**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**Docket No. PG-160924**

**Puget Sound Energy**

**Greenwood Complaint**

**PUBLIC COUNSEL DATA REQUEST NO. 028**

**PUBLIC COUNSEL DATA REQUEST NO. 028:**

**Refer to Puget Sound Energy response to Public Counsel DR No. 013 and related attachments.**

1. With regard to Attachment A, please confirm that the inspection process contained therein was in effect during the period in September 2004 when the cut & cap procedure at 8409 and 8411 Greenwood Ave N. was to occur. If not confirming please explain and provide a copy of the inspection process in effect in September 2004.
   * + 1. Page 4 of Attachment A provides an Overview of the Inspection Process. The Overview states that the inspection information is recorded on a site Audit form. Please explain who performs this inspection (PSE or contractor employee and title) and provide a copy of this form for the cut & cap at 8409, 8411 and 8413/8415 Greenwood Ave N. performed in September 2004. If the completed Site Audit form is not available, please explain why not.
       2. Who is the Service Provider?
       3. Please provide any documentation that shows PSE or Pilchuck inspectors were trained on the inspection process and procedures prior to performing the inspection work at the service line locations noted above.
       4. Provide a copy of the monthly reports of the results of the Site Audit forms for the year 2004 tracking compliance by contractor Pilchuck.
       5. Refer to page 62 and 113 of the inspection procedure. Provide a copy of the inspection check list showing that the inspector had performed the verification steps listed on these pages.
2. Explain whether or not PSE currently relies on its contractors to perform all on-site quality inspections for installation and abandonment (cut & cap) of mains and services.
3. If PSE employees perform all on-site inspections, please state when this practice began.
4. If PSE employees do not perform on-site inspections, please explain why not and how PSE ensures main and service lines installation and abandonment are being done in compliance with its procedures and specifications.
5. If PSE employees perform all on-site inspections, please state when this practice began.
6. If PSE employees do not perform on-site inspections, please explain why not and how PSE ensures main and service lines installation and abandonment are being done in compliance with its procedures and specifications.

**Response:**

Puget Sound Energy (“PSE”) responds as follows:

1. With regard to Attachment A, please confirm that the inspection process contained therein was in effect during the period in September 2004 when the cut & cap procedure at 8409 and 8411 Greenwood Ave N. was to occur. If not confirming please explain and provide a copy of the inspection process in effect in September 2004.

**The overall inspection process contained in Attachment A to PSE’s Response to Public Counsel Data Request No. 013 was in effect during the period in September 2004 when the cut and cap procedure at 8409 and 8411 Greenwood Avenue North occurred.  Details pertaining to specific inspection items may have been updated to reflect changes in PSE standards or procedures implemented subsequent to the publishing of the version provided in Attachment A, but the process itself remains largely unchanged.**

1. Page 4 of Attachment A provides an Overview of the Inspection Process. The Overview states that the inspection information is recorded on a site Audit form. Please explain who performs this inspection (PSE or contractor employee and title) and provide a copy of this form for the cut & cap at 8409, 8411 and 8413/8415 Greenwood Ave N. performed in September 2004. If the completed Site Audit form is not available, please explain why not.

**PSE Quality Assurance Inspectors perform the inspections described in the Inspection Manual.  Work at 8409, 8411 and 8413/8415 Greenwood Avenue North was not selected by a PSE Quality Assurance Inspector for inspection as part of the audit sample and therefore inspection forms do not exist.**

1. Who is the Service Provider?

**The “Service Provider” is the contractor responsible for performing the work on PSE’s gas infrastructure.  In 2004, this included Pilchuck and Potelco.**

1. Please provide any documentation that shows PSE or Pilchuck inspectors were trained on the inspection process and procedures prior to performing the inspection work at the service line locations noted above.

**Documentation showing that PSE or Pilchuck inspectors were trained is no longer available.**

1. Provide a copy of the monthly reports of the results of the Site Audit forms for the year 2004 tracking compliance by contractor Pilchuck.

**Please see PSE’s Response to Public Counsel Data Request No. 019.**

1. Refer to page 62 and 113 of the inspection procedure. Provide a copy of the inspection check list showing that the inspector had performed the verification steps listed on these pages.

**Please see PSE’s response to (a)(i), above.**

1. Did the Quality Assurance Plan in Attachment B supplement the process in Attachment A or supersede it? Also provide the dates when this process was in effect.

**The Quality Assurance Plan in Attachment B is supplemental to the process described in the Gas Site Audit Inspection Manual. The information in the plan provides a holistic overview of quality assurance for both gas and electric construction and maintenance service providers whereas the Gas Site Audit Inspection Manual provides specific inspection guidance solely for PSE gas infrastructure construction. The first Quality Assurance Plan was developed in 2008 although the process described in the plan had been in effect for many years.**

1. Did the Quality Assurance Plan in Attachment C supplement the process in Attachment A and B or supersede it? Also provide the dates when this process was in effect and confirm that it is currently in effect. If not confirming, please provide a copy of the inspection process currently in effect. Provide a copy of the Gas Site Audit Inspection Manual referenced on page 4 of Attachment C.

**The Quality Assurance Plan in Attachment C is the 2013 version of the plan and supersedes Attachment B, the 2011 version of the plan. The updated plan included minor revisions of the organizational structure. The overall quality assurance process described in the 2013 Quality Assurance Plan is still in effect with some modifications as a result the implementation of PSE’s Service Provider Alignment (SPA) project in July 2015. The inspection process described in the Gas Site Audit Inspection Manual has remained unchanged. A copy of the Gas Site Audit Inspection Manual in effect in 2013 and the most current version, last updated in 2015, are attached as Attachments A and B.**

1. Explain whether or not PSE currently relies on its contractors to perform all on-site quality inspections for installation and abandonment (cut & cap) of mains and services.

**PSE service providers are contractually obligated to have a written Quality Control Program (“QCP”) and to comply with that program. The QCP for PSE’s gas construction service provider requires 100% inspection by the job foreman (quality control). Additionally, PSE provides quality control work-in-progress inspections and post-construction quality assurance audits on a sample of the work performed by a PSE service provider.**

1. If PSE employees perform all on-site inspections, please state when this practice began.

**Please see PSE’s response to (d), above. PSE Quality Assurance Inspectors inspect all gas high-pressure work whether performed as part of a service provider contract or by bid contract.**

1. If PSE employees do not perform on-site inspections, please explain why not and how PSE ensures main and service lines installation and abandonment are being done in compliance with its procedures and specifications.

**As stated above, PSE contractually requires the service provider to implement a QCP that provides controls to ensure the work they perform meets PSE requirements.  PSE utilizes a quality assurance methodology that audits a sample of in-progress (crew on site) and post-construction work.  The sample size of post-construction work utilizes the service provider’s performance as a contributing factor in the sample size determination.**

**ATTACHMENT A to PSE’s Response to PUBLIC COUNSEL Data Request No. 028.**

**ATTACHMENT B to PSE’s Response to PUBLIC COUNSEL Data Request No. 028.**