

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Docket No. UE-060215
Puget Sound Energy, Inc.'s
Intrastate 2006 Specialized Leak Survey Records Inspection**

WUTC STAFF DATA REQUEST NO. 012

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PSE's Answer to the Complaint in this docket states in Paragraphs 6 and 29 that "PSE and Pilchuck have advised employees of the importance of accurate record keeping and that any falsification of records will result in termination of employment."

Please:

- 1) List the employees by position and by date who received this advisory.
- 2) Provide the document in which the advisory was transmitted to the employees.
- 3) For each such employee listed in your response to part 1, state the sanction that employee received, the date it was received, and the basis for it. The sanction referred to is the sanction related to conduct of the sort described in Attachment 1 to the Complaint. For purposes of this data request, "sanction" is intended to be a broad term referring any form of consequence, such as termination of employment, suspension of employment, monetary penalty, loss of benefits of any sort, reprimand, personnel letter, etc.

First Supplemental Response:

The names of the three salaried Puget Sound Energy, Inc. ("PSE") employees referenced in PSE's Response to WUTC Staff Data Request No. 012 as those employees whose history was such that they would have performed leak evaluations as PCI employees are found on page two of PSE's Response to WUTC Staff Data Request No. 012. These three salaried PSE employees are the first three named employees listed on page 2 of PSE's Response to WUTC Staff Data Request No. 012.

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Response:

All Puget Sound Energy, Inc. ("PSE") and Pilchuck employees who were involved in the leak management process at the time of the allegations in this proceeding, or who are currently involved in the leak management process, received the training and disciplinary action described below.

PSE Employees

In May 2006, three salaried PSE employees were identified whose work history was such that they would have performed leak evaluations as PCI employees. These individuals either came forward on their own or were contacted by PSE managers. All three were interviewed relative to their knowledge of leak management practices at PCI. During these interviews, PSE managers communicated PSE's expectations relative to

their actions in ensuring accurate and reliable records and overall adherence to the Company's Corporate Ethics and Compliance Code. Attached as Attachment A to PSE's Response to WUTC Staff Data Request No. 012 is the Company Corporate Ethics and Compliance Code adopted in January 2004 (as revised 11/3/06).

All employees at PSE have either had or are receiving training in the Company's Corporate Ethics and Compliance Code. This training began in early 2007 and is substantially complete. Employees received training either through on-line coursework or via in-person sessions for field personnel. Attached as Attachment B to PSE's Response to WUTC Staff Data Request No. 012 are records identifying the employees who have received this training.

On June 12, 2007, all PSE employees were reminded via e-mail that accurate and reliable records are critically important to the Company and that each employee is responsible to accurately and honestly maintain records under his/her care. Attached as Attachment C to PSE's Response to WUTC Staff Data Request No. 012 please find a copy of this e mail communication. In addition, verbal discussions were held with gas operations personnel during regular staff meetings, regarding the requirement that employees create and maintain accurate and reliable records.

The following Puget Sound Energy, Inc. employees whose work history was such that they would have performed leak evaluations as PCI employees before being hired by PSE (whether salaried or union represented) received a verbal review of expectations regarding performance as a PSE employee on the date listed and were required to complete a detailed review of Section 6(C) of PSE's Corporate Ethics and Compliance Code, entitled "Accuracy, Retention and Destruction of Records and Documents."

Greg Haugen	Quality Assurance Inspector	May 29, 2007
Casey Chamberlain	Quality Assurance Inspector	May 29, 2007
Robert Morse	Supervisor First Response	July 12, 2007
Curt Ammons	Fitter II – Corrosion Control	July 12, 2007
John Rockford	Fitter II – Corrosion Control	July 12, 2007
Bruce Voutour	Fitter II – Gas First Response	July 18, 2007

Pilchuck Employees

Attached as Attachment D to PSE's Response to WUTC Staff Data Request No. 012, please find copies of lists of Pilchuck personnel who received advisory information regarding PSE's leak evaluation policy. Also attached as Attachment D to PSE's Response to WUTC Staff Data Request No. 012, please find a copy of attendance lists identifying those individuals receiving advisory information regarding PSE's leak evaluation policy. Pilchuck employees receiving advisory information were instructed that the motivation for providing such information was to prevent future violations of PSE's leak evaluation policy. Such information was provided in the form of disciplinary

action, rather than through a general information session. The documents communicating the advisory are also provided in Attachment D to PSE's Response to WUTC Staff Data Request No. 012. At this time, Pilchuck employees have received verbal reprimands, but no employee has been terminated from employment.