



U.S. Department  
of Transportation  
  
Pipeline and Hazardous  
Materials Safety  
Administration

1200 New Jersey Avenue, SE  
Washington, D.C. 20590

October 17, 2019

FedEx Delivery

Mr. David W. Danner  
Chairman  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop SE  
Lacey, WA 98503

Dear Chairman Danner:

On August 26-30, 2019 and September 16-20, 2019, the Pipeline and Hazardous Materials Safety Administration (PHMSA) conducted an evaluation of the pipeline safety program activities carried out by the Washington Utilities and Transportation Commission (WUTC) in Calendar Year (CY) 2018. This evaluation included a review of annual Progress Report documents and pipeline program procedures and records, as well as observation of an on-site pipeline operator inspection by WUTC staff.

PHMSA conducted our evaluation pursuant to Sections 60105(e) and 60106(d) of Title 49 of the United States Code, which authorizes PHMSA to monitor State pipeline safety programs. This annual evaluation is designed to ensure compliance with the Pipeline Safety Act requirements and to provide information that will allow PHMSA to determine the State's total pipeline safety grant score for the upcoming year.

PHMSA assesses the overall performance of a State's pipeline safety program by scoring information contained in the pipeline safety program Progress Report and by conducting a Program Evaluation. Detailed results are below:

**I. Progress Report Review**

For CY 2018, the WUTC Gas and Hazardous Liquid Pipeline Safety Programs both scored 50 out of a possible 50 points.

**II. Program Evaluation Review**

For CY 2018, the WUTC Gas Safety Program scored 115 out of a possible 115 points and the Hazardous Liquid Program scored 114 out of a possible 114 points.

The State Inspection Calculation Tool (SICT) determines the total number of inspection days a State pipeline safety program must complete in a given year. Per the SICT, the WUTC must perform 408 inspection days in CY 2019 for the Gas program and 85 inspection days for the Hazardous Liquid Program. Pipeline safety inspections are one of the most critical components of the program. If you have any questions, please contact Supervisor Grants Management Specialist Rex Evans at [rex.evans@dot.gov](mailto:rex.evans@dot.gov).

As you may be aware, PHMSA and the National Association of Pipeline Safety Representatives (NAPSR) developed a set of performance metrics that are available to the public on PHMSA's stakeholder communication website, <http://primis.phmsa.dot.gov/comm/states.htm>. These metrics relate to the State's leak management, incident investigations, and damage prevention program, as well as its inspector qualification, inspection, and enforcement activities. PHMSA expects each State pipeline safety program to review these metrics and take action, as necessary, to continuously improve performance trends, thereby supporting enhanced pipeline safety.

PHMSA appreciates WUTC's support of its employees' contributions to pipeline safety. We appreciate the work of these employees in particular:

- Mr. Joe Subsits, who serves as Chair of NAPSR Liaison Committee and PHMSA's Voluntary Information-sharing Working Group, participates on the Pipeline Safety Trust Public Engagement Work Group and the NAPSR Compendium Task Team.
- Mr. Sean Mayo's continued work on the Operator Qualification Integrity Program Working Group.
- Mr. Anthony Dorrough's participation on the American Petroleum Institute's Public Awareness Program Task Group.

Thank you for the continuing support of the pipeline safety program. A response to this letter is not necessary; however, your comments are appreciated. If you have comments send them to me at 3700 S. MacArthur Blvd., Suite B, Oklahoma City, Oklahoma 73179-7612.

Sincerely,



Zach Barrett  
Director, State Programs

cc: Mr. Sean Mayo, WUTC Director, Pipeline Safety  
Mr. Glynn Blanton, PHMSA, PHP-50 State Programs  
Mr. Dustin Hubbard, PHMSA, PHP-500 Western Region Division