



June 16, 2022

Washington Utilities and Transportation Commission
621 Woodland Square Loop S.E.
Lacey, Washington 98504-7250

Subject: 2022 Biogas Gas Transmission Standard Comprehensive – Klickitat Public Utilities District – (Insp. No. 8434)

Dear Sean C. Mayo,

I am respectfully responding to your letter dated June 2, 2022, in which you requested notification that all violations had been corrected for Insp. No. 8434. Klickitat Public Utilities District is submitting this letter in response to the following alleged violations:

Item #1: 49 CFR §192.615(b)(2) Emergency Plans

Each Operator shall train the appropriate operating personnel to assure that they are knowledgeable of the emergency procedures and verify that the training is effective.

Finding(s):

KPUD could not provide a record that the training had been completed. KPUD O&M manual states the training will be done annually and KPUD staff said the training had been done but could not provide attendance sheets.

KPUD Response: KPUD has conducted a recent training of emergency procedures with applicable personnel. Moving forward this will be done on an annual basis. Please see supporting documentation attached.

Item #2: 49 CFR §191.29(b) National Pipeline Mapping System

The information required in paragraph (a) of this section must be submitted each year, on or before March 15, representing assets as of December 31 of the previous year. If no changes have occurred since the previous year's submission, the operator must comply with the guidance provided in the NPMS Operator Standards manual available at www.npms.phmsa.dot.gov or contact the PHMSA Geographic Information Systems Manager at (202) 366-4595.

Finding(s):

KPUD could not provide a record that the 2019 NPMS submission was completed. 2018, 2020, and 2021 had been submitted. Also, none of the reports were sent in by March 15th.

KPUD Response: KPUD will ensure all NPMS filings are submitted on or before the due date moving forward.



Renewable Natural Gas

Item #3: WAC 480-93-200(10)(a) Reporting Requirements

Each gas pipeline company must file with the commission the following annual reports no later than March 15 for the preceding calendar year: A copy of every Pipeline and Hazardous Materials Safety Administration (PHMSA) F-7100.1-1 and F-7100.2-1 annual report required by U.S. Department of Transportation, Office of Pipeline Safety.

Finding(s):

KPUD did not submit the 2022, CY 2021 annual report by March 15, the report was submitted on March 30, 2022. Annual reports in the previous years were submitted on time.

KPUD Response: KPUD will ensure all Annual Reports are submitted on or before the due date moving forward.

Item #4: WAC 480-93-200(10)(b) Reporting Requirements

Each gas pipeline company must file with the commission the following annual reports no later than March 15 for the preceding calendar year: A report detailing all construction defects and material failures resulting in leakage. Each gas pipeline company must categorize the different types of construction defects and material failures anticipated for their system.

Finding(s):

KPUD could not provide a record of the construction defects and material failures report for 2019. 2020-2022 were submitted on time.

KPUD Response: KPUD will ensure the construction defects and material failures report is submitted on or before the due date moving forward.

KPUD is committed to full compliance with the requirements of PHMSA and the UTC. I appreciate your consideration in this matter. Please let me know if you have any questions or require additional information.

Sincerely,



Jim Smith
General Manager
Klickitat Public Utilities District

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