



Puget Sound Energy, Inc.
P.O. Box 90868
Bellevue, WA 98009-0868

RECEIVED

JAN 18 2008

WASH. UT. & TR. COMM.

January 17, 2008

Ms. Carole J. Washburn, Secretary
Washington Utilities and Transportation Commission
P.O. Box 47250
Olympia, WA 98504-7250

Attn: Dave Lykken, Pipeline Safety Interim Director

**RE: 2007 Standard Inspection of King County Distribution System,
Docket PG-070179**

Dear Mr. Lykken:

Thank you for your letter dated January 3, 2008 accepting our response to the inspections findings identified during the inspection of King County. The following additional information is provided as requested to facilitate closing this audit.

Item #1 – Staff requested a copy of the analysis performed by PSE’s engineers. While there was no formal report written of this analysis, the following is a description of the unique features of each installation that were evaluated and the results of this evaluation.

Mark Twain School:

Description - The regulator vent discharge is located on an inside corner underneath a 3 foot overhang. The overhang is approximately 7 feet off the ground and 6 feet from the vent termination. The overhang is not continuous between the building walls which promotes ventilation of escaping gas. There is a passive vent roughly 10 feet to the right and a door 5 feet to the left, no soffits were found on the overhang.

PSE considered the configuration of the overhang and proximity to other building features and concluded that this vent location was both acceptable within the guidelines contained in our standards (2550.1800) and would allow gas to discharge into the atmosphere without undue hazard.

Fire Station:

Description - The regulator vent discharge is located on an inside corner of the building. There is an overhang on the wall adjacent to the wall the meter set is located on. While the overhang extends over the meter set assembly, it does not extend over the relief vent termination. The overhang is approximately 10 feet above the relief vent. There is a 1”

soffit located approximately 7 ½ feet above the regulator relief vent on the wall the meter set is located on. In addition, there is a non-opening window roughly 5 feet to the right of the meter set and a generator approximately 3 feet in front of the meter.

PSE considered the configuration of the overhang and proximity to the soffit and to other building features and concluded that this vent location was both acceptable within the guidelines contained in our standards (2550.1800) and would allow gas to discharge into the atmosphere without undue hazard.

Item #4 - PSE agrees with Staff's comments and does periodically evaluate information from rectifier inspections and proactively plans for the replacement of anode beds when performance indicates the anode bed is being depleted. PSE's experience is that anode beds usually fail progressively and over an extended timeframe, usually more than a year and frequently 3-5 years.

The rectifier in question was unusual in that it failed significantly more quickly than our experience would have indicated. The first indication that the anode bed performance was declining was in February of 2007 with complete failure in June of 2007. This did not allow for our normal planning and design process to occur. Upon the failure of the anode bed, we promptly began the design and permitting process for a replacement. This work is currently scheduled for completion in the first quarter of 2008.

If you have any additional questions, please call me at (425) 462-3974.

Sincerely,

A handwritten signature in black ink that reads "Duane A. Henderson". The signature is written in a cursive style with a long horizontal line extending to the right.

Duane A. Henderson, P.E.
Director, Operations Services

cc: Eric Markell
Karl Karzmar
Duane Henderson
Mike Hobbs
Bert Valdman