

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE WAIVER REQUEST)
FILED BY AVISTA UTILITIES FOR AN) **CASE NO. AVU-P-03-1**
EXEMPTION FROM THE COMMISSION'S)
SAFETY RULE 201, IDAPA 31.11.01.201.)
) **ORDER NO. 29368**
)

On October 14, 2003, Avista Utilities filed a letter requesting a waiver from the Commission's Safety Rule 201, IDAPA 31.11.01.201. Safety Rule 201 requires all gas corporations to abide by federal safety regulations contained in the Code of Federal Regulations, including 49 C.F.R. § 192.321(a). The U.S. Department of Transportation's safety standards in Section 192.321(a) require that plastic pipe used to transport natural gas "must be installed below ground level." Avista seeks a specific waiver to encase plastic gas pipe above ground where it crosses a river.

The Commission's Safety Rule 3 provides that any person may request a waiver from any safety rule. IDAPA 31.11.01.003. A waiver request must describe the specific waiver sought; refer to the particular rule or Order that is controlling; and state the facts to support the waiver. IDAPA 31.01.01.053.

THE WAIVER REQUEST

Avista requests a waiver so that it may place a 6-inch polyethylene (PE) plastic pipe above ground in a steel casing. The Company proposes to place the plastic pipe in a 10-inch steel casing where the gas line crosses the South Fork of the Palouse River on U.S. Highway 95 in Moscow, Idaho. The Company proposes that the plastic pipe (encased in the steel casing) be suspended from the concrete bridge as it spans the river for a distance of 67 feet. To further protect the casing and plastic pipe from direct sunlight, the casing will be suspended under the bridge. At the ends of the bridge, the plastic pipe will emerge from the steel encasement and will be buried below ground level.

Avista's waiver request also included the following design information:

- The Maximum Allowable Operating Pressure (MAOP) of this gas line is 60 pounds per square inch (gauge) (PSIG).

- The 10-inch steel casing will terminate below ground level on both sides of the bridge.
- The casing will be suspended from a new 67-foot length concrete bridge (Idaho Transportation Department Project No. BR-4110(147)).
- A boot-type end seal will be used at both ends of the casing to positively seal between the casing and gas carrier pipe.
- Casing vent pipes will be installed to prevent the possible buildup of pressure and to detect leakage of gasses.
- Casing insulators (thinsulators) will be installed and spaced at a minimum of 5 feet to provide positive separation between the casing and carrier pipe.
- Casing pipe is housed under the open-girder bridge and consequently will be shielded from the effects of direct sunlight.
- The computed design pressure for the PE pipe (SDR 11.5) at 120 degrees Fahrenheit is 61 PSIG; the highest recorded temperature for the area is 109 degrees Fahrenheit. Gas pressure within the pipe on the bridge will therefore not exceed system MAOP due to ambient temperature.
- The maximum thermal contraction of the PE pipe is calculated to be 13.0 inches. Because the ends of the pipe are “fixed” by the burying of the facility at the ends of the bridge, this contraction will be exhibited as internal stresses. The internal stress is calculated to be 737 psi which is less than the 1,000 psi hydrostatic design base (HDB) rating of the PE pipe.

STAFF COMMENTS

Staff believes that a waiver in this instance is warranted. The Company provided calculations to the Staff showing that 10-inch roller hangers with adequate capacity would be installed at 9.1 feet spacing along with the necessary hardware of adequate capacity. The Company has assured Staff that prior to installing the plastic pipe in the casing, cleaning pigs will be run through the casing to remove debris, which might damage the plastic pipe. The Company indicates that in the proposed location under the bridge, the pipe will be protected from ice and wind loads.

There are advantages to the use of encased plastic pipe at this bridge crossing. First, plastic pipe is not prone to corrosion, and therefore will require less maintenance than steel pipe.

Second, steel encased plastic pipe is less susceptible to damage from vandalism, airborne objects and external loading. Finally, Staff notes that many similar waivers have been granted by the various states and approved by the U.S. Department of Transportation, Office of Pipeline Safety.

FINDINGS AND DISCUSSION

After reviewing the waiver request and Staff comments, we find it reasonable to grant Avista a waiver of our Safety Rule 201 and more specifically, our adoption of 49 C.F.R. § 192.321(a). We find the measures Avista proposes to utilize to encase and protect the plastic pipe above ground where it crosses the South Fork of the Palouse River are reasonable and appropriate. Consequently, we find that it is appropriate to grant the requested waiver in this instance.

Although we grant a waiver, we recognize that the Commission must give the Department of Transportation's Office of Pipeline Safety (OPS) written notice of the waiver at least 60 days before this waiver is effective. 49 U.S.C. § 60118(d). Consequently, our Order granting this waiver request shall not become effective until December 30, 2003, unless OPS permits the waiver to become effective at an earlier date.

ORDER

IT IS HEREBY ORDERED that Avista Utilities' request for a waiver from the Commission's Safety Rule 201 (IDAPA 31.11.01.201) and, more specifically 49 C.F.R. § 192.321(a), is granted as conditioned below.

IT IS FURTHER ORDERED that the Commission's Executive Administrator forward a copy of Avista's request and our Order to the Office of Pipeline Safety (OPS) for its review.

IT IS FURTHER ORDERED that this Order granting Avista a waiver shall not become effective until December 30, 2003, unless OPS authorizes this waiver to become effective sooner.

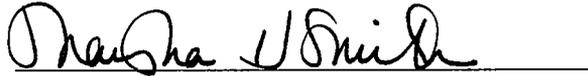
THIS IS A FINAL ORDER. Any person interested in this Order (or in issues finally decided by this Order) or in interlocutory Orders previously issued in this Case No. AVU-P-03-1 may petition for reconsideration within twenty-one (21) days of the service date of this Order with regard to any matter decided in this Order or in interlocutory Orders previously issued in this Case No. AVU-P-03-1. Within seven (7) days after any person has petitioned for

reconsideration, any other person may cross-petition for reconsideration. See *Idaho Code* § 61-626.

DONE by Order of the Idaho Public Utilities Commission at Boise, Idaho this 30th day of October 2003.



PAUL KJELLANDER, PRESIDENT

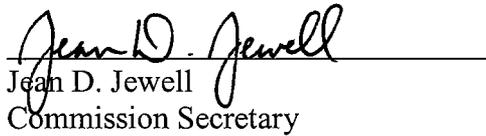


MARSHA H. SMITH, COMMISSIONER



DENNIS S. HANSEN, COMMISSIONER

ATTEST:



Jean D. Jewell
Commission Secretary

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