



STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

621 Woodland Square Loop S.E. • Lacey, Washington 98503

P.O. Box 47250 • Olympia, Washington 98504-7250

(360) 664-1160 • TTY 1-800-833-6384 or 711

Sent Via Email and FedEx

June 26, 2020

Booga K. Gilbertson
VP Operations
Puget Sound Energy
355 110th Ave NE
M/S EST 11W
Bellevue, WA 98004

RE: 2020 Liquefied Natural Gas Standard Inspection – Gig Harbor LNG Peak Shaving Plant – (Insp. No. 8043)

Dear Ms Gilbertson:

Staff from the Washington Utilities and Transportation Commission (staff) conducted a Standard inspection of Puget Sound Energy's Gig Harbor Liquefied Natural Gas (LNG) Peak Shaving Plant from June 9, 2020 to June 11, 2020. This inspection included a records review and inspection of LNG facilities.

Our inspection indicates one area of concern as noted in the enclosed report, which unless corrected, could potentially lead to future violation of state and/or federal pipeline safety rules.

Your response needed

Please review the attached report and respond in writing by July 28, 2020. The response should include how and when you plan to bring the area of concern into full compliance.

What happens after you respond to this letter?

The attached report presents staff's decision on the area of concern and does not constitute a finding of probable violation by the staff at this time.

If you have any questions or if we may be of any assistance, please contact Dennis Ritter at (360) 402-0066.

Puget Sound Energy
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Sincerely,

Sean C. Mayo
Pipeline Safety Director

cc: Cara Peterman, Director of Enterprise Risk Management, Puget Sound Energy
Duane Henderson, Manager Gas System Integrity, Puget Sound Energy
Harry Shapiro, Director of Gas Operations, Puget Sound Energy
Kaaren Daugherty , Manager Compliance Programs, Puget Sound Energy

UTILITIES AND TRANSPORTATION COMMISSION
2020 Liquefied Natural Gas Pipeline Safety Inspection
Puget Sound Energy-Gig Harbor LNG Peak Shaving Plant

The following area of concern of Title 49 CFR Part 193 was noted as a result of the 2020 inspection of the Puget Sound Energy's Gig Harbor LNG Plant. The inspection included a random selection of records, operation and maintenance (O&M), emergency response, and field inspection of the pipeline facilities.

AREA OF CONCERN

1. **49 CFR §193.2509 Emergency Procedures**
(3) Coordinating with appropriate local officials in preparation of an emergency evacuation plan, which sets forth the steps required to protect the public in the event of an emergency, including catastrophic failure of an LNG storage tank.

Finding(s):

PSE sends an electronic copy of their revised Emergency Operations Plan to local fire departments (City of Gig Harbor and Pierce County) after the two-year review and subsequent revisions. However, they do not keep a record of this transmittal (the fire department had a record). It was suggested to PSE that they should keep a record of this transmittal as it pertains to coordination with local first responders.