Form A- Annual Review 8286

UTC Standard Annual Review Inspection Report Intrastate Operators FORM A: Annual Review

Inspector and Operator Information

Inspection ID	Inspection Link	Inspector - Lead Inspector - Assist
8286	8286	David Cullom
Operator	Unit	Records Location - City & State
Northwest Natural	NWN- HQ	Portland, Oregon
Inspection Start Date	Inspection Exit Interview Date	Engineer Submit Date
06-09-2021	06-09-2021	

Inspection Summary

You must include the following in your inspection summary:

- *Inspection Scope and Summary *Facilities visited and Total AFOD
- * Summary of Significant Findings
- * Primary Operator contacts and/or participants

*Inspection Scope and Summary

This inspection was an annual review of program changes and submitted data.

*Facilities visited and Total AFOD

This was a remote inspections and consisted of (1) AFOD.

* Summary of Significant Findings

There were no probable violations or areas of concern.

* Primary Operator contacts and/or participants

Margaret Locke Regulatory Contact		Compliance Engineer		margaret.locke@nwnatural.com		(503) 610-7539		(503) 789-0154		
Ryan Truair CCC Formal Correspondence Regulatory Contact				Sr. Manager of Compliance		ryan.truair@nwnatural.com		(503) 610-7551		(503) 708-3699
Samantha Rookstool Regulatory Contact Code Compliance		Code Compliance	Specialist samantha.rookstool@nwnatural.c		tool@nwnatural.com	(503) 610-7461		(50	03) 803-9032	
aimie Lemke Damage Prevention Dirt Analysis Regulatory Contact			Code Compliance Specialist		jaimie.lemke@nwnatural.com		(503) 610-7	539	(503) 799-5727	

Instructions and Ratings Definitions

INSPECTION RESULTS: Annual Review

Satisfactory Responses	Satisfactory List	Number of Unanswered Questions	Unanswered List
31	1,3,5,6,9,10,12,13,14,15,16,17,18,20,21,22,23,24,25,26,27,28,29,30,31,32,35,37,39,40,	0	
Unsatisfactory Responses	Unsatisfactory List		
0			
Area of Concern Responses	Area of Concern List		
0			
Not Applicable Responses	Not Applicable List		
8	4,7,8,19,41,42,43,44		
Yes Responses	Yes List	No Responses	No List
3	34,36,38,	0	
Not Checked / Evaluated Responses	Not Checked / Evaluated List		
0			

^{**}If an item is marked Unsat, AOC, N/A, or N/C, an explanation must be included in the "Notes" block for that question and also summarized in the "SUMMARY OF REQUIRED COMMENTS" section at the end of this inspection form.

Crew Inspection History

Click Link for Full List of Crew Inspections

Determination crew inspection Date	Inspector	Unit	Type of Work	Foreman Name	Contractor Name	Comments / Observations for Operator
05-12-2021	David Cullom	NWN - Clark County - 7912	New Service		Loy Clark	
05-12-2021	David Cullom	NWN - Clark County - 7912	New Service		Loy Clark	
05-10-2021	Dennis Ritter	NWN - Clark County - 7912	New Service	Charles White		Will follow up with Sam on meter move. 5/14/21Received documentation from NWN that the meter was moved out of covered garage. See attached photos.
05-10-2021	Dennis Ritter	NWN - Clark County - 7912			Loy Clark	No issues noted
04-02-2021	Anthony Dorrough	NWN - Clark County - 7912	Other	Randy Bloespflug		Staff observed crew relocating a 1-inch ST pipeline (1970-1982) to clear for man-hole placement. Also on site was Helper/Mitch Stemmerman.
04-02-2021	Anthony Dorrough	NWN - Clark County - 7912	Other	Rusty Grable		Staff observed crew in the process of relocating a 4-inch PE main (1991), tying into the existing main at two locations to clear for installation of a box culvert.
04-02-2021	Anthony Dorrough	NWN - Clark County - 7912	New Service		Loy Clark	Staff observed that the work had already been completed.
03-10-2021	Dennis Ritter	NWN - Clark County - 7912	Service Repair	Randy Boespflug		No issues noted
03-10-2021	Dennis Ritter	NWN - Clark County - 7912	New Service		Loy Clark	None
03-10-2021	Dennis Ritter	NWN - Clark County - 7912	Main Install		Loy Clark	None
03-10-2021	Dennis Ritter	NWN - Clark County - 7912	New Service		Loy Clark	None
03-10-2021	Dennis Ritter	NWN - Clark County - 7912	New Service			No work started
02-24-2021	Scott Anderson	NWN - Clark County - 7912	Main Install		Loy Clark	
02-24-2021	Scott Anderson	NWN - Clark County - 7912	New Service		Loy Clark	
02-24-2021	Scott Anderson	NWN - Clark County - 7912	New Service		Loy Clark	

Determination crew inspection Date	Inspector	Unit	Type of Work	Foreman Name	Contractor Name	Comments / Observations for Operator
01-29-2021	Anthony	NWN - Clark	Relocate/Abandon	Rusty Grable		Staff observed crew in the process of relocating a meter set inside to an outside set, tying into an existing 3/4-inch STW service
01-29-2021	Dorrough Anthony	County - 7912 NWN - Clark	New Service			(1962). 1-inch PE service was installed to the new meter location. Also on site Operator/Trent Thompson and Fitter/Ryan Kitterman.
01-29-2021	Dorrough Anthony	County - 7912 NWN - Clark	New Service		Loy Clark	
11-12-2020	Dorrough Derek	County - 7912 NWN - Clark	Main Extension	Nathan	Loy Clark	
11-12-2020	Norwood Derek	County - 7912 NWN - Clark	New Service	Bonnell	Loy Clark	
	Norwood	County - 7912		CI I	LOY CIGIR	
10-29-2020	Scott Anderson	NWN - Columbia Gorge Office - 7913	New Service	Charles White		
10-29-2020	Scott Anderson	NWN - Columbia Gorge Office - 7913	Main Install			
10-21-2020	Derek Norwood	NWN - Clark County - 7912	New Service	Rusty Grable		
10-21-2020	Derek Norwood	NWN - Clark County - 7912	New Service		Loy Clark	
10-13-2020	Dennis Ritter	NWN - Clark County - 7912	Main Extension	Rusty Grable		No issues noted other than another UTC inspector was here yesterday!
10-13-2020	Dennis Ritter	NWN - Clark County - 7912	Main Extension	Randy Boespflug		No issues noted
10-12-2020	Anthony Dorrough	NWN - Clark County - 7912	Other			Staff could not get to work site due to private gated community access.
10-12-2020	Anthony Dorrough	NWN - Clark County - 7912	Other	Rusty Grable		Staff observed crew in the process of installing new 2-inch PE to reinforce a pipeline system. Calibration Audit: Gas Scope# 58424 11/11/2020 Gauges 12/19/2020 Multimeter #??? 3/10/21 Halfcell #HCC0420 3/10/21 PE found on truck: 2-inch 5/16/19 Also on site: Fitter/Ryan Kitterman and C1/Zach Johnson
09-09-2020	Derek Norwood	NWN - Clark County - 7912	Main Extension	David Lee	Loy Clark	
08-25-2020	Darren Tinnerstet	NWN - Clark County - 7912	Main Extension	Joe Dessimoz	Loy Clark	
06-26-2020	Anthony Dorrough	NWN - Clark County - 7912	Relocate/Abandon	Charles White		Staff observed crew in the process of relocating a 3/4-inch ST gas service, tying into an existing 2-inch St main. Also on site: C1/Lamont Wilkins, C3/Joe Reynsa, and Service Technician/Mike Newton.
06-26-2020	Anthony	NWN - Clark County - 7912	New Service			Staff observed that installation of new service and MSA had already been completed at this location, crew was not on site.
06-26-2020	Dorrough Anthony	NWN - Clark	New Service	Joshua	Loy Clark	Staff observed crew in the process of installing new 1-inch service to new const. home. Also on site: Operator/Garland Rogers and
06-18-2020	Dorrough Scott	County - 7912 NWN - Clark	New Service	Hatcher	Loy Clark	Operator/Shaun Dewey.
06-18-2020	Anderson Scott	County - 7912 NWN - Clark	New Service		Loy Clark	
06-18-2020	Anderson Scott	County - 7912 NWN - Clark	New Service		Loy Clark	
	Anderson	County - 7912			-	
06-18-2020 06-18-2020	Scott Anderson Scott	NWN - Clark County - 7912 NWN - Clark	New Service		Loy Clark Loy Clark	
06-18-2020	Anderson Scott	County - 7912 NWN - Clark	New Service		Loy Clark	
05-28-2020	Anderson David Cullom	County - 7912 NWN - Clark County - 7912	New Service		Loy Clark	Please ensure that your daily job reports are accurate.
05-28-2020	David Cullom	NWN - Clark County - 7912	New Service		Loy Clark	
05-04-2020	Darren Tinnerstet	NWN - Columbia Gorge Office - 7913	Relocate/Abandon	Armando Quintero		
05-04-2020	Darren Tinnerstet	NWN - Clark County - 7912	Relocate/Abandon	Rusty Grable		
04-01-2020	David Cullom	NWN - Clark	Valve Repair	Paul Nannini		Great crew. Good attention to detail.
03-26-2020	Anthony	County - 7912 NWN - Clark	Main Replacement	Paul Nannini		Staff observed crew in the process of welding up pieces of steel main to install for a relocation. Work was started 6 days previous.
03-26-2020	Dorrough Anthony	County - 7912 NWN - Clark	Other			Also on site were: Nate Dobson/Welder; Tim Snair/laborer and Erik McGarrity/C2. Staff observed crew as they were completing work pot-holing over sections of 2-inch steel gas main in preparation for a future main
03-10-2020	Dorrough Derek	County - 7912 NWN - Clark	Other	Randy		relocation project.
03-10-2020	Norwood Derek	County - 7912 NWN - Clark	New Service	Boespflug	Loy Clark	
	Norwood	County - 7912		Darron		
03-04-2020	Scott Anderson	NWN - Clark County - 7912	Main Install	Darren	Loy Clark	
03-04-2020	Scott Anderson	NWN - Clark County - 7912	New Service		Loy Clark	
03-04-2020	Scott Anderson	NWN - Clark County - 7912	New Service		Loy Clark	
03-04-2020	Scott Anderson	NWN - Clark County - 7912	New Service		Loy Clark	
03-04-2020	Scott Anderson	NWN - Clark County - 7912	New Service		Loy Clark	
03-04-2020	Scott	NWN - Clark	New Service		Loy Clark	
02-25-2020	Anderson Lex Vinsel	County - 7912 NWN - Clark	Main Replacement	Rusty Grable		Contacted Samantha Rookstool at NWN for coating procedures for work performed fri 21Feb20
02-24-2020	Lex Vinsel	County - 7912 NWN - Clark	Main Repair	Rusty Grable		25Feb20 - NWN Samantha Rookshield returned call. One of their 'Standby' folks discovered two softball sized coating damage
		County - 7912				while observing an excavation near their High Pressure line. Requested the procedures for Coating Damage. Requested and will review procedure for Coating Damage. end lev 24Feb20 - Contacted Samantha Rookshield at NWN (503)750-7264 ext. 4366 regarding the crew list for Friday 21Feb20 truck #4640 with Work Description listed as DAMAGES-MAIN.
02-12-2020	Derek Norwood	NWN - Clark County - 7912	New Service	Ken Schwanz	Loy Clark	
02-12-2020	Derek Norwood	NWN - Clark County - 7912	New Service			
02-12-2020	Derek Norwood	NWN - Clark County - 7912	New Service			
02-07-2020		NWN - Clark		James Barrett	Loy Clark	
02-07-2020	David Cullom	County - 7912 NWN - Clark	New Service	James Barrett	Loy Clark	
02-07-2020	David Cullom	County - 7912 NWN - Clark	Main Install		Loy Clark	
		County - 7912				

Determination crew inspection Date	Inspector	Unit	Type of Work	Foreman Name	Contractor Name	Comments / Observations for Operator
02-05-2020	Scott Anderson	NWN - Columbia Gorge Office - 7913	New Service			
02-04-2020	Scott Anderson	NWN - Clark County - 7912	Main Repair			
02-04-2020	Scott Anderson	NWN - Clark County - 7912			Loy Clark	
01-09-2020	Derek Norwood	NWN - Clark County - 7912	New Service		Loy Clark	
01-09-2020	Derek Norwood	NWN - Clark County - 7912	Relocate/Abandon			
01-09-2020	Derek Norwood	NWN - Clark County - 7912	Main Extension		Loy Clark	
01-09-2020	Derek Norwood	NWN - Clark County - 7912	Main Extension		Loy Clark	
01-02-2020	David Cullom	NWN - Clark County - 7912	New Service		Loy Clark	
01-02-2020	David Cullom	NWN - Clark County - 7912	New Service	James Barrett		
01-02-2020	David Cullom	NWN - Clark County - 7912				

Facility Inspection History

Link for Full List of Facility Inspections

Date	Inspection ID	Form A Operator Name	Other Company	Inspector	Type of Inspection	Do you have inspection pictures or file attachments?
05-12-2021	7912	Northwest Natural		Darren Tinnerstet	Facility	Yes
05-12-2021	7912	Northwest Natural		Darren Tinnerstet	Facility	Yes
05-12-2021	7912	Northwest Natural		Darren Tinnerstet	Facility	Yes
03-18-2021	7912	Northwest Natural		Darren Tinnerstet	Facility	Yes
03-18-2021	7912	Northwest Natural		Darren Tinnerstet	Facility	Yes
03-18-2021	7912	Northwest Natural		Darren Tinnerstet	Facility	Yes
03-18-2021	7912	Northwest Natural		Darren Tinnerstet	Facility	Yes
02-24-2021	7912	Northwest Natural		David Cullom	Pre-Field	Yes
02-17-2021	7912	Northwest Natural		Derek Norwood	Facility	Yes
02-17-2021	7912	Northwest Natural		Derek Norwood	Facility	Yes
02-17-2021	7912	Northwest Natural		Derek Norwood	Facility	Yes
01-21-2021	7912	Northwest Natural		David Cullom	Pre-Field	No
12-14-2020	7912	Northwest Natural		Derek Norwood	Facility	
12-14-2020	7912	Northwest Natural		Derek Norwood	Facility	Yes
12-14-2020	7912	Northwest Natural		Derek Norwood	Facility	Yes
11-30-2020	7912	Northwest Natural		David Cullom	Pre-Field	No
11-04-2020	7912	Northwest Natural		Darren Tinnerstet	Facility	Yes
11-04-2020	7912	Northwest Natural		Darren Tinnerstet	Facility	Yes
11-04-2020	7912	Northwest Natural		Darren Tinnerstet	Facility	Yes
10-19-2020	7912	Northwest Natural		David Cullom	Facility	Yes
10-19-2020	7912	Northwest Natural		David Cullom	Facility	No
10-19-2020	7912	Northwest Natural		David Cullom	Facility	No
10-19-2020	7912	Northwest Natural		David Cullom	Facility	Yes
10-19-2020	7912	Northwest Natural		David Cullom	Facility	No
10-19-2020	7912	Northwest Natural		David Cullom	Facility	Yes
10-19-2020	7912	Northwest Natural		David Cullom	Facility	Yes
10-19-2020	7912	Northwest Natural		David Cullom	Facility	Yes
10-19-2020	7912	Northwest Natural		David Cullom	Facility	
08-20-2020	7912	Northwest Natural		Scott Anderson	Facility	
08-12-2020	7913	Northwest Natural		Scott Rukke	Facility	Yes
06-08-2020	7912	Northwest Natural		Derek Norwood	Facility	Yes
06-08-2020	7912	Northwest Natural		Derek Norwood	Facility	Yes
05-28-2020	7912	Northwest Natural		Darren Tinnerstet	Facility	Yes
05-28-2020	7912	Northwest Natural		Darren Tinnerstet	Facility	Yes
05-26-2020	7912	Northwest Natural		Darren Tinnerstet	Facility	Yes
05-26-2020	7912	Northwest Natural		Darren Tinnerstet	Facility	Yes
05-26-2020	7912	Northwest Natural		Darren Tinnerstet	Facility	Yes

Scheduled Inspection History

Annual Review Inspection History

Year of Inspection	Facility - Operator	Unit Name	Inspection ID	Inspection Type	Inspection Status	Closed Date	Next Inspection Interval	SHAREPOIN
Northwest Na	tural (30 Inspections))	'		'			'
2021	Northwest Natural	NWN- Clark	8280	Standard Comprehensive - GD	Waiting for Compliance		03-23-2024	Documents
2021	Northwest Natural	NWN- HQ	8281	OM PPR GAS - Operations & Maintenance, Plans & Procedures Review	Complete	02-22-2021	02-04-2025	Documents
2021	Northwest Natural	NWN- HQ	8282	PA - Public Awareness	Complete	04-26-2021	04-15-2025	Documents
2021	Northwest Natural	NWN- Transmission	8283	TIMP - Gas Transmission Integrity Management	Pending			Documents
2021	Northwest Natural	NWN- HQ	8284	CRM - GAS	Complete	05-26-2021	03-23-2025	Documents
2021	Northwest Natural	NWN- HQ	8285	Pipe Replacement Plan	Pending			Documents
2021	Northwest Natural	NWN- HQ	8286	Standard - Annual Review	Complete	06-15-2021	06-09-2022	Documents
2021	Northwest Natural	NWN- Mobile LNG	8287	LNG	Pending			Documents
2020	Northwest Natural	NWN- Columbia Gorge	8056	Standard Comprehensive - GD	Complete	08-24-2020	08-17-2023	Documents
2020	Northwest Natural	NWN- Transmission	8057	Standard Comprehensive - GT	Complete	04-21-2020	04-16-2023	Documents
2020	Northwest Natural	NWN- HQ	8058	DIMP - Gas Distribution Integrity Management	Complete	06-12-2020	06-05-2023	Documents
2020	Northwest Natural	NWN- HQ	8059	Standard - Annual Review	Complete	05-14-2020	05-07-2021	Documents
2019	Northwest Natural	NWN- HQ	7814	OQ - Operator Qualification	Complete	04-01-2019	03-13-2023	Documents
2019	Northwest Natural	NWN- HQ	7815	DA - Drug & Alcohol	Complete	04-01-2019	03-13-2023	Documents
2019	Northwest Natural	NWN-HQ	7816	Pipe Replacement Plan	Complete	09-26-2019	08-08-2021	Documents
2019	Northwest Natural	NWN- HQ	7817	Standard - Annual Review	Complete	11-19-2019	11-06-2020	Documents
2019	Northwest Natural	NWN- Mobile LNG	7805	LNG	Complete	04-24-2019	04-15-2021	Documents
2018	Northwest Natural	NWN- Transmission	7568	TIMP - Gas Transmission Integrity Management	Complete	04-20-2018	02-14-2021	Documents
2018	Northwest Natural	NWN- Clark	7580	Standard Comprehensive - GD	Complete	05-22-2018	05-04-2021	Documents

Year of Inspection	Facility - Operator	Unit Name	Inspection ID	Inspection Type	Inspection Status	Closed Date	Next Inspection Interval	SHAREPOINT
2017	Northwest Natural	NWN-HQ	7239	OM PPR GAS - Operations & Maintenance, Plans & Procedures Review	Complete	09-08-2017	08-31-2021	Documents
2017	Northwest Natural	NWN- HQ	7248	DIMP - Gas Distribution Integrity Management	Complete	11-17-2017	11-02-2020	Documents
2017	Northwest Natural	NWN- HQ	7268	PA - Public Awareness	Complete	06-01-2017	04-25-2021	Documents
2017	Northwest Natural	NWN- HQ	7455	Pipe Replacement Plan	Complete	10-26-2017		Documents
2017	Northwest Natural	NWN- Columbia Gorge	7241	Standard Comprehensive - GD	Complete	02-08-2018	10-26-2020	Documents
2017	Northwest Natural	NWN- Transmission	7240	Standard Comprehensive - GT	Complete	09-22-2017	05-11-2020	Documents
2017	Northwest Natural	NWN- Clark	7416	Compliance Investigation and Follow Up	Complete	12-14-2017	03-07-2017	Documents
2017	Northwest Natural	NWN- Clark	7588	Design, Testing & Construction - Gas	Complete	06-08-2018	11-14-2018	Documents
2016	Northwest Natural	NWN- HQ	6768	CRM - GAS	Complete	06-06-2016	04-27-2020	Documents
2016	Northwest Natural	NWN- Mobile LNG	6769	Standard Comprehensive - GD	Complete	06-03-2016	04-26-2019	Documents
2015	Northwest Natural	NWN- Clark	6182	Standard Comprehensive - GD	Complete	07-01-2015	04-09-2018	Documents

GAS System Operations History

Annual Report - M	iles of Main				Annual Report GAS Transmission Miles			
Year	SYSTEM TOTAL Miles of Main	Miles of Service	SYSTEM TOTAL NO. of Services	Average Service Length	YEAR	Total Total Miles	e. Total tool mileage inspected in calendar year using in-line inspection tools	
2020	1967.9	907.01	84,165	56.9	2020	3.5	0	
2019	1938.3	883.40	80,978	57.6	2019	3.5	0	
2018	1899	870.88	79,417	57.9	2018	3.5	0	
2017	1841.6	852.80	76,841	58.6	2015	3.4	0	
2016	1798.9	836.51	74,484	59.3	2016	3.4	0	
2015	1765.08	832.29	72,398	60.7	2017	3.4	0	
					TOT	20.7	0	

Annual Report - Leaks

Year	Cause of Leak Mains Total	Cause of Leak Mains Hazardous Total	Cause of Leak Services Total	Cause of Leak Services Hazardous Total	NUMBER OF KNOWN SYSTEM LEAKS AT END OF YEAR SCHEDULED FOR REPAIR
2020	30	19	55	45	11
2019	38	33	43	37	2
2018	34	32	50	37	1
2017	29	26	59	47	2
2016	28	27	41	34	1
2015	35	29	57	45	4

Annual Report - EFV

Operator	Year	Number of EFV's Installed This Calendar Year on Single Family Residential Services:	Estimated Number of EFV's in the system at the End of The Year:	Total Number of Services with EFV Installed During Year:	Estimated Number of Services with EFV In The System At The End of The Year:	* Total Number of Manual Service Line Shut-off Valves Installed During Year:	* Estimated Number of Services with Manual Service Line Shut-off Valves Installed in the System at End of Year:		
No reports found									

HL System Operations History

HL Annual Report - Miles of Pipe by Decade

YEAR	Operator	Commodity Group	Part I - Total Miles of Pipe by Decade	Unknown	Pre- 20s	1920- 1929	1930- 1939	1940- 1949	1950- 1959	1960- 1969	1970- 1979	1980- 1989	1990- 1999	2000 2009
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No reports found

HL Annual Report - HL Miles / HCAs

YEAR	Operator	Commodity Group	Total Segment Miles that Could Affect HCAs	High Population	Other Population	Drinking Water	Ecological Resource	Comm Navigable Water
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HL Annual	Report -	Breakout	Tanks

	i il za iliadi i	report breakou	· idino					
im ole ter	YEAR	Operator	Commodity Group	Crude Oil #5	Refined (non HVL) #5	HVL #5	CO2 #5	Gr
	No reports	s found						

ANNUAL REPORT: ACCURACY/TRENDS

Question #1. 1. Result $Was the Annual \,Report \,reviewed \,for \,accuracy \,and \,trends? \,If \,any \,trends \,were \,discovered, \,please \,describe. \quad Satisfactory \,Annual \,Annual$

No reports found

Mileage is consistent for distribution and transmission with no major changes.

Access to Complete Distribution Annual Report

ACCESS 10 CC	inpicte bisarbation Amidan	тероге		
Year	SYSTEM TOTAL Miles of Main	Miles of Service	SYSTEM TOTAL NO. of Services	Average Service Length
2020	1967.9	907.01	84,165	56.9
2019	1938.3	883.40	80,978	57.6
2018	1899	870.88	79,417	57.9
2017	1841.6	852.80	76,841	58.6
2016	1798.9	836.51	74,484	59.3
2015	1765.08	832.29	72,398	60.7

Access to Complete Transmission Annual Report

YEAR	Operator	Commodity Group	Total Total Miles
Northw	est Natural (6 R	eports)	
2020	Northwest Natural	Natural Gas	3.5
2019	Northwest Natural	Natural Gas	3.5
2018	Northwest Natural	Natural Gas	3.5
2015	Northwest Natural	Natural Gas	3.4
2016	Northwest Natural	Natural Gas	3.4
2017	Northwest Natural	Natural Gas	3.4

Access to Complete Hazardous Liquid Annual Report

YEAR	Operator	Commodity Group
No reports	found	

DAMAGE PREVENTION

Annual Report Damage Prevention data

Year Operator Total Number of Number of Number Total Leaks Total Miles Number of Leaks Total Leaks Number of Hits Per	, a ii idai ik	eport barrage i reven	evention data									
Excavation Excavation of	Year	Operator	Excavation Damages By Apparent	Excavation	of	Excavation	Main	of Service	per Mile	Per 1,000	1,000 Ticket	Number of Hits Per 10,000 Services

Year	Operator	Total Number of Excavation Damages By Apparent Root Cause:	Number of Excavation Tickets	Number of Services	Total Leaks - Excavation Damage	Total Main Leaks	Miles of Service MAIN	Number of Leaks per Mile of MAIN	Total Leaks Per 1,000 Locates	Number of Hits Per 1,000 Ticket Requests	Number of Hits Per 10,000 Services
2020	Northwest Natural	83	31,069	84,165	44	52	1967.9		1.416202645724	2.6714731726158	9.8615814174538
2019	Northwest Natural	78	30,492	80,978					0	2.5580480125935	9.6322457951542
2018	Northwest Natural	97	29,965	79,417					0	3.2371099616219	12.214009594923
2017	Northwest Natural	104	28,290	76,839					0	3.6762106751502	13.534793529328
2016	Northwest Natural	75	26,259	74,482					0	2.856163601051	10.069547004645
2015	Northwest Natural	99	24,885	72,397					0	3.9783001808318	13.674599776234

DIRT data on mismarks for prior year

Dikt data on mismarks for prior year		
Company - Name	NW Natural	Totals
Damage Cause	Number of Reports	Number of Reports
Facility not marked due to incorrect facility records/maps	4	4
Facility marked inaccurately due to locator error	1	1
Not marked due to Locator error	<u>1</u>	1
Not marked due to Incorrect facility records/maps	<u>3</u>	3
Totals (4 groups)	9	9

DIRT Timeliness - Prior Year Reports must be submitted within 45 days of the damage.

Late	no	Totals
SubmitCompanyID - UTCfinalName	Number of Reports	Number of Reports
Northwest Natural	<u>85</u>	85
Totals (1 groups)	85	85

Question #2

Review the following damage prevention items:

Q2. Is the damage prevention information in the annual report complete?

Q2.d Does the operator follow a process to evaluate the cause of "Locating practices not sufficient" category?

Contract management addresses any inaccurate locates with retraining. disqualification, .etc.

Q2.g. What is the number of damages resulting from mismarks? 7 (4 in one category and 3 in another similar one)

Q2.j. Are mapping corrections timely and according to written procedures? These were reviewed in the 2021 Clark inspection and corrections were verified and were timely for those reviewed.

Q2.b. Is the annual report damages root cause information complete and accurate?

Q2.e. Is the operator or its contractor qualified and following procedures for locating and marking facilities?

Q2.h. What is the number of damages resulting from not locating within the time requirements?

This is not separated out.

Yes. The QA program monitors for this.

Q2.k. Does the operator follow a process to evaluate causes for damages listed "Excavation Practices Not Sufficient"?

This review is done on all damages.

Q2.c. Does the operator have a process to evaluate the cause of "One-call notification practices not sufficient" category?

There is a root cause analysis performed on each damage.

Q2.f. Is the operator appropriately requalifying locators to address performance deficiencies?

 ${\bf Q2.i.}\ \ ls\ the\ operator\ appropriately\ addressing\ discovered\ mapping\ errors\ resulting\ in$

excavation damage? Redlines and errors are submitted to the GIS department for review.

This is conducted in the OQ department and contract management.

Q2.L. Is the operator appropriately focusing damage prevention education and training to address the causes of excavation damage?

Yes. This was reviewed during the 2021 PA inspection. No issues noted.

NPMS SUBMISSIONS/CHANGES

Question #3.

3. Result

For transmission operators, has the operator submitted information to the NPMS database, along with changes made after the original submission? Satisfactory

2. Notes

A review of the Clark County inspection results was reviewed to see if this was covered and that question was not part of the inspection due to it being a distribution inspection. The O&M review has the procedure in SP-007 Section 3.7.4.

The operator submitted the most recent update to the NPMS on Feb 1, 2021 and was verified by viewing the "OSAVE" email.

INCIDENT/SRC/AOC REPORTS REVIEW

Question #4 Were there any federally reportable incidents during the previous year? Are there any discernable trends to these incidents? 4. Results

Not Applicable

There were no federally reportable incidents in 2020.

Q4: Federally reportable incidents

NotificationID	Operator	Company	NRC#	Assigned Engineer	Date & Time of Incident	Street Address of event/incident	Incident Address: City	Closure Date	Reporting Level
No incident notificati	ions found								

Review operator records of previous year's accidents and failures including reported third party damage and leak response. Is the operator ensuring appropriate evaluation and response as required in 192.617 (Gas) or 195.402 (HL) to determine cause of failure? Is the operator taking appropriate steps to minimize the possibility of reoccurrence?

5. Result Satisfactory

Question #5.

3819 Mislocated by NWN - No additional detail on this incident in the database. I followed up with NWN compliance representatives during this inspection.

The compliance representative spoke with the NWN's Contractor Service responsible for locating regarding the damage at 8101 NE Parkway Dr in Vancouver on 2/3/21.

On 2/8/21, Locating Inc reviewed this with the locator and determined that he failed to do a sweep and double check his marks after locating the 2-inch polyethylene main. The main ran through a small center divider that had a fence going down the middle, with a small offset in the main in this divider. He was reminded of the importance of double checking the signal with the sweep.

Question #6.

Review incident reports for the previous year for accuracy and identify any trends. If any trends discovered please describe. (Please see list of incident data at end of this report)

Q6: Incident Reports

NotificationID	Inspector	Company	Street Address of event/incident	Date & Time of Incident	ls 30-Day Report Received?	Reporting Level
3871	Darren Tinnerstet	Northwest Natural	305 SE Chkalob Dr.	06-08-2021 01:30 AM		
3864	Anthony Dorrough	Northwest Natural	10913 NE 8th Circle	05-27-2021 12:39 PM		
3859	Lex Vinsel	Northwest Natural	157 Jewitt Blvd.	05-23-2021 03:52 PM		

6. Result Satisfactory

NotificationID	Inspector	Company	Street Address of event/incident	Date & Time of Incident	Is 30-Day Report Received?	Reporting Level
3857	Lex Vinsel	Northwest Natural	7001 NE Highway 99	05-20-2021 11:11 PM		State
3856	Lex Vinsel	Northwest Natural	6811 NE 121st Ave	05-19-2021 09:26 AM		State
3867	David Cullom	Northwest Natural	915 N 10th PL	05-13-2021 12:27 PM	~	State
3834	Lex Vinsel	Northwest Natural	455 C Street	03-25-2021 01:26 PM	~	State
3831	Scott Anderson	Northwest Natural	264 8th St	03-12-2021 08:05 AM	~	State
3828	Scott Rukke	Northwest Natural	230 NE 37th Circle	03-04-2021 11:55 AM	~	
3819	Derek Norwood	Northwest Natural	8101 NE Parkway Dr	02-03-2021 01:15 PM	~	State
3805	Scott Anderson	Northwest Natural	3925 NW 61st St	01-07-2021 03:30 PM	~	State
3801	Derek Norwood	Northwest Natural	65077 Lewis and Clark Hwy	12-20-2020 11:48 PM	~	State
3799	Derek Norwood	Northwest Natural	15 NW 13th Ave	12-15-2020 09:46 AM	~	State
3789	Scott Anderson	Northwest Natural	109 SW 1st St	11-20-2020 09:35 AM	~	State
3759	David Cullom	Northwest Natural	125 Palos Verdes	10-03-2020 03:21 PM	~	State
3740	Derek Norwood	Northwest Natural	4125 Pioneer St	08-25-2020 04:38 PM	~	State
3738	Dennis Ritter	Northwest Natural	3215 NE 99th Cir	08-19-2020 11:54 AM	~	State
3719	Scott Rukke	Northwest Natural	1655 C St	07-24-2020 11:42 AM	~	State
3791	Anthony Dorrough	Northwest Natural	2437 NW Lacamas Drive	07-12-2020 02:26 PM	~	State
3707	Lex Vinsel	Northwest Natural	205 NE Wisconsin Street	07-07-2020 04:43 PM	~	State
3705	Scott Anderson	Northwest Natural	2311 SE 139th Ave	06-27-2020 02:51 PM	~	State
3684	Scott Anderson	Northwest Natural	5144 P St.	06-03-2020 02:00 PM	~	State
3682	Scott Anderson	Northwest Natural	NE Vine St & E Jewett Blvd	06-03-2020 08:18 AM	~	State
3677	Anthony Dorrough	Northwest Natural	16606 NE 95th St	05-27-2020 10:23 AM	~	State
3648	Derek Norwood	Northwest Natural	5305 NE 121st Ave	03-20-2020 04:11 PM	~	State
3647	Derek Norwood	Northwest Natural	10705 NE 99th Ave	03-19-2020 07:50 AM	~	State
3646	Derek Norwood	Northwest Natural	13700 NE Fourth Plain Blvd	03-19-2020 02:28 AM	~	State
3629	Darren Tinnerstet	Northwest Natural	15109 NE 28th. Ct.	01-22-2020 09:20 AM	~	State
3626	Lex Vinsel	Northwest Natural	407 W Main	01-02-2020 02:04 PM	~	State

I reviewed multiple incdents and 30 day reports for trends in the previous year and did not observe any events that were systemic related such as improper operations, construction defects, etc or repeated mislocates by NWN or their locating service providers.

Question #7.

Were there reportable or unreportable safety related conditions during the previous year? If yes please describe.

Q7: Report of SRCs

NotificationID	Company	Safety-Related Condition	SafetyRelatedConditionChoices	Reportable?	Date & Time of Incident	Company Notified Date	Report Date
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7. Notes

No incident notifications found No SRCs per our database report.

For transmission systems, were there any abnormal operating conditions (as described in 192.605 (c) or 195.402(d)) since the last annual review? If yes please describe.

8. Notes

O&M & EMERGENCY PROGRAMS

Question #9.

Is the O&M Manual up to date and were changes made in the previous year?

Operator Manuals on Sharepoint

Satisfactory

9. Result Satisfactory

7. Result Not Applicable

8. Result

Not Applicable

The 2021 O&M full inspection consisted of a Plan and Procedure Review of Northwest Natural's Standard Practices, the Field Operation Manual (FOM), and Emergency Response Procedures. The evaluation covered CFR 49 Part 191, 192, ADBs, best practices, and WAC 480-93 regulations. No probable violations or areas of concern were noted.

Question #10. 10. Result

If changes to the O&M were made, are changes acceptable?

There were no substantial changes made to the O&M manual.

Were emergency plans changed during the previous year?

11. Result

Satisfactory

Minor changes were made to the base plan. The plan cover sheet does not detail the changes.

Upon review with the operator the changes included:

- Reportable incident table 3.4.1
 Address for new building
 Evacuation Plan
 Backup power and emergency fueling
 Information related to threats

Question #12.

Were any changes to emergency plans satisfactory?

12. Result

Satisfactory

12. Notes

Yes they were acceptable.

INTEGRITY MANAGEMENT PROGRAMS

Were there changes to the Integrity Management programs (TIMP, DIMP or both, as applicable)?

13. Result

Satisfactory

 $Rev \ 21, 4/8/2021 \ (TIMP) is the most current revision submitted to the Commission. \ The revisions are well documented in Appendix M. \ The DIMP program revisions are in Appendix F. \ The DIMP program revisions are in$

Question #14. Is the DIMP/TIMP up to date? What are the results of the operator's program review (effectiveness evaluation) (DIMP every 5 years)?	14. Result Satisfactory
14. Notes There is an annual checklist that encompasses effectiveness, It is the IMP DIMP Annual Review Checklist. This was done in 2016 and is set for a full effectiveness review in 2021. The	,
document was created in 2017. Question #15	15. Result
Are IMP program changes acceptable?	Satisfactory
15. Notes The new gas rule items are now contained in the TIMP Plan.	
Question #16 Was appropriate assessment/ repair work conducted during the past year? (monitor progress of IMP activities)	16. Results Satisfactory
16. Notes	
The integrity management team said there no assesments or repairs scheduled. Question #17	17. Results
Does the operator's HCA location data correspond to the positional data located in UTC GIS?	Satisfactory
17. Notes There is only one small section of transmission in Washington State. It is located in Camas and it is represented in our GIS.	
Question #18 What assessment work is planned for the upcoming year?	18. Results Satisfactory
18. Notes	Jausiaciory
No work is planned.	
Question #19 Within the operator's DIMP, are low pressure systems evaluated for overpressure threats?	19. Results Not Applicable
19. Notes	Тострупсаве
No low pressure systems within their infrastructure.	
Question #20 Did the operator develop and follow specific procedures for low pressure system construction or maintenance projects? (Note: this question is revisited in greater detail in the ADB resection)	20. Results view Satisfactory
20. Notes	
No low pressure systems within their infrastructure. Question #21	21. Results
Are plastic pipe and components that have shown a record of defects/leaks being mitigated through the DIMP plans?	Satisfactory
21. Notes NWN does not have Aldyl A or HD in thier Washington system. They do have Celcon caps that are replaced as found, but are not being actively targeted under DIMP. Appendix E ha by material. Appendix E-6 is hazardous leaks by material.	s leaks
Question #22	22. Results
Has appropriate DIMP remediation work occurred during the past year? (monitor progress of DIMP activities)	Satisfactory
22. Notes	
Table Diland / A satisfaction for install and fine	
Table D-1 has A/A actions for inside service lines Appendix E-9 has tracking of removal of vintage plastic.	
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	23. Results Satisfactory
Appendix E-9 has tracking of removal of vintage plastic. Question #23 What DIMP remediation work is anticipated for upcoming year? 23. Notes	
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29. Results

30. Results

Satisfactory

Satisfactory

30. Notes
Yes There were some findings in the 2021 CRM inspection that were resolved. The CRM inspection was conducted in 2021 as a joint inspection with Oregon. Please review that inspection record for additional detail.

 $A full PA inspection \ was performed \ this \ year. \ Please \ reference \ that \ inspection. \ There \ were \ no \ areas \ of \ concern \ or \ probable \ violations.$

 $Is the CRM\ program\ up\ to\ date?\ And\ were\ there\ changes\ to\ the\ Control\ Room\ Management\ (CRM)\ program\ within\ the\ last\ year?$

The CRM inspection was conducted in 2021 as a joint inspection with Oregon. Please review that inspection for additional detail.

CONTROL ROOM PROGRAM

Are the CRM program changes satisfactory?

Question #29

Question #30

SAFETY MANAGEMENT SYSTEM API 1173

Question #31 31. Results

Is the operator developing and implementing an API 1173 Safety Management System?

31. Notes

There was a gap analysis was completed in January 2020. The employee establishing this program resigned in March 2020. NWN is actively recruiting for a new PSMS person. The position is in the engineering department. During this prior work, MOC was identified and root cause analysis in the gap analysis that was performed.

INSPECTOR ASSESSMENT OF INSPECTION UNITS

Question #32 32. Results

Are inspection units broken down appropriately? Do you recommend any changes to inspection units? Satisfactory

32 Notes

No changes needed to unit size.

Q32: List of current inspection units

Unit Name	Distribution/Transmission	Intrastate or Interstate?	GAS or LIQUID			
Northwest Natural (5 Units)						
NWN- HQ	Distribution	Intrastate	Gas			
NWN- Columbia Gorge	Distribution	Intrastate	Gas			
NWN- Clark	Distribution	Intrastate	Gas			
NWN- Transmission	Transmission	Intrastate	Gas			
NWN- Mobile LNG	Distribution	Intrastate	Gas			

OPERATOR'S PUBLIC WEB PAGE

For informational purposes: Using the drop down selections available in the "Results" block, indicate whether the operator's web page contains the information listed by placing a check in the box adjacent to all items that are present.

33. Results

37. Results

Satisfactory

39. Results

Q33.B Damage Prevention; Q33.C Pipe Location Information; Q33.D How to get additional information; Q33.E National Pipeline Mapping System; Q33.F on Call Requirements; Q33.G Potential Hazards; Q33.H Prevention Measures; Q33.I Leak/Damage Recognition; Q33.J ROW Encroachment; Q33.K Pipeline Location Information; Q33.L Integrity Management Programs; Q33.M Emergency Preparedness

The location at https://www.nwnatural.com/safety/pipeline-information contains the required content. The videos also have additional safety information about odor detection and emergency procedures.

ADVISORY BULLETIN REVIEW

Question #34

Is there potential for damage to the operator's pipeline facilities caused by flooding, river scour, or channel migration?

ADB 2019-01

34. Results ADB 2019-01 Flood Mitigation YFS

34. Notes

These situations are monitored in scheduled patrols.

If "YES" to Q34, did the operator take appropriate action in accordance with the guidance contained ADB 2019-01? Discuss ADB's guidance with operator's representative, and annotate any concerns.

ADB 2019-01

ADB 2019-01: Flood Mitigation

The operator uses triggers such monitoring rain gauges to see if additional patrols are required.

Is there potential for the operator's system to be damaged by earth movement or other seismic/geological activities?

ADB 2019-02 36 Results YES

ADB 2019-02: Earth Movement/Geological Hazards

Most infrastructures in the Pacific Northwest have risks associated with seismic and other geologic activites.

Question #36

If "YES" to Q36, did the operator take appropriate action according to ADB 2019-02? Discuss suggested actions from ADB with operator's representative and annotate any concerns.

ADB 2019-02

ADB 2019-02: Earth Movement/Geological Hazards

37. Notes

NWN has done seismic analysis on the transmission system and it continuing to perform it system wide.

Question #38

Does the operator have any indoor meter sets or regulators in their system?

ADB 2020-01

38. Results ADB 2020-01 Inside Meter Sets YES

This is tracked in the CIS (Customer information system).

If operator's system has indoor meter sets/regulators, did the operator review ADB 2020-0115? Discuss ADB guidance with operator's representative and annotate any concerns. Particular attention must be given to the operator's plan to conduct leak surveys, AC inspections, and other maintenance activities in locations that are difficult to access, as well as the inclusion of inside meters/regulators within the operator's DIMP plan, as applicable.

ADB 2020-01 ADB 2020-01 Inside Meter Sets

Satisfactory 39. Notes

From the operator's DIMP Inside Service Lines Assement and repair of inside service lines. NWN performed baseline assessment of inside service lines in 2019. A remediation of corrosion onservice lines located in buildings performed in 2021.

Question #40 Does the operator have a detailed record of locations for all indoor meter sets/regulators within their system?

ADB 2020-01

40. Results ADB 2020-01 Inside Meter Sets Satisfactory

These locations are contained within CIS (Customer information system).

Question #41

Does the operator have any low pressure systems?

ADB 2020-02 Low Pressure Systems

41. Results Not Applicable

41. Notes

No systems of this type.

Question #42

If "YES" to Q41, did the operator review ADB 2020-0025 for Overpressure Protection of Low-Pressure Natural Gas Distribution Systems? Review ADB guidance with operator and annotate

Not Applicable

ADB 2020-02 42. Results

42. Notes

No systems of this type.

ADB 2020-02 Low Pressure Systems

For low pressure construction/maintenance projects, does the operator have a process for review of engineering plans and constructibility reviews that are carried out through all applicable departments? Do all applicable departments review project plans for accuracy, completeness and correctness? How are control procedures developed that could identity system threats that could result in a common failure mode? How is the operator mitigating risk in their low presure system?

43. Results

ADB 2020-02 Low Pressure Systems Not Applicable

43. Notes

No systems of this type.

Question #44

 ${\hbox{Does the operator include all low-pressure system risks in their DIMP program appropriately?}}\\$

ADB 2020-02

44. Results ADB 2020-02 Low Pressure Systems Not Applicable

44. Notes

No systems of this type.

SUMMARY OF REQUIRED COMMENTS

COMMENTS: Required for any ratings other than Satisfactory. Summarize/consolidate entries from the "Notes" blocks above. Ensure you annotate the question number for each comment. $There were no probable violations or areas of concern. \ Additionally, the operator does not have any low pressure systems.$