



Public Service Commission of Wisconsin

Phil Montgomery, Chairperson
Lauren Azar, Commissioner
Eric Callisto, Commissioner

610 North Whitney Way
P.O. Box 7854
Madison, WI 53707-7854

April 14, 2011

Ms. Cynthia Quarterman, Administrator
Pipeline and Hazardous Material Safety Administration
1200 New Jersey Avenue, S.E.
Washington, DC 20590

Re: Pipeline Safety Forum Addressing Aging Infrastructure

Dear Ms. Quarterman:

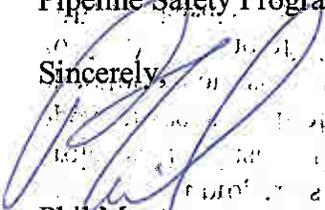
This is in response to your March 31, 2011, letter requesting comments from state pipeline safety programs concerning plans for replacement of high risk pipelines. We understand this information will be used for the upcoming Pipeline Safety Forum on April 18, 2011.

The Public Service Commission enforces the pipeline safety rules and regulations in Wisconsin. We, fortunately, have very little pipe left that is considered to be constructed of unsatisfactory materials. The last sections of cast iron pipe were removed from service in 2001. The cast iron replacement programs in our state started in the 1970s. Full rate recovery was allowed for these projects. The last section of bare steel pipe in the state was retired in 2006. According to operator records, all of the steel pipe in Wisconsin is coated and cathodically protected. The operators in our state will have replaced the vast majority of Century plastic pipe by the end of 2011. At the end of 2010, we still had 161 miles of PVC pipe in service in addition to 57 miles of EFG fiberglass pipe. Both of these materials are scheduled to be replaced by the end of 2015.

The state of Wisconsin and its gas pipeline operators have been, and will continue to be, proactive in replacing potentially unsafe materials. We believe that due to our cold climate, underperforming materials are discovered sooner than they may be in warmer parts of the country. We encourage the replacement of these materials where warranted.

The Public Service Commission of Wisconsin appreciates the opportunity to comment on this matter. If you need any further information on this subject please feel free to contact our Pipeline Safety Program Manager, Tom Stemrich at tom.stemrich@wi.gov.

Sincerely,


Phil Montgomery
Chairperson

PM:TMS:sp/Montgomery/Letters/2011/Pipeline & Hazardous Material Safety Admin