

Form A- Annual Review 8623

UTC Standard Annual Review Inspection Report
 Intrastate Operators
 FORM A: Annual Review

Print Inspection Record PHMSA Pipeline Regulations PHMSA Advisory Bulletins Print Blank Form

Inspector and Operator Information

Inspection ID 8623	Inspection Link 8623	Inspector - Lead Anthony Dorrough	Inspector - Assist
Operator Puget Sound Energy	Unit Headquarters (HQ)	OPID # 22189	Records Location - City & State Bellevue, WA
Inspection Start Date 10-17-2023	Inspection Exit Interview Date 10-17-2023	Engineer Submit Date 10-17-2023	

Inspection Summary

You must include the following in your inspection summary:

- *Inspection Scope and Summary
- *Facilities visited and Total AFOD
- * Summary of Significant Findings
- * Primary Operator contacts and/or participants

Inspection Scope and Summary

This Annual Review of Puget Sound Energy's (PSE) Annual Report Data, Program and Procedure was completed on Oct 17 - 2023

Facilities visited and Total AFOD = 1

There were no facilities visited for this inspection.

Summary of Significant Findings

There were no items of concern or probable violations identified during this audit.

Primary Operator contacts and/or participants

Justin Wahlborg/Pipeline Safety Compliance Program Manager/Compliance and Quality Management/justin.wahlborg@pse.com

Cameron Williams/Sr. Regulatory Compliance Analyst/cameron.williams@pse.com

Instructions and Ratings Definitions

INSPECTION RESULTS: Annual Review

Satisfactory Responses	Satisfactory List	Number of Unanswered Questions	Unanswered List
38	1,3,4,5,6,7,8,9,10,12,13,14,15,16,17,18,19,20,21,22,23,24,25,26,27,28,29,30,31,32,35,37,39,40,42,43,44	0	
Un satisfactory Responses 0	Un satisfactory List		
Area of Concern Responses 0	Area of Concern List		
Not Applicable Responses 0	Not Applicable List		
Yes Responses 4	Yes List 34,36,38,41	No Responses 0	No List
Not Checked / Evaluated Responses 0	Not Checked / Evaluated List		

**If an item is marked Unsat, AOC, N/A, or N/C, an explanation must be included in the "Notes" block for that question and also summarized in the " SUMMARY OF REQUIRED COMMENTS" section at the end of this inspection form.

Crew Inspection History

Facility Inspection History

Scheduled Inspection History

GAS System Operations History

HL System Operations History

ANNUAL REPORT: ACCURACY/TRENDS

Question #1. Was the Annual Report reviewed for accuracy and trends? If any trends were discovered, please describe.	1. Result Satisfactory
Question 1-a. Are Operator Manuals Up to Date? WAC 480-93-180(2) / WAC 480-75-660(2) requires operators to provide manual updates to the UTC.	1a. Result Satisfactory
Question 1-b. Are Operator Contacts Up to Date? WAC 480-93-200(11) Requires operators to notify the UTC of changes to company contacts. HL does not have a corresponding rule.	1b. Result Satisfactory
1. Notes Verified in QuickBase and TIMP inspection (8628): Manual updates were found to be submitted to UTC as required and company contacts were found to be accurate.	

DAMAGE PREVENTION

Question #2.

Review the following damage prevention items:

Q2. Is the damage prevention information in the annual report complete?

Information matches operators.

Q2.d Does the operator follow a process to evaluate the cause of "Locating practices not sufficient" category?

Quality Management (QM) performs root cause on every damage. Compliance meets monthly with QM to discuss any identified issues with ELM (contractor).

Q2.g. What is the number of damages resulting from mismarks?

175 damages, up 10 from the previous year.

Q2.j. Are mapping corrections timely and according to written procedures?

Yes. According to procedures right now there is no time frame for when corrections need to be completed.

Q2.b. Is the annual report damages root cause information complete and accurate?

769 with associated root cause damages, down 35 from the previous year.

Q2.e. Is the operator or its contractor qualified and following procedures for locating and marking facilities?

PSE has a Locating Procedure (GFP 4625.1005) - ELM has their own procedure and is qualified for both.

Q2.h. What is the number of damages resulting from not locating within the time requirements?

2 damages, up from 0 the previous year.

Q2.k. Does the operator follow a process to evaluate causes for damages listed "Excavation Practices Not Sufficient"?

PSE has developed cause codes to store information about non-sufficient excavation practices.

Q2.c. Does the operator have a process to evaluate the cause of "One-call notification practices not sufficient" category?

PSE reviews One-Call center notifications as a member of the UULC committee.

Q2.f. Is the operator appropriately requalifying locators to address performance deficiencies?

Located in GOS 7600.1000 - Section 9.1.4

Q2.i. Is the operator appropriately addressing discovered mapping errors resulting in excavation damage?

Any identified mapping errors are captured on forms that the locators have been trained to complete.

Q2.L. Is the operator appropriately focusing damage prevention education and training to address the causes of excavation damage?

Municipalities, Excavators and homeowners get spoken with in person, and through DP/ PA outreach programs.

2. Notes

In addition to research in QB, staff reviewed selected topics with operator SME's during the audit.

NPMS SUBMISSIONS/CHANGES

Question #3.

For transmission operators, has the operator submitted information to the NPMS database, along with changes made after the original submission?

3. Result

Satisfactory

3. Notes

Verified. Reviewed the email receipt for submission, dated 2/18/22. There were no changes noted.

INCIDENT/SRC/AOC REPORTS REVIEW

Annual Report Damage Prevention data

Year	Operator	Number of Excavation Tickets	Total Number of Excavation Damages By Apparent Root Cause:	Locating Practices Not Sufficient:	One-Call Notification Practices Not Sufficient:	Excavation Practices Not Sufficient:	Other:	Number of Services	Total Leaks - Excavation Damage	Total Main Leaks	Miles of Service MAIN	Numb of Leal per Mi of MAI
2022	Puget Sound Energy	291,607	769	175	333	247	14	841,096	77	330	13,056.93	
2021	Puget Sound Energy	313,755	804	165	373	245	21	836,684	97	378	13,017.13	
2020	Puget Sound Energy	302,341	832	165	413	237	17	829,368	737	133	12,955.27	
2019	Puget Sound Energy	306,050	871	177	385	283	26	822,946				
2018	Puget Sound Energy	302,118	1035	229	456	324	26	815,270				
2017	Puget Sound Energy	256,325	974	242	423	300	9	805,875				
2016	Puget Sound Energy	185,497	1012	247	350	354	61	818,651				
2015	Puget Sound Energy	169,879	980	261	336	333	50	789,272				

Question #4

Were there any federally reportable incidents during the previous year? Are there any discernable trends to these incidents?

4. Notes

Yes. The incident investigation was completed by PSE, however, at the time of this audit the WUTC has not concluded their final investigation. PSE identified [8] action items as a result of this incident that will eventually end up as standard updates. There was another reportable on 10/28/22 at 1003 Main St - Sumner that was later retracted by PSE.

Q4: Federally reportable incidents

NotificationID	Operator	Company	NRC #	Assigned Engineer	Date & Time of Incident	Street Address of event/incident
4077	Puget Sound Energy	Puget Sound Energy	1347398	Scott Anderson	09-15-2022 02:24 PM	6500 Ursela Pl S

Question #5.

Review operator records of previous year's accidents and failures including reported third party damage and leak response. Is the operator ensuring appropriate evaluation and response as required in 192.617 (Gas) or 195.402 (HL) to determine cause of failure? Is the operator taking appropriate steps to minimize the possibility of reoccurrence?

5. Notes

The highest threat is third-part-damage. PSE generated incident investigations are used to look into other type of failures.

Question #6.

Review incident reports for the previous year for accuracy and identify any trends. If any trends discovered please describe. (Please see list of incident data at end of this report)

Q6: Incident Reports

NotificationID	Inspector	Company	Street Address of event/incident	Date & Time of
4253	Derek Norwood	Puget Sound Energy	124th Ave NE & NE 16th St	10-19-2023
4252	Derek Norwood	Puget Sound Energy	451 S 13th St	10-19-2023

NotificationID	Inspector	Company	Street Address of event/incident	Date & Time of
4248	Lex Vinsel	Puget Sound Energy	1202 Alder St	10-10-2023
4255	David Cullom	Puget Sound Energy	330 Cedar Ave South	10-06-2023
4257	David Cullom	Puget Sound Energy	123 North 40th St	10-05-2023
4246	Jason Hoxit	Puget Sound Energy	13718 8th Ave S	09-28-2023
4240	Scott Anderson	Puget Sound Energy	5530 140th St.	09-13-2023
4242	Anthony Dorrrough	Puget Sound Energy	960 Republican St	09-07-2023
4236	Derek Norwood	Puget Sound Energy	3526 E Roosevelt Ave	09-02-2023
4234	Derek Norwood	Puget Sound Energy	4702 N Gove St	08-28-2023
4232	Anthony Dorrrough	Puget Sound Energy	768 Butte Ave SE	08-25-2023
4231	Anthony Dorrrough	Puget Sound Energy	22420 102nd Ave SE	08-25-2023
4216	Scott Anderson	Puget Sound Energy	8311 63rd St. Ct. W.	08-15-2023
4214	Scott Anderson	Puget Sound Energy	17430 NE 40th Pl.	08-15-2023
4215	Scott Anderson	Puget Sound Energy	5206 336th Ave SE	08-14-2023
4225	David Cullom	Puget Sound Energy	927 NW 96th ST	08-12-2023
4224	David Cullom	Puget Sound Energy	2204 159th CT E	08-11-2023
4223	David Cullom	Puget Sound Energy	16419 SE 31st	08-11-2023
4222	David Cullom	Puget Sound Energy	17616 261st St	08-10-2023
4221	David Cullom	Puget Sound Energy	40327 May Creek Rd	08-10-2023
4219	David Cullom	Puget Sound Energy	114 129th St South	08-10-2023
4218	David Cullom	Puget Sound Energy	10644 Rainier Ave South	08-08-2023
4213	Anthony Dorrrough	Puget Sound Energy	5728 E Lake Sammamish Parkway SE	08-02-2023
4211	Derek Norwood	Puget Sound Energy	1027 Sturgus Ave S	07-29-2023
4210	Derek Norwood	Puget Sound Energy	1622 NW Greenbrier Way	07-26-2023
4209	Lex Vinsel	Puget Sound Energy	16715 52nd Ave W	07-21-2023
4208	Lex Vinsel	Puget Sound Energy	760 112th St S	07-20-2023
	Dennis Ritter	Puget Sound Energy	239 Zandecky Rd	07-17-2023
4205	Derek Norwood	Puget Sound Energy	16001 Pacific Ave S	07-14-2023
4207	Lex Vinsel	Puget Sound Energy	239 Zandecky Rd	07-14-2023
4202	Derek Norwood	Puget Sound Energy	19145 NE 151st St	07-10-2023
4201	Lex Vinsel	Puget Sound Energy	322 NE 152 St	07-03-2023
4200	Lex Vinsel	Puget Sound Energy	201 N Harris Ave	07-03-2023
4199	Anthony Dorrrough	Puget Sound Energy	17502 "B" St E	06-30-2023
4198	Anthony Dorrrough	Puget Sound Energy	24231 SE 43rd St	06-30-2023
4197	David Cullom	Puget Sound Energy	1045 NE 187th St	06-22-2023
4193	Lex Vinsel	Puget Sound Energy	2042 NE Sunset Blvd	06-15-2023
4192	Lex Vinsel	Puget Sound Energy	4100 West Way	06-13-2023
4194	David Cullom	Puget Sound Energy	7619 67th Ave NE	06-11-2023
4196	David Cullom	Puget Sound Energy	13320 27th Ave Ne	06-08-2023
4189	David Cullom	Puget Sound Energy	1101 South Yakima Ave	06-05-2023
4195	Scott Anderson	Puget Sound Energy	11036 104th Ave NE	06-01-2023
4187	Scott Anderson	Puget Sound Energy	4813 116th Ave SE	06-01-2023
4185	Anthony Dorrrough	Puget Sound Energy	2515 4th Ave	05-27-2023
4186	Anthony Dorrrough	Puget Sound Energy	17614 Larch Way	05-27-2023
4184	Anthony Dorrrough	Puget Sound Energy	10314 S Tacoma Way	05-24-2023
4182	Anthony Dorrrough	Puget Sound Energy	27526 43rd Ave S	05-18-2023
4181	Anthony Dorrrough	Puget Sound Energy	2856 SW 170th St	05-17-2023
4180	Anthony Dorrrough	Puget Sound Energy	12921 39th Ave SE #28	05-15-2023
4179	Lex Vinsel	Puget Sound Energy	711 Washington Ave N	05-12-2023
4178	David Cullom	Puget Sound Energy	3724 South Brandon Street	04-19-2023
4173	Anthony Dorrrough	Puget Sound Energy	5210 Capitol Blvd	04-11-2023
4172	Anthony Dorrrough	Puget Sound Energy	301 Rope Rider Dr	04-11-2023

NotificationID	Inspector	Company	Street Address of event/incident	Date & Time of
4170	Anthony Dorrrough	Puget Sound Energy	1343 98th Ave NE	04-10-2022
4169	Lex Vinsel	Puget Sound Energy	20409 NE 37th Way	04-03-2022
4164	David Cullom	Puget Sound Energy	106 D St NW	03-21-2022
4162	Anthony Dorrrough	Puget Sound Energy	16419 122nd Ct NE	03-18-2022
4159	Lex Vinsel	Puget Sound Energy	7410 Henderson Blvd	03-07-2023
4156	Derek Norwood	Puget Sound Energy	Alaskan Way	03-03-2022
4154	Derek Norwood	Puget Sound Energy	7515 S Yakima Ave	02-27-2022
4150	Derek Norwood	Puget Sound Energy	1417 Harrison Ave	02-26-2022
4153	Lex Vinsel	Puget Sound Energy	18330 Baldwin Rd	02-12-2022
4151	Lex Vinsel	Puget Sound Energy	4750 25th Ave NE	02-05-2022
4144	Derek Norwood	Puget Sound Energy	2250 Bonair Pl SW	02-02-2022
4141	Derek Norwood	Puget Sound Energy	PSE Distribution System	01-31-2022
4140	Derek Norwood	Puget Sound Energy	30620 116th Ave SE	01-31-2022
4137	Derek Norwood	Puget Sound Energy	3830 Monte Villa Pkwy	01-30-2023
4136	Anthony Dorrrough	Puget Sound Energy	5515 East Drive	01-29-2022
4133	David Cullom	Puget Sound Energy	1500 Aberdeen Ave NE	01-20-2023
4132	Scott Anderson	Puget Sound Energy	8714 N Harborview Dr.	01-11-2022
4129	Anthony Dorrrough	Puget Sound Energy	27441 60th Ave S	01-08-2023
4128	Derek Norwood	Puget Sound Energy	6024 133rd Pl SW	12-28-2022
4118	Scott Anderson	Puget Sound Energy	137 145th PINE	12-19-2022
4115	Lex Vinsel	Puget Sound Energy	4027 Tacoma Mall Blvd	12-17-2022
4114	Lex Vinsel	Puget Sound Energy	7363 NE 145th Place	12-16-2022
4126	Darren Tinnerstet	Puget Sound Energy	521 Hemlock Way	12-09-2022
4125	Darren Tinnerstet	Puget Sound Energy	8411 169th Place NE	12-08-2022
4124	Darren Tinnerstet	Puget Sound Energy	10718 57th Ave. Dr. NE	12-07-2022
4112	Dennis Ritter	Puget Sound Energy	5301 Shilshole Ave NW	12-05-2022
4110	Dennis Ritter	Puget Sound Energy	24120 NE 8th St	12-01-2022
4108	Dennis Ritter	Puget Sound Energy	8021 181st Pl SW	11-29-2022
4106	Dennis Ritter	Puget Sound Energy	12626 182nd Ave SE	11-29-2022
4103	Dennis Ritter	Puget Sound Energy	1341 E Maple St	11-17-2022
4102	Dennis Ritter	Puget Sound Energy	13107 NE 132nd St	11-15-2022
4097	Lex Vinsel	Puget Sound Energy	19000 Canyon Rd E	11-08-2022
4099	David Cullom	Puget Sound Energy	21929 132nd Ave SE	11-02-2022
4098	David Cullom	Puget Sound Energy	15325 SE 27th	11-02-2022
4096	Scott Anderson	Puget Sound Energy	1003 Main St.	10-28-2022
4092	David Cullom	Puget Sound Energy	42321 SE 171st	10-21-2022
4093	David Cullom	Puget Sound Energy	22711 SE 23rd PL	10-20-2022
4090	Derek Norwood	Puget Sound Energy	15211 SE 176th St	10-15-2022
4089	Derek Norwood	Puget Sound Energy	6215 NE Princeton Way	10-15-2022
4088	Derek Norwood	Puget Sound Energy	5104 6th Ave	10-14-2022
4087	Derek Norwood	Puget Sound Energy	2921 204th Ln NE	10-13-2022
4085	Darren Tinnerstet	Puget Sound Energy	4224 S. 272nd St.	10-05-2022
4083	Darren Tinnerstet	Puget Sound Energy	1821 McDougal Ave.	10-03-2022
4084	Anthony Dorrrough	Puget Sound Energy	20125 28th Ave W	10-01-2022
4082	Anthony Dorrrough	Puget Sound Energy	355 110th Ave ne	09-27-2022
4080	Dennis Ritter	Puget Sound Energy	2186 NW Spring Fork Ln	09-23-2022
4079	Dennis Ritter	Puget Sound Energy	10025 NE 183rd St	09-23-2022
4078	Dennis Ritter	Puget Sound Energy	29309 61st Ave S	09-20-2022
4077	Scott Anderson	Puget Sound Energy	6500 Ursela Pl S	09-15-2022

NotificationID	Inspector	Company	Street Address of event/incident	Date & Time of
4075	Scott Anderson	Puget Sound Energy	288 106th Ave NE	09-15-2022
4072	David Cullom	Puget Sound Energy	112 West 2nd St	09-07-2022
4071	Scott Anderson	Puget Sound Energy	18612 80th Ct S	08-30-2022
4068	Scott Anderson	Puget Sound Energy	8851 24th Ave SW	08-29-2022
4066	Anthony Dorrrough	Puget Sound Energy	14410 SE Petrovitsky Rd	08-23-2022
4064	Anthony Dorrrough	Puget Sound Energy	2400 S Jackson St	08-20-2022
4070	Darren Tinnerstet	Puget Sound Energy	8111 1st Ave. S	08-18-2022
4061	Scott Anderson	Puget Sound Energy	4635 240th Ave SE	08-14-2022
4069	Darren Tinnerstet	Puget Sound Energy	249 34th Ave.	08-12-2022
4053	Anthony Dorrrough	Puget Sound Energy	16426 NE 180th PL	08-02-2022
4051	Dennis Ritter	Puget Sound Energy	630 Shannon St	07-29-2022
4048	Dennis Ritter	Puget Sound Energy	4527 13th Ave SE	07-28-2022
4045	Scott Anderson	Puget Sound Energy	8722 33rd St. W	07-23-2022
4043	Scott Anderson	Puget Sound Energy	4318 15th Ave NE	07-20-2022
4042	Scott Anderson	Puget Sound Energy	2509 S. Orcas St.	07-20-2022
4040	David Cullom	Puget Sound Energy	1429 Ave D Unit 5	07-14-2022
4038	David Cullom	Puget Sound Energy	27806 NE 156th PL	07-11-2022
4035	Dennis Ritter	Puget Sound Energy	2026 E Madison St	07-05-2022
4034	Lex Vinsel	Puget Sound Energy	938 E. Maple St 1/2	07-05-2022
4052	Lex Vinsel	Puget Sound Energy	4733 5th Ave NE	07-04-2022
4036	Lex Vinsel	Puget Sound Energy	18631 & 18635 SE 277 Place	07-02-2022
4033	Lex Vinsel	Puget Sound Energy	2520 Airport Way S	06-30-2022
4029	Anthony Dorrrough	Puget Sound Energy	29745 224th Ave SE	06-22-2022
4026	Darren Tinnerstet	Puget Sound Energy	822 3rd St. NE	06-17-2022
4027	Darren Tinnerstet	Puget Sound Energy	17600 140th Ave. NE	06-16-2022
4024	Darren Tinnerstet	Puget Sound Energy	8821NE 118th St,	06-15-2022
4020	Lex Vinsel	Puget Sound Energy	2307 Rainier Ave S	05-27-2022
4017	Derek Norwood	Puget Sound Energy	25733 Se 36th Pl	05-08-2022
4015	Derek Norwood	Puget Sound Energy	834 NE 189th St	05-06-2022
	Darren Tinnerstet	Puget Sound Energy	903 Meeker Ave.	04-26-2022
4010	Derek Norwood	Puget Sound Energy	24407 NE 18th St	04-15-2022
4008	Derek Norwood	Puget Sound Energy	1615 Edgemoor Ln	04-13-2022
4006	Derek Norwood	Puget Sound Energy	8001 Box Elder Dr SW	04-12-2022
4001	Scott Anderson	Puget Sound Energy	14th Ave NW & 140th St NW	04-09-2022
3996	Lex Vinsel	Puget Sound Energy	123 Plum St	04-01-2022
3999	Lex Vinsel	Puget Sound Energy	24022 SE 46th Place	03-31-2022
3986	Darren Tinnerstet	Puget Sound Energy	805 168th PI NE	03-03-2022
3985	Derek Norwood	Puget Sound Energy	4808 45th Ave SW	02-15-2022
3987	Dennis Ritter	Puget Sound Energy	4317 S Union Ave	02-07-2022
3982	Lex Vinsel	Puget Sound Energy	19805 NE Novelty Hill Rd	02-01-2022
3979	Scott Anderson	Puget Sound Energy	5008 139th PI SE	01-17-2022
3980	Scott Rukke	Puget Sound Energy	60 E. Lynn St	01-15-2022
3976	Scott Rukke	Puget Sound Energy	107 E. First St	01-10-2022
3974	Darren Tinnerstet	Puget Sound Energy	4224 Bull Frog Rd.	01-06-2022

6. Notes

Incident data captured matches data about DIMP threats.

Question #7.

Were there reportable or unreportable safety related conditions during the previous year? If yes please describe.

Q7: Report of SRCs

NotificationID	Company	Safety-Related Condition	SafetyRelatedConditionChoices	Reportable?	Date & Time of Incid
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NotificationID	Company	Safety-Related Condition	SafetyRelatedConditionChoices	Reportable?	Date & Time of Incid
Puget Sound Energy (2 Incident Notification records)					
2615	Puget Sound Energy	✓		State Reportable	03-29-2013 04:3
2600	Puget Sound Energy	✓		State Reportable	03-28-2013 04:4

7. Notes

No reportables during the previous year.

Question #8.

For transmission systems, were there any abnormal operating conditions (as described in 192.605 (c) or 195.402(d)) since the last annual review? If yes please describe.

8. Notes

No reportable AOC's in the previous year.

O&M & EMERGENCY PROGRAMS

Question #9.

Is the O&M Manual up to date and were changes made in the previous year?

Operator Manuals on Sharepoint

9. Result
Satisfactory

9. Notes

Yes. There were Staffing changes and titles, and there were numerous suggestions for changes but none that made it to procedural completion during the previous year. there were also 8 CARS (corrective action results) pending to GOS, related to a federally reported incident.

Question #10.

If changes to the O&M were made, are changes acceptable?

10. Result
Satisfactory

10. Notes

Changes to the O&M were found to be acceptable.

Question #11.

Were emergency plans changed during the previous year?

11. Result

Satisfactory

11. Notes

Yes. Located in 2425.2300, 2525.1400 - Added responsibilities for mutual assistance and title changes, investigating emergency calls and reports and added ASME 0591 tasks. Also located in 0100.1060, 0100.1040, 0100.1065, 0100.1070 and 0100.1080 - Updated covered task summary "Evacuating Structure" - and added ASME task lists.

Question #12.

Were any changes to emergency plans satisfactory?

12. Result

Satisfactory

12. Notes

Changes to emergency plans were found to be satisfactory.

INTEGRITY MANAGEMENT PROGRAMS

Question #13

Were there changes to the Integrity Management programs (TIMP, DIMP or both, as applicable)?

13. Result
Satisfactory

13. Notes

No changes to DIMP program, but updated some aspects from high to moderate due to progress that had been made. "Fusion" was changed from moderate to low risk, "Newer Steel and Wrapped Valves" moved from low risk to moderate risk, "Facilities Not Platted - Other" moved to low risk, "Rockwell IPH Failure" moved from moderate to zero risk because of facilities that were removed. "Transmission" is updating the plan to include Mega Rule changes and risk modelling.

Question #14.

Is the DIMP/TIMP up to date? What are the results of the operator's program review (effectiveness evaluation) (DIMP every 5 years)?

14. Result
Satisfactory

14. Notes

The operator provided DIMP presentations, documented in last years annual review and verifications of repairs of anomalies in the TIMP portion.

Question #15

Are IMP program changes acceptable?

15. Result
Satisfactory

15. Notes

IMP program changes were found to be acceptable.

Question #16

Was appropriate assessment/ repair work conducted during the past year? (monitor progress of IMP activities)

16. Results
Satisfactory

16. Notes

Yes. The "Olympia Line" had direct examinations. "South Seattle" is following up on their direct examinations.

Question #17

Does the operator's HCA location data correspond to the positional data located in UTC GIS?

17. Results
Satisfactory

17. Notes

HCA data matches mapping system geometry.

Question #18

What assessment work is planned for the upcoming year?

18. Results
Satisfactory

18. Notes

PSE is following up on direct examinations for Mega Rule updates and "South Seattle" examinations.

Question #19

Within the operator's DIMP, are low pressure systems evaluated for overpressure threats?

19. Results
Satisfactory

19. Notes

PSE is trying to eliminate their low pressure systems as best they can. They have added in redundant over pressure devices and are looking for opportunities to convert LP services to IP when it is advantageous for construction.

Question #20

Did the operator develop and follow specific procedures for low pressure system construction or maintenance projects? (Note: this question is revisited in greater detail in the ADB review section)

20. Results
Satisfactory

20. Notes

PSE procedure is that Engineering approval is required for any low pressure system work.

Question #21

Are plastic pipe and components that have shown a record of defects/leaks being mitigated through the DIMP plans?

21. Results
Satisfactory

21. Notes

The bulk of any PE mitigation involves Aldyl HD pipeline.

Question #22

Has appropriate DIMP remediation work occurred during the past year? (monitor progress of DIMP activities)

22. Results
Satisfactory

22. Notes

Yes. Active leak reduction – There were 152 to start, ended previous year with 51 due mainly to leak repairs. They are now at a place where they can find and fix with nearly no backload. There were 13 miles of pipeline replaced. There were 7,180 Sewer Cross-bore segments cleared, 59 were found per the program. There were 8,628 buried meters uncovered. Above ground meter sets, NARD (Non-hazardous above ground release of gas) program– repaired large & medium releases, about 600–700 were repaired using LLFA (alpha) tape on pipe threads, proven after a successful pilot program.

Question #23

What DIMP remediation work is anticipated for upcoming year?

23. Results
Satisfactory

23. Notes

Finding and repairing active leaks.

OQ PROGRAM

Question #24

Is the OQ program up to date? Were there changes to the Operator Qualification (OQ) program in the last year? If yes, please describe.

24. Results
Satisfactory

24. Notes

OQ's are up for renewal, PSE is continuing to changeover ASME covered tasks.
2425.2100 - Operator Qualification
updated several sections - MEA & ASME B31 Q Standard - Clarified the language
7600.1000 Operator Qualification Plan

Question #25

Are the OQ plan updates satisfactory?

25. Results
Satisfactory

25. Notes

OQ Plan renewal updates were found to be adequate.

Question #26

Are personnel performing covered tasks (including contractors) properly qualified and requalified at intervals determined in the operator's plan?

26. Results
Satisfactory

26. Notes

PSE has a list of tasks with qualification intervals.

PUBLIC AWARENESS PROGRAM

Question #27

Is the PA program up to date? And were there changes to the Public Awareness (PA) program within the last year?

27. Results
Satisfactory

27. Notes

According to Justin Wahlborg, at the time of the audit, program lead staffing changes remain in flux.

Question #28

Are changes to the PA program satisfactory?

28. Results
Satisfactory

28. Notes

No significant program changes, only staffing.

CONTROL ROOM PROGRAM

Question #29

Is the CRM program up to date? And were there changes to the Control Room Management (CRM) program within the last year?

29. Results
Satisfactory

29. Notes

Yes. Added SCADA Point-to-Point Verification - Added verification for Rupture Valves.

Question #30

Are the CRM program changes satisfactory?

30. Results
Satisfactory

30. Notes

CRM program changes were found to be satisfactory.

SAFETY MANAGEMENT SYSTEM API 1173

Question #31

Is the operator developing and implementing an API 1173 Safety Management System?

31. Results
Satisfactory

31. Notes

Located in letter to UTC with latest GOS manual.

INSPECTOR ASSESSMENT OF INSPECTION UNITS

Question #32

Are inspection units broken down appropriately? Do you recommend any changes to inspection units?

32. Results
Satisfactory

32. Notes

We (UTC & PSE) have recently split boundary lines and several units to maximize audit efficiency and there may be more to come if both parties feel like it is still warranted.

Q32: List of current inspection units

Unit Name	Distribution/Transmission	Intrastate or Interstate?	GAS or LIQUID	Operator - OPID	Unit ID
Puget Sound Energy (13 Unit records)					
PSE - HQ	Distribution	Intrastate	Gas	22189	22189
PSE - King Co. East	Distribution	Intrastate	Gas	22189	King County East
PSE - King Co. West	Distribution	Intrastate	Gas	22189	King County West
PSE - Snohomish	Distribution	Intrastate	Gas	22189	Snohomish
PSE - Kittitas	Distribution	Intrastate	Gas	22189	Kittitas
PSE - Lewis/Thurston	Distribution	Intrastate	Gas	22189	Lewis/Thurston
PSE - Pierce	Distribution	Intrastate	Gas	22189	Pierce
PSE - Transmission	Transmission	Intrastate	Gas	22189	Transmission
PSE - Propane Peak Shaving (LPG)	Distribution	Intrastate	Gas	22189	Propane Peak Shaving
PSE - Gig Harbor LNG Satellite Plant (LNG)	Distribution	Intrastate	Gas	22189	Gig Harbor LNG Satellite Plant
PSE - Jackson Prairie Storage Facility	Transmission	Interstate	Gas	22189	33875
PSE - Sumas Gas Pipeline	Transmission	Interstate	Gas	22189	74999
PSE - Tacoma LNG	Distribution	Intrastate	Gas	22189	Tacoma LNG

OPERATOR'S PUBLIC WEB PAGE

Question #33

For informational purposes: Using the drop down selections available in the "Results" block, indicate whether the operator's web page contains the information listed by placing a check in the box adjacent to all items that are present.

33. Results

33. Notes

PSE web site covers all areas and is exemplary in staff's opinion.

ADVISORY BULLETIN REVIEW

Question #34

Is there potential for damage to the operator's pipeline facilities caused by flooding, river scour, or channel migration?

ADB 2019-01

ADB 2019-01 Flood Mitigation

34. Results
YES

34. Notes

Yes. PSE seems to be aware of the risk and has taken reasonable actions to mitigate.

Question #35

If "YES" to Q34, did the operator take appropriate action in accordance with the guidance contained ADB 2019-01? Discuss ADB's guidance with operator's representative, and annotate any concerns.

ADB 2019-01

ADB 2019-01: Flood Mitigation

35. Results
Satisfactory

35. Notes

PSE has been proactive in their construction design of pipelines installed on bridges.

Question #36

Is there potential for the operator's system to be damaged by earth movement or other seismic/geological activities?

ADB 2019-02

ADB 2019-02: Earth Movement/Geological Hazards

36. Results
YES

36. Notes

PSE has a robust slide and bridge patrol program.

Question #37

If "YES" to Q36, did the operator take appropriate action according to ADB 2019-02? Discuss suggested actions from ADB with operator's representative and annotate any concerns.

ADB 2019-02

ADB 2019-02: Earth Movement/Geological Hazards

37. Results
Satisfactory

37. Notes

PSE utilizes a network of Emergency Section (ES) valves designed to block in sections of their pipeline system if found to be damaged by an earthquake.

Question #38

Does the operator have any indoor meter sets or regulators in their system?

ADB 2020-01

ADB 2020-01 Inside Meter Sets

38. Results
YES

38. Notes

Located within DIMP program and part of the GOS for hard-to-reach-meters (H2RL).

Question #39

If operator's system has indoor meter sets/regulators, did the operator review ADB 2020-0115? Discuss ADB guidance with operator's representative and annotate any concerns. Particular attention must be given to the operator's plan to conduct leak surveys, AC inspections, and other maintenance activities in locations that are difficult to access, as well as the inclusion of inside meters/regulators within the operator's DIMP plan, as applicable.

ADB 2020-01

ADB 2020-01 Inside Meter Sets

39. Results
Satisfactory

39. Notes

PSE reviews inside meter sets for mapping accuracy and leak survey.

Question #40

Is the operator's record of locations for all indoor meter sets/regulators within their system complete and sufficiently detailed??

ADB 2020-01

ADB 2020-01 Inside Meter Sets

40. Results
Satisfactory

40. Notes

Data is stored in SAP where it can be accessed by GFR's when required.

Question #41

Does the operator have any low pressure systems?

ADB 2020-02

ADB 2020-02 Low Pressure Systems

41. Results
YES

41. Notes

Yes. A single low pressure system in Seattle. Staff will meet with PSE in the field to review this system (Nov/23) take photos, identify the location and verify the number of services.

Question #42

If "YES" to Q41, did the operator review ADB 2020-0025 for Overpressure Protection of Low-Pressure Natural Gas Distribution Systems? Review ADB guidance with operator and annotate any concerns.

ADB 2020-02

ADB 2020-02 Low Pressure Systems

42. Results
Satisfactory

42. Notes

Yes. There were three low pressure distribution systems, but in 2019 two were replaced. The only remaining system located in Seattle has approx. 4.2 miles of main and 79 services.

Question #43

For low pressure construction/maintenance projects, does the operator have a process for review of engineering plans and constructibility reviews that are carried out through all applicable departments? Do all applicable departments review project plans for accuracy, completeness and correctness? How are control procedures developed that could identify system threats that could result in a common failure mode? How is the operator mitigating risk in their low pressure system?

ADB 2020-02

ADB 2020-02 Low Pressure Systems

43. Results
Satisfactory

43. Notes

All changes must be authorized by engineering, no construction work is performed without engineering approval.

Question #44

Does the operator include all low-pressure system risks in their DIMP program appropriately?

ADB 2020-02

ADB 2020-02 Low Pressure Systems

44. Results
Satisfactory

44. Notes

PSE has removed all but one of their low pressure systems. The remaining system has worker monitor over pressure protection.

SUMMARY OF REQUIRED COMMENTS

COMMENTS: Required for any ratings other than Satisfactory. Summarize/consolidate entries from the "Notes" blocks above. Ensure you annotate the question number for each comment. See notes located above.