U.S. Department of Transportation Pipeline and Hazardous Materials Safety Administration

1200 New Jersey Avenue SE Washington DC 20590

SEP 2 7 2018

Mr. Sean C. Mayo Pipeline Safety Director Washington Utilities and Transportation Commission 1300 S. Evergreen Park Drive, SW Olympia, WA 98504-7250

Dear Mr. Mayo:

In a December 8, 2017, letter to the Pipeline and Hazardous Materials Safety Administration (PHMSA), you requested an interpretation of 49 CFR Part 192. Specifically, you requested an interpretation for the definition of a transmission line under § 192.3.

You described the pipeline as a 76.53-mile-long intrastate transmission pipeline (Kettle Falls Pipeline) operated by Avista Utilities. The pipeline receives gas from a connection with an interstate transmission pipeline operated by Northwest Pipeline LLC (Williams) at approximately 5-miles north of Spokane, Washington and transports gas to north of Kettle Falls, Washington. You stated that other than the first 3.8 miles of the pipeline, the pipeline operates above 20 percent of specified minimum yield strength (SMYS) and has historically been classified as transmission pipeline by Avista.

You stated that the first 3.8 miles, where the pipeline connects to the Williams transmission line, operates at 19.65 percent SMYS. You asked whether the 3.8-mile pipeline should be regulated as a transmission line since it operates at 19.65 percent SMYS and is tied into and receives gas from an interstate transmission pipeline.

"Transmission line" is defined in § 192.3 as "a pipeline, other than a gathering line, that: (1) Transports gas from a gathering line or storage facility to a distribution center, storage facility, or large volume customer that is not down-stream from a distribution center; (2) operates at a hoop stress of 20 percent or more of SMYS; or (3) transports gas within a storage field."

NOTE: A large volume customer may receive similar volumes of gas as a distribution center, and includes factories, power plants, and institutional users of gas.

Even though the first 3.8 miles of the pipeline operates below the 20 percent SMYS, the pipeline connects to transmission lines at both ends and, therefore, meets condition 1 of the definition of a transmission line.

The Pipeline and Hazardous Materials Safety Administration, Office of Pipeline Safety provides written clarifications of the Regulations (49 CFR Parts 190-199) in the form of interpretation letters. These letters reflect the agency's current application of the regulations to the specific facts presented by the person requesting the clarification. Interpretations do not create legally-enforceable rights or obligations and are provided to help the public understand how to comply with the regulations.

A pipeline that meets any of the three conditions listed under the definition in § 192.3 is a transmission line in accordance with 49 CFR Part 192. Therefore, a pipeline that operates at a hoop stress of less than 20 percent of its specified minimum yield strength, but meets either condition one or three, meets the definition of a transmission line.

PHMSA agrees with Washington Utilities and Transportation Commission that the 76.53-milelong pipeline, including the first 3.8 miles of the pipeline, is a transmission line. If we can be of further assistance, please contact Tewabe Asebe at 202-366-5523.

Sincerely,

John A. Gale

Director, Office of Standards and Rulemaking

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## STATE OF WASHINGTON

## UTILITIES AND TRANSPORTATION COMMISSION

1300 S. Evergreen Park Dr. S.W., P.O. Box 47250 • Olympia, Washington 98504-7250 (360) 664-1160 • TTY (360) 586-8203

December 8, 2017

John A. Gale Director of Standards and Rulemaking Office of Pipeline Safety Room 24-310 1200 New Jersey Ave, SE Washington DC 20590

## RE: Request for Interpretation of "Transmission Line" as defined in §192.3

Dear Mr. Gale:

We are requesting an interpretation as to whether the first 3.8 miles of the below described 76.53 mile Avista Utilities<sup>1</sup> (Avista) Kettle Falls Pipeline should be considered "Transmission" as defined in §192.3 Definitions, *Transmission Line*, (1). We consider definition (1) to be a functional definition of Transmission.

**Transmission line** means a pipeline, other than a gathering line, that: (1) Transports gas from a gathering line or storage facility to a distribution center, storage facility, or large volume customer that is not down-stream from a distribution center; (2) operates at a hoop stress of 20 percent or more of SMYS; or (3) transports gas within a storage field.

The Kettle Falls Pipeline begins approximately 5 miles north of Spokane, WA at the point where Northwest Pipeline LLC (Williams), an interstate transmission pipeline operator, delivers natural gas to Avista through a tap at their 9-Mile Gate Station. At the 9-Mile Gate Station, the gas is metered, odorized<sup>2</sup>, the pressure is reduced, and over-pressure protection is provided. The pipeline runs 76.53 miles, transporting gas to various regulating stations along its route until it reaches its end point north of Kettle Falls WA. From the delivery point at 9-Mile, the pipeline is constructed primarily of 3.8 miles of 12-inch, 0.312 w.t., X-52 (19.65 percent of SMYS), 60.505 miles of 8-inch, 0.188 w.t., X-42 (27 percent of SMYS), 12.09 miles of 6-inch, 0.156 w.t. X-42 (25 percent of SMYS), and 0.135 miles of 4-inch (<20 percent SMYS) to its end point north of Kettle Falls WA. It has a Maximum Allowable Operating Pressure (MAOP) of 500 psig.

<sup>&</sup>lt;sup>1</sup> Avista Utilities is an intrastate Local Distribution Company operating in Washington, Idaho and Oregon that is based in Spokane WA.

 $<sup>^{2}</sup>$  WA State requires odorization of all pipelines transporting natural gas unless it makes the product unfit for the end user.

In 2010, the first 1.7 miles of 8-inch transmission line were replaced with 3.8 miles of heavier wall 12-inch due to residential encroachment and for additional flow capacity. Prior to the replacement the entire 76.53 mile segment of pipeline, from the 9-Mile Gate to its end point, with the exception of the 4-inch at the end, was operating above 20-percent of SMYS and was classified as transmission by Avista. After the replacement in 2010, Avista reclassified the 3.8 miles of 12-inch as high-pressure distribution main since it was operating at less than 20 percent of SMYS (19.65 percent). The remaining 72.73 miles of pipeline continues to operate above 20 percent of SMYS and is classified as transmission by Avista. See maps - Attachments A and B.

## Our question to you is as follows:

Since the above described 3.8 mile segment of 12-inch pipeline, operating at 19.65% SMYS, is tied into and receives gas from an Interstate Transmission Pipeline and transports the gas to an Intrastate Transmission Pipeline, do you believe that the 3.8 mile segment meets the functional definition of Transmission as found in §192.3 Definitions, Transmission Line, (1)?

If you have any questions or if we can provide further clarification or details, please contact Scott Rukke at (360) 664-1241 or Joe Subsits at (360) 664-1322.

Sincerely,

Sean C. Mayo Pipeline Safety Director

cc: Huy Nguyen, Acting Director, Western Region, PHMSA

Enclosures



9 Mile City Gate to Kettle Falls Transmission





NOTICE: THIS IS NOT A LEGAL DOCUMENT Changes to facilities may have occurred since the last update of this map. Review of this map is not an acceptable substitute for compliance with RCW Title 19, chapter 122, which includes notification of "One Call" before start of work.

Printed: 11-14-2017 Route To: Dylan Karaus 1 inch = 750 feet