



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-110029

**CERTIFIED MAIL**

January 5, 2012

Sue McLain  
Senior Vice President, Delivery Operations  
Puget Sound Energy  
PO Box 90868 MS: EST-07W  
Bellevue, Washington 98009-0868

Dear Ms. McLain:

**Re: 2011 Standard Natural Gas Inspection of Pierce County**

We conducted a natural gas standard inspection on September 2, 6 and 7, 2011, of Puget Sound Energy's (PSE) Pierce county distribution system. The inspection included a records review and inspection of the pipeline facilities.

Our inspection indicates one probable violation, as noted in the enclosed report.

**Your response needed**

Please review the attached report and respond in writing by February 7, 2012. The response should include how and when you plan to bring the probable violations into full compliance.

**What happens after you respond to this letter?**

The attached report presents staff's decision on probable violations and does not constitute a finding of violation by the commission at this time.

After you respond in writing to this letter, there are several possible actions the commission, in its discretion, may take with respect to this matter. For example, the commission may:

- Issue an administrative penalty under RCW 81.88.040, or
- Institute a complaint, seeking monetary penalties, changes in the company's, practices, or other relief authorized by law, and justified by the circumstances, or
- Consider the matter resolved without further commission action.



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If you have any questions, or if we may be of any assistance, please contact Patti Johnson at (360) 870-4915. Please refer to docket number PG-110029 in any future correspondence regarding this inspection.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Lykken', with a long horizontal flourish extending to the right.

David D. Lykken  
Pipeline Safety Director

cc. Carol Wallace, Director, Gas Operations  
Cathy Koch, Director, Gas Compliance  
Duane Henderson, Manager, Gas System Integrity  
Cheryl McGrath, Manager Gas Compliance and Regulatory Audits

**WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**  
**2011 Standard Natural Gas Pipeline Safety Inspection**  
**Puget Sound Energy-Pierce County**  
**Docket PG-110029**

The following violations of WAC 480-93 and 49 CFR Part 192 was noted as a result of the 2011 pipeline safety inspection of the Puget Sound Energy (PSE) Pierce County distribution system. The inspection included a review of the records, inventory, and field operations and maintenance of the natural gas facilities.

**PROBABLE VIOLATIONS**

1. **CFR WAC 480-93-180 Plans and procedures.**

- (1) *Each gas pipeline company must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the gas pipeline company's system. The manual must include plans and procedures for meeting all applicable requirements of 49 CFR §§ 191, 192 and chapter 480-93 WAC, and any plans or procedures used by a gas pipeline company's associated contractors.*
  
- (3) *The manual must be written in detail sufficient for a person with adequate training to perform the tasks described. For example, a manual should contain specific detailed, step-by-step instructions on how to maintain a regulator or rectifier, conduct a leak survey or conduct a pressure test.*

**Finding(s):**

In 2010, PSE adopted a new Atmospheric Corrosion Inspection Procedure. PSE's Operations and Maintenance Manual did not reflect the modifications.