



Puget Sound Energy, Inc.
P.O. Box 90868
Bellevue, WA 98009-0868

March 14, 2007

Department of Development and Environmental Services
900 Oakesdale Avenue SW
Renton, WA 98057-5212
ATTN: Pamela Dhanapal

RE: King County Proposed Amendments to State-Adopted 2006 International Building and Fire Codes and Uniform Plumbing Code

Dear Ms. Dhanapal:

Puget Sound Energy has reviewed the proposed adoption and changes to King County Title 16, specifically King County Code 16.02 240 (IBC Section 105.2 Permits – Work Exempt from Permits). We are requesting the addition of the following section, which essentially follows IBC Section 105.2.3.

16.02 240 (20) Installation, alteration or repair of generation, transmission, distribution, or metering, including related equipment, foundations, and pre-manufactured enclosures that are under the ownership and control of public and private service/utility agencies by established right, presuming that such equipment and foundations meet the requirement of this code.

PSE believes that this additional text is warranted as most equipment is not occupied by personnel nor poses a threat to safety to the surrounding properties. Metalclad Switchgear, which is often used at our new substations or is installed at substations undergoing modification, is designed in a way where qualified service personnel can enter the cabinet to perform repairs and maintenance. This equipment is housed in a cabinet that is assembled at the manufacturer and meets the National Electric Safety Code (NESC). The cabinets are entered only by qualified personnel for a short time during routine inspection and operation.

As recently as of February 2007, King County DDES has reviewed PSE's foundation designs and metalclad switchgear and issued building permits with no modifications or comment. To our knowledge PSE has not received comments from King County or any other jurisdiction regarding the design of the metalclad switchgear or foundation work. PSE uses standardized foundation designs that have been in use without problem for years. Substations are designed to operate for more than fifty years and are designed by structural engineers and constructed for the long-term.

Thank you for considering our proposal. PSE representatives would be happy to meet with you to discuss this proposal in further detail at your convenience. If you have any questions, please do not hesitate to contact me at 425-462-3820.

Sincerely,

A handwritten signature in black ink that reads 'Jason Van Nort'. The signature is written in a cursive, flowing style.

Jason Van Nort
Government and Community Relations Manager

Cc: Susan Hempstead, Government and Community Relations Manager
Jim Hogan, Manager of Standards and Compliance