



STATE OF WASHINGTON

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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(360) 664-1160 • TTY (360) 586-8203

Ref. Docket No. PG-070144

CERTIFIED MAIL

June 14, 2007

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

Dear Ms. Kreshel:

We have reviewed your public awareness plan as well as the report from the federal clearinghouse reviewing your original plan. We have enclosed the federal clearinghouse review identifying your plan's shortcomings. Briefly, the following elements are missing:

- 1) A description of the purpose of pipeline markers and the information they contain for the Affected Public, Emergency Officials, and Local Public Officials. There are a number of required messages that are outlined in RP 1162 and they vary depending on the audience.
- 2) The availability of the National Pipeline Mapping System (NPMS) in your messages to the Affected Public.
- 3) A description of how the relevant factors for instituting program enhancements have been considered. A description of the process and procedures PSE will take to determine if and when supplemental elements need to be implemented.
- 4) A description and schedule for the required annual audit that will verify that the plan is being implemented.

We understand that the API RP 1162 requirements are new and do not consider these probable violations at this time. But your plan must reflect the items addressed in the recommended practice and the clearinghouse review.

Your response needed

Review the list of missing elements and the clearinghouse review (enclosure) of your public awareness plan and respond in writing by July 13, 2007. Your response must include how and when you plan to revise your public awareness program in response to these deficiencies.



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If you have any questions, or if we may be of any assistance, please contact Lex Vinsel at (360) 664-1319. Please refer to docket number PG-070144 in any future correspondence regarding this review.

Sincerely,

A handwritten signature in black ink, appearing to read "Alan E. Rathbun". The signature is stylized with a large, circular initial "A" and a long horizontal stroke at the end.

Alan E. Rathbun,
Pipeline Safety Director

Enclosure (List from clearinghouse)

**Federal Clearinghouse Review
PSE – Public Awareness Program
Docket# PG-070144**

Deviation from API RP 1162 Recommendations:

Federal Clearinghouse Confirmation #: 987

Question : Do the Hazardous Liquids and Gas Transmission operator baseline awareness materials to the Affected Public include Pipeline location information (description of the purpose of pipeline markers and the information on them, ref §4.6.1)?

Answer : Not Included

Page Number : 15

Comments : Not included for the Affected Public

Question : Do the Hazardous Liquids and Gas Transmission operator baseline awareness materials to Emergency Officials include Pipeline location information (description of the purpose of pipeline markers and the information on them, ref §4.6.1) and availability of NPMS?

Answer : Not Included

Page Number : 16

Comments : Pipeline location information and the description of the purpose of pipeline markers and the information on them not included but the availability of NPMS included for Emergency Officials

Question : Do the Hazardous Liquids and Gas Transmission operator baseline awareness materials to Local Public Officials include Pipeline location information (description of the purpose of pipeline markers and the information on them, ref §4.6.1) and availability of NPMS?

Answer : Not Included

Page Number : 17

Comments : Pipeline location information and the description of the purpose of pipeline markers and the information on them not included but the availability of NPMS included for Local Public Officials

Question : Section 6.2 Does the program describe the process and procedure used to determine whether supplemental elements will be implemented in response to High Consequence Areas?

Answer : No

Page Number :

Comments : Does not include process and procedure

Question : Section 6.2 Does the program describe the process and procedure used to determine whether supplemental elements will be implemented in response to Third-party damage incidents?

Answer : No
Page Number :
Comments : Does not include process and procedure

Question : Does the program describe the process and procedure used to determine whether Supplemental Elements will implemented in response to any factor other than High Consequence Areas and Third party damage?

Answer : No
Page Number :
Comments : Does not include process and procedure

Question : Section 8.3 Does the program include an annual audit or review of whether the program has been developed and implemented according to the guidelines in RP 1162?

Answer : Not Included
Page Number :
Comments : Does not include information about annual audit or review of the program

Supplemental Elements Being Implemented:

Question : Has the operator implemented Supplemental Elements in response to High consequence areas?

Audience: AFFECTED PUBLIC
Supplemental Type : ENHANCED MESSAGE CONTENT AND DELIVERY/MEDIA

System Type : TRANSHAZ

Audience: EMERGENCY OFFICIALS
Supplemental Type : ENHANCED MESSAGE CONTENT AND DELIVERY/MEDIA

System Type : TRANSHAZ

Audience: LOCAL PUBLIC OFFICIALS
Supplemental Type : ENHANCED MESSAGE CONTENT AND DELIVERY/MEDIA

System Type : TRANSHAZ

Question : Has the operator implemented Supplemental Elements in response to Third-party damage incidents?

Audience: EXCAVATORS
Supplemental Type : BROADENING OR WIDENING THE AUDIENCE COVERAGE AREA

System Type : TRANSHAZ

Audience: AFFECTED PUBLIC

Supplemental Type : ENHANCED MESSAGE CONTENT AND DELIVERY/MEDIA

System Type : TRANSHAZ

Audience: LOCAL PUBLIC OFFICIALS

Supplemental Type : ENHANCED MESSAGE CONTENT AND DELIVERY/MEDIA

System Type : TRANSHAZ

Supplemental Factors Being Implemented:

Question : Has the operator implemented Supplemental Elements in response to any factor other than High Consequence Areas and Third party damage?

Supplemental Factor: POTENTIAL HAZARDS