

## 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 Chief Engineer within **30 days** from completion of the inspection.

Inspection Report			
Docket Number	110030, King County West - Standard Inspection		
Inspector Name & Submit Date	Patti Johnson, submitted 7-13-2011		
Chief Eng Name & Review/Date	Joe Subsits, 8/17/2011		
Operator Information			
Name of Operator:	Puget Sound Energy	OP ID #:	22189
Name of Unit(s):	W King County		
Records Location:	Bellevue and Georgetown		
Date(s) of Last (unit) Inspection:	April 1, 2009 through June 27, 2009	Inspection Date(s):	June 20, 2011 thru July 6, 2011

#### Inspection Summary:

PSE plat 190.68C are services to the water. Address at Pier 69, 2701 Alaskan Way south of Clay, then 2820 Alaskan N of clay near Broad is 2801 Alaska Pier 70. Master Meter maybe.

HEADS UP for PSE : Many WNG meters without PSE stickers

HQ Address: PO Box 90868 M/S: EST-07W Bellevue, WA 98009-0868	System/Unit Name & Address: W King county PO Box 90868 M/S: EST-07W Bellevue, WA 98009-0868	
Co. Official: Sue McLain Phone No.: (425) 462-3696 Fax No.: (425) 462-3770 Emergency Phone No.: (425) 882-4692	Phone No.: (425) 462-3877 Fax No.: (425) 462-3770 Emergency Phone No.: (425) 882-4692	
Persons Interviewed	Title	Phone No.
Alan Mulkey	Consulting Engineer	425-462-3889
Brandon Severson	Customer Field Service Tech	206-793-1104
Carl Blythe	Pressure Control	206-571-0281
Cathy Koch	Director	425-462-3877
Cheryl McGrath	Manager	425-462-3207
Darryl Hong	Coordinator	425-766-3388
Dave Montgomery	Corrosion Control Technician	206-571-7905
Dave Schneider	Corrosion Control Technician	206-571-8143
Debbie Larsen	Supervisor	206-766-6803
Don Frieze	Engineer	425-462-3862
Ed Voogt	Corrosion Technologist	425-748-6336
Elaine Griffith	Coordinator (H2RL)	206-766-6783
Gary Swanson	Coordinator (leaks)	206-766-6811
Jerry Games	Engineering Assistant	253-476-6224
John Matchell	Gas Worker Trainee III	253-326-1828
Josie Conzemius	Supervisor	425-456-2181
Justin Wahlborg	Sr Engineer	425-462-3977

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Ken Brown	Supervisor	206-766-6797
Mark Maass	Manager	425-462-3047
Philip Puzon	Associate Engineer	425-462-3306
Roger Scheetz	Supervisor	206-766-6766
Roy McOmber	Pressure Control	253-377-2293
Sam Gallaway	Pressure Control	206-571-2511
Soon Dye	Sr Engineer	425-462-3863
Stephanie Silva	Consulting Engineer	425-462-3923
Steve Mitchell	Heath Consultants	
Toni Imad	Consulting Engineer	425-456-2970
Trenia Duncan	Coordinator (bridges)	206-766-6784
Duane Henderson	Director Operations Services	425- 462-3974

**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 checked="" type="checkbox"/>	Team inspection was performed (Within the past five years.) or, <b>Docket 100019, November 2010 an O&amp;M review was conducted (Not a team inspection)</b>	<b>Date:</b>	<b>11-2010</b>
<input checked="" type="checkbox"/>	Other WUTC Inspector reviewed the O & M Manual (Since the last yearly review of the manual by the operator.) <b>Docket 100019, November 2010 an O&amp;M review was conducted.</b>	<b>Date:</b>	<b>11-2010</b>

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**GAS SYSTEM OPERATIONS**

<b>Gas Supplier</b>	<b>Williams</b>		
<b>Services:</b>	<i>Residential 250,000 estimate Commercial Industrial 2,637 Other</i>		
Number of reportable safety related conditions last year <b>There were no reportable safety related conditions in 2010 in W King</b>	Number of deferred leaks in system <b>2688 Total for all PSE districts end of 2010</b>		
Number of <u>non-reportable</u> safety related conditions last year Darryl is <b>None</b>	Number of third party hits last year <b>824 for 2010</b>		
Miles of transmission pipeline within unit (total miles and miles in class 3 & 4 areas) <b>2,400 ft</b>	Miles of main within inspection unit (total miles and miles in class 3 & 4 areas) <b>1,839</b>		
<b>Operating Pressure(s):</b>	<b>MAOP (Within last year)</b>	<b>Actual Operating Pressure (At time of Inspection)</b>	
Feeder <b>various</b>			
Town <b>various</b>			
Other <b>various</b>			
Does the operator have any transmission pipelines?	<b>Yes</b>		
Compressor stations? Use Attachment 1.	<b>No</b>		

<b>Pipe Specifications:</b>			
Year Installed (Range)	<b>1925-2011</b>	Pipe Diameters (Range)	<b>½ - 20inch</b>
Material Type	<b>WI, copper, STW, Bare steel, HDPE, MDPE</b>	Line Pipe Specification Used	<b>various</b>
Mileage	<b>1839 approximate</b>	SMYS %	<b>Less than 29%</b>

**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 6-28 & 29, 2011**

**Integrity Management Field Validation**

**Important:** Per PHMSA, IMP Field Verification Form (Rev 3, March 09) shall be used by the inspector as part of this standard inspection. When completed, the inspector will upload this information into the PHMSA IM Database (IMDB) located at <http://primis.phmsa.dot.gov/gasimp/home.gim> **Date Completed: 8-28-2011 Completed as Headquarters**  
**Mini inspections**

<b>PART 199 Drug and Alcohol Testing Regulations and Procedures</b>		<b>S</b>	<b>U</b>	<b>NA</b>	<b>NC</b>
<b>Subparts A - C</b>	Drug & Alcohol Testing & Misuse Prevention Program – Use PHMSA Form #13, Rev 3/19/2010. Do not ask the company to have a drug and alcohol expert available for this portion of your inspection. <b>Completed as Headquarters Mini inspections from – Violation will be written under 2011 PSE Sumas inspection</b>		x		

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REPORTING RECORDS			S	U	N/A	N/C
1.	49 U.S.C. 60132, Subsection (b)	For Gas Transmission Pipelines and LNG Plants. <b>Submission of Data to the National Pipeline Mapping System Under the Pipeline Safety Improvement Act of 2002</b> Updates to NMPS: Operators are required to make update submissions every 12 months if any system modifications have occurred. <u>If no modifications have occurred since the last complete submission (including operator contact information), send an email to <a href="mailto:opsgis@rspa.dot.gov">opsgis@rspa.dot.gov</a> stating that fact.</u> Include operator contact information with all updates.	x			
2.	RCW 81.88.080	Pipeline Mapping System: Has the operator provided accurate maps (or updates) of pipelines, operating over two hundred fifty pounds per square inch gauge, to specifications developed by the commission sufficient to meet the needs of first responders? <b>Last submission 2/22/2011</b>	x			
3.	191.5	Immediate Notice of certain incidents to NRC (800) 424-8802, or electronically at <a href="http://www.nrc.uscg.mil/nrchp.html">http://www.nrc.uscg.mil/nrchp.html</a> , and additional report if significant new information becomes available. Operator must have a written procedure for calculating an initial estimate of the amount of product released in an accident. <b>PSE has process in place, it is an internal procedure, and the new definition is in Gas Operating Standard 2400.1000. They are continuing to improve process</b>  <b>Procedure is – call to dispatch, dispatch dispatches broken and blowing, crew lets them know the size of pipe, they do reporting and part of reporting is to system planning who does calculations.</b> Reviewed Soon Dye's email for guidelines for Response Planning Engineer in re: to 191.3 Uncontrolled Gas Release of 3MMCF or more. Reviewed Gas Loss Calculation  <b>The PSE crew reporting procedure does not change because they always report broken and blowing gas and the size of the pipe and dispatch will follow up. Only dispatches procedures changed</b> Reviewed Emergency Plan 2425.2300. and Gas Field Procedures 0100.1040	x			
4.	191.7	Reports (except SRCR and offshore pipeline condition reports) must be submitted electronically to PHMSA at <a href="https://opsweb.phmsa.dot.gov">https://opsweb.phmsa.dot.gov</a> at unless an alternative reporting method is authorized IAW with paragraph (d) of this section. <b>PSE reports electronically</b>	x			
5.	191.15(a)	30-day follow-up written reports to PHMSA ( <b>Form F7100.2</b> ) Submittal must be electronically to <a href="http://pipelineonlinereporting.phmsa.dot.gov">http://pipelineonlinereporting.phmsa.dot.gov</a> <b>PSE reports electronically</b>	x			
6.	191.15(c)	Supplemental report (to 30-day follow-up) <b>PSE reports electronically</b>	x			
7.	191.17	Complete and submit DOT Form PHMSA F 7100-2.1 by March 15 of each calendar year for the preceding year. (NOTE: June 15, 2011 for the year 2010). <b>Completely electronic reporting</b>	x			
8.	191.22	Each operator must obtain an OPID, validate its OPIDs, and notify PHMSA of certain events at <a href="https://opsweb.phmsa.dot.gov">https://opsweb.phmsa.dot.gov</a> <b>For both Jackson Prairie OPIS #22189 unit 33875 and PSE Distribution the OPID # 22189</b>	x			
9.	191.23	Filing the <b>Safety Related Condition Report (SRCR)</b> <b>None in 2010</b>	x			
10.	191.25	Filing the SRCR within 5 days of determination, but not later than 10 days after discovery	x			

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REPORTING RECORDS			S	U	N/A	N/C
11.	.605(d)	Instructions to enable operation and maintenance personnel to recognize potential <b>Safety Related Conditions</b> <b>Field personnel keep Gas Operating Standard with them ( Manual 2425.1200). Tail Gate meeting and RPE (Response plan and Engineering) and in mock training for emergency procedure training which may include or if escalated could turn into a safety related conditions. Reviewed 2010 scenario test and OQ test for broken service. This is found in emergency procedure training, it is in OQ and employees are given written test on scenario.</b>	x			
12.	191.27	Offshore pipeline condition reports – filed within 60 days after the inspections <b>No offshore</b>	x			
13.	192.727(g)	Abandoned facilities offshore, onshore crossing commercially navigable waterways reports	x			
14.	480-93-200(1)	Telephonic Reports to <b>UTC Pipeline Safety Incident Notification 1-888-321-9146</b> (Within <b>2 hours</b> ) for events which results in;				
15.	480-93-200(1)(a)	A fatality or personal injury requiring hospitalization; <b>Reporting, none in 2010</b>	x			
16.	480-93-200(1)(b)	Damage to property of the operator and others of a combined total exceeding fifty thousand dollars; <b>Reporting, none in 2010</b>	x			
17.	480-93-200(1)(c)	The evacuation of a building, or high occupancy structures or areas; <b>Reporting, none in 2010</b>	x			
18.	480-93-200(1)(d)	The unintentional ignition of gas; <b>Reporting, none in 2010</b>	x			
19.	480-93-200(1)(e)	The unscheduled interruption of service furnished by any operator to twenty five or more distribution customers; <b>Reporting, none in 2010</b>	x			
20.	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; <b>One in 2010</b>	x			
21.	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; <b>Reporting, none in 2010, one in 2011 for damaged 16" in Seattle</b>	x			
22.	480-93-200(2)	Telephonic Reports to <b>UTC Pipeline Safety Incident Notification 1-888-321-9146</b> (Within <b>24 hours</b> ) for;				
23.	480-93-200(2)(a)	The uncontrolled release of gas for more than two hours;	x			
24.	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			
25.	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			
26.	480-93-200(2)(d)	A gas pipeline pressure exceeding the MAOP	x			
27.	480-93-200(4)	Did written incident reports (within 30 days of telephonic notice) include the following				
28.	480-93-200(4)(a)	Name(s) and address(es) of any person or persons injured or killed, or whose property was damaged;	x			
29.	480-93-200(4)(b)	The extent of injuries and damage;	x			
30.	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			
31.	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			
32.	480-93-200(4)(e)	The date and time the gas pipeline company was first notified of the incident;	x			
33.	480-93-200(4)(f)	The date and time the ((operators')) gas pipeline company's first responders arrived on-site;	x			
34.	480-93-200(4)(g)	The date and time the gas ((facility)) pipeline was made safe;	x			
35.	480-93-200(4)(h)	The date, time, and type of any temporary or permanent repair that was made;	x			

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36.	480-93-200(4)(i)	The cost of the incident to the ((operator)) gas pipeline company;	x			
37.	480-93-200(4)(j)	Line type;	x			
38.	480-93-200(4)(k)	City and county of incident; and	x			
39.	480-93-200(4)(l)	Any other information deemed necessary by the commission.	x			
40.	480-93-200(5)	Supplemental report if required information becomes available after 30 day report submitted	x			
41.	480-93-200(6)	Written report within 5 days of receiving the <b>failure analysis</b> of any incident or hazardous condition due to <b>construction defects or material failure</b> <b>PSE sends internal failure analysis to UTC within 5 days of completion.</b>	x			
42.	480-93-200(7)	<b>Annual Reports</b> filed with the commission no later than <b>March 15</b> for the proceeding calendar year				
43.	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			
44.	480-93-200(7)(b)	Damage Prevention Statistics Report including the following;				
45.	480-93-200(7)(b)(i)	Number of gas-related one-call locate requests completed in the field;	x			
46.	480-93-200(7)(b)(ii)	Number of third-party damages incurred; and	x			
47.	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) Other.	x			
48.	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.	x			
49.	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			
50.	480-93-200(9)	Providing by email, reports of daily construction and repair activities no later than 10:00 a.m.	x			
51.	480-93-200(10)	Submitting copy of DOT Drug and Alcohol Testing MIS Data Collection Form when required	x			

Comments:

CUSTOMER and EXCESS FLOW VALVE INSTALLATION NOTIFICATION			S	U	N/A	N/C
52.	192.16	<b>Customer notification</b> - Customers notified, within <b>90 days</b> , of their responsibility for those service lines not maintained by the operator	x			
53.	192.381	Does the excess flow valve meet the performance standards prescribed under §192.381?	x			
54.	192.383	Does the operator have an installation and reporting program for excess flow valves and does the program meet the requirements outlined in §192.383? Are records adequate?	x			

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CONSTRUCTION RECORDS			S	U	N/A	N/C
55.	480-93-013	OQ records for personnel performing New Construction covered tasks Reviewed IP job#109047032. Reviewed Donald Durand welding/fusion records for entire job. Ok. this is a wrought iron main replacement job. PSE replaced existing 4" wrought iron with 8" IP pe. 60 MAOP. Reviewed air test of the 2500 feet at one time to 96psig for 8 hours. Testing information is found in O&M 2525 3300 Section 5 table 5.1 Job Located on E Marginal Way S. installed 2500 feet of 8" pe.  Reviewed Pipeline Qualification Evaluation Completion Form for Pierce	x			
56.	192.225	Test Results to Qualify Welding Procedures	x			
57.	192.227	Welder Qualification	x			
58.	480-93-080(1)(b)	Appendix C Welders re-qualified 2/Yr (7.5Months)	x			
59.	480-93-080(2)	Plastic pipe joiners re-qualified 1/Yr (15 Months)	x			
60.	480-93-080(2)(b)	Plastic pipe joiners re-qualified if no production joints made during any 12 month period <b>O&amp;M 2700.1600.Section 6 and 7 PSE does not track every joint. PSE does have test done on a production joint in field and signs their qualification data card, or tested at union hall. This is procedure even if fuser has done joint every day, joints are not tracked. Contractor doing the same. .</b> Reviewed crew sheets for the 3 construction jobs reviewed. The information links how to get welder fuser linked to job since their name does not appear on the job. It shows who was on the job. Going forward welder fuser will sign off for each fuse on form	x			
61.	480-93-080(2)(c)	Tracking Production Joints or Re-qualify joiners 1/Yr (12Months) <b>No, always retest. If practical, test is done in field on job by welding test person</b>	x			
62.	480-93-115(2)	Test leads on casings (without vents) installed after 9/05/1992 <b>PSE only installs casing under special circumstances. Since 1992 all casing installed have test leads.</b>	x			
63.	480-93-115(3)	Sealing ends of casings or conduits on transmission lines and mains <b>Yes, per PSE O&amp;M standards</b>	x			
64.	480-93-115(4)	Sealing ends (nearest building wall) of casings or conduits on services	x			
65.	192.241(a)	Visual Weld Inspector Training/Experience Reviewed Visual Inspector Qualifications Dates	x			
66.	192.243(b)(2)	Nondestructive Technician Qualification	x			
67.	192.243(c)	NDT procedures <b>NDT on over 40% SYMS, PSE also does visual on all welds and fusions, O&amp;M 2700.1200.</b>	x			
68.	192.243(f)	Total Number of Girth Welds	x			
69.	192.243(f)	Number of Welds Inspected by NDT	x			
70.	192.243(f)	Number of Welds Rejected	x			
71.	192.243(f)	Disposition of each Weld Rejected	x			
72.	.273/.283	Qualified Joining Procedures Including Test Results	x			
73.	192.303	Construction Specifications	x			
74.	192.325 WAC 480-93-178(4)(5)	Underground Clearances	x			
75.	192.327	Amount, location, cover of each size of pipe installed	x			

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CONSTRUCTION RECORDS			S	U	N/A	N/C
76.	480-93-160(1)	Report filed <b>45 days</b> prior to construction or replacement of transmission pipelines $\geq$ <b>100</b> feet in length	x			
77.	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			
78.	480-93-160(2)(a)	Description and purpose of the proposed pipeline;	x			
79.	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			
80.	480-93-160(2)(c)	Location and specification of principal valves, js, and other auxiliary equipment to be installed as a part of the pipeline system to be constructed	x			
81.	480-93-160(2)(d)	MAOP for the gas pipeline being constructed;	x			
82.	480-93-160(2)(e)	Location and construction details of all river crossings or other unusual construction requirements encountered en route.	x			
83.	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			
84.	480-93-160(2)(g)	Welding specifications; and	x			
85.	480-93-160(2)(h)	Bending procedures to be followed if needed.	x			
86.	480-93-170(1)	Commission notified 2 days prior to pressure testing pipelines with an MAOP producing a hoop stress $\geq$ <b>20% SMYS</b> ?	x			
87.	480-93-170(7)	Pressure tests records at a minimum include required information listed under 480-93-170(a-h) <b>Reviewed Report of Pressure Test on New Main for HP Job 109044323</b>	x			
88.	480-93-170(9)	Individual pressure test records maintained for single installations where multiple pressure tests were performed? <b>The last W King inspection was conducted in 2009. Reviewed 2010 up rates for both Pierce and W King. There were none in W King.</b>  <b>There will be probable violation of WAC 480-93-155 (b) and 192 subpart K in Pierce inspection for not having original pressure test in information. There were no uprates in W King county</b>	x			
89.	480-93-170(10)	Pressure Testing Equipment checked for accuracy/intervals (Manufacturers Rec or Operators schedule) <b>Calibration dates on each pressure test as well as calibration history</b>	x			
90.	480-93-175(2)	Study prepared and approved prior to moving and lowering of metallic pipelines $>$ <b>60 psig</b> <b>PSE Engineering does not lower pipe</b>	x			
91.	480-93-175(4)	Leak survey within <b>30 days</b> of moving or lowering pipelines $\leq$ <b>60 psig</b>	x			

Comments:

OPERATIONS and MAINTENANCE RECORDS			S	U	N/A	N/C
92.	192.517(a)	Pressure Testing (operates at or above 100 psig) – <b>useful life of pipeline</b>	x			



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93.	192.517(b)	Pressure Testing (operates below 100 psig, service lines, plastic lines) – 5 years	x			
94.	192.605(a)	Procedural Manual Review – Operations and Maintenance (1 per yr/15 months) <b>Note:</b> Including review of OQ procedures as <u>suggested</u> by PHMSA - ADB-09-03 dated 2/7/09 <b>Every standard number and every procedure is reviewed, O&amp;M and Field Procedure is individually reviewed annually. Specifically reviewed OQ #7600,1000.</b>	x			
95.	192.605(b)(3)	Availability of construction records, maps, operating history to operating personnel <b>Yes, computer maps are updated and 1<sup>st</sup> responders can sign onto system and see. To streamline procedure for 1<sup>st</sup> responders they are given a CD and upload them so they can view on desktop. Reviewed form titled Notification 10837264</b>  Once a month all crews given a disc to update computer maps. Some PSE employees prefer to use hard copy maps and those maps are only updated once a year.	x			
96.	480-93-018(3)	Records, including maps and drawings updated within 6 months of completion of construction activity? <b>Yes, Mark explained process, Every 2 months Mapping review pressure test completion date and job completion date and update map at that time. Completion date starts the 6 months. Occasionally a job gets held up in mapping and they have to get job from billing to complete within 6 months.</b>  <b>HEATH found potential mapping error. 6-27-2011 reviewed mapping history with mapping, mapping personnel Mark and Jessie are going to see if Heath notified them of mapping error any time since 1980. Heath did not notify of this error. No PV since combination of old errors and Heath did mark the error on the map. History: Service at 1424 was originally installed 1965. The main was replaced in 1980 and the service became a stub and was left on map, actually the service has been totally removed and should have been taken off the map when the cast iron main was replaced with pe. In 1999 a new service was installed at 1424 1st and it was mapped incorrectly on 3<sup>rd</sup> instead of on 1<sup>st</sup>, this made the incorrectly mapped stub an active service. This service should not have been on the map since 1980.</b>	x			
97.	192.605(b)(8)	Periodic review of personnel work – effectiveness of normal O&M procedures Reviewed Quality Insurance Report. Conducted on all HP work and random intermediate work.	x			
98.	192.605(c)(4)	Periodic review of personnel work – effectiveness of abnormal operation procedures Reviewed Quality Insurance Report. Conducted on all HP work and random intermediate work.	x			
99.	192.609	Class Location Study (If applicable) <b>NA in W King</b>	x			
100.	192.611	Confirmation or revision of MAOP	x			
101.	192.614	<b>Damage Prevention (Operator Internal Performance Measures) A Headquarters inspection for Damage Prevention to be conducted 7-26 thru 7-28, 2011</b>				
102.		Does the operator have a quality assurance program in place for monitoring the locating and marking of facilities? Do operators conduct regular field audits of the performance of locators/contractors and take action when necessary? (CGA Best Practices v. 6.0, Best Practice 4-18. Recommended only, not required)	x			
103.		Does operator including performance measures in facility locating services contracts with corresponding and meaningful incentives and penalties?	x			
104.		Do locate contractors address performance problems for persons performing locating services through mechanisms such as re-training, process change, or changes in staffing levels?	x			
105.		Does the operator periodically review the Operator Qualification plan criteria and methods used to qualify personnel to perform locates?	x			

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OPERATIONS and MAINTENANCE RECORDS			S	U	N/A	N/C
106.		Review operator locating and excavation <u>procedures</u> for compliance with state law and regulations.	x			
107.		Are locates are being made within the timeframes required by state law and regulations? Examine record sample.	x			
108.		Are locating and excavating personnel properly <u>qualified</u> in accordance with the operator's Operator Qualification plan and with federal and state requirements?	x			
		Follow-up inspection performed on the pipeline where there is reason to believe the pipeline could be damaged .614(c) (6) 1. Is the inspection the done as frequently as necessary during and after the activities to verify the integrity of the pipeline? 2. In the case of blasting, does the inspection include leakage surveys?	x			
109.		<b>Informational purposes only. Not Required.</b> Does the pipeline operator voluntarily submit pipeline damage statistics into the UTC Damage Information Reporting Tool (DIRT)? Operator may register at <a href="https://identity.damagereporting.org/cgareg/control/login.do">https://identity.damagereporting.org/cgareg/control/login.do</a> Y x N	x			

Comments:
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Emergency Response Plans			S	U	N/A	N/C
110.		<b>Emergency Response Plans</b>				
111.	192.603(b)	Prompt and effective response to each type of emergency .615(a)(3) <b>Note:</b> Review operator records of previous accidents and failures including third-party damage and leak response	x			
112.	192.615(b)(1)	Location Specific Emergency Plan	x			
113.	192.615(b)(2)	Emergency Procedure training, verify effectiveness of training	x			
114.	192.615(b)(3)	Employee Emergency activity review, determine if procedures were followed.	x			
115.	192.615(c)	Liaison Program with Public Officials	x			
116.	192.616	<b>Public Awareness Program</b>				
117.	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			
118.		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.	x			
119.		<b>API RP 1162 Baseline* Recommended Message Deliveries</b>	x			

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120.		<b>Stakeholder Audience (LDC's)</b>	<b>Baseline Message Frequency (starting from effective date of Plan)</b>	x			
		Residence Along Local Distribution System	Annual				
		LDC Customers	Twice annually				
		One-Call Centers	As required of One-Call Center				
		Emergency Officials	Annual				
		Public Officials	3 years				
		Excavator and Contractors	Annual				
		<b>Stakeholder Audience (Transmission line operators)</b>	<b>Baseline Message Frequency (starting from effective date of Plan)</b>				
		Residence Along Local Distribution System	2 years				
		One-Call Centers	As required of One-Call Center				
		Emergency Officials	Annual				
		Public Officials	3 years				
		Excavator and Contractors	Annual				
		121.					
122.	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			
123.	.616(h)	IAW API RP 1162, the operator's program should be reviewed for effectiveness within four years of the date the operator's program was first completed. <u>For operators in existence on June 20, 2005</u> , who must have completed their written programs no later than June 20, 2006, the first evaluation is due no later than <b>June 20, 2010</b> . .616(h)		x			
124.	192.616(j)	Operators of a Master Meter or petroleum gas system – public awareness messages 2 times annually: (1) A description of the purpose and reliability of the pipeline; (2) An overview of the hazards of the pipeline and prevention measures used; (3) Information about damage prevention; (4) How to recognize and respond to a leak; and (5) How to get additional information. <b>This is a master meter responsibility not the LDCs</b>				x	
125.	192.617	Review operator records of accidents and failures including laboratory analysis where appropriate to determine cause and prevention of recurrence .617 <b>Note:</b> Including excavation damage and leak response records (PHMSA area of emphasis) (NTSB B.10) <b>Internal analysis sent to UTC. No failures sent out to laboratories. Joe stated review of internal records will be special inspection.</b>		x			

**Comments:**

126.	192.619/621/623	Maximum Allowable Operating Pressure (MAOP) Note: New PA-11 design criteria is incorporated into 192.121 & .123 (Final Rule Pub. 12/24/08) <b>At this time does not use PA-11 and no plans to use in immediate future</b>	x				
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127.	480-93-015(1)	Odorization of Gas – Concentrations adequate <b>O&amp;M 2650.1000 7.4, 8 test sites in W King County – Yes, adequate Reviewed SAP Odor Test Site Monthly reads for all eight sites for 2009 and 2010.</b>	x			
128.	480-93-015(2)	Monthly Odorant Sniff Testing <b>Yes, adequate Reviewed SAP Odor Test Site Monthly reads for all eight sites for 2009 and 2010</b>	x			
129.	480-93-015(3)	Prompt action taken to investigate and remediate odorant concentrations not meeting the minimum requirements <b>None but if there were they would follow O&amp;M 2650.1000 8.3</b>	x			
130.	480-93-015(4)	Odorant Testing Equipment Calibration/Intervals (Annually or Manufacturers Recommendation) <b>Reviewed SAP Odorator calibration for 2009 and 2010</b>	x			
131.	480-93-124(3)	Pipeline markers attached to bridges or other spans inspected? <b>1/yr(15 months)</b> <b>Are inspected on the Bridge and Slide Patrols quarterly or 2x a year depending on location</b>	x			
132.	480-93-124(4)	Markers reported missing or damaged replaced within <b>45 days?</b> <b>Replace when found missing if possible.</b>	x			
133.	480-93-140(2)	Service regulators and associated safety devices tested during initial turn-on <b>Documented on Meter Information Tag</b>	x			
134.	480-93-155(1)	Up-rating of system MAOP to <b>&gt;60 psig?</b> Procedures and specifications submitted <b>45 days</b> prior?	x			
135.	480-93-185(1)	Reported gas leaks promptly investigated? Graded in accordance with 480-93-186? Records retained? <b>Leak found during Heath OQ at 5113 116<sup>th</sup> St SE was above ground seep. Heath called it an A leak, called 1<sup>st</sup> Response. 1<sup>st</sup> response called no hazardous above ground release of gas, they rebuilt meter, checked inside house, checked at foundation etc. They did not fill out a leak work order (leak not graded just repaired), just made repair on CLX order #419611473. 2010 PHMSA required the reporting of above ground non hazardous release of gas reporting (Not called leak because fixed by pipe dope, O&amp;M 2625.1300 Section 4.3)</b>	x			
136.	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; <b>Reviewed foreign leak at 1080 W Ewing St and heath is sent with their equipment that detects ethane. Test proves it does not have ethane and therefore is not natural gas. Leak Survey personnel gets report back to employee who reported it.</b>	x			
137.	480-93-185(3)(b)	Leaks originating from a foreign source reported promptly/notification by mail. Records retained? <b>Reviewed letter on computer</b>	x			
138.	480-93-186(3)	Leak evaluations: Are follow-up inspections performed within <b>30 days</b> of a leak repair?	x			
139.	480-93-186(4)	Leak evaluations: Grade 1 and 2 leaks (if any), downgraded once to a grade 3 without physical repair? <b>The Leak Management system only allows leak to be downgraded once time. Then if someone tries system will not allow. When system does not allow it to be downgraded a second time the person doing the entering makes a comment to that effect and referencing the standard.,</b> <b>Reviewed letter on computer that is sent if no adult home</b>	x			
140.	480-93-187	Gas leak records: at a minimum include required information listed under 480-93-187(1-13) <b>Verified on form</b>	x			

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141.	480-93-188(1)	<p>Gas leak surveys Prior to 2010 PSE documented equipment SN on form titled Leakage Survey Report. Was reported weekly that included the SN. PSE could not prove which instrument was used for leak survey. SN not directly related to plat leak survey maps. This would have been probable violation however, in 2010 as part of the leak survey audit and quality assurance internal inspection PSE starting using document titled Leakage Survey Documentation and it does include SN of instrument used for each plat.</p> <p><b>Process is for every leak found on plat a Heath fills out Heath Consultant Leakage Control Report Field Survey. Reviewed 3 forms for leaks found on plat 190.068A</b></p> <p>Reviewed leak survey plat 190.68A. Heath found 3 leaks and did one reevaluation of existing leak (grade c)</p> <p><b>Also, On plat 190.68A there was a reevaluate leak that was not checked. A form titled Primary recheck All with reevaluation on it was filled out at time of leak survey. These forms are sent with operations map (not plat)</b></p> <p><b>2<sup>nd</sup> leak survey map buss dist inspection. Reviewed plat 190-68C, completed 9/21/2009. Reviewed associated leak N0034187. Also Reviewed 30 day recheck for 30 day checks for 10/21,2009;11/20/2009 and 12/17/2009. Good</b></p> <p>Reviewed plat 190-68F, no leaks found. A mobile unit was used.</p> <p><b>During field inspection with Heath, Noted OMD as SN 1017. This is a mobile Optical Methane detector (OMD) Steve J Mitchell on 11/12/2009. Conducted OMD calibration OQ test on 1-28-2011</b></p>	x			
142.	480-93-188(2)	<p>Gas detection instruments tested for accuracy/intervals (Mfct recommended or monthly not to exceed 45 days) <b>Reviewed calibration including preformed a oq test on the mobile calibration</b></p>	x			
143.	480-93-188(3)	Leak survey frequency ( <b>Refer to Table Below</b> )	x			
		Business Districts ( <b>implement by 6/02/07</b> )				
		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)
<b>WAC 480-93-188(3)(d) Gas leak surveys</b>						
Copper service leak survey., 2008 follow up, 42 service , they are on several different maps. Not all in W king, of the 42 four of them are in different districts. Reviewed spreadsheet of copper services; spreadsheet made from plat review per agreed in 2009 inspection: . Reviewed map 198065, it has 2 services, both on 42 <sup>nd</sup> and on map that twice annually leak surveys maps (isolated, wrapped steel, etc.) Reviewed map 197-65A one copper service on this map; reviewed map 196.064, three on this map; on maps marked as cu or copper; two on map ?plat number; Plat 197-64C has one service and one cu service removed; Plat 197064C has 3 services. Have copy of copper service. Of original 42 service, in King county 2 have been removed or replace. New total is 38.						
144.	480-93-188(4)(a)	Special leak surveys - Prior to paving or resurfacing, following street alterations or repairs <b>NONE IN W KING</b>	X			
145.	480-93-188(4)(b)	Special leak surveys - areas where substructure construction occurs adjacent to underground gas facilities, and damage could have occurred <b>NONE IN W KING</b>	X			
146.	480-93-188(4)(c)	Special leak surveys - Unstable soil areas where active gas lines could be affected <b>NONE IN W KING</b>	X			
147.	480-93-188(4)(d)	Special leak surveys - areas and at times of unusual activity, such as earthquake, floods, and explosions <b>NONE IN W KING</b>	X			
148.	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 <b>NONE IN W KING</b>	X			

