



PUGET SOUND ENERGY

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Pipeline Safety Program

October 2, 2013

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: 2013 natural Gas Standard Inspection-Puget Sound Energy-West King County

PSE has received and reviewed your letter dated July 15, 2013 regarding the "2013 Natural Gas Standard Inspection-Puget Sound Energy-West King County" and is hereby submitting the following response, including actions taken to address the noted findings.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
AREA OF CONCERN

During the facilities portion of staff's inspection, uncertainty by PSE field personnel over PSE written procedure 4700.1600 "Inspecting Pressure Regulation Stations and Pressure Relief Devices" required a call to the company's engineering department for clarification. The instructions did not have a clear set of guidance for performing lock-up on pressure regulating devices installed in a worker/monitor configuration.

Staff understands that PSE is in the process of reviewing these procedures and making necessary revisions to allow qualified personnel to properly perform the relevant task. I request that a copy of the revised procedure be provided to staff upon completion.

PSE Response:

PSE understands that in the course of conducting the inspection, qualified personnel successfully performed the lock-up on pressure regulating devices installed in a worker/monitor configuration. In addition, qualification records inspected by Staff at the time revealed these experienced individuals hold current qualifications that indicated they were fully qualified to perform this task. PSE recognizes that distractions during the inspection may have contributed to the perception of uncertainty expressed in Staff's opinion.

In its aim of continuous improvement and to address the concern raised by Staff, PSE began the process of reviewing Gas Field Procedure GFP 4700.1600 Inspecting Pressure Regulating Stations and Pressure Relief Devices. Revisions to the procedure as deemed appropriate will be reflected in the 2014 issue of the Gas Field Procedures manual. A copy of the manual will be submitted to Staff upon publishing.

PSE trusts that the information provided fully responds to and satisfies your request. PSE respects the Commission's responsibilities in auditing and enforcing pipeline safety regulations and we continue our efforts to construct, operate and maintain a safe gas pipeline system that meets high standards of excellence.

Sincerely,



Booga Gilbertson
Vice President, Operations

cc: Harry Shapiro, Director Gas Operations
Cathy Koch, Director Compliance
Shamish Patel, Manager Standards
Cheryl McGrath, Manager Compliance and Regulatory Audits - Gas