



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

July 11, 2022

Dan Koch
VP of Operations
Puget Sound Energy
355 110th Ave NE, M/S EST 11W
Bellevue, WA, 98004

**RE: 2022 Natural Gas Standard Inspection – Puget Sound Energy –East King County
(Insp. No. 8449)**

Dear Mr. Koch:

Staff from the Washington Utilities and Transportation Commission (staff) conducted a Standard Inspection of Puget Sound Energy (PSE), East King County, from June 7 to June 17, 2022. The inspection included a records review and inspection of selected pipeline facilities.

Our inspection indicates one probable violation as noted in the enclosed report.

Your response needed

Please review the attached report and respond in writing by August 12, 2022. The response should include how and when you plan to bring the probable violation into full compliance.

What happens after you respond to this letter?

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

After you respond in writing to this letter, there are several possible actions the commission, in its discretion, may take with respect to this matter. For example, the commission may:

- Issue an administrative penalty under [RCW 81.04.405](#); or
- Issue a complaint under [RCW 81.88.040](#), seeking monetary penalties, changes in the company's practices, or other relief authorized by law, and justified by the circumstances. Any pipeline company that violates any pipeline safety provision of any commission order, or any rule in this chapter including those rules adopted by reference, or chapter [81.88](#) RCW is subject to a civil penalty not to exceed \$218,647 for each violation for

each day that the violation persists. The maximum civil penalty for a related series of violations is \$2,186,465; or

- Consider the matter resolved without further commission action.

We have not yet decided whether to pursue a penalty or complaint in this matter. Should the commission decide to assess a penalty or initiate a complaint, your company will have an opportunity to respond and formally present its position.

If you have any questions or if we may be of any assistance, please contact Dave Cullom at (360) 489-8684. Please refer to the subject matter described above in any future correspondence pertaining to this inspection.

Sincerely,

Sean C. Mayo
Pipeline Safety Director

Enclosure

cc: Harry Shapiro, Director of Gas Operations, PSE
Troy Hutson, Director of Compliance, PSE
Zak Mohamed, Manager Compliance & Quality Management, PSE

UTILITIES AND TRANSPORTATION COMMISSION
2022 Natural Gas Pipeline Safety Inspection
Puget Sound Energy – East King County

The following probable violation of Title 49 CFR Part 192 was noted as a result of the 2022 inspection of the Puget Sound Energy – East King County. The inspection included a random selection of records, operation and maintenance (O&M), emergency response, inventory, and field inspection of the pipeline facilities.

PROBABLE VIOLATIONS

1. **49 CFR §192.807 Recordkeeping.**

Each operator shall maintain records that demonstrate compliance with this subpart.

(a) Qualification records shall include:

(1) Identification of qualified individual(s);

(2) Identification of the covered tasks the individual is qualified to perform;

(3) Date(s) of current qualification; and

(4) Qualification method(s).

(b) Records supporting an individual's current qualification shall be maintained while the individual is performing the covered task. Records of prior qualification and records of individuals no longer performing covered tasks shall be retained for a period of five year.

Finding(s):

PSE's field personnel met us at the King County Solid Waste Treatment Facility at Monster Rd on June 14, 2022 to perform an odorant sniff test. I asked to check the operator's qualifications for odorant testing and the task was not on the list of his qualifications. Other qualifications, such as valve operation and maintenance that we would be observing during the field portion that day were documented and were current.

Upon further investigation by PSE staff, the records were not located for that task in the OQ database.

The operator did have some informational records about the individual being signed up for a requalification course and presented those later during the inspection, but no completed test or record for requalification was provided.

The individual has now been requalified with a new qualification date of 6/17/2022.