



U.S. Department  
Of Transportation

**Pipeline and Hazardous Materials  
Safety Administration**

1200 New Jersey Ave., SE  
Washington, DC 20590

November 4, 2015

**OVERNIGHT EXPRESS MAIL**

Mr. David W. Danner  
Chairman  
Washington Utilities and Transportation Commission  
1300 South Evergreen Park Drive, SW  
P.O. Box 47250  
Olympia, WA 98502

Dear Chairman Danner:

Sections 60105(e) and 60106(d) of the Pipeline Safety, Regulatory Certainty, and Job Creation Act of 2011 (Act) provide for the monitoring of State pipeline safety programs by the Pipeline and Hazardous Materials Safety Administration (PHMSA). This annual monitoring is to ensure compliance with the Act's requirements for State pipeline safety programs and provides information for determining the State's total point award for the PHMSA pipeline safety grant for next year.

July 6-10, 2015, and September 21-25, 2015, a representative of PHMSA's Office of State Programs evaluated the CY 2014 Pipeline Safety program activities of the natural gas and hazardous liquid program, conducted by the Washington Utilities and Transportation Commission (WUTC). The evaluation encompassed the validation of annual Progress Report documents submitted to PHMSA, review of the pipeline program procedures and records, and the observation of an on-site inspection of a pipeline operator conducted by your staff. Thank you for the courtesies extended to Mr. Michael Thompson PHMSA State Programs, by your staff.

PHMSA appreciates the contributions to pipeline safety by Mr. David Lykken who served as the 2014 National Vice Chairman for the National Association of Pipeline Safety Representatives (NAPSR) along with the many other task groups Mr. Lykken served on. We also appreciate the work of Mr. Joe Subsits who has also served on various NAPSR committees. These efforts are extremely important in accomplishing our mutual goal of pipeline safety.

Based on the evaluation and the validation of Progress Report information, it appears the pipeline safety program is generally complying with PHMSA's requirements. If an item has not been corrected from the previous evaluation it will result in a loss of grant funding. As a result of this evaluation, I would like to bring the following items to your attention:

1. The Progress Report review has a possible score of 50 points. The WUTC's resulting scores for the CY 2014 Natural Gas and Hazardous Liquid Progress Reports were 50 points each.
2. During the evaluation review, we were very pleased to see Mr. Alan Rathbun who was recently named to replace Mr. Lykken as the Director of Pipeline Safety for the WUTC in attendance. Mr. Rathbun's experience and knowledge should make this transition of leadership move very smoothly. Please feel free to reach out to us in PHMSA State Programs for any help you might need.
3. In Part A of the Program Evaluation the accuracy of compliance actions reported in Attachment 5 of the Progress Report are verified. The WUTC claimed zero compliance actions on Attachment 5 of both the natural gas and hazardous liquids program's Progress Reports. Upon a review of the records the WUTC had actually sent out 12 compliance action letters to natural gas operators and 2 compliance action letters to hazardous liquid operators in CY 2014. One half (0.5) point, was deducted from both the natural gas and hazardous liquids programs for this issue.
4. In Part C of the Program Evaluation the WUTC failed to verify all inspectors obtained the minimum qualifications to lead applicable inspections. An inspector was assigned as lead on (4) Standard Inspections and (7) Operator Qualification (OQ) inspections before completing the required training. Qualified inspectors were in attendance at all the Standard Inspections and all but (3) of the OQ inspections. One point was deducted from the natural gas program for allowing an inspector to lead an OQ inspection prior to completing the OQ required training.

Please provide your comments regarding the above items 3 and 4 within 60 days of your receipt of this letter to avoid losing performance points in next year's evaluation. The response should be addressed to me at the following address: 3700 S. MacArthur Blvd, Suite B, Oklahoma City, OK 73179-7612. Thank you for your contributions and continuing support of the pipeline safety program.

Sincerely,



Zach Barrett  
Director for State Programs  
Office of Pipeline Safety

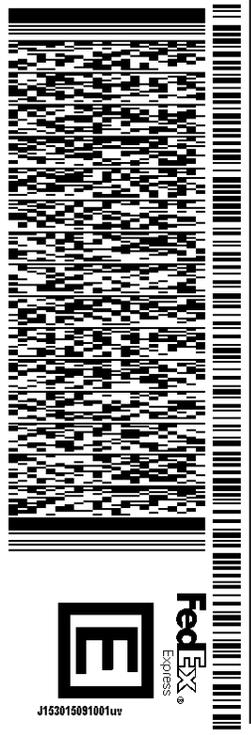
cc: Alan Rathbun, Pipeline Safety Director  
Chris Hoidal, Western Region Director, PHMSA PHP-500  
Michael Thompson, PHMSA PHP-50

ORIGIN ID:XSMA (202) 366-4595  
ROBIN POWELL  
DOI  
1200 NEW JERSEY AVENUE, SE  
E22-204  
WASHINGTON, DC 20390  
UNITED STATES US

SHIP DATE: 04NOV15  
ACTWGT: 0.50 LB  
CAD: 108208986/NET3670  
BILL SENDER

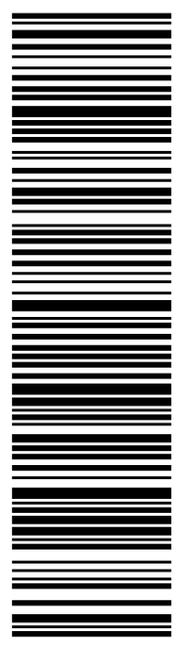
TO DAVID DANNER  
WASHINGTON UTILITIES COMMISSION  
1300 SOUTH EVERGREEN PARK DRIVE, SW  
P.O. BOX 47250  
OLYMPIA WA 98502  
(202) 366-4595  
REF: DCHQ465 P=0DTPH5615 F=00023  
PO. DEPT

539J23F56/31D0



TRK# 7749 0079 5370  
0201  
THU - 05 NOV 4:30P  
STANDARD OVERNIGHT  
ASR

XH OLMA  
98502  
SEA  
WA-US



**After printing this label:**

1. Use the 'Print' button on this page to print your label to your laser or inkjet printer.
2. Fold the printed page along the horizontal line.
3. Place label in shipping pouch and affix it to your shipment so that the barcode portion of the label can be read and scanned.

**Warning:** Use only the printed original label for shipping. Using a photocopy of this label for shipping purposes is fraudulent and could result in additional billing charges, along with the cancellation of your FedEx account number.

Use of this system constitutes your agreement to the service conditions in the current FedEx Service Guide, available on fedex.com. FedEx will not be responsible for any claim in excess of \$100 per package, whether the result of loss, damage, delay, non-delivery, misdelivery, or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim. Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to the greater of \$100 or the authorized declared value. Recovery cannot exceed actual documented loss. Maximum for items of extraordinary value is \$1,000, e.g. jewelry, precious metals, negotiable instruments and other items listed in our ServiceGuide. Written claims must be filed within strict time limits, see current FedEx Service Guide.