



Puget Sound Energy  
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[PSE.com](http://PSE.com)

*Sent via email*

January 18<sup>th</sup>, 2023

Scott Rukke  
Acting Pipeline Safety Director  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop S.E.  
Lacey, WA 98503

**RE: 2021 Natural Gas Standard Inspection – Puget Sound Energy – East King County  
– Insp. No. 8449**

Dear Mr. Rukke:

I am writing to follow up on PSE's response dated August 11, 2022 (August 11 Letter) to the referenced inspection. PSE has completed the commitments identified in the August 11 Letter. PSE is providing information regarding the completion of commitments related to the findings from the the East King County audit. Below are the findings from the audit and actions PSE has taken to address the audit findings.

**Probable Violation**

**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 the inspector at King County Solid Waste Treatment Facility on Monster Rd on June 14, 2022 to perform an odorant sniff test. The inspector checked the operator's qualifications for odorant testing and the task was not on the list of his qualifications within the InstantCard OQ system. Other qualifications, such as valve operation and maintenance were documented and were current. Upon further investigation by PSE staff, the records were not located for that task in the OQ database. PSE did have some informational records about the individual being signed up for a

qualification course and presented those later during the inspection, but no completed test or record for qualification was provided.

In response to this finding, Puget Sound Energy updated our “Gas OQ Dashboard”, which is a tool that offers real time qualifications information on all Operator Qualified PSE employees. Below are the action items that PSE outlined in the August 11 Letter, and details of how each action item has been completed.

- *PSE will develop a business process for verifying new, optional qualifications. This process will be documented and implemented by December 1, 2022.*
  - PSE Gas Operations developed a process for adding new OQ skills to an employee’s list standard of qualifications. The process includes steps for supervisors to verify the new qualification using the OQ dashboard. This document was completed on 11/24/2022.
- *PSE will update the business process which is used to schedule odorant checks to include verification using the OQ dashboard tool. This document will be updated by September 1, 2022.*
  - The Gas Work Planning team, which is responsible for assigning and scheduling odorant inspections, updated their “Odorant Run Manual” documentation to include verifying qualifications via the updated OQ dashboard – this document was updated on 9/26/2022.
- *PSE will initiate a recurring Gas Operations quality assessment of the periodic odorant testing process. This assessment procedure will be drafted by December 1, 2022, with assessment planned for 2023.*
  - The Gas Operations Quality Control team implemented a new periodic assessment for the odorant testing process. This assessment reviews all aspects of the odorant testing process including records completion, timeliness of inspections, and remedial actions if required. The assessment procedure was drafted by 8/18/2022, and the first assessment was completed on 12/02/2022.

Let me know if you would like further information and I can set up a meeting to review the information with you. PSE appreciates the opportunity to continue to work with Staff on this resolution. Should you have any additional questions, please call me at 425-766-1811.

Sincerely,

DocuSigned by:

*Justin Wahlborg*

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Justin Wahlborg

Sr. Compliance Program Manager

cc:

Zak Mohamed, Manager Compliance

Kendall Cammermeyer, Chief Ethics & Compliance Officer

Kaaren Daugherty, Director Gas Operations