



STATE OF WASHINGTON
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 13, 2013

Ms. Booga K. Gilbertson
Vice President - Operations
Puget Sound Energy
10885 NE 4th Street
Bellevue, WA 98004

Dear Ms. Gilbertson:

RE: 2013 Intrastate Propane/Air Peak Shaving System Standard Inspection – Puget Sound Energy - D.W. Swarr Propane-Air Plant

Staff from the Washington Utilities and Transportation Commission (staff) conducted a Standard Inspection from July 22-26 and July 29-31, 2013, of Puget Sound Energy (PSE), D.W. Swarr Propane-Air Plant. The inspection included a records review and inspection of the plant facilities.

No apparent violations were noted as a result of the inspection; however one area of concern was noted during the inspection which was corrected at the time of the inspection.

Section 2675.1200 of the PSE Operating Standards Manual (Effective on 03/01/13) – Propane Leakage Program Section 3.2, reads in part, “When conducting tests for leakage on buried propane gas systems, it is essential that samples be taken at or near the pipe, in the bottom of ditch lines, and at the low point of substructures.”

Staff observed PSE leak survey contractor Survey & Analysis personnel performing a propane bar hole test only 12 inches below the ground surface. The propane pipeline is greater than 12 inches deep so the requirement for propane detection that “samples be taken at or near the pipe”, was not met.

Propane leakage surveys were performed by excavating with a vacuum truck to just below and to the side of the buried pipeline. Permanent test wells have since been installed at these locations that will allow for proper leak sampling going forward.

Staff would like to thank PSE’s professionalism, assistance, and cooperation during this inspection.



Puget Sound Energy
2013 Intrastate Propane/Air Peak Shaving System Standard Inspection – Puget Sound Energy -
D.W. Swarr Propane-Air Plant
August 13, 2013
Page 2

If you have any questions, or if we may be of any assistance, please contact Lex Vinsel at (360) 664-1319. Please refer to the subject matter described above in any future correspondence pertaining to this inspection.

Sincerely,



David D. Lykken
Pipeline Safety Director

cc: Carol Wallace, Director, Gas Operations, (PSE)
Catherine Koch, Director, Compliance, (PSE)
Duane Henderson, Manager, Gas System Integrity, (PSE)
Cheryl McGrath, Manager, Compliance and Regulatory Audits Gas, (PSE)