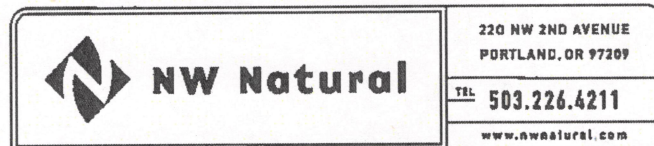


J.R. Gonzalez, P.E.
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August 23, 2017

Mr. Sean Mayo
Pipeline Safety Director
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive SW
P. O. Box 47250
Olympia, Washington 98504-7250

RECEIVED
State of Washington
AUG 23 2017
UTC
Pipeline Safety Program

Subject: Response to NW Natural Transmission Inspection 7250

Dear Mr. Mayo:

Inspection Finding:

Area of concern:

49 CFR 192.3 Definitions

Transmission line means a pipeline, other than a gathering line, that:
(1) *Transports gas from a gathering line or storage facility to a distribution center, storage facility, or large volume customer that is not down-stream from a distribution center;*
(2) *Operates at a hoop stress of 20 percent or more of SMYS; or*
(3) *Transports gas within a storage field.*

Finding(s):

There are two segments of pipe which staff believe should be classified as Transmission lines in accordance with Title 49 CFR § 192.3.

The first segment believed to be a transmission line is at the Hood River Meter Station in White Salmon, Washington. The pipeline transports gas from the Northwest Pipeline LLC (Williams) transmission line to Williams' transmission line which crosses the Columbia River. This pipeline should be classified as transmission because it is transporting gas from a storage facility to a storage facility. This pipeline should also be classified as an interstate pipeline because it receives and continues interstate transportation of gas between Washington and Oregon.

The second segment believed to be a transmission line is the segment that crosses Lacamas Lake in Camas, Washington. Although the segment is not operating at a hoop stress of 20 percent or more of SMYS, it is used to continue transportation of gas from a NWN transmission line and deliver to a NWN transmission line, eventually feeding a NWN distribution center. NWN classifies this line as high pressure distribution due to hoop stress of less than 20 percent of SMYS, but does not consider the functional definition of transmission line, which defines a transmission line as a line that transports gas from a storage facility to a gas distribution center. This line segment accepts and delivers gas to a transmission line. Functionally, this segment acts like (and is) a transmission line

NW Natural Response:

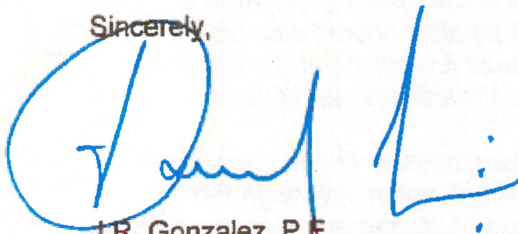
The first pipeline segment referenced in Staff's findings is a short section of pipeline used to facilitate the process of odorizing natural gas that is supplied to NW Natural by NW Pipeline LLC at a facility located in the state of Washington. All of the odorized gas is supplied to end users in NW Natural's service territory in the state of Oregon.

In agreement with Northwest Pipeline LLC, NW Natural will be selling this section of pipe to Northwest Pipeline LLC. This will remove requirements of NW Natural to classify this segment of pipe as transmission main, as well classification as an interstate pipeline. Details are given in the attached Letter of Intent.

Secondly, upon request by the WUTC, the pipeline segment which crosses Lacamas Lake will be classified and maintained as transmission main, effective September 1, 2017.

NW Natural's interpretation of the definition of transmission pipeline has consistently been based on a pipeline operating at a hoop stress of 20 percent or more of SMYS, and maintained accordingly. This particular segment of 8" pipe has historically been classified by NW Natural as high pressure distribution main with a SMYS calculation of 18.75%. Because of its short length and the physical location adjoining two segments of transmission main (SMYS of 20% or greater), it has been treated as if it were a transmission main with respect to integrity assessments and all surveys and patrols. Moving forward, NW Natural will continue to operate and maintain this 107-foot long section 8" pipe as transmission, update GIS records, and include its length in future PHMSA Natural Gas Transmission Annual Reports.

Sincerely,



J.R. Gonzalez, P.E.
Manager, Code Compliance

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