



Renewable Natural Gas

502 Roosevelt Grade Rd.  
Roosevelt, WA 99356  
(509) 773-7428

December 22, 2025

Dennis Ritter  
Acting Director, Pipeline Safety  
Washington Utilities and Transportation Commission

Dear Mr. Ritter,

This letter is to formally respond to the findings from the 2025 UTC Inspections of Klickitat PUD (KPUD). Please see our response to the specific findings below. Supporting documentation has been provided.

### **Inspection 9013 – Natural Gas Operations and Maintenance Manual**

#### Probable Violations

1. WAC 480-93-160 Reporting requirements of proposed construction.  
Finding: Klickitat does not have a process to file a proposed construction report for construction or replacement of any segment of gas transmission pipeline of at least 100 feet in length.  
Response: The required procedure has been added to the O&M manual (Section 4.20).
2. WAC 480-93-200 Reporting requirements.  
Finding: Klickitat does not have a process to submit timely and complete reports of construction defects and material failures that resulted in leaks.  
Response: The required procedure has been added to the O&M manual (Section 4.5).

Note: the same findings were cited for the following inspections.

### **Inspection 9014 – Natural Gas Public Awareness and Inspection 9015 – Natural Gas Standard**

#### **Comprehensive**

#### Probable Violations

1. 49 CFR § 192.614 Damage prevention program.
2. RCW 19.122.030 Excavator and facility operator duties before excavation.  
Finding: Klickitat did not have records for five locate tickets (21456948, 22100071, 23031524, 24001939, 24166199) found on One Call Concepts ITIC website (ITIC) during 2021-2024 for which Klickitat was a notified member. The results in ITIC for Klickitat on these tickets show "Does not report." Klickitat failed to respond to four locate tickets (24284440, 24284441, 24284442, 24284443) in 2024. The results in ITIC for Klickitat on these tickets show "Not yet responded."  
Response: KPUD has updated the personnel who receive one-call tickets, and has designated EverLine as its locating contractor. A copy of a cleared one-call ticket, received on 10/8/2025, is attached.

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[www.klickitatpud.com](http://www.klickitatpud.com)



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KPUD understands the importance of and is committed to the safe operation and maintenance of its natural gas pipeline facilities. We thank the UTC for its diligence in ensuring pipeline safety in Washington and look forward to working together in the future. If you have any questions related to our response, please contact me at (509) 773-7430 or [lswift@klickpud.com](mailto:lswift@klickpud.com).

Sincerely,

Leonard Swift  
RNG Interim Supervisor