



Puget Sound Energy
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PSE.com

September 25, 2017

Sean Mayo
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. Mayo:

**RE: Supplemental Response to 2017 Natural Gas Standard Inspection- Puget Sound Energy –
Pierce County Inspection Number 7229**

Staff requested additional information in the form of a supplemental response for Probable Violation 2. PSE is submitting the following supplemental response.

PROBABLE VIOLATION 2

WAC 480-93-188 Gas leak surveys.

(3) Each gas pipeline company must conduct gas leak surveys according to the following minimum frequencies:

(a) Business districts - At least once annually, but not to exceed fifteen months between surveys. All mains in the right of way adjoining a business district must be included in the survey;

Finding(s):

A number of plat maps were randomly selected from the Pierce County, Kittitas, and Thurston/Lewis service areas to review leak survey records for during this inspection. Of 69 maps selected, 29 instances of leak surveys exceeding the minimum required inspection frequencies for business districts were identified.

PSE Supplemental Response

PSE reviewed the twenty nine Can't Get In (CGI) and Skipped Leak Survey (Skip) locations that were noted during the audit, and has completed the leak surveys for these locations. No leaks or significant atmospheric corrosion issues were found.

These twenty nine locations are examples of where PSE and our Service Provider Hydromax (HUSA) have had difficulty completing leak surveys. In some cases, we are unable to physically access the facility such as a locked gate (also known as a Can't-Get-In or "CGI"). In other cases, we cannot find a service line to perform the survey because of either a mapping issue, an inability to physically locate the facility, or because it's hard to physically reach the facility without specialized equipment (also known as a "Skip").

Plans are currently underway to resolve the CGI and Skip locations. To provide additional transparency, PSE will share these processes with the WUTC at our next quarterly meeting.

CGI Resolution

To address the historic CGIs, PSE will send a notification to customers informing them that we were previously unable to gain access to perform our required maintenance, and that we will be reaching out to them in the near future to schedule appointments. The letter will also leave contact information for them to call and schedule the maintenance, if preferred.

Hydromax will attempt to contact the customer via phone and schedule an appointment to complete the survey. This will be followed by a second phone call attempt to reach the customer three days later. If contact is unsuccessful, each location will be visited and a surveyor will attempt to gain access to complete the survey. If access is still not available, a letter will be left with HUSA's contact information, and the customer will again be asked to call and schedule a visit within five days. If the customer does not contact HUSA within five days, crews are equipped with ladders, bolt cutters, and if necessary will coordinate with animal control or police to gain access. HUSA has added ten (10) two-person crews dedicated to this effort. PSE anticipates that these measures will resolve the vast majority of the historic CGI locations.

After all of these measures are taken, if there are instances where HUSA has still not gained access, PSE will initiate a 3-letter campaign communicating to the customer, with increasing urgency, that PSE needs to gain access to our facilities to perform required safety maintenance, and failure to do so may result in termination of gas service.

Skip Resolution

The process for resolving a Skip involves researching facility mapping history, conducting field visits, performing locates, and disposition of the facility as either a Hard to Reach Location (existing or new), a mapping update, or the piping is located/resolved and a survey is completed. PSE has added 4 additional office employees to review the historic skip locations and resolve them.

Work Prioritization

Our data indicates that there are 2489 unique locations that were classified as a CGI for more than one survey cycle. These tend to be services located in Business Districts. PSE will prioritize this data set for resolution first. We anticipate the vast majority of these will be resolved by January 31, 2018, and the remainder of the historic CGI and Skip locations will be addressed by December 31, 2018. PSE will communicate the status of this commitment during PSE/WUTC quarterly meetings.

We hope the information provided is responsive to the findings of the UTC inspection. PSE is committed to constructing, operating, and maintaining a safe gas pipeline system.

Sincerely,



Booga K. Gilbertson

Sr. Vice President, Operations

Cc: Cara Peterman, Director Enterprise Risk and Compliance
Cheryl McGrath, Manager Compliance Programs
Harry Shapiro, Director Gas Operations
Doug Loreen, Director Safety and Preparedness
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