



STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

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Sent Via Email

November 1, 2023

Joe Karney
Vice President of Engineering and Utility Operations
Northwest Natural
250 Southwest Taylor Street
Portland, OR 97204

RE: 2023 Natural Gas Standard Comprehensive Inspection – Northwest Natural Columbia Gorge – (Insp. No. 8611)

Dear Mr. Karney:

Staff from the Washington Utilities and Transportation Commission (staff) conducted a Standard Comprehensive inspection of Northwest Natural's (NWN) Columbia Gorge distribution system from August 29, 2023, to October 5, 2023. This inspection included a records review and inspection of pipeline facilities.

Our inspection indicates two area(s) of concern as noted in the enclosed report, which unless corrected, could potentially lead to future violations of state and/or federal pipeline safety rules.

Your response needed

Please review the attached report and respond in writing by December 4, 2023. The response should include how and when you plan to bring the area of concern into full compliance.

What happens after you respond to this letter?

The attached report presents staff's decision on the area of concern and does not constitute a finding of probable violation by the staff at this time if the issue is resolved within 90 days of discovery.

If this issue is not resolved within 90 days, this matter may result in the issuance of a notice of probable violation.

Northwest Natural
2023 Natural Gas Standard Comprehensive Inspection, Columbia Gorge, Insp. No. 8611
October 31, 2023
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If you have any questions or if we may be of any assistance, please contact Dave Cullom at (360) 489-8684. Please refer to the subject matter described above in any future correspondence pertaining to this inspection.

Sincerely,

Scott Rukke
Pipeline Safety Director

Enclosure

cc: Ryan Truair, Sr. Manager of Compliance, Northwest Natural
NWN Code Compliance Inbox, nwncodecompliance@nwnatural.com

UTILITIES AND TRANSPORTATION COMMISSION
2023 Natural Gas Standard Comprehensive Inspection
Northwest Natural – Columbia Gorge (Insp. No. 8611)

The following areas of concern of Title 49 CFR Part 192 and WAC 480-93 were noted as a result of the 2023 inspection of the Northwest Natural – Columbia Gorge unit. The inspection included a random selection of records, operation and maintenance (O&M), emergency response, inventory, and field inspection of the pipeline facilities.

AREAS OF CONCERN

1. WAC 480-93-110 Corrosion Control

- (2) *Each gas pipeline company must complete remedial action within ninety days to correct any cathodic protection deficiencies known and indicated by any test, survey, or inspection. An additional thirty days may be allowed for remedial action if due to circumstances beyond the gas pipeline company's control the company cannot complete remedial action within ninety days. Each gas pipeline company must be able to provide documentation to the commission indicating that remedial action was started in a timely manner and that all efforts were made to complete remedial action within ninety days. (Examples of circumstances allowing each gas pipeline company to exceed the ninety-day time frame include right of way permitting issues, availability of repair materials, or unusually long investigation or repair requirements.)*

49 CFR §192.463 External corrosion control: Cathodic protection.

- (a) *Each cathodic protection system required by this subpart must provide a level of cathodic protection that complies with one or more of the applicable criteria contained in appendix D of this part. If none of these criteria is applicable, the cathodic protection system must provide a level of cathodic protection at least equal to that provided by compliance with one or more of these criteria.*

Finding(s):

In Carson, WA, there was a cathodic protection test at an annual test site that was unable to achieve a polarized "instant off" reading of at least -850mV using a Cu/CuSO₄ reference cell during our field portion. It was at the following location.

122 Henryetta Ln, Carson, Wa. -1059mV CSE PSP (on) -667mV CSE PSP (off).

2. WAC 480-93-110 Corrosion Control

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Finding(s):

In Carson, WA, there was a cathodic protection test at an annual test site that was unable to achieve a polarized "instant off" reading of at least -850mV using a Cu/CuSO₄ reference cell during our field portion. It was at the following location.

1201 Smith Beckon Rd Carson, Wa. -1008mV CSE PSP (on) -613mV CSE PSP (off).