



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

**CERTIFIED MAIL**

August 31, 2016

Booga K. Gilbertson  
Sr. VP Operations  
Puget Sound Energy  
PO Box 97034 M/S: PSE-12N  
Bellevue, WA 98009-9734

Dear Ms. Gilbertson:

**RE: 2016 Natural Gas Standard Inspection – Puget Sound Energy, King County East  
(Insp. No. 6747)**

Staff from the Washington Utilities and Transportation Commission (staff) conducted a standard distribution system inspection from June 13 - 16, July 25-28, and August 1, 2016, of Puget Sound Energy (PSE), King County East. The inspection included a records review and inspection of the pipeline facilities.

Our inspection indicates two areas of concern as noted in the enclosed report, which unless corrected, could potentially lead to future violation of state and/or federal pipeline safety rules.

**Your response needed**

Please review the attached report and respond in writing by October 3, 2016. The response should include how and when you plan to bring each area of concern into full compliance.

**What happens after you respond to this letter?**

The attached report presents staff's decision on the areas of concern and does not constitute a finding of probable violation by the staff at this time if the issue is resolved within 90 days of discovery.

If this issue is not resolved within 90 days, this matter may result in the issuance of a notice of probable violation.

Puget Sound Energy  
2016 Natural Gas Standard Inspection, East King County  
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If you have any questions or if we may be of any assistance, please contact Dave Cullom at (360) 664-1141. Please refer to the subject matter described above in any future correspondence pertaining to this inspection.

Sincerely,

A handwritten signature in blue ink, appearing to read "Alan E. Rathbun", with a long horizontal flourish extending to the right.

Alan E. Rathbun  
Pipeline Safety Director

Enclosure

cc: Cara Peterman, Director, Enterprise Risk Management & Compliance, PSE  
Harry Shapiro, Director, Gas Operations, PSE  
Cheryl McGrath, Manager, Compliance Programs, PSE

**UTILITIES AND TRANSPORTATION COMMISSION**  
**2016 Natural Gas Pipeline Safety Standard Inspection**  
**Puget Sound Energy – King County East**

The following areas of concern of Title 49 CFR Part 192 and WAC 480-93 were noted as a result of the 2016 inspection of the Puget Sound Energy – King County East unit. The inspection included a random selection of records, operation and maintenance (O&M), emergency response, inventory, and field inspection of the pipeline facilities.

**AREAS OF CONCERN**

1. **49 CFR §192.747 Valve maintenance: Distribution systems.**

- (a) *Each valve, the use of which may be necessary for the safe operation of a distribution system, must be checked and serviced at intervals not exceeding 15 months, but at least once each calendar year.*
- (b) *Each operator must take prompt remedial action to correct any valve found inoperable, unless the operator designates an alternative valve.*

**Finding(s):**

During the field portion of the inspection, an emergency section valve, VA-04267, was inoperable by one person. It is unknown if the valve can be operated by two people or if the valve is completely inoperable. Please provide documentation of any remedial action taken to ensure this valve operates as intended during an emergency. If two gas first response personnel are needed to operate a valve, please provide documentation that demonstrates that two personnel will be dispatched, in the event of an emergency, to each location that requires two individuals to safely complete the task.

2. **WAC 480-93-110 Corrosion control**

- (2) *Each gas pipeline company must complete remedial action within ninety days to correct any cathodic protection deficiencies known and indicated by any test, survey, or inspection. An additional thirty days may be allowed for remedial action if due to circumstances beyond the gas pipeline company's control the company cannot complete remedial action within ninety days. Each gas pipeline company must be able to provide documentation to the commission indicating that remedial action was started in a timely manner and that all efforts were made to complete remedial action within ninety days. (Examples of circumstances allowing each gas pipeline company to exceed the ninety-day time frame include right of way permitting issues, availability of repair materials, or unusually long investigation or repair requirements).*

**Finding(s):**

During the field portion of the inspection, we obtained low readings at the following locations:

- 7/26/2016 -712mV CSE PSP (galvanic/on) at 19207 37<sup>th</sup> Ave in Lake Forest Park, WA.
- 7/27/2016 -611mV CSE PSP (on) and -493mV CSE PSP (off) at 16536 121st Ave SE, Renton, WA.

If uncorrected within 90 days, these conditions could lead to probable violations.