



Coalition of Eastside Neighborhoods
for Sensible Energy

August 3, 2020

David Danner, UTC Chairman
Ann Rendahl, UTC Commissioner
Jay Balasbas, UTC Commissioner
PO Box 47250
Olympia, WA 98504-7250

Re: High-voltage discharge incident near hazardous pipeline

Dear Commissioners,

In accordance with Washington Administrative Code 480-07-910, CENSE, a non-profit citizen organization representing more than 1,300 residents of Eastside cities including Bellevue, Newcastle, Renton, and Redmond, wishes to file an informal complaint against Puget Sound Energy (PSE). Our complaint also raises safety and reporting questions for the Olympic Pipeline Company (OPL).

In short, PSE's inadequate vegetation management practices have led to several high-voltage discharges close to Olympic's high-pressure fuel pipeline, posing grave danger to residents living nearby. In most cases, property and trees were set on fire. OPL has not been consistently notified of these incidents. For its part, OPL does not share relevant information about the risk the transmission lines pose or how emergency response would work. As a result, the danger of harmful accidents has not diminished.

Afternoon explosion

At approximately 4:30 pm on July 20, 2020, PSE's transmission lines discharged into nearby trees that had not been trimmed by the company since 2018 (according to PSE). The explosive shockwave rattled homes up to half a mile away. Twenty-eight alarmed neighbors called 9-1-1, and the Bellevue Fire Department showed up about ten minutes later to extinguish three trees and a fence that had been ignited by the arcing electricity. One of the trees was only a few yards from a nearby house. Fortunately, no one was injured in the incident.

Although the fire was a significant concern, the proximity of the discharged electricity to the pipeline significantly compounds the danger. As described in a 2015 study by the safety consultant DNV-GL, high-voltage discharges into a pipeline can cause damage to the protective coating, pitting of the pipe wall, cracking, and even "burn-through."¹



A burned tree near a Bellevue home after the 7/20 incident

¹ <https://www.ingaa.org/File.aspx?id=24732>, p. 19

Concerned about possible damage to the pipeline, CENSE president Don Marsh called OPL shortly after the incident to get an update on the company’s response. Marsh learned that pipeline operators had not been notified of the incident by PSE or the Bellevue Fire Department. Shortly after Marsh’s call, OPL shut down the entire 300-mile pipeline until pipeline integrity checks could be completed.

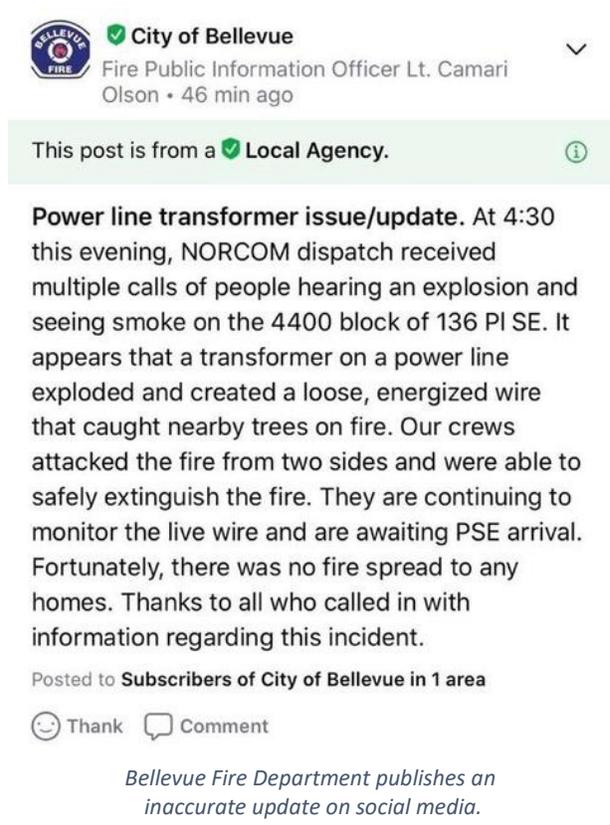
PSE also failed to provide the Bellevue Fire Department with accurate information. The Fire Department published the information shown on the right to a social media site. This post is not accurate in significant details. First, there was no transformer explosion. Second, there was no loose wire. Third, PSE has stated the whole circuit was de-energized within seconds of the discharge by an automated response.

Lack of communication and coordination during an emergency can lead to delayed or inappropriate responses that jeopardize public safety. For example, if the Fire Department believes there is a live high-voltage wire in the vicinity, dispersal of water may be delayed to prevent electricity from running through the stream and electrocuting the fire crew.

Both PSE and the Bellevue Fire Department failed to notify OPL of the incident. According to current protocol, a “courtesy call” to OPL is optional unless a leak or damage to the pipeline is evident. OPL’s strong response to a citizen call demonstrates appropriate caution. Electricity can damage a pipeline in ways that may not be obvious to non-experts. To conduct an integrity check, professionals use specialized equipment to measure the electromagnetic response of the pipeline. But this only happens if proper notification has been received by OPL.

The week after the incident, PSE representative David Hoffman presented the company’s account of the incident to the Bellevue City Council. Mr. Hoffman blamed overgrown ivy for the unexpected discharge. However, ivy does not grow taller than trees in this part of the Somerset neighborhood. If this were a credible threat, PSE should have trimmed the overgrown vegetation before it caused an incident. In fact, neighbors had asked PSE to trim the trees not long before the incident occurred, but PSE refused.

These facts demonstrate inadequate maintenance, lack of communication and coordination during and after a dangerous incident, and lack of accountability and transparency in subsequent reporting. Residents of Bellevue and the other Eastside cities ask the UTC to remedy these shortcomings through stronger regulations and enforcement. These are issues affecting each of the four cities through which this utility corridor passes, and therefore oversight at the state level is appropriate. Since the UTC regulates both pipelines and transmission lines in the state of Washington, the Commission is the appropriate authority to act on these matters.



A troubling pattern

The most recent discharge incident is not an isolated incident. We are aware of several similar incidents over the last 15 years, but there may be others.

In May 2006, a high-voltage line fell to the ground in the same utility corridor, less than a mile from the most recent incident. The electricity set fire to a tree and arced into the Olympic pipeline. When OPL investigated, it found the pipe was damaged and had to be replaced. The homeowner took this photo as the pipeline was excavated in his backyard:



In November 2014, a similar incident happened in the Bridle Trails neighborhood in North Bellevue. A windstorm caused swinging wires to contact a tree, which was set ablaze. The heat from the fire melted the transmission line, which fell to the ground. Electricity was discharged into a sprinkler system, running to the nearby house, where it burned wiring and exploded several appliances. In that incident, the pipeline was close by, but the neighbors do not recall a safety investigation afterwards. PSE did not tell the Bellevue City Council about the incident during a storm report at a subsequent council meeting.

In each of these incidents, damage to the pipeline was possible. In one case, damage was found and fixed. In the latest case, integrity checks were performed, but OPL provided little information other than "all clear." An OPL representative was absent from the city council presentation regarding the incident.

It only takes one breach to inflict catastrophic property damage and possible fatalities in our community. The community seeks assurance that safety protocols are adequate, that they will be followed, that emergency responses will be coordinated, lessons will be incorporated to alleviate future problems, and the public will have transparent access to investigations of incidents and any remedies that are adopted. The UTC should provide the necessary regulations and oversight.

Community concerns

PSE's power lines and OPL's pipelines operate in a relatively narrow corridor (in some cases, less than 100 feet wide) that passes close to homes, schools, and parks in our community. In Bellevue, OPL's pipeline passes less than 200 feet from Tyee Middle School. This close proximity to hundreds of schoolchildren would be illegal in California, which requires separation of no less than 1,500 feet between schools and hazardous liquid pipelines.² PSE's 115 kV transmission lines pass within 40 feet of the school, less than half the distance required under California code.³ Washington has no equivalent safety codes, making vigilance and careful coordination essential to protect the safety of our communities and our children.

OPL's dual pipelines are more than 50 years old and continue to transport 13 million gallons of hazardous liquid fuel, including jet fuel and gasoline, through Eastside neighborhoods daily. PSE operates high-voltage transmission lines in the same corridor, carrying electricity that serves both local and interstate customers.

On July 27, the Bellevue City Council invited representatives from PSE, OPL, and the Bellevue Fire Department to report on the incident and response. PSE gave a confusing explanation of the cause, and the OPL representative did not show up. The community received neither clarity nor comfort.

Questions

CENSE asks the Commission to investigate these incidents and answer the following questions.

1. What obligation does PSE have to notify OPL of high-voltage discharges in the shared utility corridor? Do these requirements need to be strengthened?
2. What obligation does PSE have to provide timely notice and accurate updates to local fire departments following high-voltage discharges within the department's jurisdiction?
3. Given the extreme consequences of a pipeline breach, as demonstrated by the 1999 Bellingham explosion, what obligation does OPL have to provide quick, effective emergency response? In other words, how long might a neighborhood burn before a pipeline fire can be extinguished? Does the UTC enforce any response requirements?
4. WAC 480-75-260.3 requires OPL to notify the UTC of any emergency shutdown of the company's pipeline. The 7/20 incident does not appear to have been reported, even though the entire pipeline was shut down out of caution. Is this a code violation?
5. WAC 480-75-660 requires OPL to submit a copy of its procedural manual for operations, maintenance, and emergencies to the Commission. Can we obtain a copy of this manual?
6. PSE proposes to undertake a major construction project ("Energize Eastside") within feet of these half-century-old pipelines. The EIS for the project evaluates a generic "pool fire" incident that does not accurately model the hilly terrain traversed by the corridor. Of even greater concern, no additional emergency resources or risk management appear to be required during construction, even though an accident could be "catastrophic." Are more stringent regulations and enforcement needed to protect the public?

² <https://www.cde.ca.gov/ls/fa/sf/title5regs.asp>, Article 2, section 14010(h)

³ *Ibid.*, Article 2, section 14010(c)

Remedies

CENSE asks the Commission for the following remedies:

1. Conduct a thorough and transparent investigation of this latest incident to assure the public that proper communication, coordination, and response are being provided to protect public safety.
2. Require a joint safety plan from PSE, OPL, and local authorities that enables the public to understand what improvements the companies and the cities will pursue to enhance safety of this hazardous infrastructure during the next two decades. The safety plan should be updated every five years to address developing needs and technology advancements.
3. Require a detailed incident report from PSE, OPL, and the affected jurisdiction whenever a potentially dangerous incident occurs involving one or both energy facilities. Establish a reasonable deadline for disclosure of the report to the public.

PSE and OPL have incentives to minimize or ignore incidents that occur during operation of their facilities. We are grateful for the Commission's diligence in protecting the public from these dangers.

Sincerely,



Don Marsh, President
CENSE.org

Cc: Bellevue City Council
Newcastle City Council
Renton City Council
Redmond City Council
East Bellevue Community Council
King County Council
Jay Inslee, Governor
Bob Ferguson, Washington State Attorney General
Lisa Gafken, Washington State Public Counsel
Lisa Wellman, Washington State Senator
Patty Kuderer, Washington State Senator
Bob Hasegawa, Washington State Senator
Mary E. Kipp, CEO, Puget Sound Energy
Steven W. Hooper, Chairperson, Puget Energy Board of Directors
Bernard Looney, CEO, BP
Douglas Nilsen, Asset Manager, BP
Francisco Brito, President, Somerset Community Association
Lynne Prevette, President, Olympus Homeowners Association
Karin L. Morgan and Laura Polt, Co-Presidents, Bridle Trails Community Club
Gary Kline, President, Sunset Community Association
Mindy Garner, President Lake Hills Neighborhood Association
Ann Brashear, President, Newport Hills Community Club