



STATE OF WASHINGTON

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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April 11, 2011

Cynthia L. Quarterman
Administrator
U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration
1200 New Jersey Avenue, Southeast
Washington D.C. 20590

Dear Ms. Quarterman:

SUBJECT: March 31, 2011, High Risk Pipe Information Request

Thank you for the invitation to the April 18, 2011, Pipeline Safety Forum. I look forward to attending on behalf of the State of Washington and the Washington Utilities and Transportation Commission.

We agree that an aging infrastructure should be a concern to every pipeline safety regulatory agency. Washington is aware of the risks posed by aging pipes and has taken several important actions in recent years to address these risks. These include:

1. In 1992, the Commission approved a settlement agreement (Docket No. UG-920487) with the state's largest gas utility, Washington Natural Gas (now Puget Sound Energy), requiring the company to replace all cast iron pipe in the system within 15 years. These lines were targeted in response to high leak rates. As a result of this settlement agreement the company replaced 318 miles of pipe. No cast iron pipe remains in use in Washington State.
2. In 2003, the Commission worked with Pipeline and Hazardous Materials Safety Administration (PHMSA) to inspect and identify interstate transmission pipe operated by Williams Gas Pipeline West that were potentially susceptible to stress corrosion cracking. Based on the Commission's inspections and

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recommendations, PHMSA took 268 miles of 26-inch pipe out of service.
(Corrective Action Order 5-2003-1003-H)

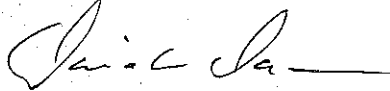
3. In 2005, the Commission issued an order (Docket No. PG-030080) directing Puget Sound Energy to eliminate all bare steel in the system by 2014. A copy of that order is enclosed. Of the 207 miles of bare steel pipe targeted for replacement, only 29 miles remain to be replaced. Those are on schedule to be replaced by 2014.

In addition, that order directed Puget Sound Energy to upgrade its software for tracking its monitoring activities, identify isolated facilities (i.e., short segments of cathodically protected steel pipe) to ensure inspections occur as required, and identify non-continuous sections of metallic pipe (including coated and bare steel mains) within cathodic protection systems and establish tests site for monitoring them.

4. We are currently evaluating pre-1970's vintage Aldyl A pipe for possible replacement and working with impacted operators to address this issue.
5. In 2009, the Commission staff convened pipeline operators, gas and electric utilities, (local governments), excavators, and others to discuss potential steps to reduce third-party damage to pipelines. Based on those discussions, the Commission this year worked in drafting Substitute House Bill 1634, which just this week passed the state Senate and now awaits House concurrence. The bill, if enacted, will clarify the Commission's pipeline safety jurisdiction over excavators, local governments, and consumer-owned utilities, and significantly strengthen penalties and enforcement mechanisms available to it.

Thank you for your ongoing work addressing aging pipeline infrastructure in the United States. I look forward to meeting you in Washington April 18.

Sincerely,



David W. Danner
Executive Director

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cc: Charles D. Gray, NARUC