



STATE OF WASHINGTON
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
1300 S. Evergreen Park Dr. S.W., P.O. Box 47250 • Olympia, Washington 98504-7250
(360) 664-1160 • TTY (360) 586-8203

CERTIFIED MAIL

August 27, 2014

Grant M. Yoshihara
Vice President of Utility Operations
Northwest Natural
220 NW Second Avenue
Portland, OR 97209

Dear Mr. Yoshihara:

RE: 2014 Standard Natural Gas Safety Inspection – Northwest Natural Camas Transmission

Staff from the Washington Utilities and Transportation Commission (staff) conducted a standard inspection from June 17-19, 2014 of Northwest Natural's (NWN) Camas Transmission pipeline. The inspection included a records review and inspection of the pipeline facilities.

Our inspection indicates one probable violation as indicated in the enclosed report.

Your response needed

Please review the attached report and respond in writing by September 30, 2014. 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 81.88.040, or;
- Institute a complaint, seeking monetary penalties, changes in the company's practices, or other relief authorized by law, and justified by the circumstances, or;
- Consider the matter resolved without further commission action.



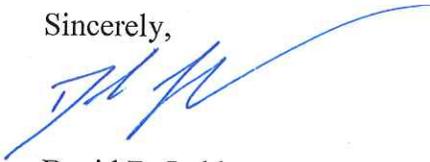
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We have not yet decided whether to pursue a complaint or penalty in this matter. Should an administrative law judge decide to pursue a complaint or penalty, your company will have an opportunity to present its position directly to the commissioners.

We would like to thank NWN's personnel for their professionalism and cooperation during this inspection.

If you have any questions or if we may be of any assistance, please contact Dave Cullom at (360) 664-1141. Please refer to the subject matter described above in any future correspondence pertaining to this inspection.

Sincerely,



David D. Lykken
Pipeline Safety Director

Enclosure

cc: Kerry F. Shampine, Manager, Code Compliance, Northwest Natural

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
2014 Natural Gas Pipeline Safety Inspection
Northwest Natural – Camas Transmission Pipeline

The following probable violation of WAC 480-93-018 was noted as a result of the 2014 inspection of the Northwest Natural (NWN) - Camas Transmission Line. The inspection included a random selection of records, operation and maintenance (O&M), emergency response, inventory, and field inspection of the pipeline facilities.

PROBABLE VIOLATION

1. **WAC 480-93-018 Records.**

(1) Each gas pipeline company must maintain records sufficient to demonstrate compliance with all requirements of 49 CFR §§ 191, 192 and chapter 480-93 WAC.

Finding(s):

There are two concrete supports at either side of the Lacamas Lake Bridge that support the P04 - Camas Transmission Line. The annual bridge-line inspection form has items for both atmospheric corrosion and the pipe coating condition. The NWN procedure referenced in SPW 480 3.2.2 indicates, that during the atmospheric inspection, particular attention shall be given to pipe supports. The bridge-line inspection form did not indicate that the line pipe under the supports is being evaluated for corrosion. It is unclear how an inspection” giving particular attention to pipe supports” is conducted. The NWN procedure was vague. Visual observation of the supports leads staff to conclude that an inspection under the supports was not performed. Documentation (procedures and inspection records) do not appear to demonstrate compliance with 49 CFR 192.481.