



June 1, 2015

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

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State of Washington
UTC
Pipeline Safety Program

Dear Mr. Lykken:

RE: 2014 Natural Gas Standard Inspection- Puget Sound Energy – King County East
(Insp. No 5852)

In response to the 2014 East King County audit, Probable Violation #2, PSE expressed our intent to perform a review of services within the distribution system, develop an inspection and remediation plan, and communicate the status of the assessment and path forward by June 1, 2015.

PSE has identified a potential population of 5/8" PE services that at some point were believed to be buried or unknown transition fittings. Further refinement of this potential population has begun according to the following plan:

- 1) Each service has or will undergo a mapping and records review to identify if any infrastructure changes have occurred to clarify installation elements that would remove them from the list.
- 2) A pilot study will be conducted to further define the probability of the concern installation and the need and method for field investigation.
- 3) Based on the results of the pilot study, PSE will develop an inspection and remediation plan including timeframes for completion.
- 4) Each service will undergo increased leak surveys at a 6 month frequency until it is concluded that an increased frequency is not necessary.
- 5) PSE will present updates to the WUTC regarding the status of this project at the quarterly meetings.

Please let me know if you have any questions,

Sincerely,

Stephanie Silva

Stephanie Silva

Cc: Cara Peterman, Director Compliance
Cheryl McGrath, Manager Compliance Programs
Catherine Koch, Director Planning
Harry Shapiro, Director Gas Operations
Dan Koch, Director Engineering
Booga Gilbertson, Senior VP Operations