



STATE OF WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION

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*Sent via email*

April 19, 2021

Jon G. Huddleston  
Vice President of Engineering and Utility Operations  
Northwest Natural  
250 Southwest Taylor Street  
Portland, Oregon 97204

**RE: 2021 Natural Gas Standard Comprehensive – Northwest Natural – Clark (Insp. No. 8280)**

Dear Mr. Huddleston:

Staff from the Washington Utilities and Transportation Commission (staff) conducted a standard inspection of Northwest Natural (NWN), Clark County from March 1, 2021 to March 23, 2021. This inspection included a records review and inspection of the pipeline facilities.

Our inspection indicates two probable violation(s) as noted in the enclosed report. We also noted two areas of concern, which unless corrected, could potentially lead to future violation of state and/or federal pipeline safety rules.

**Your response needed**

Please review the attached report and respond in writing by May 21, 2021. The response should include how and when you plan to bring the probable violations into full compliance.

**What happens after you respond to this letter?**

The attached report presents staff's decision on probable violations and does not constitute a finding of violation by the commission at this time.

After you respond in writing to this letter, there are several possible actions the commission, in its discretion, may take with respect to this matter. For example, the commission may:

- Issue an administrative penalty under [RCW 81.04.405](#); or
- Issue a complaint under [RCW 81.88.040](#), seeking monetary penalties, changes in the company's practices, or other relief authorized by law, and justified by the circumstances. Any pipeline company that violates any pipeline safety provision of any commission order, or any rule in this chapter including those rules adopted by reference, or chapter

81.88 RCW is subject to a civil penalty not to exceed \$222,504 for each violation for each day that the violation persists. The maximum civil penalty for a related series of violations is \$2,225,034; or

- Consider the matter resolved without further commission action.

We have not yet decided whether to pursue a penalty or complaint in this matter. Should the commission decide to assess a penalty or initiate a complaint, your company will have an opportunity to respond and formally present its position.

If you have any questions or if we may be of any assistance, please contact Dave Cullom at (360) 489-8684. Please refer to the subject matter described above in any future correspondence pertaining to this inspection.

Sincerely,

Sean C. Mayo  
Pipeline Safety Director

Enclosure

**UTILITIES AND TRANSPORTATION COMMISSION**  
**2021 Natural Gas Pipeline Safety Inspection**  
**Northwest Natural – Clark County**

The following probable violation(s) and areas of concern of WAC 480-93 were noted as a result of the 2021 inspection of the Northwest Natural Clark County unit. The inspection included a random selection of records, operation and maintenance (O&M), emergency response, inventory, and field inspection of the pipeline facilities.

**PROBABLE VIOLATIONS**

1. **WAC 480-93-188 Gas Leak Surveys**

*(3) Each gas pipeline company must conduct gas leak surveys according to the following minimum frequencies:*

*(a) Business districts - At least once annually, but not to exceed fifteen months between surveys. All mains in the right of way adjoining a business district must be included in the survey;*

**Finding(s):**

Business district leak surveys are not being conducted in all areas that they are required to be performed.

2. **WAC 480-93-170 Tests and Reports for Gas Pipelines**

*(7) Each gas pipeline company must keep records of all pressure tests performed for the life of the pipeline and must document the following information:*

*(a) Gas pipeline company's name;*

*(b) Employee's name;*

*(c) Test medium used;*

*(d) Test pressure;*

*(e) Test duration;*

*(f) Line pipe size and length;*

*(g) Dates and times; and*

*(h) Test results.*

**Finding(s):**

Pressure test records were verified and indicated all necessary information as required by WAC 480-93-170(7) for larger construction project records reviewed during this inspection. However, pressure test records for service line installations reviewed did not contain a location on the form to store test medium used or if the test passed or failed in all cases. The items missing from the service line sample test records were:

- (c) Test medium used;
- (h) Test results.

### **AREAS OF CONCERN**

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

*(5) Each gas pipeline company must conduct inspections or tests for electrical isolation between metallic pipeline casings and metallic pipelines at least once annually, but not to exceed fifteen months between inspections or tests. The test or inspection must also determine whether the pipeline has adequate levels of cathodic protection at the casing to pipeline interface. These requirements do not apply to unprotected copper inserted in ferrous pipe.*

*(b) Whenever electrical isolation tests or inspections indicate that a possible shorted condition exists between a casing and a pipeline, the gas pipeline company must conduct a follow-up test within ninety days to determine whether an actual short exists. The gas pipeline company's procedures manual must have a level or threshold that would indicate a potential shorted condition and must also detail the method of determining whether the casing is actually shorted to the pipeline.*

*(c) The gas pipeline company must clear the shorted condition where practical.*

*(d) Whenever a short exists between a line pipe and casing, the gas pipeline company must perform a leak survey within ninety days of discovery and at least twice annually thereafter, but not to exceed seven and one-half months between leak surveys until the shorted condition is eliminated.*

#### **Finding(s):**

During the field portion of the inspection, a casing did not meet the operator's minimum isolation criteria of 200mV from the carrier pipe to casing during a field cathodic protection test. The operator did create a work order to document this finding and perform follow up testing. Documentation of work completed to resolve this condition as well as follow up leak survey records are necessary to verify this finding has been remedied.

#### **2. WAC 480-93-124 Pipeline markers.**

*(1) Each gas pipeline company must place pipeline markers at the following locations:*

*(f) Over mains located in Class 1 and 2 locations;*

#### **Finding(s):**

Observations during the course of this inspection indicated that the operator's manual states that markers are not required for gas lines that fall within the Urban Growth Area (UGA) because they are considered Class 3 or 4 locations and do not require pipeline marking per 192.707(b)(2). The operator did provide a map containing the UGA and

with their pipeline system on it for review, but it did not contain class location information. This practice could result in mains located in Class 1 or 2 locations that also fall within the UGA not being properly marked, presenting a conflict with WAC 480-93-124.