

# Form A- Annual Review 9072

UTC Standard Annual Review Inspection Report  
 Intrastate Operators  
 FORM A: Annual Review

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## Inspector and Operator Information

<b>Inspection ID</b> 9072	<b>Inspection Link</b> 9072	<b>Inspector - Lead</b> Anthony Dorrough	<b>Inspector - Assist</b>
<b>Operator</b> Puget Sound Energy	<b>Unit</b> HQ	<b>OPID #</b> 22189	<b>Records Location - City &amp; State</b> Bellevue WA
<b>Inspection Start Date</b> 10-31-2025	<b>Inspection Exit Interview Date</b> 10-31-2025	<b>Engineer Submit Date</b>	

## Inspection Summary

You must include the following in your inspection summary:

- \*Inspection Scope and Summary
- \*Facilities visited and Total AFOD
- \* Summary of Significant Findings
- \* Primary Operator contacts and/or participants

### Inspection Scope and Summary

This was an annual review of PSE's Annual Report data, program, and procedure changes that occurred in 2024.

### Facilities visited and Total AFOD = 1

There were no facilities visited for this inspection, this inspection on **Fri Oct 31** was conducted online via MS Teams.

### Summary of Significant Findings

There were no unsat results or findings.

### Primary Operator contacts and/or participants

Justin Wahlborg, Pipeline Safety Compliance Program Manager, Compliance & Quality Management, PSE, justin.wahlborg@pse.com

Cameron Williams, Sr. Regulatory Compliance Analyst

## Instructions and Ratings Definitions

### INSPECTION RESULTS: Annual Review

Satisfactory Responses	Satisfactory List	Number of Unanswered Questions	Unanswered List
38	1,3,4,5,6,7,8,9,10,12,13,14,15,16,17,18,19,20,21,22,23,24,25,26,27,28,29,30,31,32,35,37,39,40,42,43,44	5	2.N,2.O,2.P,3.1,3.2,
Unsatisfactory Responses	Unsatisfactory List		
0			
Area of Concern Responses	Area of Concern List		
0			
Not Applicable Responses	Not Applicable List		
0			
Yes Responses	Yes List	No Responses	No List
4	34,36,38,41	0	
Not Checked / Evaluated Responses	Not Checked / Evaluated List		
0			

\*\*If an item is marked Unsat, AOC, N/A, or N/C, an explanation must be included in the "Notes" block for that question and also summarized in the " SUMMARY OF REQUIRED COMMENTS" section at the end of this inspection form.

- ↕ Crew Inspection History
- ↕ Facility Inspection History
- ↕ Scheduled Inspection History
- ↕ GAS System Operations History
- ↕ HL System Operations History
- ↕ ANNUAL REPORT: ACCURACY/TRENDS

<b>Question #1.</b> Was the Annual Report reviewed for accuracy and trends? If any trends were discovered, please describe.	<b>1. Result</b> Satisfactory
<b>Question 1-a. Are Operator Manuals Up to Date?</b> WAC 480-93-180(2) / WAC 480-75-660(2) requires operators to provide manual updates to the UTC.	<b>1a. Result</b> Satisfactory
<b>Question 1-b. Are Operator Contacts Up to Date?</b> WAC 480-93-200(11) Requires operators to notify the UTC of changes to company contacts. HL does not have a corresponding rule.	<b>1b. Result</b> Satisfactory

### 1. Notes

Verified in QB - Manual updates submitted as required (last submission 3/11/25), company contacts were found to be accurate. The following **Leaks Eliminated/Repaired** trends were identified:

**Corrosion Failure** - Mains trending down, Services trending up.

**Natural Force Damage** - Mains trending up, Services trending up.

**Excavation Damage** - Mains holding, Services trending down.

**Other Outside Force Damage** - Mains holding, Services trending down.

Pipe, Weld or Joint Failure - Mains trending down, Services trending up.

Equipment Failure - Mains trending down, Services trending down.

Incorrect Operations - Mains trending up, Services trending up.

Other Cause - Mains trending up, Services trending down.

## DAMAGE PREVENTION

### Question #2.

Review the following damage prevention items:

**Q2. Is the damage prevention information in the annual report complete?**  
WUTC information matches the operators.

**Q2.b. Is the annual report damages root cause information complete and accurate?**

Yes. 684 with associated root cause damages, down 85 from the previous year. 275,439 Excavation tickets, up 19,417.

**Q2.c. Does the operator have a process to evaluate the cause of "One-call notification practices not sufficient" category?**

PSE reviews One-Call center notifications as a member of the UULC Committee.

**Q2.d Does the operator follow a process to evaluate the cause of "Locating practices not sufficient" category?**

Quality Management (QM) performs root cause on every damage. Compliance meets monthly with QM to discuss any identified issues with their contractor (ELM).

**Q2.e. Is the operator or its contractor qualified and following procedures for locating and marking facilities?**

PSE has a locating procedure [GFP 4625.1005] - ELM has their own procedure and is qualified for both.

**Q2.f. Is the operator appropriately requalifying locators to address performance deficiencies?**

Located in GOS 7600.1000 - Section 9.1.4

**Q2.g. What is the number of damages resulting from mismarks?**  
79 damages, down 96 from the previous year.

**Q2.h. What is the number of damages resulting from not locating within the time requirements?**

1 damage, down 1 from the previous year.

**Q2.i. Is the operator appropriately addressing discovered mapping errors resulting in excavation damage?**

Any identified mapping errors are captured on forms that the locators have been trained to complete.

**Q2.j. Are mapping corrections timely and according to written procedures?**  
Yes. There were no mapping errors.

**Q2.k. Does the operator follow a process to evaluate causes for damages listed "Excavation Practices Not Sufficient"?**

PSE has developed cause codes to store information about non-sufficient excavation practices.

**Q2.L. Is the operator appropriately focusing damage prevention education and training to address the causes of excavation damage?**

Municipalities, excavators and homeowners get spoken with in person and through DP/PA outreach programs.

**Q2.M. Does the operator track on-time performance of locate requests (i.e. 2 Business Days) If so, review and record the statistics.**

Yes. Staff was able to review statistics.

### 2. Notes

### Question 2.N

### 2.N Result

### 2.N Notes

### Question 2.O

### 2.O Result

### 2.O Notes

### Question 2.P

### 2.P Result

### 2.P Notes

## Mapping Records / NPMS Updates

### Question #3.

For transmission operators, has the operator submitted information to the NPMS database, along with changes made after the original submission?

### 3. Result

Satisfactory

### 3. Notes

Staff viewed email verifying submission date.

### Question 3.1

### 3.1 Result

### 3.1 Notes

### Question 3.2

### 3.2 Result

### 3.2 Notes

## INCIDENT/SRC/AOC REPORTS REVIEW

### Annual Report Damage Prevention data

Year	Operator	Number of Excavation Tickets	Total Number of Excavation Damages By Apparent Root Cause:	Locating Practices Not Sufficient:	One-Call Notification Practices Not Sufficient:	Excavation Practices Not Sufficient:	Other:	Number of Services	Total Leaks - Excavation Damage	Total Main Leaks	Miles of Service MAIN	Number of Leaks per Mile of MAIN
2024	Puget Sound Energy	275,439	684	125	302	245	12	848,265	629	267	13,131.99	0.02033202888518
2023	Puget Sound Energy	256,022	725	148	350	211	16	845,237	649	289	13,100.7	0.02205988992954
2022	Puget Sound Energy	291,607	769	175	333	247	14	841,096	77	330	13,056.93	0.02527393499084
2021	Puget Sound Energy	313,755	804	165	373	245	21	836,684	97	378	13,017.13	0.02903865905925
2020	Puget Sound Energy	302,341	832	165	413	237	17	829,368	737	133	12,955.27	0.01026609248591

Year	Operator	Number of Excavation Tickets	Total Number of Excavation Damages By Apparent Root Cause:	Locating Practices Not Sufficient:	One-Call Notification Practices Not Sufficient:	Excavation Practices Not Sufficient:	Other:	Number of Services	Total Leaks - Excavation Damage	Total Main Leaks	Miles of Service MAIN	Number of Leaks per Mile of MAIN
2019	Puget Sound Energy	306,050	871	177	385	283	26	822,946				
2018	Puget Sound Energy	302,118	1035	229	456	324	26	815,270				
2017	Puget Sound Energy	256,325	974	242	423	300	9	805,875				
2016	Puget Sound Energy	185,497	1012	247	350	354	61	818,651				
2015	Puget Sound Energy	169,879	980	261	336	333	50	789,272				

**Question #4**

Were there any federally reportable incidents during the previous year? Are there any discernable trends to these incidents?

**4. Notes**

There was one reportable incident during the previous year. No trends established.

**Q4: Federally reportable incidents**

NotificationID	Operator	Company	NRC #	Assigned Engineer	Date & Time of Incident	Street Address of event/incident	Incident
No Incident Notification records found							

**Question #5.**

Review operator records of previous year's accidents and failures including reported third party damage and leak response. Is the operator ensuring appropriate evaluation and response as required in 192.617 (Gas) or 195.402 (HL) to determine cause of failure? Is the operator taking appropriate steps to minimize the possibility of reoccurrence?

**5. Notes**

Third Party damage remains the highest threat. PSE generated incident investigations are utilized to look into other types of failures.

**Question #6.**

Review incident reports for the previous year for accuracy and identify any trends. If any trends discovered please describe. (Please see list of incident data at end of this report)

**Q6: Incident Reports**

NotificationID	Inspector	Company	Street Address of event/incident	Date & Time of Incident
4632	Thomas Green	Puget Sound Energy	10613 NE 38 Pl	03-09-2026 12:00 A
4631	Scott Anderson	Puget Sound Energy	3011 S. Jackson St.	03-07-2026 10:51 A
4630	David Cullom	Puget Sound Energy	17230 SE Auburn Black Diamond Rd	02-25-2026 06:53 F
4629	David Cullom	Puget Sound Energy	106 Central Way	02-24-2026 10:25 A
4627	David Cullom	Puget Sound Energy	2120 Auburn Way N	02-23-2026 09:20 F
4626	David Cullom	Puget Sound Energy	27325 14th CT South	02-23-2026 04:54 F
4624	Jason Hoxit	Puget Sound Energy	38th Ave NW & Fox Ct	02-19-2026 11:17 A
4623	Jason Hoxit	Puget Sound Energy	1205 Queen Anne Ave N	02-18-2026 09:44 A
4622	Jason Hoxit	Puget Sound Energy	3101 247th Ave SE	02-17-2026 01:02 F
4621	Jason Hoxit	Puget Sound Energy	12555 SE 172nd St	02-16-2026 09:11 A
4620	Scott Anderson	Puget Sound Energy	10330 4th Ave W.	02-10-2026 12:00 A
4619	Thomas Green	Puget Sound Energy	4309 22 St SE	02-07-2026 02:30 F
4618	Thomas Green	Puget Sound Energy	391 Sky Country Way NW	02-05-2026 05:01 F
4616	Emma Barrett	Puget Sound Energy	11th Ave & Taylor St	01-30-2026 11:48 A
4614	Emma Barrett	Puget Sound Energy	707 S 56th St	01-27-2026 02:21 F
4613	Anthony Dorrough	Puget Sound Energy	1508 7th Ave Place	01-21-2026 12:41 F
4610	Derek Norwood	Puget Sound Energy	558 1st Ave S	01-15-2026 07:25 A
4608	Derek Norwood	Puget Sound Energy	1518 4th Ave N	01-14-2026 09:53 A
4606	David Cullom	Puget Sound Energy	8109 184th East	01-09-2026 03:49 F
4605	David Cullom	Puget Sound Energy	4763 Point Fosdick Dr	01-06-2026 02:21 F
4604	David Cullom	Puget Sound Energy	Eastlake Ave East and East Roanoke St	01-06-2026 03:53 A
4602	Emma Barrett	Puget Sound Energy	15315 1st Ave NE	12-30-2025 01:23 F
4601	Scott Anderson	Puget Sound Energy	2301 150th St Ct E	12-17-2025 02:17 A
4600	Scott Anderson	Puget Sound Energy	120 E 82nd St	12-17-2025 02:10 A
4597	Emma Barrett	Puget Sound Energy	401 Summit Ave N	12-07-2025 01:00 F
4596	Emma Barrett	Puget Sound Energy	12715 NE 124th St	12-05-2025 10:50 F
4595	Emma Barrett	Puget Sound Energy	5150 S Orchard St	12-04-2025 10:39 A

NotificationID	Inspector	Company	Street Address of event/incident	Date & Time of Incident
4593	David Cullom	Puget Sound Energy	3850 South Meridian	11-25-2025 01:30 F
4592	David Cullom	Puget Sound Energy	10105 Mountain Loop Hwy	11-24-2025 02:52 F
4591	Scott Anderson	Puget Sound Energy	22621 NE Union Hill Rd	11-20-2025 02:48 A
4589	Jason Hoxit	Puget Sound Energy	6801 36th Ave NW	11-10-2025 02:39 F
4588	Thomas Green	Puget Sound Energy	159 Pine Ave	11-09-2025 02:56 F
4585	Anthony Dorrrough	Puget Sound Energy	11501 17th Pl SW	11-01-2025 10:20 F
4584	Anthony Dorrrough	Puget Sound Energy	1200 Yew St	10-29-2025 09:25 A
4582	David Cullom	Puget Sound Energy	22621 NE Union Hill Rd	10-15-2025 02:41 F
4581	David Cullom	Puget Sound Energy	11805 8th St. East	10-15-2025 10:38 A
4580	David Cullom	Puget Sound Energy	2044 E. 35th St.	10-15-2025 10:12 A
4576	Scott Anderson	Puget Sound Energy	3831 Stone Way N.	09-23-2025 01:53 F
4574	Anthony Dorrrough	Puget Sound Energy	10523 5th Ave NE	09-18-2025 12:05 F
4573	Anthony Dorrrough	Puget Sound Energy	1215 182nd St Ct E	09-18-2025 11:25 A
4572	Anthony Dorrrough	Puget Sound Energy	12808 60TH Ave w	09-16-2025 03:36 F
4571	Anthony Dorrrough	Puget Sound Energy	2317 Sahalee Drive	09-16-2025 09:40 A
4569	Derek Norwood	Puget Sound Energy	1229 SW 137th St	09-13-2025 02:30 A
4568	Derek Norwood	Puget Sound Energy	23921 Westview Ct	09-12-2025 11:23 A
4567	Derek Norwood	Puget Sound Energy	18650 42nd Ave S	09-10-2025 04:02 F
4566	Derek Norwood	Puget Sound Energy	2510 S 279th Pl	09-08-2025 05:32 F
4564	David Cullom	Puget Sound Energy	5225 SW Jacobsen Rd	09-06-2025 12:05 F
4559	Jason Hoxit	Puget Sound Energy	7506 NE 170th St	08-28-2025 05:54 F
4556	Jason Hoxit	Puget Sound Energy	16101 Greenwood Ave N	08-26-2025 08:58 A
4555	Jason Hoxit	Puget Sound Energy	138 N 80th St	08-25-2025 02:20 F
4554	Thomas Green	Puget Sound Energy	19815 32 Ave S	08-22-2025 05:35 F
4552	Thomas Green	Puget Sound Energy	1720 S. 78th St	08-20-2025 07:22 A
4551	Thomas Green	Puget Sound Energy	3718 Rodesco Dr SE	08-19-2025 12:10 F
4550	David Cullom	Puget Sound Energy	18932 28th Dr Se	08-16-2025 01:27 F
4549	David Cullom	Puget Sound Energy	9610 12th Ave NE	08-16-2025 12:40 F
4548	David Cullom	Puget Sound Energy	12855 110tu Ave NE	08-16-2025 01:00 A
4547	David Cullom	Puget Sound Energy	31401 36th Ave SW	08-15-2025 12:01 F
4545	David Cullom	Puget Sound Energy	10823 23rd Dr. SE.	08-13-2025 03:25 F
4542	Anthony Dorrrough	Puget Sound Energy	12810 NE 168th St	08-07-2025 12:00 A
4540	Jason Hoxit	Puget Sound Energy	22023 NE 183rd Place	07-19-2025 11:42 A
4538	Jason Hoxit	Puget Sound Energy	14227 4th Ave NE	07-17-2025 09:16 A
4537	Jason Hoxit	Puget Sound Energy	14228 SE 41st St	07-14-2025 08:20 A
4536	Jason Hoxit	Puget Sound Energy	3800 Sapp Rd SW	07-14-2025 08:19 A
4534	Derek Norwood	Puget Sound Energy	2918 100th St SW	07-10-2025 09:20 A
4532	Scott Anderson	Puget Sound Energy	12829 16th Pl W	07-05-2025 01:45 F
4530	Scott Anderson	Puget Sound Energy	915 NW 96th St	07-03-2025 11:35 A
4528	Scott Anderson	Puget Sound Energy	16617 70th Pl W	07-02-2025 12:14 F
4526	Anthony Dorrrough	Puget Sound Energy	5011 S Tacoma Way	06-27-2025 09:34 A
4522	Anthony Dorrrough	Puget Sound Energy	8130 Hudson Place SW	06-23-2025 12:45 F
4520	Derek Norwood	Puget Sound Energy	9015 Vernon Rd	06-17-2025 01:33 F
4519	David Cullom	Puget Sound Energy	4021 University Way	06-15-2025 04:10 F
4518	David Cullom	Puget Sound Energy	2108 North Mullen Rd	06-14-2025 09:58 A
4517	David Cullom	Puget Sound Energy	1146 Harrison St	06-10-2025 11:26 F
4515	Jason Hoxit	Puget Sound Energy	6651 216th Street	06-05-2025 11:02 A
4514	Jason Hoxit	Puget Sound Energy	13719 209th Ave NE	06-04-2025 01:20 F
4513	Jason Hoxit	Puget Sound Energy	3825 Sunnyside Ave N	06-04-2025 01:22 A
4511	Jason Hoxit	Puget Sound Energy	749 Sleater Kinney Rd SE	06-03-2025 10:53 A
4510	Jason Hoxit	Puget Sound Energy	6419 NE 153rd St	06-03-2025 10:46 A
4509	Thomas Green	Puget Sound Energy	1111 N 34th St	05-31-2025 12:22 F
4506	Thomas Green	Puget Sound Energy	17601 NE 141st St	05-28-2025 08:33 F
4505	Thomas Green	Puget Sound Energy	3230 210th St SE	05-28-2025 09:58 A
4504	Thomas Green	Puget Sound Energy	2213 NW 63rd St	05-28-2025 09:43 A

NotificationID	Inspector	Company	Street Address of event/incident	Date & Time of Incident
4502	Scott Anderson	Puget Sound Energy	7711 New Market St. SW	05-22-2025 11:28 A
4500	Scott Anderson	Puget Sound Energy	4220 Chilberg Ave SW	05-20-2025 08:10 A
4499	Anthony Dorrough	Puget Sound Energy	316 N 36th St - Unit E	05-16-2025 10:52 A
4498	Thomas Green	Puget Sound Energy	12th Ave S Bridge over I-90	05-08-2025 12:00 F
4497	Thomas Green	Puget Sound Energy	71 Skagit Key	05-05-2025 09:41 A
4496	David Cullom	Puget Sound Energy	16828 Ambaum Blvd.	05-04-2025 02:40 F
4494	David Cullom	Puget Sound Energy	13027 12th PL NE	04-30-2025 01:10 F
4491	David Cullom	Puget Sound Energy	4505 126th St.	04-28-2025 01:50 F
4490	Thomas Green	Puget Sound Energy	20629 193 Ave E	04-26-2025 11:41 F
4489	Jason Hoxit	Puget Sound Energy	1914 E Pioneer	04-19-2025 07:10 F
4487	Jason Hoxit	Puget Sound Energy	719 34th Ave	04-14-2025 10:37 A
4484	Scott Anderson	Puget Sound Energy	1520 Pike St. NW	04-08-2025 12:00 A
4483	Anthony Dorrough	Puget Sound Energy	11430 101 st PL NE	04-04-2025 03:41 F
4480	David Cullom	Puget Sound Energy	1528 74th St Se	03-22-2025 09:12 A
4479	David Cullom	Puget Sound Energy	13721 se 188th ST	03-20-2025 01:18 F
4478	David Cullom	Puget Sound Energy	11313 NE 144th Place	03-20-2025 09:34 A
4471	Jason Hoxit	Puget Sound Energy	5710 8th Ave NW	03-10-2025 10:58 A
4469	Scott Anderson	Puget Sound Energy	95 Burnett Ave S	02-27-2025 07:50 A
4467	Anthony Dorrough	Puget Sound Energy	1952 1 Ave s	02-21-2025 04:19 A
4468	Anthony Dorrough	Puget Sound Energy	9268 53rd Ave S	02-20-2025 10:00 A
4466	Derek Norwood	Puget Sound Energy	9905 239th Pl SW	02-15-2025 12:16 F
4465	Derek Norwood	Puget Sound Energy	8622 N Mercer Way	02-13-2025 10:10 A
4463	Jason Hoxit	Puget Sound Energy	913 23rd Ave E	01-30-2025 09:40 A
4462	Scott Anderson	Puget Sound Energy	1219 S. 234th Dr.	01-16-2025 03:42 F
4459	Scott Anderson	Puget Sound Energy	1713 N National Ave.	01-14-2025 03:15 F
4458	Anthony Dorrough	Puget Sound Energy	412 Bell St	01-09-2025 12:32 F
4456	Derek Norwood	Puget Sound Energy	2207 35th Ave SE	01-04-2025 12:33 F
4453	Derek Norwood	Puget Sound Energy	2825 NE Sunset Blvd	01-01-2025 02:02 A

**6. Notes**

WUTC information matches the operators.

Trends identified - 8 total non-reportable incidents previous year, 5 since Jan 2025

**Question #7.**

Were there reportable or unreportable safety related conditions during the previous year? If yes please describe.

**Q7: Report of SRCs**

NotificationID	Company	Safety-Related Condition	SafetyRelatedConditionChoices	Reportable?	Date & Time of Incident
<b>Puget Sound Energy (3 Incident Notification records)</b>					
4380	Puget Sound Energy	✓	Defect on Pipeline	Federal Reportable	07-26-2024 07:43 PM
2615	Puget Sound Energy	✓		State Reportable	03-29-2013 04:36 PM
2600	Puget Sound Energy	✓		State Reportable	03-28-2013 04:46 PM

**7. Notes**

4380 - Federal Reportable SRC - The replacement project began 8/12/2024 and a temporary pressure reduction was put in place.

**Question #8.**

For transmission systems, were there any abnormal operating conditions (as described in 192.605 (c) or 195.402(d)) since the last annual review? If yes please describe.

**8. Notes**

There no AOC's since the last annual review.

**O&M & EMERGENCY PROGRAMS**

**Question #9.**

Is the O&M Manual up to date and were changes made in the previous year?

Operator Manuals on Sharepoint

**9. Result**

Satisfactory

**9. Notes**

Per. PSE changes to the O&M manual are always being updated and implemented. There were no significant changes identified.

**Question #10.**

If changes to the O&M were made, are changes acceptable?

**10. Result**

Satisfactory

**10. Notes**

**Question #11.**

Were emergency plans changed during the previous year?

**11. Result**

Satisfactory

**11. Notes**

There were no significant changes identified.

**Question #12.**

Were any changes to emergency plans satisfactory?

**12. Result**

Satisfactory

**12. Notes**

## INTEGRITY MANAGEMENT PROGRAMS

**Question #13**

Were there changes to the Integrity Management programs (TIMP, DIMP or both, as applicable)?

**13. Notes**

There were no significant changes identified.

**13. Result**

Satisfactory

**Question #14.**

Is the DIMP/TIMP up to date? What are the results of the operator's program review (effectiveness evaluation) (DIMP every 5 years)?

**14. Notes****14. Result**

Satisfactory

**Question #15**

Are IMP program changes acceptable?

**15. Notes**

IMP program was found to be acceptable.

**Question #16**

Was appropriate assessment/ repair work conducted during the past year? (monitor progress of IMP activities)

**16. Notes**

Staff reviewed assessment/repair work involved after a pigging project in South King at a section of pipeline that crosses a bridge span.

**Question #17**

Does the operator's HCA location data correspond to the positional data located in UTC GIS?

**17. Notes**

HCA data matches mapping systems geometry.

**Question #18**

What assessment work is planned for the upcoming year?

**18. Notes**

PSE planning on additional pigging work in South King in 2025.

**Question #19**

Within the operator's DIMP, are low pressure systems evaluated for overpressure threats?

**19. Notes**

There has been continued effort to make reductions to their only remaining low pressure system located in the downtown Seattle area.

**15. Result**

Satisfactory

**16. Results**

Satisfactory

**17. Results**

Satisfactory

**18. Results**

Satisfactory

**19. Results**

Satisfactory

**Question #20**

Did the operator develop and follow specific procedures for low pressure system construction or maintenance projects? (Note: this question is revisited in greater detail in the ADB review section)

**20. Notes**

PSE has a procedure in place that specifies that engineering approval is required for any low pressure system work.

**Question #21**

Are plastic pipe and components that have shown a record of defects/leaks being mitigated through the DIMP plans?

**21. Notes**

Staff was able to review records that verified mitigation.

**Question #22**

Has appropriate DIMP remediation work occurred during the past year? (monitor progress of DIMP activities)

**22. Notes**

There has been continued effort to make reductions to their only remaining low pressure system located in the downtown Seattle area.

**Question #23**

What DIMP remediation work is anticipated for upcoming year?

**23. Notes**

PSE indicated further work is anticipated on their low pressure system.

**20. Results**

Satisfactory

**21. Results**

Satisfactory

**22. Results**

Satisfactory

**23. Results**

Satisfactory

## OQ PROGRAM

**Question #24**

Is the OQ program up to date? Were there changes to the Operator Qualification (OQ) program in the last year? If yes, please describe.

**24. Notes**

There were no significant changes identified.

**Question #25****24. Results**

Satisfactory

**25. Results**

Are the OQ plan updates satisfactory?

Satisfactory

25. Notes

Question #26

Are personnel performing covered tasks (including contractors) properly qualified and requalified at intervals determined in the operator's plan?

26. Results

Satisfactory

26. Notes

PSE has a list of tasks with qualification intervals.

PUBLIC AWARENESS PROGRAM

Question #27

Is the PA program up to date? And were there changes to the Public Awareness (PA) program within the last year?

27. Results

Satisfactory

27. Notes

PSE has been transitioning LMS to SAP with a goal of completion being Oct/Nov - Staff was able to verify a live roll out for Nov 21

Question #28

Are changes to the PA program satisfactory?

28. Results

Satisfactory

28. Notes

The previous PA manager has returned and last years personnel flux has been stabilized.

CONTROL ROOM PROGRAM

Question #29

Is the CRM program up to date? And were there changes to the Control Room Management (CRM) program within the last year?

29. Results

Satisfactory

29. Notes

Staff conducted a recent CRM inspection, the most recent change was changing what was once a back-up CRM location to second permanent location.

Question #30

Are the CRM program changes satisfactory?

30. Results

Satisfactory

30. Notes

SAFETY MANAGEMENT SYSTEM API 1173

Question #31

Is the operator developing and implementing an API 1173 Safety Management System? Satisfactory

31. Results

31. Notes

Located in letter to the WUTC with the latest GOS (Gas Operating System) manual.

INSPECTOR ASSESSMENT OF INSPECTION UNITS

Question #32

Are inspection units broken down appropriately? Do you recommend any changes to inspection units?

32. Results

Satisfactory

32. Notes

Staff feels that there needs to be changes to the naming conventions represented after the split to boundary lines, some are confusing, especially when assigning incident notifications. They need to be simplified and clearly definable.

Q32: List of current inspection units

Unit Name	Distribution/Transmission	Intrastate or Interstate?	GAS or LIQUID	Operator - OPID	Unit ID	Date Created
<b>Puget Sound Energy (16 Unit records)</b>						
PSE - HQ	Distribution	Intrastate	Gas	22189	22189	02-06-2019 10:50 AM
PSE - King Co. West	Distribution	Intrastate	Gas	22189	King County West	02-06-2019 10:50 AM
PSE - Snohomish	Distribution	Intrastate	Gas	22189	Snohomish	02-06-2019 10:50 AM
PSE - Kittitas	Distribution	Intrastate	Gas	22189	Kittitas	02-06-2019 10:50 AM
PSE - Lewis/Thurston	Distribution	Intrastate	Gas	22189	Lewis/Thurston	02-06-2019 10:50 AM
PSE - Transmission	Transmission	Intrastate	Gas	22189	Transmission	02-06-2019 10:50 AM
PSE - Propane Peak Shaving (LPG)	Distribution	Intrastate	Gas	22189	Propane Peak Shaving	02-06-2019 10:50 AM
PSE - Gig Harbor LNG Satellite Plant (LNG)	Distribution	Intrastate	Gas	22189	Gig Harbor LNG Satellite Plant	02-06-2019 10:50 AM
PSE - Jackson Prairie Storage Facility	Transmission	Interstate	Gas	22189	33875	02-06-2019 10:50 AM
PSE - Sumas Gas Pipeline	Transmission	Interstate	Gas	22189	74999	02-06-2019 10:50 AM
PSE - Tacoma LNG	Distribution	Intrastate	Gas	22189	Tacoma LNG	06-28-2019 03:51 PM
PSE - Mobile LNG	Distribution	Intrastate	Gas	22189	Mobile LNG	04-03-2024 05:19 PM
Puget Sound Energy - King Co. South	Distribution	Intrastate	Gas	22189	PSE King Co. South	09-17-2024 01:30 PM
Puget Sound Energy - King Co. North	Distribution	Intrastate	Gas	22189	PSE King Co. North	09-17-2024 01:32 PM
Puget Sound Energy - Pierce Co. East	Distribution	Intrastate	Gas	22189	Pierce Co. East	09-17-2024 01:37 PM
Puget Sound Energy - Pierce Co. West	Distribution	Intrastate	Gas	22189	Pierce Co. West	09-17-2024 01:38 PM

OPERATOR'S PUBLIC WEB PAGE

Question #33

For informational purposes: Using the drop down selections available in the "Results" block, indicate whether the operator's web page contains the information listed by placing a check in the box adjacent to all items that are present.

33. Results

Q33.A Pipeline Purpose and Reliability ; Q33.B Damage Prevention ; Q33.C Pipe Location Information ; Q33.D How to get additional information ; Q33.E National Pipeline Mapping System ; Q33.F On Call Requirements ; Q33.G Potential Hazards ; Q33.H Prevention Measures ; Q33.I Leak/Damage Recognition ; Q33.J ROW Encroachment ; Q33.K Pipeline Location Information ; Q33.L Integrity Management Programs ; Q33.M Emergency Preparedness

### 33. Notes

PSE website covers all areas identified.

## ADVISORY BULLETIN REVIEW

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### Question #34

Is there potential for damage to the operator's pipeline facilities caused by flooding, river scour, or channel migration?

#### ADB 2019-01

ADB 2019-01 Flood Mitigation

#### 34. Results

YES

### 34. Notes

PSE has taken reasonable action to mitigate.

### Question #35

If "YES" to Q34, did the operator take appropriate action in accordance with the guidance contained ADB 2019-01? Discuss ADB's guidance with operator's representative, and annotate any concerns.

#### ADB 2019-01

ADB 2019-01: Flood Mitigation

#### 35. Results

Satisfactory

### 35. Notes

There were no concerns identified.

### Question #36

Is there potential for the operator's system to be damaged by earth movement or other seismic/geological activities?

#### ADB 2019-02

ADB 2019-02: Earth Movement/Geological Hazards

#### 36. Results

YES

### 36. Notes

PSE has a robust slide and bridge patrol mitigation program.

### Question #37

If "YES" to Q36, did the operator take appropriate action according to ADB 2019-02? Discuss suggested actions from ADB with operator's representative and annotate any concerns.

#### ADB 2019-02

ADB 2019-02: Earth Movement/Geological Hazards

#### 37. Results

Satisfactory

### 37. Notes

There were no concerns identified.

### Question #38

Does the operator have any indoor meter sets or regulators in their system?

#### ADB 2020-01

ADB 2020-01 Inside Meter Sets

#### 38. Results

YES

### 38. Notes

PSE reviews inside meter sets for mapping accuracy and leak survey.

### Question #39

If operator's system has indoor meter sets/regulators, did the operator review ADB 2020-0115? Discuss ADB guidance with operator's representative and annotate any concerns. Particular attention must be given to the operator's plan to conduct leak surveys, AC inspections, and other maintenance activities in locations that are difficult to access, as well as the inclusion of inside meters/regulators within the operator's DIMP plan, as applicable.

#### ADB 2020-01

ADB 2020-01 Inside Meter Sets

#### 39. Results

Satisfactory

### 39. Notes

PSE has an inside meter program that they have implemented to help address these issues.

### Question #40

Is the operator's record of locations for all indoor meter sets/regulators within their system complete and sufficiently detailed??

#### ADB 2020-01

ADB 2020-01 Inside Meter Sets

#### 40. Results

Satisfactory

### 40. Notes

Staff was able to verify in the field during standard and random facility inspections.

### Question #41

Does the operator have any low pressure systems?

#### ADB 2020-02

ADB 2020-02 Low Pressure Systems

#### 41. Results

YES

### 41. Notes

One remaining system that is located in the Seattle downtown area. Staff was able to review this system within the previous year and verify the number of services. 4.2 miles with 79 services.

### Question #42

If "YES" to Q41, did the operator review ADB 2020-0025 for Overpressure Protection of Low-Pressure Natural Gas Distribution Systems? Review ADB guidance with operator and annotate any concerns.

#### ADB 2020-02

ADB 2020-02 Low Pressure Systems

#### 42. Results

Satisfactory

### 42. Notes

There were no concerns identified.

### Question #43

For low pressure construction/maintenance projects, does the operator have a process for review of engineering plans and constructibility reviews that are carried out through all applicable departments? Do all applicable departments review project plans for accuracy, completeness and correctness? How are control procedures developed that could identify system threats that could result in a common failure mode? How is the operator mitigating risk in their low pressure system?

#### ADB 2020-02

ADB 2020-02 Low Pressure Systems

#### 43. Results

Satisfactory

### 43. Notes

### Question #44

Does the operator include all low-pressure system risks in their DIMP program appropriately?

**44. Notes**

Yes. Staff was able to verify that low pressure system risks are included.

 **SUMMARY OF REQUIRED COMMENTS**

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**COMMENTS:** Required for any ratings other than Satisfactory. Summarize/consolidate entries from the "Notes" blocks above. Ensure you annotate the question number for each comment.