

**Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Distribution Systems
Records Review and Field Inspection**

A completed **Standard Inspection Checklist, OQ Field Validation Protocol form and Cover Letter/Field Report** are to be submitted to the Senior Engineer within **30 days** from completion of the inspection.

| Inspection Report | | | |
|---|---|----------------------------|-------------------------|
| Docket Number | PG-090030 | | |
| Inspector Name & Submit Date | Scott Rukke 6/30/09 | | |
| Sr. Eng Name & Review/Date | D. Lykken 7/01/09 | | |
| Operator Information | | | |
| Name of Operator: | Puget Sound Energy | OP ID #: | 22189 |
| Name of Unit(s): | West King County Inspection unit | | |
| Records Location: | Tacoma, Kent, Georgetown, NOB, Bellevue | | |
| Date(s) of Last (unit) Inspection: | N/A. This is a new inspection unit. The entire King County area was last inspected in October 2007. | Inspection Date(s): | April 1, 2009 – June 27 |

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| Inspection Summary: |
| West King County records and facilities. North to Snohomish County Line, South to 156 St and East to I-5. |

| | | |
|---|--|------------------|
| HQ Address: PO Box 90868, EST-07W Bellevue, WA 98009 | System/Unit Name & Address: West side of King County King County from I-5 and Lake Washington on the east boundary with 156 th to the South and King Snohomish line on the North. | |
| Co. Official: Phone No.: Fax No.: Emergency Phone No.: | Phone No.: Fax No.: Emergency Phone No.: | |
| Persons Interviewed | Title | Phone No. |
| Ken Brown | GFR Supervisor | 206-766-6797 |
| Gary Swanson | Maint Program Coord. | 206-766-6811 |
| Signe Lippert | Maint Program Supervisor | 206-766-6787 |
| Roger Scheetz | Pressure Control Supervisor | 206-571-2673 |
| Darryl Hong | Compliance Prog. Coord. | 425-766-3388 |
| | | |
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|--|--|--------------|--------|
| WUTC staff conducted an abbreviated procedures inspection on 192 O&M and WAC items that changed since the last inspection. This checklist focuses on Records and Field items per a routine standard inspection. | | | |
| (check one below and enter appropriate date) | | | |
| <input type="checkbox"/> | Team inspection was performed (Within the past five years.) or, | Date: | |
| <input checked="" type="checkbox"/> | Other WUTC Inspector reviewed the O & M Manual (Since the last yearly review of the manual by the operator.) | Date: | 5/2005 |

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| GAS SYSTEM OPERATIONS | | | |
|---|---------|--------------------------------|---|
| Gas Supplier | | Williams | |
| Services: 775,000 total customers not broken down by unit. <i>Residential Commercial Industrial Other</i> PSE has approximately 775,000 services system wide. The West King inspection unit is a small part of their total system and the number of services is undetermined. | | | |
| Number of reportable safety related conditions last year | | 0 | Number of deferred leaks in system |
| Number of <u>non-reportable</u> safety related conditions last year | | 0 | Number of third party hits last year |
| Miles of transmission pipeline within unit (total miles and miles in class 3 & 4 areas) | | 0 | Miles of main within inspection unit (total miles and miles in class 3 & 4 areas) <u>Undetermined</u> |
| Operating Pressure(s): | | MAOP (Within last year) | Actual Operating Pressure (At time of Inspection) |
| Feeder: | Various | Various | Various |
| Town: | Various | Various | Various |
| Other: | Various | Various | Various |
| Does the operator have any transmission pipelines? | | Yes | |
| Compressor stations? Use Attachment I. | | No | |

| Pipe Specifications: | | | |
|-----------------------------|---|------------------------------|-----------|
| Year Installed (Range) | 1920 to present | Pipe Diameters (Range) | ½" to 20" |
| Material Type | W.I., STW, bare steel, PE, copper | Line Pipe Specification Used | Various |
| Mileage | Undetermined for specific inspection unit | SMYS % | Various |

Operator Qualification Field Validation

Important: Per OPS, the OQ Field Inspection Protocol Form (Rev 3, Feb 08) shall be used by the inspector as part of this standard inspection. When completed, the inspector will upload this information into the PHMSA OQ Database (OQDB) located at <http://primis.phmsa.dot.gov/oqdb/home.oq> **Date Completed** 5/27/09

| REPORTING RECORDS | | | S | U | N/A | N/C |
|-------------------|------------------|---|---|---|-----|-----|
| 1. | 191.5 | Any incidents requiring telephonic reporting to the NRC (800-424-8802) | X | | | |
| 2. | 191.23 | Filing the Safety Related Condition Report within 5 days of determination, but not later than 10 days after discovery | X | | | |
| 3. | 192.727(g) | Abandoned facilities offshore, onshore crossing commercially navigable waterways reports | | | X | |
| 4. | 480-93-200(1) | Telephonic Reports to UTC Pipeline Safety Incident Notification 1-888-321-9146 (Within 2 hours) for events which results in; | | | | |
| 5. | 480-93-200(1)(a) | A fatality or personal injury requiring hospitalization; | X | | | |
| 6. | 480-93-200(1)(b) | Damage to property of the operator and others of a combined total exceeding fifty thousand dollars; | X | | | |
| 7. | 480-93-200(1)(c) | The evacuation of a building, or high occupancy structures or areas; | X | | | |
| 8. | 480-93-200(1)(d) | The unintentional ignition of gas; | X | | | |
| 9. | 480-93-200(1)(e) | The unscheduled interruption of service furnished by any operator to twenty five or more distribution customers; | X | | | |
| 10. | 480-93-200(1)(f) | A pipeline pressure exceeding the MAOP plus ten percent or the maximum pressure allowed by proximity considerations outlined in WAC 480-93-020; | X | | | |

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| REPORTING RECORDS | | | S | U | N/A | N/C |
|-------------------|-----------------------|---|---|---|-----|-----|
| 11. | 480-93-200(1)(g) | Is significant, in the judgment of the operator, even though it does not meet the criteria of (a) through (f) of this subsection; | X | | | |
| 12. | 480-93-200(2) | Telephonic Reports to UTC Pipeline Safety Incident Notification 1-888-321-9146 (Within 24 hours) for; | | | | |
| 13. | 480-93-200(2)(a) | The uncontrolled release of gas for more than two hours; | X | | | |
| 14. | 480-93-200(2)(b) | The taking of a high pressure supply or transmission pipeline or a major distribution supply gas pipeline out of service; | X | | | |
| 15. | 480-93-200(2)(c) | A gas pipeline operating at low pressure dropping below the safe operating conditions of attached appliances and gas equipment; or | X | | | |
| 16. | 480-93-200(2)(d) | A gas pipeline pressure exceeding the MAOP | X | | | |
| 17. | 480-93-200(4) | Did written incident reports (within 30 days of telephonic notice) include the following | | | | |
| 18. | 480-93-200(4)(a) | Name(s) and address(es) of any person or persons injured or killed, or whose property was damaged; | X | | | |
| 19. | 480-93-200(4)(b) | The extent of injuries and damage; | X | | | |
| 20. | 480-93-200(4)(c) | A description of the incident or hazardous condition including the date, time, and place, and reason why the incident occurred. If more than one reportable condition arises from a single incident, each must be included in the report; | X | | | |
| 21. | 480-93-200(4)(d) | A description of the gas pipeline involved in the incident or hazardous condition, the system operating pressure at that time, and the MAOP of the facilities involved; | X | | | |
| 22. | 480-93-200(4)(e) | The date and time the gas pipeline company was first notified of the incident; | X | | | |
| 23. | 480-93-200(4)(f) | The date and time the ((operators')) gas pipeline company's first responders arrived on-site; | X | | | |
| 24. | 480-93-200(4)(g) | The date and time the gas ((facility)) pipeline was made safe; | X | | | |
| 25. | 480-93-200(4)(h) | The date, time, and type of any temporary or permanent repair that was made; | X | | | |
| 26. | 480-93-200(4)(i) | The cost of the incident to the ((operator)) gas pipeline company; | X | | | |
| 27. | 480-93-200(4)(j) | Line type; | X | | | |
| 28. | 480-93-200(4)(k) | City and county of incident; and | X | | | |
| 29. | 480-93-200(4)(l) | Any other information deemed necessary by the commission. | X | | | |
| 30. | 480-93-200(5) | Submit a supplemental report if required information becomes available | X | | | |
| 31. | 480-93-200(6) | Written report within 5 days of receiving the failure analysis of any incident or hazardous condition due to construction defects or material failure | | | X | |
| 32. | 480-93-200(7) | Annual Reports filed with the commission no later than March 15 for the proceeding calendar year | | | | |
| 33. | 480-93-200(7)(a) | A copy of PHMSA F-7100.1-1 and F-7100.2-1 annual report required by U.S. Department of Transportation, PHMSA/Office of Pipeline Safety | X | | | |
| 34. | 480-93-200(7)(b) | Damage Prevention Statistics Report including the following; | | | | |
| 35. | 480-93-200(7)(b)(i) | Number of gas-related one-call locate requests completed in the field; | X | | | |
| 36. | 480-93-200(7)(b)(ii) | Number of third-party damages incurred; and | X | | | |
| 37. | 480-93-200(7)(b)(iii) | Cause of damage, where cause of damage is classified as one of the following: (A) Inaccurate locate; (B) Failure to use reasonable care; (C) Excavated prior to a locate being conducted; or (D) Excavator failed to call for a locate. | X | | | |
| 38. | 480-93-200(7)(c) | Reports detailing all construction defects and material failures resulting in leakage. Categorizing the different types of construction defects and material failures. The report must include the following: (i) Types and numbers of construction defects; and (ii) Types and numbers of material failures. PSE's list of failures does not include all PE failures. See violation report. | X | | | |

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| REPORTING RECORDS | | | S | U | N/A | N/C |
|-------------------|----------------|--|---|---|-----|-----|
| 39. | 480-93-200(8) | Providing updated emergency contact information to the commission and appropriate officials of all municipalities where gas pipeline companies have facilities | X | | | |
| 40. | 480-93-200(9) | Providing by email, reports of daily construction and repair activities no later than 10:00 a.m. | X | | | |
| 41. | 480-93-200(10) | Submitting copy of DOT Drug and Alcohol Testing MIS Data Collection Form when required | X | | | |

| Documentation Reviewed: | | | | |
|-------------------------|-----------------|---------------|---------------------|----------------------|
| Document Title | Document Number | Revision Date | Date Range Reviewed | Pct of Data Reviewed |
| | | | | |
| | | | | |
| | | | | |

Comments:

192.727(g) no abandoned facilities offshore or under commercially navigable waterways.

480-93-200(6) - no failure analysis' conducted since last inspection

| CUSTOMER and EXCESS FLOW VALVE INSTALLATION NOTIFICATION | | | S | U | N/A | N/C |
|--|---------|---|---|---|-----|-----|
| 42. | 192.16 | New customers notified, within 90 days, of their responsibility for those service lines not maintained by the operator | X | | | |
| 43. | 192.381 | Does the excess flow valve meet the performance standards prescribed under §192.381? | X | | | |
| 44. | 192.383 | Does the operator have a voluntary installation program for excess flow valves and does the program meet the requirements outlined in §192.383? Are records adequate? | X | | | |
| 45. | 192.383 | If no voluntary program for EFV installations, are customers notified in accordance with §192.383? Are records adequate? | X | | | |

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|-------------------------|-----------------|---------------|---------------------|----------------------|
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| | | | | |
| | | | | |

Comments:

| CONSTRUCTION RECORDS | | | S | U | N/A | N/C |
|----------------------|------------|--|---|---|-----|-----|
| 46. | 480-93-013 | OQ records for personnel performing New Construction covered tasks | X | | | |
| 47. | 192.225 | Test Results to Qualify Welding Procedures | X | | | |

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| CONSTRUCTION RECORDS | | | S | U | N/A | N/C |
|----------------------|----------------------|--|---|---|-----|-----|
| 48. | 192.227 | Welder Qualification | X | | | |
| 49. | 480-93-080(1)(a)(iv) | Appendix C Welders re-qualified 2/Yr (7.5Months) | X | | | |
| 50. | 480-93-080(2) | Plastic pipe joiners re-qualified 1/Yr (15 Months) | X | | | |
| 51. | 480-93-080(2)(b) | Plastic pipe joiners re-qualified if no production joints made during any 12 month period | X | | | |
| 52. | 480-93-080(2)(c) | Tracking Production Joints or Re-qualify joiners 1/Yr (12Months) | X | | | |
| 53. | 480-93-115(2) | Test leads on casings (without vents) installed after 9/05/1992 | X | | | |
| 54. | 480-93-115(3) | Sealing ends of casings or conduits on transmission lines and mains | X | | | |
| 55. | 480-93-115(4) | Sealing ends (nearest building wall) of casings or conduits on services | X | | | |
| 56. | 192.241(a) | Visual Weld Inspector Training/Experience | X | | | |
| 57. | 192.243(b)(2) | Nondestructive Technician Qualification | X | | | |
| 58. | 192.243(c) | NDT procedures | X | | | |
| 59. | 192.243(f) | Total Number of Girth Welds | | | X | |
| 60. | 192.243(f) | Number of Welds Inspected by NDT | | | X | |
| 61. | 192.243(f) | Number of Welds Rejected | | | X | |
| 62. | 192.243(f) | Disposition of each Weld Rejected | | | X | |
| 63. | 192.303 | Construction Specifications | | | X | |
| 64. | 192.325 | Underground Clearance | | | X | |
| 65. | 192.327 | Amount, location, cover of each size of pipe installed | | | X | |
| 66. | 480-93-160(1) | Report filed 45 days prior to construction or replacement of transmission pipelines ≥ 100 feet in length | | | X | |
| 67. | 480-93-160(2) | Did report describe the proposed route and the specifications for the pipeline and must include, but is not limited to the following items: | | | X | |
| 68. | 480-93-160(2)(a) | Description and purpose of the proposed pipeline; | | | X | |
| 69. | 480-93-160(2)(b) | Route map showing the type of construction to be used throughout the length of the line, and delineation of class location as defined in 49 CFR Part 192.5, and incorporated boundaries along the route. | | | X | |
| 70. | 480-93-160(2)(c) | Location and specification of principal valves, regulators, and other auxiliary equipment to be installed as a part of the pipeline system to be constructed | | | X | |
| 71. | 480-93-160(2)(d) | MAOP for the gas pipeline being constructed; | | | X | |
| 72. | 480-93-160(2)(e) | Location and construction details of all river crossings or other unusual construction requirements encountered en route. | | | X | |
| 73. | 480-93-160(2)(f) | Proposed corrosion control program to be followed inc specs for coating and wrapping, and method to ensure the integrity of the coating using holiday detection equipment; | | | X | |
| 74. | 480-93-160(2)(g) | Welding specifications; and | | | X | |
| 75. | 480-93-160(2)(h) | Bending procedures to be followed if needed. | | | X | |
| 76. | 480-93-170(1) | Commission notified 2 day's prior to pressure testing pipelines with an MAOP producing a hoop stress ≥ 20% SMYS? | | | X | |
| 77. | 480-93-170(7) | Pressure tests records at a minimum include required information listed under 480-93-170(a-h) | X | | | |
| 78. | 480-93-170(9) | Individual pressure test records maintained for single installations where multiple pressure tests were performed? | X | | | |
| 79. | 480-93-170(10) | Pressure Testing Equipment checked for accuracy/intervals (Manufacturers Rec or Operators schedule) | X | | | |
| 80. | 480-93-175(2) | Study prepared and approved prior to moving and lowering of metallic pipelines > 60 psig Will verify. Per Darryl on 4/3/2009, PSE does not lower any steel pipelines. | | | X | |
| 81. | 480-93-175(4) | Leak survey within 30 days of moving or lowering pipelines ≤ 60 psig | | | X | |

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|--------------------------------|------------------------|----------------------|----------------------------|
| Document Title | Document Number | Revision Date | Date Range Reviewed |
| | | | |
| | | | |
| | | | |

Comments:

192.243(f) - no large construction jobs since last inspection. (59 - 76)
 480-90-160 - no large construction jobs since last inspection. (59 - 76)
 480-93-175(2) and (4)- Per Darryl on 4/3/2009, PSE does not lower any steel pipelines.

| OPERATIONS and MAINTENANCE RECORDS | | | S | U | N/A | N/C |
|---|---------------|--|----------|----------|------------|------------|
| 82. | 192.517(a) | Pressure Testing (operates at or above 100 psig) – useful life of pipeline Did a sampling of >100 psig jobs. | X | | | |
| 83. | 192.605(a) | Procedural Manual Review – Operations and Maintenance (1 per yr/15 months) | X | | | |
| 84. | 192.605(b)(3) | Availability of construction records, maps, operating history to operating personnel | X | | | |
| 85. | 480-93-018(3) | Records, including maps and drawings updated within 6 months of completion of construction activity? | X | | | |
| 86. | 192.605(b)(8) | Periodic review of personnel work – effectiveness of normal O&M procedures | X | | | |
| 87. | 192.609 | Class Location Study (If pipeline operating at >40% of SMYS) | | | X | |
| 88. | 192.614 | Damage Prevention (Miscellaneous) Several ways to verify | X | | | |
| 89. | 192.615(b)(1) | Location Specific Emergency Plan Do in Georgetown. | X | | | |
| 90. | 192.615(b)(2) | Emergency Procedure training, verify effectiveness of training | X | | | |
| 91. | 192.615(b)(3) | Employee Emergency activity review, determine if procedures were followed. Form 1284. Questionable whether this covers all requirements. | X | | | |
| 92. | 192.615(c) | Liaison Program with Public Officials | X | | | |
| 93. | 192.616 | Public Awareness Program | | | | |
| 94. | 192.616(e&f) | Documentation properly and adequately reflects implementation of operator’s Public Awareness Program requirements - Stakeholder Audience identification, message type and content, delivery method and frequency, supplemental enhancements, program evaluations, etc. (i.e. contact or mailing rosters, postage receipts, return receipts, audience contact documentation, etc. for emergency responder, public officials, school superintendents, program evaluations, etc.). See table below: | X | | | |
| 95. | | Operators in existence on June 20, 2005, must have completed their written programs no later than June 20, 2006. See 192.616(a) and (j) for exceptions. | | | | |

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|------------------------------------|------------------|--|--------|---|-----|-----|----------------|
| 96. | | API RP 1162 Baseline* Recommended Message Deliveries | | | | | |
| 97. | | Stakeholder Audience (LDC's) | | | | | |
| | | Baseline Message Frequency (starting from effective date of Plan) | | | | | |
| | | Residence Along Local Distribution System | | | | | Annual |
| | | LDC Customers | | | | | Twice annually |
| | | Emergency Officials | | | | | Annual |
| | | Public Officials | | | | | 3 years |
| | | Excavator and Contractors | Annual | | | | |
| 98. | | * Refer to API RP 1162 for additional requirements, including general program recommendations, supplemental requirements, recordkeeping, program evaluation, etc. | | | | | |
| 99. | 192.616(g) | The program conducted in English and any other languages commonly understood by a significant number of the population in the operator's area. | X | | | | |
| 100. | 192.617 | Analyzing accidents and failures including laboratory analysis where appropriate to determine cause and prevention of recurrence .617 | X | | | | |
| 101. | 192.619 | Maximum Allowable Operating Pressure (MAOP) Verified through uprate records. | X | | | | |
| 102. | 480-93-015(1) | Odorization of Gas – Concentrations adequate | X | | | | |
| 103. | 480-93-015(2) | Monthly Odorant Sniff Testing | X | | | | |
| 104. | 480-93-015(3) | Prompt action taken to investigate and remediate odorant concentrations not meeting the minimum requirements | X | | | | |
| 105. | 480-93-015(4) | Odorant Testing Equipment Calibration/Intervals (Annually or Manufacturers Recommendation) | X | | | | |
| 106. | 480-93-124(4) | Pipeline markers attached to bridges or other spans inspected? 1/yr(15 months) | X | | | | |
| 107. | 480-93-124(5) | Markers reported missing or damaged replaced within 45 days? | X | | | | |
| 108. | 480-93-140(2) | Service regulators and associated safety devices tested during initial turn-on | X | | | | |
| 109. | 480-93-155(1) | Up-rating of system MAOP to >60 psig? Procedures and specifications submitted 45 days prior? | X | | | | |
| 110. | 480-93-185(1) | Reported gas leaks promptly investigated? Graded in accordance with 480-93-186? Records retained? | X | | | | |
| 111. | 480-93-185(3)(a) | Leaks originating from a foreign source. Take appropriate action to protect life and property regarding the pipeline company's own facilities, and; | X | | | | |
| 112. | 480-93-185(3)(b) | Leaks originating from a foreign source reported promptly/notification by mail. Records retained? | X | | | | |
| 113. | 480-93-186(1) | Leak evaluations: Location and/or magnitude of a leak, the gas pipeline company must assign one of the leak grades defined in WAC 480-93-18601 to establish the leak repair priority. | X | | | | |
| 114. | 480-93-186(2) | Leak evaluations: Determine and document the perimeter of the leak area. Was investigation extended to inside the building if leak extended to building wall? | X | | | | |
| 115. | 480-93-186(3) | Leak evaluations: Are follow-up inspections performed within 30 days of a leak repair? | X | | | | |
| 116. | 480-93-186(4) | Leak evaluations: Grade 1 and 2 leaks (if any), downgraded once to a grade 3 without physical repair? | X | | | | |
| 117. | 480-93-187 | Gas leak records: at a minimum include required information listed under 480-93-187(1-13) Inaccurate information was observed on numerous leak records but training has been conducted since the last inspection so these deficiencies were not noted. | X | | | | |
| 118. | 480-93-188(1) | Gas leak surveys Copper services are not surveyed semi-annually. Annual report indicates there are 332 copper services. See violation report. | | X | | | |

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|------------------------------------|---------------|---|---|---|-----|-----|
| 119. | 480-93-188(2) | Gas detection instruments tested for accuracy/intervals (Mfct recommended or monthly not to exceed 45 days) Numerous instruments went past the monthly schedule. See violation report. | | X | | |
| 120. | 480-93-188(3) | Leak survey frequency (Refer to Table Below) | X | | | |

| | |
|--|-------------------|
| Business Districts (implement by 6/02/07) | 1/yr (15 months) |
| High Occupancy Structures | 1/yr (15 months) |
| Pipelines Operating ≥ 250 psig | 1/yr (15 months) |
| Other Mains: CI, WI, copper, unprotected steel | 2/yr (7.5 months) |

| | | | | | | |
|------|------------------|--|---|--|---|--|
| 121. | 480-93-188(4)(a) | Special leak surveys - Prior to paving or resurfacing, following street alterations or repairs No special leak surveys for approximately 3 years. 2625.1100 4-1 No special leak surveys performed | | | X | |
| 122. | 480-93-188(4)(b) | Special leak surveys - areas where substructure construction occurs adjacent to underground gas facilities, and damage could have occurred No special leak surveys performed | | | X | |
| 123. | 480-93-188(4)(c) | Special leak surveys - Unstable soil areas where active gas lines could be affected No special leak surveys performed | | | X | |
| 124. | 480-93-188(4)(d) | Special leak surveys - areas and at times of unusual activity, such as earthquake, floods, and explosions No special leak surveys performed | | | X | |
| 125. | 480-93-188(4)(e) | Special leak surveys - After third-party excavation damage to services; operators must perform a gas leak survey from the point of damage to the service tie-in | X | | | |
| 126. | 480-93-188(5) | Gas Survey Records | X | | | |
| 127. | 480-93-188(6) | Leak program - Self Audits | X | | | |
| 128. | 192.709 | Patrolling (Transmission Lines) (Refer to Table Below) .705 | X | | | |

| Class Location | At Highway and Railroad Crossings | At All Other Places |
|----------------|-----------------------------------|---------------------|
| 1 and 2 | 2/yr (7½ months) | 1/yr (15 months) |
| 3 | 4/yr (4½ months) | 2/yr (7½ months) |
| 4 | 4/yr (4½ months) | 4/yr (4½ months) |

| | | | | | | |
|------|---------|---|---|--|--|--|
| 129. | 192.709 | Leak Surveys (Transmission Lines) (Refer to Table Below) .706 | X | | | |
|------|---------|---|---|--|--|--|

| Class Location | Required | Not Exceed |
|----------------|----------|------------|
| 1 and 2 | 1/yr | 15 months |
| 3 | 2/yr | 7½ months |
| 4 | 4/yr | 4½ months |

| | | | | | | |
|------|--------------------|--|---|--|---|--|
| 130. | 192.603(b) | Patrolling Business District (4 per yr/4½ months) (721) | X | | | |
| 131. | 192.603(b) | Patrolling Outside Business District (2 per yr/7½ months) 192.721(b)(2) | X | | | |
| 132. | 192.603(b) | Leakage Survey - Outside Business District (5 years) 192.723(b)(1) | X | | | |
| 133. | 192.603(b) | Tests for Reinstating Service Lines 192.725 | X | | | |
| 134. | 192.603(b)/.727(g) | Abandoned Pipelines; Underwater Facility Reports 192.727 No abandoned pipelines. | | | X | |
| 135. | 192.709 | Pressure Limiting and Regulating Stations (1 per yr/15 months) .739 | X | | | |
| 136. | 192.709 | Pressure Limiting and Regulator Stations – Capacity (1 per yr/15 months) .743 | X | | | |
| 137. | 192.709 | Valve Maintenance – Transmission (1 per yr/15 months) .745 Looked at HP and Transmission only. Two valves late. See violation report. | X | | | |

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| OPERATIONS and MAINTENANCE RECORDS | | | S | U | N/A | N/C |
|------------------------------------|---------------|--|---|---|-----|-----|
| 138. | 192.709 | Valve Maintenance – Distribution (1 per yr/15 months) .747 Some distribution emergency valves went past due to weather. . | X | | | |
| 139. | 480-93-100(3) | Service valve maintenance (1 per yr/15 months) Some service valves went past due. Due to weather. | X | | | |
| 140. | 192.709 | Vault maintenance (≥200 cubic feet)(1 per yr/15 months) .749 No vaults over 200 sq. ft. | | | X | |
| 141. | 192.603(b) | Welding – Procedure 192.225(b) | X | | | |
| 142. | 192.603(b) | Welding – Welder Qualification 192.227/.229 | X | | | |
| 143. | 192.603(b) | NDT – NDT Personnel Qualification .243(b)(2) | X | | | |
| 144. | 192.709 | NDT Records (pipeline life) .243(f) No jobs requiring NDT since last inspection | | | X | |
| 145. | 192.709 | Repair: pipe (pipeline life); Other than pipe (5 years) | X | | | |

| Documentation Reviewed: | | | |
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| Document Title | Document Number | Revision Date | Date Range Reviewed |
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Comments:

#87 - N/A nothing over 40% in this district.
#140 - PSE states no vaults over 200 CF
192.603(b)/.727(g) - no abandoned pipelines
192.709 - no jobs with NDT since last inspection

| CORROSION CONTROL RECORDS | | | S | U | N/A | N/C |
|---------------------------|---------------|--|---|---|-----|-----|
| 146. | 192.453 | CP procedures (design, installation, operation, and maintenance) carried out by qualified personnel | X | | | |
| 147. | 192.455(a)(1) | Pipeline coatings meet requirements of 192.461 (for buried pipelines installed after 7/31/71) | X | | | |
| 148. | 192.455(a)(2) | CP system installed on and operating within 1 yr of completion of pipeline construction (after 7/31/71) | X | | | |
| 149. | 192.465(a) | Annual Pipe-to-soil Monitoring (1 per yr/15 months) for short sections (10% per year; all in 10 years) Reviewed on a sampling basis. | X | | | |
| 150. | 192.491 | Maps or Records .491(a) | X | | | |
| 151. | 192.491 | Examination of Buried Pipe when exposed .459 | X | | | |
| 152. | 480-93-110(8) | CP test reading on all exposed facilities where coating has been removed | X | | | |
| 153. | 192.491 | Annual Pipe-to-soil monitoring (1 per yr/15 months) .465(a) | X | | | |
| 154. | 192.491 | Rectifier Monitoring (6 per yr/2½ months) .465(b) | X | | | |
| 155. | 192.491 | Interference Bond Monitoring – Critical (6 per yr/2½ months) .465(c) | | | X | |
| 156. | 192.491 | Interference Bond Monitoring – Non-critical (1 per yr/15 months) .465(c) | | | X | |
| 157. | 480-93-110(2) | Remedial action taken within 90 days (Up to 30 additional days if other circumstances. Must document) .465(d) | X | | | |

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| CORROSION CONTROL RECORDS | | | S | U | N/A | N/C |
|---------------------------|------------------|---|---|---|-----|-----|
| 158. | 480-93-110(3) | CP equipment/ instrumentation maintained, tested for accuracy, calibrated, and operated in accordance with manufactures recommendations, or at appropriate schedule determined by gas company if no recommendation. | X | | | |
| 159. | 192.491 | Unprotected Pipeline Surveys, CP active corrosion areas (1 per 3 cal yr/39 months) .465(e) | X | | | |
| 160. | 192.491 | Electrical Isolation (Including Casings) .467 Verify steel in cast iron | X | | | |
| 161. | 480-93-110(5) | Casings inspected/tested annually not to exceed fifteen months | X | | | |
| 162. | 480-93-110(5)(a) | Casings w/no test leads installed prior to 9/05/1992. Demonstrate other acceptable test methods | X | | | |
| 163. | 480-93-110(5)(b) | Possible shorted conditions – Perform confirmatory follow-up inspection within 90 days | X | | | |
| 164. | 480-93-110(5)(c) | Casing shorts cleared when practical | X | | | |
| 165. | 480-93-110(5)(d) | Shorted conditions leak surveyed within 90 days of discovery. Twice annually/7.5 months | X | | | |
| 166. | 192.491 | Interference Currents .473 | X | | | |
| 167. | 192.491 | Internal Corrosion; Corrosive Gas Investigation .475(a) | X | | | |
| 168. | 192.491 | Internal Corrosion; Internal Surface Inspection; Pipe Replacement .475(b) | | | X | |
| 169. | 192.491 | Internal Corrosion Control Coupon Monitoring (2 per yr/7½ months) .477 | | | X | |
| 170. | 192.491 | Atmospheric Corrosion Control Monitoring (1 per 3 cal yr/39 months onshore; 1 per yr/15 months offshore) .481 Verified on a sampling basis. | X | | | |
| 171. | 192.491 | Remedial: Replaced or Repaired Pipe; coated and protected; corrosion evaluation and actions .483/485 | X | | | |

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Comments:
 #155 and 156 - no interference bonds
 #168 and 169. 192.491 - no large coupons removed for inspection. No corrosive gas and no coupons for monitoring

| PIPELINE INSPECTION (Field) | | | S | U | N/A | N/C |
|-----------------------------|------------------|---|---|---|-----|-----|
| 172. | 192.161 | Supports and anchors | X | | | |
| 173. | 480-93-080(1)(d) | Welding procedures located on site where welding is performed? | X | | | |
| 174. | 480-93-080(1)(b) | Use of testing equipment to record and document essential variables | X | | | |
| 175. | 480-93-080(2)(a) | Plastic procedures located on site where fusing is performed? | X | | | |
| 176. | 480-93-080(3) | Identification and qualification cards/certificates w/name of welder/joiner, their qualifications, date of qualification and operator whose qualification procedures were followed. | X | | | |

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| PIPELINE INSPECTION (Field) | | | S | U | N/A | N/C |
|-----------------------------|------------------|---|---|---|-----|-----|
| 177. | 480-93-013 | Personnel performing "New Construction" covered tasks OQ qualified? | X | | | |
| 178. | 480-93-015(1) | Odorization | X | | | |
| 179. | 480-93-018(5) | Updated records, inc maps and drawings made available to appropriate operations personnel? | X | | | |
| 180. | 192.179 | Valve Protection from Tampering or Damage | X | | | |
| 181. | 192.455 | Pipeline coatings meet requirements of 192.461 (for buried pipelines installed after 7/31/71) | X | | | |
| 182. | 192.463 | Levels of cathodic protection Found several low reads. PSE corrected them immediately | X | | | |
| 183. | 192.465 | Rectifiers | X | | | |
| 184. | 192.467 | CP - Electrical Isolation | X | | | |
| 185. | 192.479 | Pipeline Components exposed to the atmosphere | X | | | |
| 186. | 192.481 | Atmospheric Corrosion: monitoring | X | | | |
| 187. | 192.491 | Test Stations – Sufficient Number .469 | X | | | |
| 188. | 480-93-115(2) | Casings – Test Leads (casings w/o vents installed after 9/05/1992) | X | | | |
| 189. | 480-93-115(2) | Mains or transmission lines installed in casings/conduit. Are casing ends sealed? | X | | | |
| 190. | 480-93-115(4) | Service lines installed in casings/conduit. Are casing ends nearest to building walls sealed? | X | | | |
| 191. | 192.605(a) | Appropriate parts of manuals kept at locations where O&M activities are conducted | X | | | |
| 192. | 192.605 | Knowledge of Operating Personnel | X | | | |
| 193. | 480-93-124 | Pipeline markers installed | X | | | |
| 194. | 480-93-124(4) | Markers reported missing or damaged replaced within 45 days? | X | | | |
| 195. | | Warning Signs | | | | X |
| 196. | 192.719 | Pre-pressure Tested Pipe (Markings and Inventory) Not checked. | | | X | |
| 197. | 192.195 | Overpressure protection designed and installed where required? | X | | | |
| 198. | 192.739 | Pressure Limiting and Regulating Devices (Mechanical) | X | | | |
| 199. | 192.743 | Pressure Limiting and Regulating Devices (Capacities) | X | | | |
| 200. | 192.355 | Customer meters and regulators. Protection from damage | X | | | |
| 201. | 192.355(c) | Pits and vaults: Able to support vehicular traffic where anticipated. | X | | | |
| 202. | 480-93-140 | Service regulators installed, operated and maintained per state/fed regs and manufacturers recommended practices? | X | | | |
| 203. | 480-93-178(2) | Plastic Pipe Storage facilities – Maximum Exposure to Ultraviolet Light (2yrs) | X | | | |
| 204. | 480-93-178(4) | Minimum Clearances from other utilities. For parallel lines a minimum of twelve inches. Where a minimum twelve inches of separation is not possible, must take adequate precautions, such as inserting the plastic pipeline in conduit, to minimize any potential hazards. | X | | | |
| 205. | 480-93-178(5) | Minimum Clearances from other utilities. For perpendicular lines a minimum of six inches of separation from the other utilities. Where a minimum six inches of separation is not possible, must take adequate precautions, such as inserting the plastic pipeline in conduit, to minimize any potential hazards | X | | | |
| 206. | 480-93-178(6) | Are there Temporary above ground PE pipe installations currently? | | | | |
| 207. | 480-93-178(6)(a) | If yes, is facility monitored and protected from potential damage? None observed. | | | X | |
| 208. | 480-93-178(6)(b) | If installation exceeded 30 days, was commission staff notified prior to exceeding the deadline? None observed. | | | X | |
| 209. | 192.745 | Valve Maintenance (Transmission) Not checked in field | | | | X |

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| PIPELINE INSPECTION (Field) | | | S | U | N/A | N/C |
|-----------------------------|---------|---|---|---|-----|-----|
| 210. | 192.747 | Valve Maintenance (Distribution) Not checked in field | | | | X |

Comments:
 #195 - no leak repairs evaluated in field where warning signs would be required
 #182. 192.463 - several areas of low CP found in field
 #207 and 208 - no above ground temporary installations
 #209 and 210 - no valves were operated in field

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Pipeline Safety Advisory Bulletins:

OPS, PHMSA ADB-08-02 dated 3/04/2008 Notice to Owners and Operators of Gas Pipelines to Consider the Potential Failure Modes for Mechanical Couplings Used for Joining and Pressure Sealing Pipe Joints
Due to variables related to age of couplings, specific procedures and installation practices, and conditions specific to certain regions of the country, it is difficult to cite common criteria affecting all failures that operators should address. To ensure compliance with 49 CFR Part 192, PHMSA advises operators of gas distribution pipelines using mechanical couplings to take the 7 measures outlined in this notice.

OPS, PHMSA DB-06-03 dated 11/17/2006 Notice to Operators of Natural Gas and Hazardous Liquid Pipelines to Accurately Locate and Mark Underground Pipelines Before Excavation Activities Commence Near the Pipelines

Excavation damage continues to be one of the three leading causes of pipeline damage. PHMSA continues to find pipeline operators damaging regulated pipelines, production and gathering pipelines, and other utilities adjacent to where construction and maintenance is being performed. This damage jeopardizes the safety of excavators, pipeline employees, construction personnel, and others in the vicinity of the excavation. To guard the integrity of buried pipelines and prevent injury, death, and property and environmental damage, PHMSA advises pipeline operators to take the 15 damage prevention measures outlined in this notice.

OPS, PHMSA ADB-06-01 dated 1/17/06 Integrate Operator Qualification Regulations into Excavation Activities

Although excavation is not explicitly addressed in 49 CFR parts 192 and 195, excavation is considered a covered task under the pipeline operator qualifications regulations. These regulations require that pipeline operators and contractors be qualified to perform pipeline excavation activities. This advisory reminds operators to ensure all procedures and processes to perform excavation and backfilling are followed. Only qualified personnel must oversee all marking, trenching, and backfilling operations.

Attachment 1

Distribution Operator Compressor Station Inspection

Unless otherwise noted, all code references are to 49CFR Part 192. S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
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| 211. | .605(b) | COMPRESSOR STATION PROCEDURES | S | U | N/A | N/C |
|------|---------|--|---|---|-----|-----|
| 212. | | .605(b)(6) Maintenance procedures, including provisions for isolating units or sections of pipe and for purging before returning to service | | | X | |
| 213. | | .605(b)(7) Starting, operating, and shutdown procedures for gas compressor units | | | X | |
| 214. | | .731 Inspection and testing procedures for remote control shutdowns and pressure relieving devices (1 per yr/15 months), prompt repair or replacement | | | X | |
| 215. | | .735 (a) Storage of excess flammable or combustible materials at a safe distance from the compressor buildings | | | X | |
| 216. | | (b) Tank must be protected according to NFPA #30 | | | X | |
| 217. | | .736 Compressor buildings in a compressor station must have fixed gas detection and alarm systems (must be performance tested), unless: | | | X | |
| 218. | | • 50% of the upright side areas are permanently open, or | | | X | |
| 219. | | • It is an unattended field compressor station of 1000 hp or less | | | X | |

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| Document Title | Document/Section Number | Revision Date |
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Comments:
211 through 219 N/A, no compression.

| COMPRESSOR STATION O&M RECORDS | | | S | U | N/A | N/C |
|---|------|---|---|---|-----|-----|
| 220. | .709 | .731(a) Compressor Station Relief Devices (1 per yr/15 months) | | | X | |
| 221. | | .731(c) Compressor Station Emergency Shutdown (1 per yr/15 months) | | | X | |
| 222. | | .736(c) Compressor Stations – Detection and Alarms (Performance Test) | | | X | |

| Documentation Reviewed: | | | |
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Attachment 1

Distribution Operator Compressor Station Inspection

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Comments:
 220 through 222 N/A, no compression.

| COMPRESSOR STATIONS INSPECTION (Field) | | | S | U | N/A | N/C | |
|---|--|--|--|---|-----|-----|--|
| (Note: Facilities may be "Grandfathered") | | | | | | | |
| 223. | .163 | (c) Main operating floor must have (at least) two (2) separate and unobstructed exits | | | X | | |
| 224. | | Door latch must open from inside without a key | | | X | | |
| 225. | | Doors must swing outward | | | X | | |
| 226. | | (d) Each fence around a compressor station must have (at least) 2 gates or other facilities for emergency exit | | | X | | |
| 227. | | | Each gate located within 200 ft of any compressor plant building must open outward | | | X | |
| 228. | | | When occupied, the door must be opened from the inside without a key | | | X | |
| 229. | | (e) Does the equipment and wiring within compressor stations conform to the National Electric Code, ANSI/NFPA 70? | | | X | | |
| 230. | | .165 | (a) If applicable, are there liquid separator(s) on the intake to the compressors? | | | X | |
| 231. | | | (b) Do the liquid separators have a manual means of removing liquids? | | | X | |
| 232. | If slugs of liquid could be carried into the compressors, are there automatic dumps on the separators, Automatic compressor shutdown devices, or high liquid level alarms? | | | | X | | |
| 233. | .167 | (a) ESD system must: | | | | | |
| 234. | | - Discharge blowdown gas to a safe location | | | X | | |
| 235. | | - Block and blow down the gas in the station | | | X | | |
| 236. | | - Shut down gas compressing equipment, gas fires, electrical facilities in compressor building and near gas headers | | | X | | |
| 237. | | - Maintain necessary electrical circuits for emergency lighting and circuits needed to protect equipment from damage | | | X | | |
| 238. | | ESD system must be operable from at least two locations, each of which is: | | | | | |
| 239. | | | - Outside the gas area of the station | | | X | |
| 240. | | | - Not more than 500 feet from the limits of the station | | | X | |
| 241. | | (b) | - ESD switches near emergency exits? | | | X | |
| 242. | | | For stations supplying gas directly to distribution systems, is the ESD system configured so that the LDC will not be shut down if the ESD is activated? | | | X | |
| 243. | | (c) | Are ESDs on platforms designed to actuate automatically by... | | | | |
| 244. | | | - For unattended compressor stations, when: | | | | |
| 245. | | | ▪ The gas pressure equals MAOP plus 15%? | | | X | |
| 246. | | | ▪ An uncontrolled fire occurs on the platform? | | | X | |
| 247. | | - For compressor station in a building, when | | | | | |
| 248. | | ▪ An uncontrolled fire occurs in the building? | | | X | | |
| 249. | ▪ Gas in air reaches 50% or more of LEL in a building with a source of ignition (facility conforming to NEC Class 1, Group D is not a source of ignition)? | | | X | | | |
| 250. | .171 | (a) Does the compressor station have adequate fire protection facilities? If fire pumps are used, they must not be affected by the ESD system. | | | X | | |

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Distribution Operator Compressor Station Inspection

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| COMPRESSOR STATIONS INSPECTION (Field) | | | S | U | N/A | N/C |
|---|------|--|---|---|-----|-----|
| (Note: Facilities may be "Grandfathered") | | | | | | |
| 251. | (b) | Do the compressor station prime movers (other than electrical movers) have over-speed shutdown? | | | X | |
| 252. | (c) | Do the compressor units alarm or shutdown in the event of inadequate cooling or lubrication of the unit(s)? | | | X | |
| 253. | (d) | Are the gas compressor units equipped to automatically stop fuel flow and vent the engine if the engine is stopped for any reason? | | | X | |
| 254. | (e) | Are the mufflers equipped with vents to vent any trapped gas? | | | X | |
| 255. | .173 | Is each compressor station building adequately ventilated? | | | X | |
| 256. | .457 | Is all buried piping cathodically protected? | | | X | |
| 257. | .481 | Atmospheric corrosion of aboveground facilities | | | X | |
| 258. | .603 | Does the operator have procedures for the start-up and shut-down of the station and/or compressor units? | | | X | |
| 259. | | Are facility maps current/up-to-date? | | | X | |
| 260. | .615 | Emergency Plan for the station on site? | | | X | |
| 261. | .619 | Review pressure recording charts and/or SCADA | | | X | |
| 262. | .707 | Markers | | | X | |
| 263. | .731 | Overpressure protection – relief's or shutdowns | | | X | |
| 264. | .735 | Are combustible materials in quantities exceeding normal daily usage, stored a safe distance from the compressor building? | | | X | |
| 265. | | Is aboveground oil or gasoline storage tanks protected in accordance with NFPA standard No. 30? | | | X | |
| 266. | .736 | Gas detection – location | | | X | |

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Comments:
 223 through 266 N/A, no compression.