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May 29, 2007

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

Attn: Alan Rathbun, Pipeline Safety Director

RE: 2007 Standard Inspection of Snohomish County Distribution System, Docket PG-070177

Dear Mr. Rathbun,

This letter is in response to the "2007 Standard Inspection of Snohomish County Distribution System" report dated April 26, 2007. In this report, Staff identified one probable violation and one area of concern. Below are PSE's responses to these findings.

PROBABLE VIOLATION

1. **Part 192.605 Procedural Manual for Operations, Maintenance, and Emergencies.**

(a) *General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response.*

Finding:

A safety related condition existed with a meter shutoff valve closed and not locked. Commission staff was informed by the business owner at 111 Main Street in Sultan, Washington (Meter #386777) that PSE was notified in June 2006 to discontinue gas service. During the pre-field inspection staff identified the service meter valve was closed and not locked. Also, the meter's automatic meter reader was disassembled and parts removed. PSE Gas Operating Standards 2575.2200 – Locking and Unlocking Meter states,

3.1 "The riser shutoff valve shall be closed and locked to prevent the flow of gas to the customer and to prevent the valve from being opened by unauthorized individuals, for the following conditions:

3.1.3 Meter shutoff due to nonpayment, unauthorized gas use, service disconnection,..."

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Response:

As a result of this finding, PSE conducted a review of a small sample of meters with service discontinued. In all but one instance, locks were present in accordance with Gas Operating Standard 2575.2200. In this instance, the meter set assembly also had indications of tampering as the locking ears on the meter valve had been removed. As a result, we were unable to determine if a lock had been present prior to the locking ears being removed. PSE has taken the following actions to prevent these types of conditions from recurring:

- 1) Reviewed requirements for locking of riser shutoff valves when service is discontinued with the employee responsible for service call at 111 Main Street in Sultan.
- 2) Reviewed the requirement to lock riser shutoff valves when service is discontinued with all staff responsible for meter shut-offs.
- 3) Ordered additional clam shell style locks for use when locking ears on riser shutoff valves have been removed.

AREA OF CONCERN:

1. **Part 192.317 Protection from Hazards,**

(b) Each aboveground transmission line or main, ..., must be protected from accidental damage by vehicular traffic or other similar causes, either by being placed at a safe distance from the traffic or by installing barricades.

Finding:

The Everett Delta Gate Station (#2667) is in proximity to a curve on State Highway (SR) 92 and is located west of North Machias Road. The Gate Station is located on the outside radius of SR 92 curve where a guardrail is located. Vehicular traffic traveling east on SR 92 begin turning to the northeast just before the Gate Station and before the start of the guardrail. During the on-site inspection heavy equipment such as logging, gravel, and cement trucks were observed using SR 92. The possibility exit for a vehicle traveling east, that fails to turn to the northeast, could approach the aboveground odorizer storage tank and injection unit. The placement of safety barricades will protect the above ground piping and equipment from vehicular traffic.

Response:

The need for additional protection from vehicular damage at the Everett Delta Gate Station was analyzed using chapters 700 and 710 of the Washington State Department of Transportation (WSDOT) Design Manual. These chapters cover Traffic Safety and Traffic Barriers. Based on the criteria in this manual, the gate station is well outside all clear zones, which are established to provide a safe area for vehicles that may leave the traveled road to recover before encountering a hazard.

While a guardrail is not necessarily required for this situation due to the distance of the hazard from the roadway, the manual recommends additional consideration for protection for hazards outside of the clear zone. Based on the guidelines provided in the manual, an analysis was performed and the existing guardrail was confirmed to provide adequate protection.

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Therefore, the combination of the existing guardrail and the distance of the station from SR 92 right-of-way provide adequate protection from vehicular damage based on the parameters specified in the WSDOT Design Manual.

PSE respects the Commission's responsibilities in auditing and enforcing pipeline safety regulations and we continue our efforts to construct and operate a safe system that meets high standards of excellence.

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
Kimberly Harris
Karl Karzmar

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