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June 22, 2007

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

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Pipeline Safety Division

Attn: Alan Rathbun, Pipeline Safety Director

RE: 2007 Alcohol Misuse Prevention and Anti-Drug Programs, Docket PG-070176

Dear Mr. Rathbun,

This letter is in response to the "2007 Alcohol Misuse Prevention and Anti-Drug Programs" report dated May 23, 2007. In this report, Staff identified three areas of concern. Below are PSE's responses to these findings.

AREA OF CONCERN

1. **Part 199.201 Alcohol Misuse Plan,**
Each operator must maintain and follow a written alcohol misuse plan that conforms to the requirements of this part and DOT Procedures concerning alcohol testing programs.

Finding:

During the inspection, PSE's draft plan for the alcohol misuse program was available, the final plan was not.

Response:

PSE's revised alcohol misuse prevention plan, the draft of which was reviewed during the inspection, is now finalized and approved. A copy of the approved plan is attached.

2. **Part 199.101 Anti-drug Plan.**
Each operator shall maintain and follow a written anti-drug plan that conforms to the requirements of this part and DOT Procedures.

Finding:

During the inspection, PSE's draft plan for the anti-drug program was available, the final plan was not.

Response:

PSE's revised anti-drug plan, the draft of which was reviewed during the inspection, is now finalized and approved. A copy of the approved plan is attached.

3. **Part 199.105(c)(5) Drug Tests Required.**

Each operator shall conduct the following drug tests for the presence of a prohibited drug. (c) Random Testing. (5) The selection of employees for random drug testing shall be made by a scientifically valid method,...

Finding:

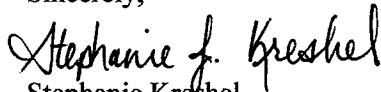
PSE's draft plan for the anti-drug program states the employee shall report to the collecting site within 2 hours, plus travel time, once notified by the supervisor. The DOT guidance for drug test recommends the employee report immediately to the collection site or within 30 minutes, plus travel time, once notified by a company official for a random drug test. PSE uses Laboratory Corporation of America for analysis of specimen, who recommends the employee report immediately to prevent the possibility of specimen dilution by hydration. A diluted specimen is likely to be rejected.

Response:

For the approved plan, effective June 15, 2007, the language was modified to match the DOT guidance and requires the employee to report within 30 minutes, plus travel time.

Please feel free to contact me at 425-462-3734 if you have any further questions or comments.

Sincerely,



Stephanie Kreshel,
Standards & Compliance

cc: Sue McLain
Duane Henderson
Eric Markell
Karl Karzmar
Marla Mellies