



Puget Sound Energy
P.O. Box 97034
Bellevue, WA 98009-9734
PSE.com

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Pipeline Safety Program

June 9, 2014

David Lykken
Pipeline Safety Director
Washington Utilities and Transportation Commission
Pipeline Safety Section
1300 S. Evergreen Park Drive S.W.
PO Box 47250
Olympia, WA 98504-7250

Dear Mr. Lykken:

RE: 2014 Natural Gas Standard Inspection- Puget Sound Energy - Pierce County

PSE has received and reviewed your letter dated May 8, 2014 regarding the 2014 Pierce County Audit, and pursuant to your request is submitting the following written response to the two areas of concern noted.

AREAS OF CONCERN

During the field inspection, one area of evaluation was PSE's steep slope patrols. The following issues were noted as part of that evaluation:

1. Edgewood: Several large Douglas fir trees were noted growing over the pipeline on the steep slope. PSE should evaluate whether this condition would compromise the pipeline should one or more of these trees blow over during a windstorm.
2. Orting: The homeowner at the top of the slope has routed a drain line to the head of the slope which showed signs of erosion over the top of PSE's pipeline. PSE should evaluate whether this condition would compromise that pipeline should it be allowed to continue along the present drainage course.

PSE Response:

1. Edgewood: PSE located and marked the pipeline. Using a pipe locator instrument, the depth of the pipeline was determined to be 4.5 feet. PSE consulted with a Certified Arborist with the International Society of Arboriculture who informed PSE that the typical depth of the roots in question would be approximately 18-24 inches. PSE concluded that the trees will not negatively affect the pipeline should they topple in a windstorm.

2. Orting: PSE evaluated the site and determined that the drain was located a sufficient distance up the slope such that it should not affect the pipeline cover. However, erosion control measures were added to provide extra protection for the slope. PSE installed straw wattles per company procedures to serve as erosion control near the drain location. In addition, PSE observed the presence of native grasses that support the slope over and adjacent to the pipeline, providing additional soil stabilization in the vicinity of the pipeline.

We hope the information provided addresses and satisfies your concerns. PSE appreciates the Commission's responsibilities in auditing and enforcing pipeline safety regulations. We are committed to constructing, operating, and maintaining a safe gas pipeline system.

Sincerely,



Booga K. Gilbertson
Vice President, Operations

Cc: Cathy Koch, Director Compliance
Cheryl McGrath, Manager Compliance Programs
Duane Henderson, Manager Gas System Integrity
Tania Klippert, Manager Gas First Response
Dave Lagerquist, Manager Gas First Response