

Inspection Output (IOR)

Generated on 2018.October.22 14:19

Inspection Information

Inspection Name	PSE 2018 Distribution (Snohomish and West King)	Operator(s)	PUGET SOUND ENERGY (22189) Lead David Cullom	Plan Submitted	01/24/2018
Status	PLANNED	Observer(s)	Denise Crawford	Plan Approval	01/29/2018 by Joe Subsits
Start Year	2018	Supervisor	Joe Subsits	All Activity Start	07/23/2018
System Type	GD	Director	Sean Mayo	All Activity End	09/27/2018
Protocol Set ID	WA.GD.2017.01			Inspection Submitted	--
				Inspection Approval	--

Inspection Summary

Inspection Scope and Summary

This inspection was performed as an "Intrastate Integrated Inspection" where the records portion for both units were conducted first. This standard audit consisted of a joint records review for multiple inspection units (Snohomish and West King County) The records portion consisted of one week for both unit's records and then each unit had a field review portion of one week.

The records verification of PSE's facilities included but was not limited to: Leak survey records, leak work orders, cathodic protection (CP) test and remediation records, valve inspections, bridge and slide patrols, odorant checks, equipment calibrations, pressure control records, operator qualification (OQ) records, new construction records, and additional compliance records for drug and alcohol, damage prevention, and public awareness were reviewed.

I also performed checks in the field for operator qualification verification and to verify records reviewed in PSE's offices through field data collection. The field portion included: pipe to soil readings, isolation testing, rectifier inspections, pressure regulator and over pressure operation, emergency block valve operation, odorant concentration testing, and we also visited two low pressure distribution systems in Seattle to observe how annual inspections are performed.

Facilities visited:

Please see the field notes form for sites visited.

Total AFOD (12)

Summary of Significant Findings

AREA OF CONCERN

1. **WAC 480-93-110 Corrosion control**

-

(2) *Each gas pipeline company must complete remedial action within ninety days to correct any cathodic protection deficiencies known and indicated by any test, survey, or inspection. An additional thirty days may be allowed for remedial action if due to circumstances beyond the gas pipeline company's control the company cannot complete remedial action within ninety days. Each gas pipeline company must be able to provide documentation to the commission indicating that remedial action was started in a timely manner and that all efforts were made to complete remedial action within ninety days. (Examples of circumstances allowing each gas pipeline company to exceed the ninety-day time frame include right of way permitting issues, availability of repair materials, or unusually long investigation or repair requirements).*

Finding(s):

During the field portion of the inspection, we obtained a low reading at the following location:

· **(Insp. No. 7550 – King County West)** 9/28/2018 TS-052826 NE 65th ST and 24 Ave NE -826 mV CSE PSP (galvanic system)

If uncorrected within 120 days from the discovery date indicated above in the findings, these conditions could lead to probable violations. PSE's compliance department recently provided documentation that they have started the process in a timely manner which will allow for an additional 30 days beyond the standard 90 day deadline for remediation due to potential local permitting issues.

Primary Operator contacts and/or participants

Stephanie Silva, Compliance Program Manager, Compliance Program PO Box 97034 M/S: PSE11N Bellevue, WA 98009-9734 425-462-3923 Office 425-754-2237 Cell 425-462-3770 Fax stephanie.silva@pse.com

Lee Maxwell, Sr. Regulatory Compliance Analyst - Audits - Day to day contact PO Box 97034 M/S: PSE11N Bellevue, WA 98009-9734 425-462-3575 (Office) 425-462-3770 Fax lee.maxwell@pse.com

Argentina Stefanescu Regulatory Compliance Analyst - Day to day contact - 30 day incident report contact PO Box 97034 M/S: PSE11N Bellevue, WA 98009-9734 425-462-3087 Office 425-457-5752 Fax argentina.stefanescu@pse.com

Operator executive contact and mailing address for any official correspondence

Booga K. Gilbertson, Sr. VP Operations PO Box 97034 M/S: PSE-12N Bellevue, WA 98009-9734 425-462-3843 Office bk.gilbertson@pse.com

CC. Cara Peterman, Director, Enterprise Risk Management & Compliance PO Box 97034 M/S: PSE11N Bellevue, WA 98009-9734 425-462-3092 Office 253-312-2780 Cell cara.peterman@pse.com

Harry Shapiro, Director, Gas Operations PO Box 97034 M/S: EST-06W Bellevue, WA 98009-9734 425-456-2543 Office 206-571-2380 Cell harry.shapiro@pse.com

Cheryl McGrath, Manager, Compliance Programs PO Box 97034 M/S: PSE11N Bellevue, WA 98009-9734 425-462-3207 Office 206-604-3221 Cell 425-456-2724 Fax cheryl.mcgrath@pse.com

Scope (Assets)

#	Short Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1.	West King	West King	other	West King	Compressor Stations Storage Fields Bottle/Pipe - Holders Offshore GOM OCS Cast or Ductile Iron Copper Pipe Aluminum pipe	126	126	126	100.0%
2.	Snohomish	Snohomish	other	Snohomish	Compressor Stations Storage Fields Bottle/Pipe - Holders Offshore GOM OCS Cast or Ductile Iron Copper Pipe Aluminum pipe	126	126	126	100.0%

a. Percent completion excludes unanswered questions planned as "always observe".

Plans

#	Plan Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent	Notes
1.	West King	n/a	PRR	P, R, O, S	Detail	
2.	West King	n/a	FR	P, R, O, S	Detail	
3.	Snohomish	n/a	PRR	P, R, O, S	Detail	
4.	Snohomish	n/a	FR	P, R, O, S	Detail	

Plan Implementations

#	Activity Name	SMAR T Act#	Start Date	End Date	Focus Directives	Involved Groups/Subgroups	Assets	Qst Type(s)	Planned	Required	Total Inspected	Required % Complete
1	West King Field	--	09/24/2018	09/27/2018	n/a	all planned questions	West King	O	45	45	45	100.0%
2	All Records	--	07/23/2018	07/26/2018	n/a	all planned questions	West King, Snohomish	R	162	162	162	100.0%
3	Snohomish Field	--	08/06/2018	08/09/2018	n/a	all planned questions	Snohomish	O	45	45	45	100.0%

a. Since questions may be implemented in multiple activities, but answered only once, questions may be represented more than once in this table.

b. Percent completion excludes unanswered questions planned as "always observe".

Forms

No. Entity	Form Name	Status	Date Completed	Activity Name	Asset
1. Attendance List	Field and Records Attendance List (Non OQ Covered Employees)	COMPLETED	10/16/2018	All Records	West King Snohomish

Results (all values, 127 results)

135 (instead of 127) results are listed due to re-presentation of questions in more than one sub-group.

PRR.REPORT: Reporting

1. Question Result, ID, References **Sat, RPT.RR.IMMEDREPORT.R, 191.5(a) (191.7(a), 191.7(d))**
 Question Text *Do records indicate immediate notifications of incidents were made in accordance with 191.5?*
 Assets Covered **West King, Snohomish**
2. Question Result, ID, References **Sat, GDIM.RR.MECHANICALFITTINGDATAIMPL.R, 192.1009 (191.12)** (also presented in: GDIM.IMPL)
 Question Text *Have accurate records been maintained documenting mechanical fitting failures that resulted in hazardous leaks?*
 Assets Covered **West King, Snohomish**
 Result Notes **PSE reports this annually. They keep the failed components stored at the South King base.**
3. Question Result, ID, References **Sat, RPT.RR.INCIDENTREPORT.R, 191.9(a)**
 Question Text *Do records indicate reportable incidents were identified and reports were submitted to DOT on Form 7100.2 (01-2002) within the required timeframe?*
 Assets Covered **West King, Snohomish**
4. Question Result, ID, References **Sat, RPT.RR.INCIDENTREPORTSUPP.R, 191.9(b)**
 Question Text *Do records indicate accurate supplemental incident reports were filed and within the required timeframe?*
 Assets Covered **West King, Snohomish**
 Result Notes **The Capital Hill House Fire and Downtown Seattle 6/12/2017. 9130 15th PL South also required a supplemental report.**
5. Question Result, ID, References **Sat, RPT.RR.ANNUALREPORT.R, 191.11(a)**
 Question Text *Have complete and accurate Annual Reports been submitted?*
 Assets Covered **West King, Snohomish**
 Result Notes **Annual report was reviewed and compared with previous submissions.**
6. Question Result, ID, References **NA, RPT.RR.SRCR.R, 191.23(a) (191.23(b), 191.25(a), 191.25(b))**
 Question Text *Do records indicate safety-related condition reports were filed as required?*
 Assets Covered **West King, Snohomish**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
7. Question Result, ID, References **Sat, MO.GO.CUSTNOTIFY.R, 192.16(d) (192.16(a), 192.16(b), 192.16(c))**
 Question Text *Do records indicate the customer notification process satisfies the requirements of 192.16?*
 Assets Covered **West King, Snohomish**
 Result Notes **The letter that is sent to everyone for new service contains this notification.**
8. Question Result, ID, References **NA, RPT.RR.MAOPINCREASENOTIFY.R,**
 Question Text *Do records indicate submittal of a written plan of procedures to the commission at least forty-five days before uprating to a MAOP greater than 60 psig?*

Assets Covered West King, Snohomish

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

9. Question Result, ID, References Sat, RPT.RR.DAILYCONSTRUCTIONRPT.R,

Question Text Do records indicate daily construction and repair activities were emailed to the commission no later than 10 AM each day work is scheduled?

Assets Covered West King, Snohomish

Result Notes PSE has been doing an acceptable job in this reporting aspect. IFS and Michels are the primary contractors and they also send daily notices

PRR.CORROSION: Corrosion Control

10. Question Result, ID, References Sat, TQ.QU.CORROSION.R, 192.453 (192.807(a), 192.807(b))

Question Text Do records indicate qualification of personnel implementing pipeline corrosion control methods?

Assets Covered West King, Snohomish

Result Notes I checked Michelle G and Alan Mulkey's OQ records.

11. Question Result, ID, References Sat, TD.CP.ELECISOLATE.R, 192.491(c) (192.467(a), 192.467(b), 192.467(c), 192.467(d), 192.467(e))

Question Text Do records adequately document electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?

Assets Covered West King, Snohomish

Result Notes 4800 Rainier Ave South had a shorted casing. I reviewed the leak survey carried out 3/20/2017.

12. Question Result, ID, References Sat, TD.CP.RECORDS.R, 192.491(a)

Question Text Do records indicate the location of all items listed in 192.491(a)?

Assets Covered West King, Snohomish

Result Notes PSE has this in an ESRI map viewer.

13. Question Result, ID, References Sat, TD.CPEXPOSED.EXPOSEINSPECT.R, 192.491(c) (192.459)

Question Text Do records adequately document that exposed buried piping was examined for corrosion?

Assets Covered West King, Snohomish

Result Notes Corrosion provided EPCRs where PSPs were taken and analyzed.

14. Question Result, ID, References Sat, TD.CPMONITOR.CURRENTTEST.R, 192.491(c) (192.465(b))

Question Text Do records document details of electrical checks of sources of rectifiers or other impressed current sources?

Assets Covered West King, Snohomish

Result Notes I checked the past three years of records in Excel.

15. Question Result, ID, References Sat, TD.CPMONITOR.TEST.R, 192.491(c) (192.465(a))

Question Text Do records adequately document cathodic protection monitoring tests have occurred as required?

Assets Covered West King, Snohomish

Result Notes I checked the past three years of records in Excel.

16. Question Result, ID, References NA, TD.CPMONITOR.REVCURRENTTEST.R, 192.491(c) (192.465(c))

Question Text Do records document details of electrical checks interference bonds, diodes, and reverse current switches?

Assets Covered West King, Snohomish

Result Notes No such event occurred, or condition existed, in the scope of inspection review. PSE states they have no such connections in these inspection units.

17. Question Result, ID, References **Sat, TD.CP.MONITOR.DEFICIENCY.R, 192.491(c) (192.465(d))**
 Question Text *Do records adequately document actions taken to correct any identified deficiencies in corrosion control?*
 Assets Covered **West King, Snohomish**
 Result Notes **I reviewed several G3s that showed remediation efforts were taken.**
18. Question Result, ID, References **Sat, TD.CP.UNPROTECT.R, 192.491(c) (192.465(e))**
 Question Text *Do records adequately document that exposed buried piping was examined for corrosion and deteriorated coating?*
 Assets Covered **West King, Snohomish**
 Result Notes **EPCRs are completed each time a dig is completed.**
19. Question Result, ID, References **Sat, TD.CP.MONITOR.TESTSTATION.R, 192.469**
 Question Text *Do records identify the location of test stations and show a sufficient number of test stations?*
 Assets Covered **West King, Snohomish**
 Result Notes **Test stations are mapped.**
20. Question Result, ID, References **Sat, TD.CP.MONITOR.TESTLEAD.R, 192.491(c) (192.471(a), 192.471(b), 192.471(c))**
 Question Text *Do records document that pipelines with cathodic protection have electrical test leads installed in accordance with requirements of Subpart I?*
 Assets Covered **West King, Snohomish**
 Result Notes **GOS 2600.1200 is the procedure. Records of HP projects have this on the design drawings and the redlined as-builts.**
21. Question Result, ID, References **Sat, TD.CP.MONITOR.INTFRCURRENT.R, 192.491(c) (192.473(a))**
 Question Text *Do records document an effective program is in place to minimize detrimental effects of interference currents and that detrimental effects of interference currents from CP systems on other underground metallic structures are minimized?*
 Assets Covered **West King, Snohomish**
 Result Notes **The records are on PSE "H" drive.**
22. Question Result, ID, References **NA, FS.FG.CASINGTESTLEAD.R,**
 Question Text *Do records indicate that all casings without vents installed after September 5, 1992 had separate test lead wires installed?*
 Assets Covered **West King, Snohomish**
 Result Notes **This does not apply, but they gave a procedure for test lead installs. 2525.1900 Casing Requirements.**
23. Question Result, ID, References **Sat, FS.FG.CASINGSEALS.R,**
 Question Text *Do records indicate that mains and service lines installed in casing or conduit are sealed at the ends as required?*
 Assets Covered **West King, Snohomish**
 Result Notes **The GOS 2525.1900 contains this procedure and it is also on the D-4 records (typically in the notes)**
24. Question Result, ID, References **Sat, TD.ICP.CORRGAS.R, 192.491(c) (192.475(a))**
 Question Text *Do the records demonstrate that the corrosive effect of the gas in the pipeline has been investigated and if determined to be corrosive, steps be taken to minimize internal corrosion?*
 Assets Covered **West King, Snohomish**
 Result Notes **Corrosive gas is checked for at the Solid Waste Treatment Plant on Monster Rd.**
25. Question Result, ID, References **Sat, TD.ICP.EXAMINE.R, 192.491(c) (192.475(a), 192.475(b))**
 Question Text *Do records document examination of removed pipe for evidence of internal corrosion?*
 Assets Covered **West King, Snohomish**
 Result Notes **When pipe is removed this is documented.**

26. Question Result, ID, References **NA, TD.ICP.CORRGASACTION.R, 192.491(c) (192.477)**
 Question Text *Do records document the actions taken when corrosive gas is being transported by pipeline?*
 Assets Covered **West King, Snohomish**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
27. Question Result, ID, References **Sat, TD.ATM.ATMCORRODEINSP.R, 192.491(c) (192.481(a), 192.481(b), 192.481(c))**
 Question Text *Do records document inspection of aboveground pipe for atmospheric corrosion?*
 Assets Covered **West King, Snohomish**
 Result Notes **I reviewed the Annual Reg Station PMs sheets and the Leak surveys have AC surveys.**
28. Question Result, ID, References **Sat, TD.COAT.NEWPIPE.R, 192.491(c) (192.455(a), 192.461(a), 192.461(b), 192.483(a))**
 Question Text *Do records document that each buried or submerged pipeline installed after July 31, 1971 has been externally coated with a suitable coating material?*
 Assets Covered **West King, Snohomish**
 Result Notes **GOS 2600.1100 contains the procedure. This is in the project documentation. If the line is installed via HDD the additional ARO coating in addition to the standard FBE coating is also documented so the crew can set the "jeep" voltage correctly.**
29. Question Result, ID, References **NA, TD.ICP.REPAIR.R, 192.485(a) (192.485(b))**
 Question Text *Do records document the repair or replacement of pipe that has been internally corroded to an extent that there is not sufficient remaining strength in the pipe wall?*
 Assets Covered **West King, Snohomish**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
30. Question Result, ID, References **NA, TD.ICP.EVALUATE.R, 192.491(c) (192.485(c))**
 Question Text *Do records document adequate evaluation of internally corroded pipe?*
 Assets Covered **West King, Snohomish**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

PRR.PT: Pressure Test

31. Question Result, ID, References **Sat, DC.PTLOWPRESS.PRESSTEST100PSIG.R, 192.517(b) (192.509(a), 192.509(b))**
 Question Text *Do records indicate that pressure testing is conducted in accordance with 192.509(a)?*
 Assets Covered **West King, Snohomish**
 Result Notes **This is verified during DTC inspections and during this inspection in the construction job folders.**
32. Question Result, ID, References **Sat, DC.PTLOWPRESS.PRESSTESTLOWSTRESS.R, 192.517(a) (192.507(a), 192.507(b), 192.507(c))**
 Question Text *Do records indicate that pressure testing is conducted in accordance with 192.507?*
 Assets Covered **West King, Snohomish**
 Result Notes **GOS 2525.3300 Section 6 contains this procedure. We check this during DTC inspections throughout the year and I review job folders during the standard inspections and as part of proximity request design reviews.**
33. Question Result, ID, References **Sat, DC.PT.SERVICELINE.R, 192.517(b) (192.511(a), 192.511(b), 192.511(c))**
 Question Text *Do records indicate that pressure testing is conducted in accordance with 192.511?*
 Assets Covered **West King, Snohomish**
 Result Notes **GOS 2525.3300 Section 8 contains this procedure. We check this during DTC inspections throughout the year and I review job folders during the standard inspections and as part of proximity request design reviews.**
34. Question Result, ID, References **Sat, DC.PT.PRESSTESTPLASTIC.R, 192.517(b) (192.513(a), 192.513(b), 192.513(c), 192.513(d))**

Question Text *Do records indicate that pressure testing is conducted in accordance with 192.513?*

Assets Covered **West King, Snohomish**

Result Notes **GOS 2525.3300 Section 4-4.1.2 contains this procedure. We check this during DTC inspections throughout the year and I review job folders during the standard inspections and as part of proximity request design reviews.**

PRR.UPRATE: Uprating

35. Question Result, ID, References **NA, MO.GOUPRATE.MAOPINCREASE.R, 192.553(a) (192.553(b), 192.553(c))**

Question Text *Do records indicate that increases in MAOP of pipeline were determined in accordance with 192.553?*

Assets Covered **West King, Snohomish**

Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

36. Question Result, ID, References **NA, MO.GOUPRATE.MAOPINCREASELIMIT.R, 192.553(b) (192.553(c), 192.553(d), 192.557(a))**

Question Text *Do records indicate that increases in MAOP are limited in accordance with 192.519 and 192.621?*

Assets Covered **West King, Snohomish**

Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

37. Question Result, ID, References **NA, MO.GOUPRATE.MAOPINCREASEPREP.R, 192.553(b) (192.553(c), 192.553(a), 192.557(b), 192.557(c))**

Question Text *Do records indicate that increases in MAOP were preceded by the actions specified in 192.557?*

Assets Covered **West King, Snohomish**

Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

PRR.OM: Operations And Maintenance

38. Question Result, ID, References **Sat, EP.ERG.LIAISON.R, 192.605(a) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), 192.616(c), ADB-05-03)** (also presented in: MISCTOPICS.PUBAWARE)

Question Text *Do records indicate liaisons established and maintained with appropriate fire, police and other public officials and utility owners in accordance with procedures?*

Assets Covered **West King, Snohomish**

Result Notes **PSE sent 142 emails with 129 delivered to FRs. 162 (opened emails) on 9/27/2017 were sent to public works. They also send an email to public officials. For every jurisdiction, they send to a city manager, mayor, and public works per Charlie Gadzik.**

39. Question Result, ID, References **Sat, MO.GO.OMANNUALREVIEW.R, 192.605(a)**

Question Text *Has the operator conducted annual reviews of the written procedures or processes in the manual as required?*

Assets Covered **West King, Snohomish**

Result Notes **There was a change log in the past. Now each individual standard has the changes at the end of each standard.**

40. Question Result, ID, References **Sat, MO.RW.MARKERREPLACE.R,**

Question Text *Do records indicate that damaged or missing markers were replaced within forty-five days of discovery?*

Assets Covered **West King, Snohomish**

Result Notes **As part of the bridge patrols, they look at markers every quarter. The regular markers are inspected every 5 years. There were 334 plats that were inspected this cycle.**

41. Question Result, ID, References **Sat, PD.PA.EVALEFFECTIVENESS.R, 192.616(c) (API RP 1162 Section 8.4)** (also presented in: MISCTOPICS.PUBAWARE)

Question Text *Have effectiveness evaluation(s) of the program been performed for all stakeholder groups in all notification areas along all systems covered by the program?*

Assets Covered **West King, Snohomish**

Result Notes They send out a survey to FRs in 2017 and they provided a list of 201 parties to contact. 39 phone interviews were obtained and metrics contained awareness of info on markers, NPMS, emergency contact awareness, .etc.

They did this with FRs, Excavators, Public Officials, and the public. They conducted an online survey for the public. They had about ~400 public responses.

They are using building permits to check for effectiveness. Damage prevention per /1000 tickets is the enhanced metric they use.

42. Question Result, ID, [Sat, PD.PA.LANGUAGE.R, 192.616\(g\)](#) (API RP 1162 Section 2.3.1) (also presented in: [References MISCTOPICS.PUBAWARE](#))
Question Text *Were materials and messages developed and delivered in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?*
Assets Covered [West King, Snohomish](#)
Result Notes [PSE provides information in other languages throughout its service area.](#)
43. Question Result, ID, [NA, PD.PA.MSTRMETER.R, 192.616\(j\)](#) (192.616(h), API RP 1162 Section 2.7 (Step 12), API RP 1162 Section 8.5) (also presented in: [MISCTOPICS.PUBAWARE](#))
Question Text *Do records indicate the public awareness program for a master meter or petroleum gas system operator has met the requirements of Part 192?*
Assets Covered [West King, Snohomish](#)
Result Notes [No such relevant facilities/equipment existed in the scope of inspection review. PSE is not a master meter.](#)
44. Question Result, ID, [Sat, MO.GO.OMHISTORY.R, 192.605\(a\)](#) (192.605(b)(3))
References
Question Text *Are construction records, maps and operating history available to appropriate operating personnel?*
Assets Covered [West King, Snohomish](#)
Result Notes [They use the Tensing locally, ESRI, and Imagesite.](#)
45. Question Result, ID, [Sat, MO.GO.OMEFFECTREVIEW.R, 192.605\(a\)](#) (192.605(b)(8))
References
Question Text *Do records indicate periodic review of the work done by operator personnel to determine the effectiveness, and adequacy of the processes used in normal operations and maintenance and modifying the processes when deficiencies are found?*
Assets Covered [West King, Snohomish](#)
Result Notes [Jack Hand's group \(Darryl and Monica\) QM group. They perform QA inspections to verify Odorizing Stations, AC, Valve Inspections. They will submit fixes to problems.](#)
46. Question Result, ID, [Sat, MO.RW.DISTPATROL.R, 192.603\(b\)](#) (192.721(a), 192.721(b))
References
Question Text *Do records indicate distribution patrolling was conducted as required?*
Assets Covered [West King, Snohomish](#)
Result Notes [Most are 4x a year. The PBS \(Patrol Bridge Slide\). The AC inspections are for any exposed pipe. Bridges, docks. No corrosion beyond a 1 or 2.](#)
47. Question Result, ID, [Sat, MO.RW.DISTPATROLLEAKAGE.R, 192.603\(b\)](#) (192.723(a), 192.723(b))
References
Question Text *Do records indicate distribution leakage surveys were conducted as required?*
Assets Covered [West King, Snohomish](#)
48. Question Result, ID, [Sat, MO.RW.MARKERSMAPSDRAW.R,](#)
References
Question Text *Are records sufficient to indicate class location and other areas where pipeline markers are required?*
Assets Covered [West King, Snohomish](#)
Result Notes [PSE keeps records of marker locations.](#)
49. Question Result, ID, [Sat, MO.RW.MARKERSURVEY.R,](#)
References
Question Text *Do records indicate that pipeline marker surveys were completed and completed in the timeframe specified by WAC 480-93-124?*

Assets Covered West King, Snohomish
Result Notes Records were reviewed for the last two surveys.

50. Question Result, ID, References NA, MO.RW.TRANSLEAKAGE.R, 192.709(c) (192.706, 192.706(a), 192.706(b))

Question Text *Do records indicate transmission leakage surveys conducted as required?*

Assets Covered West King, Snohomish

Result Notes This is not a transmission inspection.

51. Question Result, ID, References NA, MO.RW.TRANSPATROL.R, 192.709(c) (192.705(a), 192.705(b), 192.705(c))

Question Text *Do records indicate that transmission line ROW surface conditions have been patrolled as required?*

Assets Covered West King, Snohomish

Result Notes No such activity/condition was observed during the inspection.

52. Question Result, ID, References Sat, MO.GOABNORMAL.ABNORMALREVIEW.R, 192.605(a) (192.605(c)(4))

Question Text *Do records indicate periodic review of work done by operator personnel to determine the effectiveness of the abnormal operation processes and corrective action taken where deficiencies are found?*

Assets Covered West King, Snohomish

Result Notes Quality Management is doing monthly monitoring for IFS. There also is Jerry Halsen's group that checks construction inspections.

53. Question Result, ID, References Sat, PD.OC.PDPROGRAM.R, 192.614(c)

Question Text *Does the damage prevention program meet minimum requirements specified in 192.614(c)?*

Assets Covered West King, Snohomish

Result Notes I reviewed DIRT metrics and PSE has been doing a much better job of DIRT reporting after our recent audit findings. They have been nearly 100% on time for the 45 day reporting when I checked PSE's metrics and verified with pipeline damage prevention staff.

54. Question Result, ID, References NA, MO.GOCLASS.CLASSLOCATESTUDY.R, 192.605(b)(1) (192.609(a), 192.609(b), 192.609(c), 192.609(d), 192.609(e), 192.609(f))

Question Text *Do records indicate performance of the required study whenever the population along a pipeline increased or there was an indication that the pipe hoop stress was not commensurate with the present class location?*

Assets Covered West King, Snohomish

Result Notes No such relevant facilities/equipment existed in the scope of inspection review. PSE designs to class 4.

55. Question Result, ID, References Sat, EP.ERG.POSTEVNTREVIEW.R, 192.605(a) (192.615(b)(1), 192.615(b)(3))

Question Text *Do records indicate review of employee activities to determine whether the procedures were effectively followed in each emergency?*

Assets Covered West King, Snohomish

Result Notes The 1284 forms are used for line breaks. 2590 were found in the database dating back to 2014.

56. Question Result, ID, References Sat, EP.ERG.TRAINING.R, 192.605(a) (192.615(b)(2))

Question Text *Has the operator trained the appropriate operating personnel on emergency procedures and verified that the training was effective in accordance with its procedures?*

Assets Covered West King, Snohomish

Result Notes I verified this during the Sumas interstate audit in 2018.

57. Question Result, ID, References Sat, EP.ERG.INCIDENTANALYSIS.R, 192.605(a) (192.617)

Question Text *Do records indicate actions initiated to analyze accidents and failures, including the collection of appropriate samples for laboratory examination to determine the causes of the failure and minimize the possibility of recurrence, in accordance with its procedures?*

Assets Covered West King, Snohomish

Result Notes The lab is in South Seattle. Everything except corrosion and third party damage is analyzed by the lab.

58. Question Result, ID, [Sat, MO.GOMAOP.MAOPDETERMINE.R, 192.619\(a\) \(1192.619\(b\), 192.621\(a\), 192.621\(b\), 192.623\(a\), 192.623\(b\)\)](#)
 References
 Question Text *Do records indicate determination of the MAOP of pipeline segments in accordance with 192.619 and limiting of the operating pressure as required?*
 Assets Covered [West King, Snohomish](#)
 Result Notes [PSE does determine in accordance with .619](#)
59. Question Result, ID, [Sat, MO.GOODOR.ODORIZE.R, 192.709\(c\) \(192.625\(a\), 192.625\(b\), 192.625\(c\), 192.625\(d\), 192.625\(e\), 192.625\(f\)\)](#)
 References
 Question Text *Do records indicate appropriate odorization of its combustible gases in accordance with its processes and conduct of the required testing to verify odorant levels met requirements?*
 Assets Covered [West King, Snohomish](#)
 Result Notes [2015 to 2017 was checked. The lowest read was .711 - which is OK. They had no exceedances.](#)
60. Question Result, ID, [NA, AR.RMP.TESTREINSTATE.R, 192.603\(b\) \(192.725\(a\), 192.725\(b\)\)](#)
 References
 Question Text *From the review of records, did the operator properly test disconnected service lines?*
 Assets Covered [West King, Snohomish](#)
 Result Notes [No such event occurred, or condition existed, in the scope of inspection review. None in the construction jobs selected had the disconnections](#)
61. Question Result, ID, [NA, MO.GM.MOVEANDLOWER.R,](#)
 References
 Question Text *Do records indicate that a study was prepared before moving or lowering a steel gas pipeline as required?*
 Assets Covered [West King, Snohomish](#)
 Result Notes [No such event occurred, or condition existed, in the scope of inspection review. As a practice they do not, but if they had to a leak survey would be performed.](#)
62. Question Result, ID, [NA, MO.GM.MOVEANDLOWERSURVEY.R,](#)
 References
 Question Text *Do records indicate that a leak survey was conducted not more than thirty days after moving and/or lowering a metallic pipeline?*
 Assets Covered [West King, Snohomish](#)
 Result Notes [No such event occurred, or condition existed, in the scope of inspection review.](#)
63. Question Result, ID, [Sat, MO.GM.ABANDONPIPE.R, 192.709\(c\) \(192.727\(a\), 192.727\(b\), 192.727\(c\), 192.727\(d\), 192.727\(e\), 192.727\(f\), 192.727\(g\)\)](#)
 References
 Question Text *Do records indicate pipelines and facilities were abandoned or deactivated in accordance with requirements?*
 Assets Covered [West King, Snohomish](#)
64. Question Result, ID, [Sat, MO.GMOPP.PRESSREGTEST.R, 192.709\(c\) \(192.739\(a\), 192.739\(b\)\)](#)
 References
 Question Text *Do records indicate inspection and testing of pressure limiting, relief devices, and pressure regulating stations as required and at the specified intervals?*
 Assets Covered [West King, Snohomish](#)
 Result Notes [I reviewed 2015-2018 records.](#)
65. Question Result, ID, [Sat, MO.GMOPP.PRESSREGCAP.R, 192.709\(c\) \(192.743\(a\), 192.743\(b\), 192.743\(c\)\)](#)
 References
 Question Text *Do records indicate testing or review of the capacity of each pressure relief device at each pressure limiting station and pressure regulating station as required and a new or additional device installed if determined to have insufficient capacity?*
 Assets Covered [West King, Snohomish](#)
 Result Notes [I reviewed 2015-2018 records.](#)
66. Question Result, ID, [Sat, MO.GM.DISTVALVEINSPECT.R, 192.603\(b\) \(192.747\(a\), 192.747\(b\)\)](#)
 References
 Question Text *Do records indicate proper inspection and partial operation of each distribution system valve that might be required in an emergency at intervals not exceeding 15 months, but at least once each calendar year, and prompt remedial action to correct any valve found inoperable?*
 Assets Covered [West King, Snohomish](#)

Result Notes I reviewed three years worth of records. I checked back to 2015. All were fine. Emergency section valves were looked at as well. (10748 for both) There were no exceedances for 2015 -2017.

67. Question Result, ID, References NA, FS.FG.VAULTINSPECTFAC.R, 192.709(c) (192.749(a), 192.749(b), 192.749(c), 192.749(d))
Question Text Do records document inspections at the required interval of all vaults having a volumetric internal content of 200 cubic feet (5.66 cubic meters) or more that house pressure regulating/limiting equipment?
Assets Covered West King, Snohomish
Result Notes No such relevant facilities/equipment existed in the scope of inspection review. None
68. Question Result, ID, References Sat, MO.GM.IGNITION.R, 192.709 (192.751(a), 192.751(b), 192.751(c))
Question Text Do records indicate personnel followed processes for minimizing the danger of accidental ignition where the presence of gas constituted a hazard of fire or explosion?
Assets Covered West King, Snohomish
Result Notes No hot work permits are used at PSE.
69. Question Result, ID, References Sat, DC.WELDPROCEDURE.WELD.R, 192.225(a) (192.225(b))
Question Text Do records indicate weld procedures are being qualified in accordance with 192.225?
Assets Covered West King, Snohomish
Result Notes This question is more appropriate for the O&M review, but I review welding processes during the records review portion and during DTC field visits to ensure the welder is following a PQRed WPS.
70. Question Result, ID, References Sat, TQ.QUOMCONST.WELDER.R, 192.227(a) (192.227(b), 192.229(a), 192.229(b), 192.229(c), 192.229(d), 192.328(a), 192.328(b), 192.807(a), 192.807(b))
Question Text Do records indicate adequate qualification of welders?
Assets Covered West King, Snohomish
Result Notes Records for jobs that occurred throughout the year and OQ records are also checked during DTC inspections.
71. Question Result, ID, References Sat, TQ.QUOMCONST.NDT.R, 192.243(b)(2) (192.807(a), 192.807(b), 192.328(a), 192.328(b))
Question Text Do records indicate the qualification of nondestructive testing personnel?
Assets Covered West King, Snohomish
Result Notes Michelle G is the main person that performs this and is qualified.
72. Question Result, ID, References Sat, DC.CO.PLASTICJOINTPROCEDURE.R, 192.273(b) (192.283(a), 192.283(b), 192.283(c), 192.283(d))
Question Text Have plastic pipe joining procedures been qualified in accordance with 192.283?
Assets Covered West King, Snohomish
Result Notes This is checked in the O&M review.
73. Question Result, ID, References Sat, DC.CO.PLASTICJOINTQUAL.R, 192.285(d) (192.285(a), 192.285(b), 192.285(c), 192.807(a), 192.807(b))
Question Text Do records indicate persons making joints in plastic pipelines are qualified in accordance with 192.285?
Assets Covered West King, Snohomish
Result Notes We verify this in DTC audits.
74. Question Result, ID, References Sat, DC.CO.PLASTICJOINTINSR.R, 192.287 (192.807(a), 192.807(b))
Question Text Do records indicate persons inspecting the making of plastic pipe joints have been qualified?
Assets Covered West King, Snohomish
Result Notes We verify this in DTC audits.
75. Question Result, ID, References NA, DC.CO.PLASTICPIPESEP.R,
Question Text Do records indicate minimum separation requirements are met for plastic pipelines?
Assets Covered West King, Snohomish

Result Notes No such activity/condition was observed during the inspection.

76. Question Result, ID, References Sat, DC.METERREGSVC.REGTEST.R,
Question Text Do records indicate that service regulators have been installed, operated, maintained, tested during initial turn-on and tested when customers experience pressure problems?
Assets Covered West King, Snohomish
77. Question Result, ID, References Sat, MO.RW.LEAKFOLLOW.R,
Question Text Do records indicate that a follow-up inspection was performed not more than thirty days following a repair where residual gas remained in the ground?
Assets Covered West King, Snohomish
Result Notes I review leak work orders for follow-ups and leak grade changes..
78. Question Result, ID, References Sat, MO.RW.DOWNGRADELEAKREPAIR.R,
Question Text Do records indicate that leaks that have been downgraded are repaired within twenty-one months?
Assets Covered West King, Snohomish
Result Notes There were no noted issues with the leak survey records.
79. Question Result, ID, References Sat, MO.RW.LEAKREPAIRTIME.R,
Question Text Do records indicate that leaks were repaired and re-evaluated in the timeframes specified in WAC 480-93-18601?
Assets Covered West King, Snohomish
Result Notes I did not note any issues with leak evaluation and repairs.
80. Question Result, ID, References Sat, MO.RW.LEAKRECORDS.R,
Question Text Have gas leak records been prepared and maintained as required?
Assets Covered West King, Snohomish
81. Question Result, ID, References NA, MO.GM.RECORDS.R, 192.605(b)(1) (192.243(f), 192.709(a), 192.709(b), 192.709(c))
Question Text Do records indicate that records are maintained of each pipe/"other than pipe" repair, NDT required record, and (as required by subparts L or M) patrol, survey, inspection or test?
Assets Covered West King, Snohomish
Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

FR.FIELDPIPE: Pipeline Inspection (Field)

82. Question Result, ID, References Sat, DC.MA.MARKING.O, 192.63(a) (192.63(b), 192.63(c), 192.63(d))
Question Text Are pipe, valves, and fittings properly marked for identification?
Assets Covered West King, Snohomish
83. Question Result, ID, References Sat, DC.DPC.GDVALVEPLACEMENT.O, 192.141 (192.181(a), 192.181(b), 192.181(c))
Question Text Are distribution line valves being installed as required of 192.181?
Assets Covered West King, Snohomish
84. Question Result, ID, References Sat, DC.METERREGSVC.CUSTOMETERREGLOC.O, 192.351 (192.353(a), 192.353(b), 192.353(c), 192.353(d))
Question Text Are meters and service regulators being located consistent with the requirements of 192.353?
Assets Covered West King, Snohomish
Result Notes I did not note any deficiencies in the pre-field or field inspection.
85. Question Result, ID, References Sat, DC.METERREGSVC.CUSTOMETERREGPROT.O, 192.351 (192.355(a), 192.355(b), 192.355(c))

Question Text *Are meters and service regulators being protected from damage consistent with the requirements of 192.355?*

Assets Covered **West King, Snohomish**

Result Notes **I did not note any deficiencies in the pre-field or field inspection.**

86. Question Result, ID, **Sat, MO.RW.ROWMARKER.O, 192.707(a) (192.707(b), 192.707(d), CGA Best Practices, v4.0, Practice 2-References 5, CGA Best Practices, v4.0, Practice 4-20)** (also presented in: ATT1FR.FIELDPCS)

Question Text *Are line markers placed and maintained as required?*

Assets Covered **West King, Snohomish**

Result Notes **I did not note any deficiencies in the pre-field or field inspection.**

87. Question Result, ID, **Sat, MO.RW.ROWMARKERABOVE.O, 192.707(c) (CGA Best Practices, v4.0, Practice 2-5, CGA Best Practices, v4.0, Practice 4-20)** (also presented in: ATT1FR.FIELDPCS)

Question Text *Are line markers placed and maintained as required for above ground pipelines?*

Assets Covered **West King, Snohomish**

Result Notes **Bridge crossings were all well marked.**

88. Question Result, ID, **NA, DC.METERREGSVC.CUSTOMETERREGINSTALL.O, 192.351 (192.357(a), 192.357(b), 192.357(c), References 192.357(d))**

Question Text *Are meters and service regulators being installed consistent with the requirements of 192.357?*

Assets Covered **West King, Snohomish**

Result Notes **No such activity/condition was observed during the inspection.**

89. Question Result, ID, **NA, DC.METERREGSVC.CUSTOMETEROPPRESS.O, 192.351 (192.359(a), 192.359(b), 192.359(c))**
References

Question Text *Are customer meter operating pressures consistent with the requirements of 192.359?*

Assets Covered **West King, Snohomish**

Result Notes **No such activity/condition was observed during the inspection.**

90. Question Result, ID, **NA, DC.METERREGSVC.SVCLINEINSTALL.O, 192.351 (192.361(a), 192.361(b), 192.361(c), 192.361(d), References 192.361(e), 192.361(f), 192.361(g))**

Question Text *Are customer service lines being installed consistent with the requirements of 192.361?*

Assets Covered **West King, Snohomish**

Result Notes **No such activity/condition was observed during the inspection.**

91. Question Result, ID, **NA, DC.METERREGSVC.SVCLINEVLVLOCATEREQT.O, 192.351 (192.363(a), 192.363(b), 192.363(c), References 192.365(a), 192.365(b), 192.365(c))**

Question Text *Are customer service line valves being installed meeting the valve and locations requirements of 192.363 and 192.365?*

Assets Covered **West King, Snohomish**

Result Notes **No such activity/condition was observed during the inspection.**

92. Question Result, ID, **NA, DC.METERREGSVC.SVCLINECONNECT.O, 192.351 (192.367(a), 192.367(b), 192.369(a), 192.369(b))**
References

Question Text *Are customer service lines being installed with connections meeting the requirements of 192.367 and 192.369?*

Assets Covered **West King, Snohomish**

Result Notes **No such activity/condition was observed during the inspection.**

93. Question Result, ID, **NA, DC.METERREGSVC.SVCLINEMATERIAL.O, 192.351 (192.371, 192.373(a), 192.373(b), 192.373(c), References 192.375(a), 192.375(b), 192.377)**

Question Text *Are customer service lines being installed constructed appropriately for the types of materials used?*

Assets Covered **West King, Snohomish**

Result Notes **No such activity/condition was observed during the inspection.**

94. Question Result, ID, **NA, DC.METERREGSVC.NEWSVCLINENOTUSED.O, 192.351 (192.379, 192.379(a), 192.379(b), References 192.379(c))**

Question Text *Are new customer service lines not in use configured in accordance with the requirements of 192.379?*

Assets Covered **West King, Snohomish**

Result Notes **No such activity/condition was observed during the inspection.**

95. Question Result, ID, References **NA, DC.METERREGSVC.EXCSFLOWVLVLOCATE.O, 192.351 (192.381(c), 192.381(d), 192.381(e))**
 Question Text *Are service line excess flow valves located and identified in accordance with the requirements of 192.381?*
 Assets Covered **West King, Snohomish**
 Result Notes **No such activity/condition was observed during the inspection.**
96. Question Result, ID, References **NA, DC.METERREGSVC.REGTEST.O,**
 Question Text *Are service regulators operated, maintained, installed and tested during the initial turn-on in accordance with manufacturer's recommendations and WAC requirements?*
 Assets Covered **West King, Snohomish**
 Result Notes **No such activity/condition was observed during the inspection.**
97. Question Result, ID, References **NA, TD.COAT.NEWPIPEINSTALL.O, 192.461(d)**
 Question Text *Is external protective coating being protected from damage that could result from adverse ditch conditions or supporting blocks?*
 Assets Covered **West King, Snohomish**
 Result Notes **No such activity/condition was observed during the inspection.**
98. Question Result, ID, References **Sat, TD.CPMONITOR.MONITORCRITERIA.O, 192.465(a) (192.463(b), 192.463(c))**
 Question Text *Are methods used for taking CP monitoring readings that allow for the application of appropriate CP monitoring criteria?*
 Assets Covered **West King, Snohomish**
 Result Notes **PSE performed instant offs to account for IR drop.**
99. Question Result, ID, References **Sat, TD.CPMONITOR.CURRENTTEST.O, 192.465(b)**
 Question Text *Are impressed current sources properly maintained and are they functioning properly?*
 Assets Covered **Snohomish**
 Result Notes **Please review field notes.**
100. Question Result, ID, References **Concern, TD.CPMONITOR.CURRENTTEST.O, 192.465(b)**
 Question Text *Are impressed current sources properly maintained and are they functioning properly?*
 Assets Covered **West King**
 Result Issue Summary **Although this is not an impressed current system, the galvanic power source (anodes) are not delivering enough current to protect the entire system. PSE's response stated their service provider would be installing additional anodes to achieve adequate cathodic protection. Per the operator, the pre-inspection was expected to take about 5 days, then a permit from the City of Seattle was requested. The permit typically takes about two months to be approved, but an expedited review will be requested.**
 Result Notes **During the field portion of the inspection, we obtained a low reading at: TS-052826 NE 65th ST and 24 Ave NE -826 mV CSE PSP (galvanic system) on 9/28/2018. It has been noted as an Area of Concern in the findings letter.**
101. Question Result, ID, References **Sat, TD.CP.ELECISOLATE.O, 192.467(a) (192.467(b), 192.467(c), 192.467(d), 192.467(e))**
 Question Text *Are measures performed to ensure electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?*
 Assets Covered **West King, Snohomish**
 Result Notes **We check for isolation from foreign structures during CP field checks.**
102. Question Result, ID, References **Sat, TD.CPMONITOR.TESTSTATION.O, 192.469**
 Question Text *Do cathodically protected pipelines have a sufficient number of test stations?*
 Assets Covered **West King, Snohomish**
103. Question Result, ID, References **Sat, TD.CPMONITOR.TESTLEAD.O, 192.471(a)**

Question Text *Do pipelines with cathodic protection have electrical test leads installed in accordance with requirements of Subpart I?*

Assets Covered **West King, Snohomish**

104. Question Result, ID, References **Sat, FS.FG.CASING.O,**

Question Text *Are all casings bare steel and do they have test leads installed on new casings without vents?*

Assets Covered **West King, Snohomish**

Result Notes **Yes, this is in the GOS. Casings observed in the field had test leads for these two field inspections.**

105. Question Result, ID, References **Sat, FS.FG.CASESEAL.O,**

Question Text *Does the operator seal both ends of casings/conduits for mains and transmission lines and seal the end nearest the building for service lines?*

Assets Covered **West King, Snohomish**

Result Notes **Yes, This was not observed during the field portion of this inspection, but is verified in DTC inspections.**

106. Question Result, ID, References **NA, TD.CP.MONITOR.INTFCURRENT.O, 192.473(a)**

Question Text *Are areas of potential stray current identified, and if found, the detrimental effects of stray currents minimized?*

Assets Covered **West King, Snohomish**

Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

107. Question Result, ID, References **Sat, TD.CP.ADJACENTMETAL.O, 192.473(b)**

Question Text *Are impressed current type cathodic protection systems and galvanic anode systems installed so as to minimize any adverse effect on existing adjacent underground metallic structures?*

Assets Covered **West King, Snohomish**

108. Question Result, ID, References **Sat, TD.ICP.CORRGASPRVNT.O, 192.475(a)**

Question Text *If the transportation of corrosive gas is not allowed, is the transportation of corrosive gas prevented?*

Assets Covered **West King, Snohomish**

Result Notes **Yes. Monitoring at potential corrosive-gas injection sites, such as the Monster Rd plant, occurs to prevent high H2S and H2O content from entering the system.**

109. Question Result, ID, References **NA, TD.ICP.CORRGASACTION.O, 192.477**

Question Text *Are adequate actions taken when corrosive gas is being transported by pipeline?*

Assets Covered **West King, Snohomish**

Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

110. Question Result, ID, References **Sat, TD.ATM.ATMCORRODEINSP.O, 192.481(b) (192.481(c), 192.479(a), 192.479(b), 192.479(c)) (also presented in: ATT1FR.FIELDCS)**

Question Text *Is pipe that is exposed to atmospheric corrosion protected?*

Assets Covered **West King, Snohomish**

111. Question Result, ID, References **Sat, AR.RCOM.REMEDIATIONOM.O, 192.487(a) (192.487(b))**

Question Text *Is anomaly remediation and documentation of remediation adequate for all segments?*

Assets Covered **West King, Snohomish**

Result Notes **I reviewed this documentation during the 2018 transmission inspection with Michelle G.**

112. Question Result, ID, References **Sat, MO.GOODOR.ODORIZE.O, 192.625(a) (192.625(c), 192.625(d), 192.625(e), 192.625(f))**

Question Text *Is sampling of combustible gases adequate using an instrument capable of determining the percentage of gas in air at which it becomes readily detectable?*

Assets Covered **West King, Snohomish**

Result Notes **I checked odorant in both units and checked the equipment to ensure it was calibrated.**

113. Question Result, ID, References **Sat, MO.GO.PURGE.O, 192.629(a) (192.629(b))**
 Question Text *Are lines being purged in accordance with 192.629?*
 Assets Covered **West King, Snohomish**
 Result Notes **This is checked during our DTC inspections.**
114. Question Result, ID, References **Sat, MO.GMOPP.PRESSREGTEST.O, 192.739(a) (192.739(b))**
 Question Text *Are field or bench tests or inspections of regulating stations, pressure limiting stations or relief devices adequate?*
 Assets Covered **West King, Snohomish**
 Result Notes **No issues - see field notes for details.**
115. Question Result, ID, References **Sat, MO.GMOPP.PRESSREGMETER.O, 192.741(a) (192.741(b), 192.741(c))**
 Question Text *Are telemetering or recording gauges properly utilized as required for distribution systems?*
 Assets Covered **West King, Snohomish**
 Result Notes **PSE has done a good job of having chart boxes (and newer RTU units) installed where required. Lee Maxwell provided calibration records for field observed chart boxes as well.**
116. Question Result, ID, References **Sat, MO.GMOPP.MULTIPRESSREG.O,**
 Question Text *Are regulator stations installed in a manner to provide protection between regulator stages?*
 Assets Covered **West King, Snohomish**
 Result Notes **We discussed this in the field with the field pressure control people. The spacing between double cut stations is to prevent against outside force damage and also for performance reasons.**
117. Question Result, ID, References **Sat, MO.GM.DISTVALVEINSPECT.O, 192.747(a) (192.747(b))**
 Question Text *Is proper inspection and partial operation being performed for each distribution system valve that might be required in an emergency, and prompt remedial action to correct any valves found inoperable?*
 Assets Covered **West King, Snohomish**
 Result Notes **I observed the operator perform valve operation during the field inspections for Snohomish and West King County.**
118. Question Result, ID, References **NA, MO.GM.VAULTINSPECT.O, 192.749(a) (192.749(b), 192.749(c), 192.749(d))**
 Question Text *Are vault inspections adequate?*
 Assets Covered **West King, Snohomish**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
119. Question Result, ID, References **Sat, AR.RMP.IGNITION.O, 192.751(a) (192.751(b), 192.751(c))**
 Question Text *Perform observations of selected locations to verify that adequate steps have been taken by the operator to minimize the potential for accidental ignition.*
 Assets Covered **West King, Snohomish**
 Result Notes **Vaults were all CGIed before opening.**
120. Question Result, ID, References **Sat, AR.PTI.PLASTICPRESSURETEST.O,**
 Question Text *Is plastic pipe installed and backfilled prior to pressure testing?*
 Assets Covered **West King, Snohomish**
 Result Notes **We check this during our DTC inspections.**
121. Question Result, ID, References **Sat, AR.PTI.EQUIPCALIB.O,**
 Question Text *Is pressure testing equipment calibrated according to calibration schedules and procedures?*
 Assets Covered **West King, Snohomish**
 Result Notes **This is checked during the field portion of the audit by reviewing records.**

122. Question Result, ID, References **Sat, DC.CO.PLASTICPIPEPROC.O,**
 Question Text *Is plastic pipe handled, stored and installed in accordance with manufacturer's recommendations, including maximum ultraviolet exposure?*
 Assets Covered **West King, Snohomish**
 Result Notes **I checked plastic pipe storage at the Georgetown base.**
123. Question Result, ID, References **Sat, DC.CO.PLASTICWEAKLINK.O,**
 Question Text *Is a weak link installed when pulling plastic pipe by mechanical means?*
 Assets Covered **West King, Snohomish**
 Result Notes **We observe this in DTC inspections throughout the year.**
124. Question Result, ID, References **NA, DC.CO.PLASTICPIPESEP.O,**
 Question Text *Are plastic pipelines installed with the minimum separation from other utilities as required?*
 Assets Covered **West King, Snohomish**
 Result Notes **We observe this in DTC inspections throughout the year.**
125. Question Result, ID, References **Sat, DC.CO.PLASTICBACKFILL.O,**
 Question Text *Is plastic pipe buried in essentially rock-free material or material recommended by the pipe manufacturer?*
 Assets Covered **West King, Snohomish**
 Result Notes **We observe this in DTC inspections throughout the year.**
126. Question Result, ID, References **Sat, DC.CO.PLASTICSQUEEZING.O,**
 Question Text *Is the number of times plastic pipe can be squeezed and how far from fittings plastic pipe can be squeezed limited?*
 Assets Covered **West King, Snohomish**
 Result Notes **We observe this in DTC inspections throughout the year. This is also a "P" question and in the O&M review question set.**
127. Question Result, ID, References **Sat, MO.GM.ONSITEPROCS.O,**
 Question Text *Are procedures applicable to the work being done located onsite where the work is being done?*
 Assets Covered **West King, Snohomish**
 Result Notes **Procedures are always available on site.**

ATT1FR.FIELDPCS: Compressor Stations Inspection (Field)

128. Question Result, ID, References **Sat, MO.RW.ROWMARKER.O, 192.707(a) (192.707(b), 192.707(d), CGA Best Practices, v4.0, Practice 2-5, CGA Best Practices, v4.0, Practice 4-20)** (also presented in: FR.FIELDPIPE)
 Question Text *Are line markers placed and maintained as required?*
 Assets Covered **West King, Snohomish**
 Result Notes **I did not note any deficiencies in the pre-field or field inspection.**
129. Question Result, ID, References **Sat, MO.RW.ROWMARKERABOVE.O, 192.707(c) (CGA Best Practices, v4.0, Practice 2-5, CGA Best Practices, v4.0, Practice 4-20)** (also presented in: FR.FIELDPIPE)
 Question Text *Are line markers placed and maintained as required for above ground pipelines?*
 Assets Covered **West King, Snohomish**
 Result Notes **Bridge crossings were all well marked.**
130. Question Result, ID, References **Sat, TD.ATM.ATMCORRODEINSP.O, 192.481(b) (192.481(c), 192.479(a), 192.479(b), 192.479(c))** (also presented in: FR.FIELDPIPE)
 Question Text *Is pipe that is exposed to atmospheric corrosion protected?*
 Assets Covered **West King, Snohomish**

GDIM.IMPL: GDIM Implementation

131. Question Result, ID, References **Sat, GDIM.RR.MECHANICALFITTINGDATAIMPL.R, 192.1009 (191.12)** (also presented in: PRR.REPORT)
Question Text *Have accurate records been maintained documenting mechanical fitting failures that resulted in hazardous leaks?*
Assets Covered **West King, Snohomish**
Result Notes **PSE reports this annually. They keep the failed components stored at the South King base.**

MISCTOPICS.PUBAWARE: Public Awareness Program Effectiveness

132. Question Result, ID, References **Sat, EP.ERG.LIAISON.R, 192.605(a) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), 192.616(c), ADB-05-03)** (also presented in: PRR.OM)
Question Text *Do records indicate liaisons established and maintained with appropriate fire, police and other public officials and utility owners in accordance with procedures?*
Assets Covered **West King, Snohomish**
Result Notes **PSE sent 142 emails with 129 delivered to FRs. 162 (opened emails) on 9/27/2017 were sent to public works. They also send an email to public officials. For every jurisdiction, they send to a city manager, mayor, and public works per Charlie Gadzik.**
133. Question Result, ID, References **Sat, PD.PA.EVALEFFECTIVENESS.R, 192.616(c) (API RP 1162 Section 8.4)** (also presented in: PRR.OM)
Question Text *Have effectiveness evaluation(s) of the program been performed for all stakeholder groups in all notification areas along all systems covered by the program?*
Assets Covered **West King, Snohomish**
Result Notes **They send out a survey to FRs in 2017 and they provided a list of 201 parties to contact. 39 phone interviews were obtained and metrics contained awareness of info on markers, NPMS, emergency contact awareness, .etc.**

They did this with FRs, Excavators, Public Officials, and the public. They conducted an online survey for the public. They had about ~400 public responses.

They are using building permits to check for effectiveness. Damage prevention per /1000 tickets is the enhanced metric they use.
134. Question Result, ID, References **Sat, PD.PA.LANGUAGE.R, 192.616(g) (API RP 1162 Section 2.3.1)** (also presented in: PRR.OM)
Question Text *Were materials and messages developed and delivered in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?*
Assets Covered **West King, Snohomish**
Result Notes **PSE provides information in other languages throughout its service area.**
135. Question Result, ID, References **NA, PD.PA.MSTRMETER.R, 192.616(j) (192.616(h), API RP 1162 Section 2.7 (Step 12), API RP 1162 Section 8.5)** (also presented in: PRR.OM)
Question Text *Do records indicate the public awareness program for a master meter or petroleum gas system operator has met the requirements of Part 192?*
Assets Covered **West King, Snohomish**
Result Notes **No such relevant facilities/equipment existed in the scope of inspection review. PSE is not a master meter.**

Report Parameters: Results: all

Inspection documentation, including completed protocol forms, summary reports, executive summary reports, and enforcement documentation are for internal use only by federal or state pipeline safety regulators. Some inspection documentation may contain information which the operator considers to be confidential. In addition, supplemental inspection guidance and related documents in the file library are also for internal use only by federal or state pipeline safety regulators (with the exception of documents published in the federal register, such as advisory bulletins). Do not distribute or otherwise disclose such material outside of the state or federal pipeline regulatory

organizations. Requests for such information from other government organizations (including, but not limited to, NTSB, GAO, IG, or Congressional Staff) should be referred to PHMSA Headquarters Management.