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WASH. UT. & TP. COMM

April 11, 2007

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

Attn: Alan Rathbun, Pipeline Safety Director

**Re: Docket PG-060571 - 2006 Standard Inspection of Gig Harbor LNG Peak Shaving**

Dear Mr. Rathbun,

This letter is in response to the "2006 Standard Inspection of Gig Harbor LNG Peak Shaving" dated March 16, 2007. In this letter Staff identified one area of concern. Below is PSE's response.

**Area of Concern**

"The gas track instrument used at the Gig Harbor LNG facility is not considered a flammable gas detector as specified in NFPA-59A Section 9.7.4. Last year, portable detectors (Bascom-Turner) were available that measured the full range of methane concentration. LNG vapors are not odorized and the sense of smell cannot be relied on to detect the presence methane. The code requires three portable detectors shall be available at all times. Using two for monitoring when required and a third detector for backup. This provides a spare detector in the event of failure of one of the primary detectors and also allows verification if the two primary detectors provide different readings."

**Response:**

PSE is currently in the process of purchasing new gas detection equipment for all of Gas Operations. The new units are capable of detecting multiple gases, as well as providing a numerical measurement of the percent gas in air, and will replace the various models of gas detection equipment and combustible gas indicators currently in use by PSE. The existing units at Gig Harbor are planned to be replaced by the new multi-purpose units during 2007.

Please feel free to contact me at 425-462-3957 if you have any further questions or comments.

Sincerely,

Jim Hogan,  
Manager, Standards & Compliance

cc: Sue McLain  
Duane Henderson  
Kimberly Harris  
Karl Karzmar