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STATE OF WASHINGTON
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
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Ref. No. Docket PG-050516

September 25, 2006

Jim Hogan
Manager Standards & Compliance
Puget Sound Energy
PO Box 90868, EST-07W
Bellevue, WA 98009-0868

Dear Mr. Hogan:

Subject: 2005 Standard Inspection of King County Distribution System

This letter is in response to your June 5, 2006, correspondence in reference to our 2005 standard inspection. As you know, our standard inspection resulted in three probable violations and one area of concern.

We find your response to probable violations No. 2 and 3 as well as the area of concern to be acceptable. The probable violation related to the vent piping at Mark Twain Elementary remains a concern. You state in your response that human error resulted in overlooking this PVC vent pipe.

Background of this issue

Your will recall that PSE's program to identify and replace all PVC vent pipes was in reaction to a natural gas incident in January 1998. In a letter to Ms. Christy Omohundro dated November 16, 1999, Carole Washburn wrote: "Effective January 1, 2000, all plastic relief vents identified by Commission Staff will be subject to civil penalty pursuant to RCW 80.28.212." The pipeline safety section granted PSE requested time extensions to complete this initiative. On July 16, 2004, PSE notified us that all work related to the regulator relief vent inspection/remediation project was complete.

Mitigation of Mark Twain Elementary relief vent

We acknowledge that the regulator vent installed at Mark Twain Elementary is in conformance with PSE standards. However, given this unique location (sheltered area with limited air circulation), this downward directed nipple does not meet the intent of CFR 192.199(e) discharging into the atmosphere without undue hazard. At our request, a consultant, experienced in gas distribution systems, viewed your installation at the school. He agreed with pipeline safety staff that this vent warrants a vent pipe extending above the roof line.

RMS
AA

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Next steps

We are considering recommending that the commission issue a complaint against PSE in conjunction with this specific probable violation. The two issues of concern include PSE's failure to meet its commitment in finding all plastic vent pipes and the resulting mitigation at Mark Twain Elementary with the downward directed nipple. If we make this recommendation, it will be up to an administrative law judge to determine if probable cause exists for the issuance of a complaint. If the commission issues a complaint, PSE will have the opportunity to present its position directly to the commissioners.

We will notify you once a determination on this matter is made. Please contact me at (360) 664-1254 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Alan E. Rathbun", with a long horizontal flourish extending to the right.

Alan E. Rathbun
Pipeline Safety Director

cc: Duane Henderson
Sue McLain