas handling equipment need not be reported under this rule);
  - (c) Results in the evacuation of a **dwelling**, building or ~~other~~ area of public assembly;
  - (d) Results in the unintentional ignition of gas;
  - (e) Results from construction defects or material failure;
  - (f) Results in the un-controlled release of gas for more than one hour;
  - ~~(e)~~(g) Is significant, in the judgment of the company, even though it does not meet the criteria of (a) ~~and~~, (b), (c), (d), (e), (f) of this subsection;
  - ~~(d)~~(h) Results in the taking of a high pressure supply or transmission pipeline or a major distribution supply pipeline out of service or lowering its pressure fifty percent or more below its normal operating pressure; ~~or~~
  - ~~(e)~~(i) Results in the news media reporting the occurrence, even though it does not meet the criteria of (a) through ~~(d)~~(h) of this **sub**section.
  - (j) Routine or planned maintenance and operational activities of the company which result in company controlled plant and equipment shut downs, reduction in system pressures except as noted above, flaring or venting of gas, and normal leak repairs are not to be considered reportable items under this section.

- (k) When a pipeline or system operating at low pressure drops below the safe operating conditions of attached appliances and gas equipment; ~~and~~
- (l) When a pipeline, operating in excess of two hundred fifty psig, is taken out of service for any reason the commission ~~shall~~ must be notified

**CNG:**

**The rule should not require a specific time limit for reporting these occurrences. The proposal should be changed from “within two hours of occurrence” to “as soon as practical upon discovery”. Many of the occurrences may not be discovered within six hours of occurrence, such as media reports the next day.**

**Paragraphs 1(c), 1(e), and 1(f) should be deleted. In the past, the Commission has only required the reporting of significant events. Adding these items will require gas companies to report insignificant events to the Commission. If evacuating a dwelling will result in the notification requirement, some operators could hesitate to do the right thing and properly make the situation safe. These additional reports would be a burden on gas companies and the Commission with no corresponding benefit to public safety.**

**Paragraph 1(b) proposes the property damage threshold be lowered to one thousand dollars from five thousand dollars. We recommend this threshold remain at five thousand dollars. This reduction will exponentially increase the number of reports required, and many insignificant events would have to be reported.**

- (2) When a pipeline or system pressure exceeds the established maximum operating pressure, the commission ~~shall~~ must receive telephonic notification ~~be notified~~ within six hours, to be followed by written explanation within thirty days;

**CNG:**

**We recommend paragraph (2) be amended to state “When a pipeline or system pressure exceeds maximum allowable operating pressure”.**

- (3) ~~Such~~ The reports shall must be verified in detail in writing ~~if not so reported initially~~ and provided to the Commission within thirty days of the initial telephonic report. The reports ~~shall~~ must include at least the following:

**CNG:**

**We recommend paragraph (3) be amended to allow 45 days for the written report. This matches other proposed period extensions.**

- (a) Name(s) and address(es) of any person or persons injured or killed or whose property was damaged;
- (b) The extent of such injuries and damage;
- (c) A description of the ~~accident~~, incident, or hazardous condition to include date, time, and place;
- (d) A description of the gas facilities involved in the ~~accident~~, incident, or hazardous condition and the system operating pressure at that time, and the maximum operating pressure of the facilities involved;

**CNG:**

**We recommend that paragraph 3(d) be amended to say “maximum allowable operating pressure of the facilities involved.”**

- (e) The date and time the gas facility was made safe;
- (f) The date, time, and type of any temporary or permanent repair made; ~~and~~
- (g) Cost of the incident to the pipeline facility operator;

**CNG:**

**The reason for reporting cost information should be discussed further. We would like to understand how this information will be used and what benefits may be derived.**

- (gh) A written report ~~shall~~ must be ~~available~~ provided to the commission within ~~three months~~ thirty days, upon ~~request~~, receipt of the failure analysis of any ~~accident~~, incident, or hazardous condition which was due to construction or material failure.
- (i) Unscheduled interruptions to the service furnished by any gas company to an industrial customer, a master meter customer, or twenty-five or more distribution customers.

**CNG:**



**The placement of paragraph 3(i) should be examined. This requirement should probably be under paragraph (1). We have no objection to its placement here, but if it is moved to paragraph (1), it should be deleted from paragraph (3).**

~~Routine or planned maintenance and operational activities of the company which result in company controlled plant and equipment shut-downs, reduction in system pressures except as noted above, flaring or venting of gas, and normal leak repairs are not to be considered reportable items under this section.~~

- (4) Every gas company ~~shall~~ must file a copy of every required RSPA F-7100.1-1 and F-7100.2-1 ~~leak~~ annual reports with the commission. Names and telephone numbers of commission personnel authorized to take telephonic leak reports will be furnished and kept current under a separate letter to every company.
- In addition to the above required forms every gas company must file a report titled, "Damage Prevention Statistics", detailing the following information:
- a. Number of One-Call locate requests completed in field.
  - b. Number of third party damages incurred.
  - c. Specific cause of damage.

The "Damage Prevention Statistics" will apply to gas locates only and the fiscal year should correspond to the RSPA form requirements.

**CNG:**

**The information requested by the proposal in 4(b) and 4(c) is already submitted as part of the RSPA F-7100.1-1 and F-7100.2-1 forms.**

**We are interested in providing appropriate pipeline safety data to the Commission. We recommend further discussions of this proposed rule to achieve an appropriate wording for this change, and an understanding of the benefits derived.**

- (5) All gas companies ~~shall~~ must file with the commission, and with appropriate officials of all municipalities ~~within which such~~ where gas companies have facilities, the names, addresses, and telephone numbers of responsible officials of such gas companies who may be contacted in the event of an emergency. In the event of any changes in gas company personnel, immediate notification ~~thereof~~ shall must be given to the commission and municipalities.
- (6) The commission ~~shall~~ must be notified in writing at least two business days prior to the commencement of any pressure test of a gas pipeline to be operated at

pressures in excess of 20% of the specified minimum yield strength of the pipe used.

- (56) Daily reports of construction and repair activities ~~shall~~ must be sent electronically to the Commission. Reports shall be sent either by fax or e-mail and be received no later than 10:00 AM each day of the scheduled work and include both gas company and contractor construction and repair activities.

**CNG:**

**It is a burden on gas companies to require reports of all construction and repair activities be sent to the Commission on a daily basis. We currently submit daily reports upon which no actions are taken. To our knowledge, there are no administrative rules requiring non-gas utilities to report similar information. The primary purpose of this data would appear to facilitate “surprise” inspection of gas company construction and repair activities.**

**Submitting reports should only be required if the reports are necessary. This information should be obtained by contacting the specific operations base, not by requiring all gas companies report every day regardless of the locations of inspection personnel. We recommend that suitable language allowing the reports to be submitted upon a specific and prudent demand replace this proposed rule.**

- (6) When a gas company is required to file a copy of RSPA Drug Testing and Alcohol Testing MIS “EZ” Data Collection Form with the Federal Office of Pipeline Safety a company must ~~also simultaneously forward~~ submit a copy of the Form to the commission.