



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

1200 New Jersey Avenue, SE
Washington, DC 20590

August 6, 2020

Via Email

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

Dear Chairman Danner:

On June 9, July 6-9, and July 31, 2020, 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) 2019. This evaluation included a review of annual Progress Report documents and pipeline program procedures and records, as well as observation of on-site pipeline operator inspections 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 2019, both the WUTC Gas and Hazardous Liquid Pipeline Safety Programs scored 50 out of a possible 50 points.

II. Program Evaluation Review

For CY 2019, the WUTC Gas Safety Program scored 89 out of a possible 94 points.

1. A comprehensive review was conducted to verify that the WUTC has inspected all types of operators and inspection units within the maximum time intervals established in its written procedures. Several instances were identified where the intervals were not met for conducting comprehensive inspections of operators' drug and alcohol (D&A) misuse plans. The program has since corrected this deficiency having performed or scheduled in the near term any outstanding D&A inspections.

Five points were deducted for not completing all D&A inspections within 60 days of the maximum five-year time interval allowed in its procedures and PHMSA State Program Guidelines.

For CY 2019, the WUTC Hazardous Liquid Safety Program scored 94 out of a possible 94 points.

As you may be aware, PHMSA and the National Association of Pipeline Safety Representatives 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.

Please provide your response regarding item one above within 60 days of your receipt of this letter to avoid losing performance points on next year's evaluation.

The response should be addressed to me at 3700 S. MacArthur Blvd., Suite B, Oklahoma City, Oklahoma 73179-7612. Additionally, please email a PDF of your signed response to zach.barrett@dot.gov and don.martin@dot.gov. Thank you for your continued support of pipeline safety.

Sincerely,



Zach Barrett

Director, State Programs

cc: Mr. Sean Mayo, Director of Pipeline Safety, WUTC
Mr. Dustin Hubbard, PHMSA Western Region Director
Mr. David Lykken, Transportation Specialist, PHMSA State Programs