



# Public Service Commission of Wisconsin

Phil Montgomery, Chairperson  
Eric Callisto, Commissioner  
Ellen Nowak, Commissioner

610 North Whitney Way  
P.O. Box 7854  
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July 18, 2012

VIA ELECTRONIC MAIL

Mr. Jeffrey D. Wiese  
Associate Administrator for Pipeline Safety  
Pipeline and Hazardous Material Safety Administration  
1200 New Jersey Avenue South East  
Washington, DC 20590  
[PHMSA-state-updates@dot.gov]

Dear Mr. Wiese:

This is in response to your June 13, 2012, letter requesting comments from state pipeline safety programs concerning plans for replacement of high risk pipelines. We understand this information will be used for updating data that was originally provided to you in April 2011.

The Public Service Commission of Wisconsin (PSC) enforces the pipeline safety rules and regulations in our state. Fortunately, Wisconsin has very little pipe left that is considered to be constructed of unsatisfactory materials. The last sections of cast iron pipe were removed from service in 2001. The cast iron replacement programs in our state started in the 1970s. Full rate recovery was allowed for these projects. The last section of bare steel pipe in the state was retired in 2006. According to operator records, all steel pipe in Wisconsin is coated and cathodically protected. The operators in our state replaced the vast majority of Century plastic pipe by the end of 2011. At the end of 2011 we had 95 miles of PVC pipe in service in addition to 45 miles of EFG fiberglass pipe. Both of these materials are schedule to be replaced by the end of 2014.

The state of Wisconsin and its gas pipeline operators have been, and will continue to be, proactive in replacing potentially unsafe materials. We believe that due to our cold climate, underperforming materials are discovered sooner than they may be in warmer parts of the country. We encourage the replacement of these materials where warranted.

The PSC appreciates the opportunity to comment on this matter. If you need any further information on this subject please feel free to contact our Pipeline Safety Program Manager, Tom Stemrich, at [Tom.Stemrich@wisconsin.gov](mailto:Tom.Stemrich@wisconsin.gov).

Sincerely,

Robert Norcross  
Administrator  
Gas and Energy Division

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