

Inspection Output (IOR)

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Report Filters

Assets All, and including items not linked to any asset.

Results All

Inspection Information

Inspection Name	9028 - NWN Public Awareness Review	Operator(s)	NORTHWEST NATURAL GAS CO (13840) Lead Scott Anderson	Plan Submitted	01/14/2025
Status	LOCKED	Observer(s)	David Cullom, Anthony Dorrough, Derek Norwood, John Trier, Marina Rathbun, Tom Green, Jason Hoxit, Emma Barrett	Plan Approval	01/15/2025 by Dennis Ritter
Start Year	2025	Supervisor	Dennis Ritter	All Activity Start	05/13/2025
System Type	GT	Director	Scott Rukke	All Activity End	05/14/2025
Protocol Set ID	WA.GT.2024.02			Inspection Submitted	06/02/2025
				Inspection Approval	07/03/2025 by Scott Rukke

Inspection Summary

Inspection Scope and Summary

This inspection consisted of a review of NWN public awareness procedures and records.

Facilities visited and Total AFOD

1 AFOD

Summary of Significant Findings

No findings

Primary Operator contacts and/or participants

Samantha Rookstool, Code Compliance Specialist

Hanna Koonce, Code Compliance Specialist

Andy Fortier, Compliance Engineer

Operator executive contact and mailing address for any official correspondence

Joe Karney

VP, Engineering and Utility Operations

NW Natural

250 SW Taylor St.

Portland, OR 97204

Scope (Assets)

#	Short Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1.	88965 (1,826)	Northwest Natural-HEADQUARTERS	unit	88965	Compressor Stations Bottle/Pipe - Holders Vault Gas Storage Field	43	43	43	100.0%

#	Short Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
					(Aboveground) Offshore GOM OCS Cast or Ductile Iron Copper Pipe Aluminum/Amphoteric AMAOP CDA Abandoned					

1. Percent completion excludes unanswered questions planned as "always observe".

Plans

#	Plan Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent	Notes
1.	88965 (1,826)	--	PD	P, R	Detail	--

Plan Implementations

Activity #	Activity Name	SMART Act#	Start Date	End Date	Focus Directives	Involved Groups/Subgroups	Assets	Qst Type(s)	Planned	Required	Inspected	Total	Required % Complete
1.	PA	--	05/13/2025	05/14/2025	--	all planned questions	all assets	all types	43	43	43	43	100.0%

1. Since questions may be implemented in multiple activities, but answered only once, questions may be represented more than once in this table.

2. Percent completion excludes unanswered questions planned as "always observe".

Forms

No.	Entity	Form Name	Status	Date Completed	Activity Name	Asset
1.	Attendance List	PA	COMPLETED	06/02/2025	PA	88965 (1,826)

Results (all values, 43 results)

49 (instead of 43) results are listed due to re-presentation of questions in more than one sub-group.

EP.ERG: Emergency Response

- Question Result, ID, Sat, EP.ERG.LIAISON.R, 192.603(b) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), References 192.616(c), 192.9(d), 192.9(e), ADB-2005-03) (also presented in: PD.PA)

Question Text *Do records indicate that liaison has been established and maintained with appropriate fire, police, other public officials, and 911 emergency call centers?*

Assets Covered 88965 (1,826)

Result Notes Reviewed mailing lists and mailing material for 2022-2024 for public officials, first responders, and 911 emergency call centers.

Reviewed postage receipts for these stakeholder groups.

Public officials/first responders contacted for 2022, 314; for 2023, 328; for 2024, 328.

MO.GO: Gas Pipeline Operations

2. Question Result, ID, **Sat, MO.GO.CONTSURVEILLANCE.P, 192.605(e) (192.613(a), 192.613(b), 192.703(b), 192.703(c))** (also References presented in: MO.GOCLASS, PD.RW)
Question Text *Are there processes for performing continuing surveillance of pipeline facilities, and also for reconditioning, phasing out, or reducing the MAOP in a pipeline segment that is determined to be in unsatisfactory condition but on which no immediate hazard exists?*
Assets Covered **88965 (1,826)**
Result Notes **NWN Standard Practices, SPW 613 - Continuing Surveillance and Response to Unsatisfactory Conditions.**
NWN Standard Practices, SPW 703 - Patrolling Transmission and Distribution Lines.
3. Question Result, ID, **Sat, MO.GO.CONTSURVEILLANCE.R, 192.709(c) (192.613(a), 192.613(b), 192.703(b), 192.703(c))** (also References presented in: MO.GOCLASS, PD.RW)
Question Text *Do records indicate performance of continuing surveillance of facilities as required, and also the reconditioning, phasing out, or MAOP reduction in any pipeline segment that was determined to be in unsatisfactory condition but on which no immediate hazard existed?*
Assets Covered **88965 (1,826)**
Result Notes **Reviewed sampling of patrols and leak survey records for 2022-2024.**

MO.RW: ROW Markers, Patrols, Leakage Survey and Monitoring

4. Question Result, ID, **Sat, MO.RW.LEAKRECORDS.P**, (also presented in: PD.RW)
References
Question Text *Does the operator have procedures to prepare and maintain gas leak records containing all information required by WAC 480-93-178?*
Assets Covered **88965 (1,826)**
Result Notes **NWN Standard Practices, SPW 709 - Leak Classification and Repair.**

PD.DP: Damage Prevention

5. Question Result, ID, **Sat, PD.DP.PDPROGRAM.P, 192.614(a)**
References
Question Text *Is a damage prevention program approved and in place?*
Assets Covered **88965 (1,826)**
Result Notes **NWN Standard Practices, SPW 605 - Excavation Damage Prevention Program.**
NWN Standard Practices, SPW 619 - Customer and Public Education.
NWN Public Awareness Plan, 1.3 - Compliance with Regulations and Standards.
NWN Public Awareness Plan, 1.5 Commitment from Management.
NWN Public Awareness Plan, 3.1-3.4 for stakeholder audiences.
6. Question Result, ID, **Sat, PD.DP.ONECALL.P, 192.614(b)**
References
Question Text *Does the process require participation in qualified one-call systems?*
Assets Covered **88965 (1,826)**
Result Notes **NWN Standard Practices, SPW 605 - Excavation Damage Prevention Program.**
NWN Public Awareness Plan, 5.4.1 - One-Call Centers.
7. Question Result, ID, **Sat, PD.DP.EXCAVATEMARK.P, 192.614(c)(5)**
References
Question Text *Does the process require marking proposed excavation sites to CGA Best Practices or use more stringent and accurate requirements?*
Assets Covered **88965 (1,826)**
Result Notes **NWN Standard Practices, SPW 605 - Excavation Damage Prevention Program.**

FOM, Locating Facilities.

8. Question Result, ID, References Sat, PD.DP.EXCAVATEMARK.R, 192.614(c)(5)
Question Text *Do records indicate that marking proposed excavation sites was completed within two business days and in accordance with RCW 19.122?*
Assets Covered 88965 (1,826)
Result Notes Reviewed sampling of locates tickets for 2022-2024. Also reviewed tickets where facilities were not located within 2 days.
9. Question Result, ID, References Sat, PD.DP.TPD.P, 192.614(c)(1)
Question Text *Does the process specify how reports of Third Party Activity and names of associated contractors or excavators are input back into the mail-outs and communications with excavators along the system?*
Assets Covered 88965 (1,826)
Result Notes NWN Public Awareness Plan, 8.2 - Process Evaluation.
10. Question Result, ID, References Sat, PD.DP.TPDONECALL.P, 192.614(c)(3)
Question Text *Does the process specify how reports of TPD are checked against One-Call tickets?*
Assets Covered 88965 (1,826)
Result Notes NWN Public Awareness Plan, 8.2 - Process Evaluation?

FOM, Monitoring Third-Party Excavations

SME from the NWN DP division, Jaime Lemke, reviews all TPD and does a full RCA.

11. Question Result, ID, References Sat, PD.DP.PDPROGRAM.R, 192.614(c) (Appendix F to Part 112)
Question Text *Does the damage prevention program meet minimum requirements specified in 192.614(c)?*
Assets Covered 88965 (1,826)
Result Notes Reviewed sampling of Report of Damage reports from 2022-2024
12. Question Result, ID, References Sat, PD.DP.DPINFOGATHER.P, 192.917(b) (192.935(b)(1)(ii))
Question Text *Does the process require critical damage prevention information be gathered and recorded during pipeline patrols, leak surveys, and integrity assessments?*
Assets Covered 88965 (1,826)
Result Notes NWN Standard Practices, SPW 703 - Patrolling Transmission and Distribution Lines

NWN Public Awareness Plan, 4.5.1.1 - ROW Encroachment Prevention.
13. Question Result, ID, References Sat, PD.DP.DPINFOGATHER.R, 192.947(b) (192.917(b), 192.935(b)(1)(ii))
Question Text *Do records demonstrate that critical damage prevention information is being gathered and recorded during pipeline patrols, leakage surveys, and integrity assessments?*
Assets Covered 88965 (1,826)
Result Notes Reviewed sampling of patrol and leak survey records for 2022-2024.
14. Question Result, ID, References Sat, PD.DP.NOTICETOEXCAVATOR.P,
Question Text *Is there a process to provide the required information to excavators who damage pipeline facilities?*
Assets Covered 88965 (1,826)
Result Notes NWN Standard Practices, SPW 605 - Excavation Damage Prevention Program.
15. Question Result, ID, References Sat, PD.DP.NOTICETOEXCAVATOR.R,
Question Text *Do records indicate that the operator provides the required information to excavators who damage pipeline facilities?*
Assets Covered 88965 (1,826)
Result Notes Reviewed a sampling of letters delivered to excavators for 2022-2024. Each letter contains a bill of damage, a memo going over the dig law, and RCW 19.122.

16. Question Result, ID, References **Sat, PD.DP.COMMISSIONREPORT.P,**
 Question Text *Is there a process to report to the commission when the operator or its contractor observes or becomes aware of the activities described in WAC 480-93-200(9)?*
 Assets Covered **88965 (1,826)**
 Result Notes **NWN Standard Practices, SPW 605 - Excavation Damage Prevention Program.**
17. Question Result, ID, References **NA, PD.DP.COMMISSIONREPORT.R,**
 Question Text *Do records indicate the operator reports to the commission when the operator or its contractor observes or becomes aware of the activities described in WAC 480-93-200(9)?*
 Assets Covered **88965 (1,826)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**
18. Question Result, ID, References **NA, PD.DP.REBURIALINSPECT.R,**
 Question Text *When a third party exposes a pipeline owned by the operator, does the operator have a record showing they examined the pipeline for damage in the vicinity of the excavation?*
 Assets Covered **88965 (1,826)**
 Result Notes **No such event occurred, or condition existed, in the scope of inspection review.**

PD.PA: Public Awareness

19. Question Result, ID, References **Sat, PD.PA.ASSETS.P, 192.616(b) (API RP 1162 Section 2.7 Step 4)**
 Question Text *Does the program clearly identify the specific pipeline systems and facilities to be included in the program, along with the unique attributes and characteristics of each?*
 Assets Covered **88965 (1,826)**
 Result Notes **NWN Public Awareness Plan, 2.1 - Asset Identification.**
20. Question Result, ID, References **Sat, PD.PA.AUDIENCEID.P, 192.616(d) (192.616(e), 192.616(f), API RP 1162 Section 2.2, API RP 1162 Section 3)**
 Question Text *Does the program establish methods to identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents?*
 Assets Covered **88965 (1,826)**
 Result Notes **NWN Public Awareness Plan, 5 - Message Type Per Audience.**
21. Question Result, ID, References **Sat, PD.PA.MGMTSUPPORT.P, 192.616(a) (API RP 1162 Section 2.5, API RP 1162 Section 7.1)**
 Question Text *Does the operator's program documentation demonstrate management support?*
 Assets Covered **88965 (1,826)**
 Result Notes **NWN Public Awareness Plan, 1.5 - Commitment from Management.**
NWN Public Awareness Plan, 1.6 - Responsibilities and Key Personnel, and Budget.
22. Question Result, ID, References **Sat, PD.PA.PROGRAM.P, 192.616(a) (192.616(h))**
 Question Text *Has the continuing public education (awareness) program been established as required?*
 Assets Covered **88965 (1,826)**
 Result Notes **NWN public awareness plan has been established since 2006, API RP1162 is referenced in the manual. The plan is annually reviewed and updated as necessary.**
23. Question Result, ID, References **Sat, PD.PA.AUDIENCEID.R, 192.616(d) (192.616(e), 192.616(f), API RP 1162 Section 2.2, API RP 1162 Section 3)**
 Question Text *Do records identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents to which it sends public awareness materials and messages?*
 Assets Covered **88965 (1,826)**

Result Notes Reviewed mailing lists that contained all the stakeholder audiences listed in this question for 2022-2024.

Checked a sampling of addresses for affected public in IQGeo.

24. Question Result, ID, References Sat, PD.PA.MESSAGES.P, 192.616(c) (API RP 1162 Section 3, API RP 1162 Section 4, API RP 1162 Section 5)
Question Text *Does the program define the combination of messages, delivery methods, and delivery frequencies to comprehensively reach all affected stakeholder audiences in all areas where gas is transported?*
Assets Covered 88965 (1,826)
Result Notes NWN Public Awareness Plan, 6 - Delivery Methods and Frequency.

NWN Public Awareness Plan, 5 - Message Type Per Audience.
25. Question Result, ID, References Sat, PD.PA.SUPPLEMENTAL.P, 192.616(c) (API RP 1162 Section 6.2)
Question Text *Were relevant factors considered to determine the need for supplemental public awareness program enhancements for each stakeholder audience, as described in API RP 1162?*
Assets Covered 88965 (1,826)
Result Notes NWN Public Awareness Plan, 4.1 - Determining Message Content.

NWN Public Awareness Plan, 4.4 - Emergency Preparedness Communications.

NWN Public Awareness Plan, 6.3 - Electronic Communication Methods.

NWN Public Awareness Plan, 6.4 - Mass Media Communications.

NWN Public Awareness Plan, 7 - Program Implementation.

NWN Public Awareness Plan, 8.2 - Program Evaluation.
26. Question Result, ID, References Sat, PD.PA.EDUCATE.R, 192.616(d) (192.616(f))
Question Text *Do records indicate delivered messages specifically included provisions to educate the public, emergency officials, local public officials, and excavators on the categories defined in §192.616(d)?*
Assets Covered 88965 (1,826)
Result Notes Reviewed mailers for each of these stakeholder audiences.
27. Question Result, ID, References Sat, PD.PA.LOCATIONMESSAGE.R, 192.616(e) (192.616(f))
Question Text *Were messages developed and delivered to advise affected municipalities, school districts, businesses, and residents of pipeline facility locations?*
Assets Covered 88965 (1,826)
Result Notes Reviewed mailers for each of these stakeholder audiences.
28. Question Result, ID, References Sat, PD.PA.MESSAGEFREQUENCY.R, 192.616(c) (API RP 1162 Table 2-1, API RP 1162 Table 2-2, API RP 1162 Table 2-3)
Question Text *Did the delivery of materials and messages meet or exceed the baseline delivery frequencies specified in API RP 1162, Table 2-1 through Table 2.3?*
Assets Covered 88965 (1,826)
Result Notes All messages are delivered annually for all stakeholder audiences. LDC customers receive these 10 times/yr.
29. Question Result, ID, References Sat, PD.PA.LANGUAGE.P, 192.616(g) (API RP 1162 Section 2.3.1)
Question Text *Does the program require that materials and messages be provided in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?*
Assets Covered 88965 (1,826)
Result Notes NWN Public Awareness Plan, 5.1.2.1 - Message in Native Languages
30. Question Result, ID, References Sat, PD.PA.LANGUAGE.R, 192.616(g) (API RP 1162 Section 2.3.1)

Question Text *Were materials and messages developed and delivered in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?*

Assets Covered 88965 (1,826)

Result Notes Mailers are delivered in Spanish and English. All others show contact information to receive the letters in simplified Chinese, and Russian.

31. Question Result, ID, References Sat, PD.PA.EVALPLAN.P, 192.616(i) (192.616(c), API RP 1162 Section 8, API RP 1162 Appendix E)

Question Text *Does the program include a process that specifies how program implementation and effectiveness will be periodically evaluated?*

Assets Covered 88965 (1,826)

Result Notes NWN Public Awareness Plan, 8.3 - Effectiveness Evaluation.

32. Question Result, ID, References Sat, PD.PA.EVALIMPL.R, 192.616(c) (192.616(i), API RP 1162 Section 8.3)

Question Text *Has an audit or review of the operator's program implementation been performed annually since the program was developed?*

Assets Covered 88965 (1,826)

Result Notes NWN has had a public awareness plan since 2006. Reviewed revised PA plans for 2022-2024.

33. Question Result, ID, References Sat, PD.PA.AUDITMETHODS.R, 192.616(c) (192.616(i), API RP 1162 Section 8.3)

Question Text *Was one or more of the three acceptable methods (i.e., internal assessment, 3rd-party contractor review, or regulatory inspections) used to complete the annual audit or review of program implementation?*

Assets Covered 88965 (1,826)

Result Notes NWN performs annual internal assessments. Reviewed annual effectiveness documentation for 2022-2024.

NWN Public Awareness Plan, 1.6 - Responsibilities and Key Personnel, and Budget

34. Question Result, ID, References Sat, PD.PA.PROGRAMIMPROVE.R, 192.616(c) (API RP 1162 Section 8.3)

Question Text *Were changes made to improve the program and/or the implementation process based on the results and findings of the annual audit(s)?*

Assets Covered 88965 (1,826)

Result Notes Reviewed the areas for improvement and action plans for the internal effectiveness reviews that were performed for 2022-2024.

Areas for improvement and action plans for 2022 were:

- Improvement Measure - Increase awareness of what to do (Go) if one smells natural gas, with Affected Public. Action Plan(s) - continuing an integrated approach, with increased education on leaving (Go) if one smells natural gas.
- Improvement Measure - Strengthen first responder awareness of NWN training resources. Action Plan(s) - perform more trainings with fire departments and determine if any information on safety materials can be improved.
- Improvement Measure - Decrease dig-in damages from contractors/excavators. Action Plan(s) - expanding the preventative communication strategy with the Damage Prevention team: Tailor engagement collateral and follow-up email to different contractor groups (eg. concrete, directional drilling, fence installers), in addition to top offending contractors. Train field employees and contractor personnel to educate those who do not call 811 when out in the field.
- Improvement Measure - Strengthening engagement with public to continue increasing awareness of natural gas safety. Action Plan(s) - Launch specific stand-alone safety email campaigns. Increase use of safety activation at community events and increase safety event exposure. Update NW Natural safety app to be more interactive; enhance home safety and emergency-preparedness resources.

Areas for improvement and action plan for 2023:

- Improvement Measure - Increase awareness of what to do (Go) if one smells natural gas, with Affected Public. Action Plan(s) - Provide more frequent education on leaving (Go) if one smells natural gas in standalone emails and customer safety communications.

- Improvement Measure - Decrease dig-in damages from contractors/excavators. Action Plan(s) - Internal no-locate submission form on Hub to be released company-wide. Follow up with repeat offenders of insufficient one-call practices via mailed/emailed letter as part of permanent process.
- Improvement Measure - Modify fire department face-to-face training Action Plan(s) - Conduct evaluation of scoring surveys and review external training presentation for updates. Examine opportunity to include LNG fire department training as appropriate
- Improvement Measure - Strengthening engagement with public to continue increasing awareness of natural gas safety. Action Plan(s) - Investigate programmatic options with Culver and NW Natural. Increase frequency of stand-alone safety messages & social posts. Launch updated NWN safety app to be more interactive/enhance home safety and emergency-preparedness resources. Update Spanish version of General Safety Brochure.

Areas for improvement and action plan for 2024:

- Improvement Measure - Increase awareness of what to do (Go) if smell natural gas, and overall Smell. Go. Let us Know. with Affected Public. Action Plan(s) - Enhance messaging on leaving (Go) if one smells natural gas and overall S.G.LUK. in standalone emails and customer safety communications.
- Improvement Measure - Decrease dig-in damages from contractors/excavators. Action Plan(s) - Examine opportunity to reinforce messaging to excavators about not using big equipment in the tolerance zone. Review handout and email materials for potential excavator grouping updates
- Improvement Measure - Modify fire department face-to-face training Action Plan(s) - Increase outreach for police department face-to-face training at Sherwood/on-site.
- Improvement Measure - Increase survey results from all audience groups in public awareness plan. Action Plan(s) - Bring program management & creative back in-house for targeted mailings.
- Improvement Measure - Strengthening engagement with affected public and audiences. Action Plan(s) - Explore geofencing pilot with PAPA for excavators and first responders. Provide Spanish-translated version of general safety brochure. Internal communications awareness for employees on residential safety messages.

35. Question Result, ID, References **Sat, PD.PA.EVALEFFECTIVENESS.R, 192.616(c) (API RP 1162 Section 8.4)**

Question Text *Have effectiveness evaluation(s) of the program been performed for all stakeholder groups in all notification areas along all systems covered by the program?*

Assets Covered **88965 (1,826)**

Result Notes **NWN performs internal annual effectiveness reviews. Reviewed areas for improvement and action plans for 2022-2024. Stakeholder group evaluations are continuing to have positive trends and feedback results.**

36. Question Result, ID, References **Sat, PD.PA.MEASUREOUTREACH.R, 192.616(c) (API RP 1162 Section 8.4.1)**

Question Text *In evaluating effectiveness, was actual program outreach for each stakeholder audience tracked?*

Assets Covered **88965 (1,826)**

Result Notes **Appendix A in NWN PA plan tracks this, it was reviewed.**

Also reviewed program outreach tracking in the 2022-2024 internal effectiveness reviews.

37. Question Result, ID, References **Sat, PD.PA.MEASUREUNDERSTANDABILITY.R, 192.616(c) (API RP 1162 Section 8.4.2)**

Question Text *In evaluating program effectiveness, was the percentage of each stakeholder audience that understood and retained the key information from the messages determined?*

Assets Covered **88965 (1,826)**

Result Notes **Reviewed survey results in the annual internal effectiveness reviews for 2022-2024. Audiences appeared to understand key information from messages.**

38. Question Result, ID, References **Sat, PD.PA.MEASUREBEHAVIOR.R, 192.616(c) (API RP 1162 Section 8.4.3)**

Question Text *In evaluating program effectiveness, was evaluation made of whether appropriate preventive, response, and mitigative behaviors were understood and likely to be exhibited?*

Assets Covered **88965 (1,826)**

Result Notes **Reviewed evaluation results in the annual internal effectiveness reviews for 2022-2024.**

39. Question Result, ID, References **Sat, PD.PA.MEASUREBOTTOM.R, 192.616(c) (API RP 1162 Section 8.4.4)**
 Question Text *Were bottom-line results of the program measured by tracking third-party incidents and consequences including: (1) near misses, (2) excavation damages resulting in pipeline failures, (3) excavation damages that do not result in pipeline failures?*
 Assets Covered **88965 (1,826)**
 Result Notes **Reviewed annual effectiveness reviews for 2022-2024. Annual reports were also reviewed showing this information.**
40. Question Result, ID, References **Sat, PD.PA.CHANGES.R, 192.616(c) (API RP 1162 Section 2.7 (Step 12), API RP 1162 Section 8.5)**
 Question Text *Were needed changes and/or modifications to the program identified and documented based on the results and findings of the program effectiveness evaluations?*
 Assets Covered **88965 (1,826)**
 Result Notes **Reviewed the areas for improvement and action plans for the internal effectiveness reviews that were performed for 2022-2024.**

PD.SP: Special Permits

41. Question Result, ID, References **NA, PD.SP.REPAIR.P, 190.341(d)(2)**
 Question Text *If the operator operates a pipeline under a special permit have the processes been modified to incorporate the requirements of the permit for required repairs?*
 Assets Covered **88965 (1,826)**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
42. Question Result, ID, References **NA, PD.SP.BESTPRACTICE.P, 190.341(d)(2)**
 Question Text *If the operator operates a pipeline under a special permit, do the processes specify implementation of applicable CGA Best Practices?*
 Assets Covered **88965 (1,826)**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**
43. Question Result, ID, References **NA, PD.SP.REPAIR.R, 190.341(d)(2)**
 Question Text *If the operator operates a pipeline under a special permit, do records indicate that required repairs were performed?*
 Assets Covered **88965 (1,826)**
 Result Notes **No such relevant facilities/equipment existed in the scope of inspection review.**

MO.GOCLASS: Gas Pipeline Class Location

44. Question Result, ID, References **Sat, MO.GO.CONTSURVEILLANCE.P, 192.605(e) (192.613(a), 192.613(b), 192.703(b), 192.703(c)) (also presented in: MO.GO, PD.RW)**
 Question Text *Are there processes for performing continuing surveillance of pipeline facilities, and also for reconditioning, phasing out, or reducing the MAOP in a pipeline segment that is determined to be in unsatisfactory condition but on which no immediate hazard exists?*
 Assets Covered **88965 (1,826)**
 Result Notes **NWN Standard Practices, SPW 613 - Continuing Surveillance and Response to Unsatisfactory Conditions.**
NWN Standard Practices, SPW 703 - Patrolling Transmission and Distribution Lines.
45. Question Result, ID, References **Sat, MO.GO.CONTSURVEILLANCE.R, 192.709(c) (192.613(a), 192.613(b), 192.703(b), 192.703(c)) (also presented in: MO.GO, PD.RW)**
 Question Text *Do records indicate performance of continuing surveillance of facilities as required, and also the reconditioning, phasing out, or MAOP reduction in any pipeline segment that was determined to be in unsatisfactory condition but on which no immediate hazard existed?*
 Assets Covered **88965 (1,826)**
 Result Notes **Reviewed sampling of patrols and leak survey records for 2022-2024.**

PD.PA: Public Awareness

46. Question Result, ID, **Sat, EP.ERG.LIAISON.R, 192.603(b) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4),**
References **192.616(c), 192.9(d), 192.9(e), ADB-2005-03** (also presented in: EP.ERG)
Question Text *Do records indicate that liaison has been established and maintained with appropriate fire, police, other public officials, and 911 emergency call centers?*
Assets Covered **88965 (1,826)**
Result Notes **Reviewed mailing lists and mailing material for 2022-2024 for public officials, first responders, and 911 emergency call centers.**

Reviewed postage receipts for these stakeholder groups.

Public officials/first responders contacted for 2022, 314; for 2023, 328; for 2024, 328.

PD.RW: ROW Markers, Patrols, Monitoring

47. Question Result, ID, **Sat, MO.GO.CONTSURVEILLANCE.P, 192.605(e) (192.613(a), 192.613(b), 192.703(b), 192.703(c))** (also
References presented in: MO.GO, MO.GOCLASS)
Question Text *Are there processes for performing continuing surveillance of pipeline facilities, and also for reconditioning, phasing out, or reducing the MAOP in a pipeline segment that is determined to be in unsatisfactory condition but on which no immediate hazard exists?*
Assets Covered **88965 (1,826)**
Result Notes **NWN Standard Practices, SPW 613 - Continuing Surveillance and Response to Unsatisfactory Conditions.**

NWN Standard Practices, SPW 703 - Patrolling Transmission and Distribution Lines.
48. Question Result, ID, **Sat, MO.GO.CONTSURVEILLANCE.R, 192.709(c) (192.613(a), 192.613(b), 192.703(b), 192.703(c))** (also
References presented in: MO.GO, MO.GOCLASS)
Question Text *Do records indicate performance of continuing surveillance of facilities as required, and also the reconditioning, phasing out, or MAOP reduction in any pipeline segment that was determined to be in unsatisfactory condition but on which no immediate hazard existed?*
Assets Covered **88965 (1,826)**
Result Notes **Reviewed sampling of patrols and leak survey records for 2022-2024.**
49. Question Result, ID, **Sat, MO.RW.LEAKRECORDS.P,** (also presented in: MO.RW)
References
Question Text *Does the operator have procedures to prepare and maintain gas leak records containing all information required by WAC 480-93-178?*
Assets Covered **88965 (1,826)**
Result Notes **NWN Standard Practices, SPW 709 - Leak Classification and Repair.**

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