



Energy Services Department

Natural Gas Division

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June 2, 2025

Scott Rukke
Pipeline Safety Director
Washington Utilities and Transportation Commission
PO Box 47250
Olympia, WA 98504-7250

RE: 2025 Natural Gas Public Awareness Inspection – City of Ellensburg (Insp. No. 9001)

Dear Mr. Rukke:

The City of Ellensburg Gas Division received the results of Pipeline Safety Inspection No. 9001 that took place on May 5-6, 2025 and offers the following information regarding the probable violations and the actions taken by the Gas Division to ensure compliance now and into the future.

UTC Probable Violations

1. 49 CFR § 192.616 Public awareness.

- (c) The operator must follow the general program recommendations, including baseline and supplemental requirements of API RP 1162, unless the operator provides justification in its program or procedural manual as to why compliance with all or certain provisions of the recommended practice is not practicable and not necessary for safety.

Findings:

COE did not send public awareness communications to the affected residents along the distribution system stakeholder audience in either 2021 or 2023. API RP 1162, Table 2-2.1, requires an annual message delivery frequency for affected residents along the local distribution system.

COE did not send public awareness communications to its LDC customer stakeholder audience twice annually for 2021-2024. API RP 1162, Table 2-2.1, requires a twice annually message delivery frequency for LDC customers.

City of Ellensburg Response/Action Taken

The City of Ellensburg Gas Division has acknowledged the referenced probable violation #1 and began taking immediate action following the Public Awareness audit on May 5th and 6th, 2025. It became clear during the audit that the City of Ellensburg Gas Division has been referencing and following the guidance of RP 1162 1st Edition Section 2.8 Table 2-1.1 by mistake. This guidance is for Transmission systems, when the City Gas Division should be following Section 2.8 Table 2-2.1 for Distribution systems.

The City Gas Division Operation and Maintenance Manual Section 14 – Public Awareness & Damage Prevention Program Section 14.8.1 has been updated to reflect the appropriate baseline frequency for messaging to the affected public. A copy of the updated Section 14.8.1 is attached and has also been submitted separately to the pipelineprogram email address. *(Attachment: Probable Violation 1 – O&M Manual Section 14.8.1 – Updated)*

In addition to updating our Operation and Maintenance Manual, we immediately set up a bill stuffer as soon as we could to ensure we could meet the twice annually messaging to our customers for this year. We were able to get on the schedule for July bills and will send out our second message in November or December of this year. Please see the attached email chain that began May 7, 2025 to correct and align with the appropriate baseline messaging frequency. *(Attachment: Probable Violation 1 – Action Taken – LDC Customers)*

The letter to residents along the pipeline will now go out in the fall of each year instead of the fall of every other year.

2. 49 CFR § 192.616 Public awareness.

- (i) The operator's program documentation and evaluation results must be available for periodic review by appropriate regulatory agencies.

Findings:

COE did not maintain records showing that an annual audit or review of its public awareness program was completed in 2023. This is noted in both the 2024 third-party audit conducted by Q3 Integrated Solutions, LLC, and COE's Operations and Maintenance Manual, Section 14.19.3 - Third-Party Audit of Program, Page 23.

City of Ellensburg Response/Action Taken

The City of Ellensburg Gas Division has acknowledged the referenced probable violation #2 and began taking action in early 2024.

Over the past several years, 3rd Party Damages have been clearly identified through our DIMP Program and Plan as the main threat to our system. To take action on our top threat, the City of Ellensburg Gas Division has made continuous efforts to enhance and elevate our Public Awareness and Damage Prevention Program. Through the process of increasing efforts, it was realized in early 2024 that we missed our Program Audit in 2023. With staff stretched thin and now realizing we missed an important part of our Program, we decided to hire a 3rd party auditor in 2024. We entered into an agreement in May and had a final report in September of 2024. There were several recommendations and 1 finding in that report. The finding was the missed audit in 2023.

An action taken as a result of the 3rd party audit was the creation of a formalized Program Audit form. This form is now incorporated into our O&M Manual Section 14 as Appendix C and will serve as a uniform audit method that we can successfully perform each year. The new form was added in October of 2024 and submitted to the UTC as part of our Quarter 4 O&M Manual updates on 1/6/2025. *(See attachment: Probable Violation 2 – Action Taken – Section 14 Appendix C Added)*

Despite these shortcomings in our Program, I am confident that the actions taken through the past three years have proven to be successful and that we are moving toward a safer more educated community. Our most recent effectiveness survey indicated strong growth from the baseline survey and even from 2023 to 2024 as we find new ways to educate and reach all our stakeholders. Our survey results are attached for reference along with our outreach efforts, indicating our efforts to each stakeholder audience throughout each year. (*Attachments: Supporting Documentation – Effectiveness Survey Results, Supporting Documentation – Outreach Activities 2021-2024*)

The City of Ellensburg Gas Division is thankful for the detailed approach the UTC takes when looking through and reviewing our system files and programs. We are all better because of it.

If you have any further questions regarding our response, please contact me at (509) 962-7124.

Sincerely,

Buddy Stanavich

Buddy Stanavich
Energy Services Director

Cc: Heidi Behrends Cerniwey, City Manager
Darin Yusi, Gas Engineer
Darren Larsen, Gas Operations Supervisor