



Puget Sound Energy
P.O. Box 97034
Bellevue, WA 98009-9734
PSE.com

August 5, 2020

Sean Mayo
Pipeline Safety Director
Washington Utilities and Transportation Commission
Pipeline Safety Section
621 Woodland Square Loop S.E.
Lacey, WA 98503

RE: 2020 Liquefied Natural Gas Standard Inspection – Gig Harbor LNG Peak Shaving Plant – (Insp. No. 8043)

Dear Mr. Mayo:

PSE received and reviewed your letter dated June 26 regarding the 2020 Gig Harbor LNG Plant audit, and pursuant to your request is submitting the following written response to the area of concern identified.

Area of Concern

49 CFR §193.2509 Emergency Procedures

(3) Coordinating with appropriate local officials in preparation of an emergency evacuation plan, which sets forth the steps required to protect the public in the event of an emergency, including catastrophic failure of an LNG storage tank.

Findings:

PSE sends an electronic copy of their revised Emergency Operations Plan to local fire departments (City of Gig Harbor and Pierce County) after the two-year review and subsequent revisions. However, they do not keep a record of this transmittal (the fire department had a record). It was suggested to PSE that they should keep a record of this transmittal as it pertains to coordination with local first responders.

PSE Response:

During the inspection of the Gig Harbor LNG plant, PSE provided to the inspector its copy of the 2019 electronic transmittal of the Emergency Operations Plan (EOP) that the company had shared with the Gig Harbor Fire & Medic One District, which is the district that handles training for both Gig Harbor and Pierce county fire departments. However, to show evidence of the 2017 submittal, PSE had to obtain a copy of the transmittal from the Gig Harbor Fire & Medic One District. Moving forward, PSE will retain the electronic record each time the EOP is shared with the fire departments. To document this, PSE will update the EOP by November 1, 2020 to add a requirement to retain a record of the electronic transmittal. This date aligns with a previously planned review schedule for the manual.

We trust the information provided is responsive to the findings of the UTC inspection. PSE is committed to constructing, operating, and maintaining a safe gas pipeline system.

Sincerely,

DocuSigned by:



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Booga K. Gilbertson

Sr. Vice President, Operations

Cc: Cara Peterman, Director Compliance
Kaaren Daugherty, Manger Compliance and Quality Management
Harry Shapiro, Director Gas Operations
Duane Henderson, Manger Gas System Integrity