

Woodard, Marina (UTC)

From: Imad, Antoinette M -Toni <antoinette.imad@pse.com>
Sent: Thursday, February 23, 2012 3:43 PM
To: Lykken, David (UTC)
Cc: Woodard, Marina (UTC); McGrath, Cheryl; Subsits, Joe (UTC); Gas Compliance -- mail --
Subject: RE: PG-110644 | 2011 Public Awareness Program Inspection
Attachments: PG110644 PSE Response - Public Awaareness Program Inspection.pdf

Dear Mr. Lykken,

Pursuant to your request, PSE is hereby submitting a response to address the areas of concern noted in the 2011 Public Awareness Program Inspection report dated January 6, 2012.

Best Regards,

Toni Imad

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February 23, 2012

David Lykken
Pipeline Safety Director
Washington Utilities and Transportation Commission
Pipeline Safety Section
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PO Box 47250
Olympia, WA 98504-7250

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Dear Mr. Lykken:

RE: 2011 Public Awareness Inspection of Puget Sound Energy

PSE has received and reviewed your letter dated January 6, 2012 regarding the “2011 Public Awareness Inspection of Puget Sound Energy” and pursuant to your request is submitting the following written response.

AREAS OF CONCERN

PSE has a written Public Awareness Program Plan; however, the PAP lacks detail and clarity. API 1162 Section 7.1 states, “Each operator of a hazardous liquid pipeline system, natural gas transmission pipeline system, gathering pipeline system or a natural gas distribution pipeline system should establish (and periodically update) a written Public Awareness Program designed to cover all required components of the program described in the Recommended Practice.” WAC 480-93-180 Plan and Procedures, requires plans and procedures for meeting all applicable requirements of 49 CFR §§ 191, 192 and chapter 480-93 WAC.

PSE’s has a written plan. It lacks detail regarding process and procedure (including documentation). The following areas need to be reviewed and revised:

1. Implement, document and verify improvements recommended in its 4 year evaluation (Form 21 question 4.07)
2. Use evaluation results and data to determine if the stakeholders have demonstrated the intended learned behaviors (Form 21 question 4.05)
3. Determine whether appropriate prevention behaviors have been understood by the stakeholder audiences (found in PAP II Section 8) (Form 21 question 4.05)
4. Evaluate data to assess the percentage of the intended stakeholder audience that understood and retained the key information in each PAP message. (Form 21 question Form 21 question 4.04)

5. Determine the statistical sample size and margin-of-error for each of the four intended stakeholder audiences. (Form 21 question 4.03)
6. Estimate the percentage of individuals or entities actually reached within each intended stakeholder audience group. (Form 21 question 4.03)
7. Track the number of individuals or entities reached within each intended stakeholder audience group (Form 21 question 4.02)
8. Conducting the 4 year evaluation. (Form 21 question 4.01)
9. Assess the results of its annual PAP audit/review then develop and implement changes in its program (Form 21 question 3.03)
10. Conduct annual audits/reviews of its PAP. (Form 21 question 3.02)
11. Make its emergency response plan available; identified the operator's expectations for emergency responders and identified whether the expectations are the same for all locations; identify how the operator determined the affected emergency response organizations have adequate and proper resources to respond; identify how the operator ensures that information was communicated to emergency responders that did not attend training/information sessions by the operator. (Form 21 question 2.06)
12. Determine relevant factors to determine the need for supplemental program enhancements as described in API RP 1162 for each stakeholder audience (Form 21 question 2.05)
13. Document and track delivered messages to the individual stakeholder groups. (Form 21 question 1.05)
14. Identify how the operator determines stakeholder notification areas and distance on either side of the pipeline the procedure and process used to determine the data source used to identify each stakeholder audience. (Form 21 question 1.04)
15. Identify how the operator determines stakeholder notification areas and distance on either side of the pipeline? (Form 21 question 1.04)
16. Determine the process and/or data source used to identify each stakeholder audience in the plan (Form 21 question 1.04)
17. Address where unique attributes in each system are (Form 21 question 1.03)
18. Determine how management participates in the PAP; to verify resources provided to implement public awareness are in the PAP; to determine how many employees involved with the PAP and what their roles are and to determine if the operator uses external support resources for any implementation or evaluation efforts. (Form 21 question 1.02)

PSE Response:

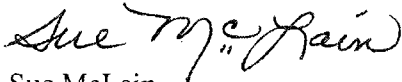
As noted by Staff, PSE has a written Public Awareness Program that follows the general program recommendations of API RP1162. In addition PSE's commitment to and engagement in raising public awareness of gas safety was clearly demonstrated during the public awareness inspection.

PSE agrees with Staff that the plan needs to be updated in order to provide more descriptive information on methodologies used to implement the program. In order to

address the 18 areas of concern identified during the inspection, PSE will complete an evaluation of the written Public Awareness Program based on the results of this inspection and previous plan evaluations and determine what updates are required. A revised Public Awareness Program plan including enhancements identified in the evaluation will be documented by July 1st, 2012. Furthermore a summary of how each of the 18 areas was considered in this review would also be documented and shared with Staff by July 15, 2012.

PSE trusts that the information provided fully responds and satisfies your request. PSE respects the Commission's responsibilities in auditing and enforcing pipeline safety regulations and we continue our efforts to construct, operate and maintain a safe gas pipeline system that meets high standards of excellence.

Sincerely,



Sue McLain
Senior Vice-President Delivery Operations

Cc: Andy Wappler, VP Corporate Affairs
Cathy Koch, Director Compliance
Grant Ringel, Director Communications
Dorothy Bracken, Manager Customer Communication
Cheryl McGrath, Manager Compliance and Regulatory Audits- Gas
Shamish Patel, Manager Standards