



STATE OF WASHINGTON

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

1300 S. Evergreen Park Dr. S.W., P.O. Box 47250 • Olympia, Washington 98504-7250  
(360) 664-1160 • TTY (360) 586-8203

Ref. No. Docket PG-070177

**CERTIFIED MAIL**

April 26, 2007

Jim Hogan  
Standards and Compliance Manager  
Puget Sound Energy  
PO Box 90868 MS: XRD-LL  
Bellevue, Washington 98009-0868

Dear Mr. Hogan:

**Subject: 2007 Standard Inspection of Snohomish County Distribution System**

We inspected Puget Sound Energy's (PSE) Snohomish County distribution system the week of March 5, 2007. The inspection included a review of the maintenance records in accordance with WAC 480-93 and 49 CFR Part 192. Enclosed is our report containing the results of the inspection which noted one violation of federal pipeline safety codes and one area of concern.

We appreciated the opportunity to discuss ongoing concerns we have with accessing maintenance records from the PSE database, and we trust that PSE will continue to evaluate and take measures which will expedite the process for accessing and evaluating these records. For our part, when practical, we will submit requests for certain data in advance of future inspections so PSE can adequately prepare the documentation requested. This will make more efficient use of both parties time.

Please review the attached report and respond in writing by May 30, 2007. The response should include a letter of intent and the date you plan to address the probable violations noted.



PSE - Snohomish County

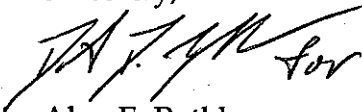
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If you have any questions, or if we may be of any assistance, please contact Al Jones at (360) 664-1321. Please refer to docket number PG- 070177 in any future correspondence regarding this inspection.

Sincerely,

A handwritten signature in black ink, appearing to read "A. E. Rathbun" with a stylized flourish at the end.

Alan E. Rathbun

Pipeline Safety Director

*The Washington Utilities and Transportation Commission (Commission) has the authority to enforce the minimum safety regulations per Chapter 480-93 of the Washington Administrative Code (WAC) pertaining to the construction, maintenance and operation of pipelines transporting natural gas in the state of Washington. In addition, the Commission adopts the Code of Federal Regulations (CFR) Title 49, Part 191 and 192.*

**WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**  
**2007 Natural Gas Pipeline Standard Inspection Report**  
**Puget Sound Energy – Snohomish County District**  
**Docket No. PG-070177**

The following violations of WAC 480-93, which adopts 49 CFR Part 192, were noted as a result of the 2007 pipeline safety inspection of Puget Sound Energy (PSE) Snohomish County District natural gas distribution system. The inspection included a review of the procedures, records, inventory, and field operations and maintenance of the natural gas facilities.

**PROBABLE VIOLATIONS**

**1. Part 192.605 Procedural Manual for Operations, Maintenance, and Emergencies.**

*(a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response.*

**Finding:**

A safety related condition existed with a meter shutoff valve closed and not locked. Commission staff was informed by the business owner at 111 Main Street in Sultan, Washington (Meter #386777) that PSE was notified in June 2006 to discontinue gas service. During the pre-field inspection staff identified the service meter valve was closed and not locked. Also, the meter's automatic meter reader was disassembled and parts removed. PSE Gas Operating Standards 2575.2200 - Locking and Unlocking Meters states,

3.1 "The riser shutoff valve shall be closed and locked to prevent the flow of gas to the customer and to prevent the valve from being opened by unauthorized individuals, for the following conditions:

3.1.3 Meter shutoff due to nonpayment, unauthorized gas use, service disconnection, ..."

## AREA OF CONCERN

1. **Part 192.317 Protection from Hazards.**

*(b) Each aboveground transmission line or main, ..., must be protected from accidental damage by vehicular traffic or other similar causes, either by being placed at a safe distance from the traffic or by installing barricades.*

**Finding:**

The Everett Delta Gate Station (#2667) is in proximity to a curve on State Highway (SR) 92 and is located west of North Machias Road. The Gate Station is located on the outside radius of SR 92 curve where a guardrail is located. Vehicular traffic traveling east on SR 92 begin turning to the northeast just before the Gate Station and before the start of the guardrail. During the on-site inspection heavy equipment such as logging, gravel, and cement trucks were observed using SR 92. The possibility exist for a vehicle traveling east, that fails to turn to the northeast, could approach the aboveground odorizer storage tank and injection unit. The placement of safety barricades will protect the above ground piping and equipment from vehicular traffic.