



STATE OF WASHINGTON

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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Ref. No. Docket PG-110644

CERTIFIED MAIL

January 6, 2012

Sue McLain
Senior VP Operations
PO Box 90868 M/S PSE-12N
Bellevue, WA 98009-0868

Dear Ms. McLain:

Re: 2011 Public Awareness Program Inspection of Puget Sound Energy

The Pipeline Safety Program of the Washington Utilities and Transportation Commission (Commission) conducted a Public Awareness Program (PAP) inspection of Puget Sound Energy, at the Headquarters Office in Bellevue, Washington. The inspection included a review of the PAP and associated documentation.

No apparent probable violation was noted as a result of this inspection. Eighteen areas of concern were noted which unless corrected, could potentially lead to future violation of state and/or federal pipeline safety rules.

Your response needed

Please review the attached report and respond in writing to the areas of concern by February 8, 2012.

We thank PSE personnel for their cooperation and assistance during the inspection. If you have any question, please contact Patti Johnson, Pipeline Safety Engineer at (360) 870-4915. Please refer to docket number PG-110644 in any future correspondence regarding this inspection.

Sincerely,

David D. Lykken
Pipeline safety Director

Enclosure

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



WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
2011 Public Awareness Program Inspection Report
Puget Sound Energy
Docket No. PG-110644

AREAS OF CONCERN

PSE has a written Public Awareness Program Plan; however, the PAP lacks detail and clarity. API 1162 Section 7.1 states, "Each operator of a hazardous liquid pipeline system, natural gas transmission pipeline system, gathering pipeline system or a natural gas distribution pipeline system should establish (and periodically update) a written Public Awareness Program designed to cover all required components of the program described in this Recommended Practice." WAC 480-93-180 Plan and Procedures, requires plans and procedures for meeting all applicable requirements of 49 CFR §§ 191, 192 and chapter 480-93 WAC.

PSE's has a written plan. It lacks detail regarding process and procedure (including documentation). The following areas need to be reviewed and revised:

1. Implement, document and verify improvements recommended in its 4 year evaluation (Form 21 question 4.07)
2. Use evaluation results and data to determine if the stakeholders have demonstrated the intended learned behaviors (Form 21 question 4.05)
3. Determine whether appropriate prevention behaviors have been understood by the stakeholder audiences (found in PAP II Section 8) (Form 21 question 4.05)
4. Evaluate data to assess the percentage of the intended stakeholder audience that understood and retained the key information in each PAP message. (Form 21 question Form 21 question 4.04)
5. Determine the statistical sample size and margin-of-error for each of the four intended stakeholder audiences. (Form 21 question 4.03)
6. Estimate the percentage of individuals or entities actually reached within each intended stakeholder audience group. (Form 21 question 4.03)
7. Track the number of individuals or entities reached within each intended stakeholder audience group (Form 21 question 4.02)
8. Conducting the 4 year evaluation. (Form 21 question 4.01)
9. Assess the results of its annual PAP audit/review then develop and implement changes in its program (Form 21 question 3.03)
10. Conduct annual audits/reviews of its PAP. (Form 21 question 3.02)
11. Make its emergency response plan available; identified the operator's expectations for emergency responders and identified whether the expectations are the same for all locations; identify how the operator determined the affected emergency response organizations have adequate and proper resources to respond; identify how the operator ensures that information was communicated to emergency responders that did not attend training/information sessions by the operator.(Form 21 question 2.06)
12. Determine relevant factors to determine the need for supplemental program enhancements as described in API RP 1162 for each stakeholder audience (Form 21 question 2.05)
13. Document and track delivered messages to the individual stakeholder groups. (Form 21 question 1.05)
14. Identify how the operator determines stakeholder notification areas and distance on either side of the pipeline the procedure and process used to determine the data source used to identify each stakeholder audience. (Form 21 question 1.04)
15. Identify how the operator determines stakeholder notification areas and distance on either side of the pipeline? (Form 21 question 1.04)

16. Determine the process and/or data source used to identify each stakeholder audience in the plan (Form 21 question 1.04)
17. Address where unique attributes in each system are (Form 21 question 1.03)
18. Determine how management participates in the PAP; to verify resources provided to implement public awareness are in the PAP; to determine how many employees involved with the PAP and what their roles are and to determine if the operator uses external support resources for any implementation or evaluation efforts. (Form 21 question 1.02)