



Public Service Commission of the District of Columbia
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Betty Ann Kane
Chairman

April 14, 2011

Ms. Cynthia L. Quarterman
Administrator
U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration
1200 New Jersey Avenue, SE.
Washington, DC 20590

RE: Replacement Plans for High Risk Pipelines in the District of Columbia

Dear Ms. Quarterman:

This letter is in response to your March 31, 2011 letter requesting that we review current replacement plans for the highest risk pipelines and consider what would be necessary to accelerate these plans. We have one operator in the District of Columbia which has cast iron and bare steel pipes in its natural gas distribution system. Through a joint effort between the D.C. Public Service Commission and the operator, it was agreed that starting in 1993, the operator "will replace all 8" to 12" high pressure cast iron main in the District of Columbia at a cost of approximately \$1.8 million per year, over a ten-year period." In practice, the operator replaced all of this main, approximately 17 miles in total, by the end of 2004. In addition, the remaining cast iron main was to be handled as follows; "High pressure cast iron pipe of diameters greater than 12" will continue to be monitored and analyzed in accordance with the current industry and more stringent operator requirements" and, "The normal maintenance and repair program will remain in place for the balance of the distribution system, including replacement where appropriate."

The operator now has 428 miles of cast iron main to be replaced following replacement of two miles of main in 2010. A portion of the cast iron has been lined and/or the joints internally sealed. The operator currently has projects on the books to continue to replace/remediate facilities based on Optimain risk assessment and field observations. The operator has several projects totaling just under 18,000 ft. (3.41 miles) for 2011. In 2010, the operator replaced approximately one mile of its bare steel main with 29 miles remaining, and replaced 248 steel services with 26,862 services remaining.

Ms. Cynthia L. Quarterman
April 14, 2011
Page 2

The operator is also currently working under a seven-year program to comply with orders from the D.C. Public Service Commission to replace or encapsulate approximately 26 miles of vintage mechanically coupled main and 3,500 vintage mechanically coupled services which apparently experienced elevated leakage rates when exposed to LNG/low heavy hydrocarbon gas. The cost of this project is approximately \$28 million over the seven years. The scope, cost recovery, and oversight of this program were determined through an agreement between the operator and stakeholders.

As part of our robust underground facility protection and excavation damage prevention efforts we have provided three-month bridge financing to supplement the PHMSA One Call grant and enable us to implement the One Call inspection, oversight and enforcement program year round. We are promoting inter agency and public utility coordination and collaboration of underground/excavation work across the District to enhance underground facility damage prevention and public safety. We are also participating in the promotion of the April 2011 "Safe Digging Month" and the national "Call Before You Dig" (811) programs. To this end, we have issued a D.C. Public Service Commission press release, initiated a web site campaign, prepared a Proclamation by the Mayor, and are expediting a Resolution for the Council of the District of Columbia promoting the month of April as "Safe Digging Month" in the District of Columbia.

We will need DOT/PHMSA's continued and increased resource support to enable the D.C. Public Service Commission to improve public safety through diligent and rigorous inspections, monitoring, oversight and enforcement related to the aging infrastructure assessment, reinvestment and improvement by our gas pipeline distribution system operator. We look forward to a continued partnership with PHMSA to achieve the common goal of gas pipeline safety. Please contact us if you have further questions or if we can be of further assistance.

Sincerely,



Betty Ann Kane

cc: Udeozo Ogbue, P.Eng.