

U.S. Department of Transportation
Research and Special Programs Administration
400 Seventh St., S.W.
Washington, D.C. 20590

JUN 28 2002

Mr. Douglas Kilpatrick, P. E.
Pipeline Safety Director
Washington Utilities and Transportation Commission
P.O Box 47250
Olympia, WA 98504-7250

Dear Mr. Kilpatrick:

We have considered your letter of April 26, 2002, notifying us the Washington Utilities and Transportation Commission has granted the City of Ellensburg a waiver from compliance with the definition of "main" in 49 CFR 192.3. The waiver permits the City of Ellensburg to classify as service lines, instead of mains, pipelines that are located on private property that supply gas to no more than two residential building customers. As a result, the pipelines would be subject to the minimum burial depths for service lines (49 CFR 192.361) rather than the minimum burial depths for mains (49 CFR 192.327).

The effect of the waiver is to reclassify these mains as "service lines." Because the circumstances and limitations of the waiver are similar to those in other State waivers we have approved, we have no objection to the waiver.

Sincerely,
Stacey L. Gerard
Associate Administrator for Pipeline Safety

STATE OF WASHINGTON
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
1300 5. Evergreen Park Dr. S.W
P.O. Box 47250
Olympia, Washington 98504-7250

Ref. No. Docket UG-011624

April 26, 2002

Stacey Gerard
Associate Administrator
Office of Pipeline Safety DPS — 20.1
United States Department of Transportation
400 Seventh Street Southwest
Washington, District of Columbia 20590

Dear Ms. Gerard:

Subject: Request for Waiver of 49 CFR 192.3 to Waive the Definition of Main

The Washington Utilities and Transportation Commission (WUTC) approved the City of Ellensburg's petition for a waiver of WAC 480-93-005 (12), regarding the definition of main, at its Open Meeting on April 24, 2002.

The Commission has approved a waiver of the definition of "main" for certain City of Ellensburg pipelines located on private property that serve no more than two residential buildings with the following conditions:

1. The effective date be subject to the U.S. Department of Transportation (USDOT), Office of Pipeline Safety, sixty-day review and approval of the request for waiver of the Code of Federal Regulations, Title 49, Part 192, Section 3 for "main".
2. The buildings must be located on contiguous private property and not be divided by streets, alleys, roads, or other public thoroughfares.
3. The maximum allowable operating pressure be 60 psig or less and the pipe and facilities are located on private property.
4. This waiver request does not apply to high-pressure "farm taps" placed adjacent to buildings.

This waiver does not affect any other Commission requirement, and the pipeline will meet all construction, operation, and maintenance requirements that pertain to gas service lines.

Please find enclosed the City of Ellensburg's letter dated November 5, 2001, requesting a petition for a waiver of 49 CFR 192.3 definition of "main" and a copy of the Commission Order, dated April 24, 2002, Docket Number UG-011624.

Sincerely,
Douglas Kilpatrick, P.E. Pipeline Safety Director

City of Ellensburg
420 North Pearl Street
Ellensburg, WA 98926
Energy Services Department — 509-962-7124

November 5, 2001

Mr. Douglas Kilpatrick, P.E.
Pipeline Safety Engineer
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. SW
P.O. Box 47250
Olympia, WA 985047250

RE: Request for Waiver

Attn: Mr. Scott Rukke

The City of Ellensburg petitions the Washington Utilities and Transportation Commission for a waiver for certain pipeline facilities from the regulatory definitions of the term "main." This request concerns the definition of "main" as prescribed by federal law in the Title 49, Code of Federal Regulations, Part 192.3. This request also addresses the definition of a "main" as prescribed by state law in WAC 480-93-005(12).

After installation of a service line to a building a prospective customer at an adjacent building often requests gas service. There are two methods to provide service to this adjacent building: 1) Install a new parallel service line with a new connection to the main. 2) Install a "branch" service by making a connection to the existing service line and branching to the prospective customer. The branching of the service is usually a more economical means of providing service.

Once the split service is installed, that portion of the original service that serves "as a common source of supply for more than one service" would need to be re-classified as main under both the federal and state definitions. If this waiver is not granted, the City of Ellensburg might need to incur additional cost to bring that portion of the existing service to the standards for a main. This might include lowering the line or installing a new line at required depths. Also, initial costs would be higher to install single service lines that may or may not be split off from in the future. Both of these costs may ultimately fall on City of Ellensburg natural gas customers.

The City of Ellensburg often prefers to install split services for the following reasons: 1) The installation is more economical if the line is not required to meet the standards of a main. 2) The branch service eliminates construction within the road right-of-way and thereby reduces exposure to conflicts and possible hazardous exposure with existing utilities. 3) Local jurisdictions would prefer that we not cut roads when other means are available to serve customers. 4) Less pipe installed to serve customers equates to less exposure to future dig-ins.

For these afore mentioned reasons, the City of Ellensburg requests a waiver which exempts it from the definition of the term "main" as prescribed in 49 CFR part 192.3 and WAC 480-93-005(12) and which instead classifies as service line, any existing or future pipelines which serve buildings on a single parcel of property or which serve buildings on an adjacent or abutting property.

Sincerely,
Darren Larsen
Gas Operations Supervisor

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Petition of)	
)	DOCKET NO. UG-011624
THE CITY OF ELLENSBURG)	
)	
For Waiver of Certain Pipeline)	
Facilities from Regulatory Definitions)	ORDER GRANTING WAIVER
of the Term "Main" [WAC 480-93-)	
005(12), CFR 49 Part 192.3])	
.....))	

BACKGROUND

- 1 On March 12, 2002, The City of Ellensburg, a Washington Corporation, filed with the Commission a request for waiver of WAC 480-93-005(12) and CFR Title 49 Part 192.3, Definitions. 49 CFR Part 192 is incorporated into the Washington Administration Code as WAC 480-93-010. The waiver will provide the City of Ellensburg the right to install new service lines from branching points on existing service lines to adjacent buildings where the pressure does not exceed 60 pounds per square-inch gauge.
- 2 The City of Ellensburg requests the waiver for the following reasons: 1) the installation is more economical if the line is not required to meet the standards of a main; 2) the branch service eliminates construction within the road right-of-way and thereby reduces exposure to conflicts and possible hazardous exposure with existing utilities; 3) local jurisdictions would prefer that they not cut roads when other means are available to serve customers; 4) less pipe installed to serve customers equates to less exposure to future dig-ins.

FINDINGS

- 3 (1) WAC 480-93-005 (12) states that a "main" is a gas pipeline which serves as a common source of gas for more than one service line, which crosses a public right-of-way, or which crosses property not owned by the customer or the gas company. A service line means a distribution line that transports gas from a common source of supply to a customer meter or the connection to a customer's piping. A customer is defined as any individual who purchases gas for his own consumption. A "main" is defined by 49 CFR 192.3 as a distribution line that serves as a common source of supply for more than one service line.

DATED Olympia, Washington, and effective this 24th day of April, 2002.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

MARILYN SHOWALTER, CHAIRWOMAN

RICHARD HEMSTAD, COMMISSIONER

PARTRICK J. OSHIE, COMMISSIONER