U.S. Department
of Transportation
**Pipeline and Hazardous
Materials Safety
Administration**

**1200 New Jersey Avenue SE
Washington DC 20590**

2009 Natural Gas State Program Evaluation

for

Washington Utilities and Transportation Commission

Document Legend
PART:

- O -- Representative Date and Title Information
- A -- General Program Qualifications
- B -- Inspections and Compliance - Procedures/Records/Performance
- C -- Interstate Agent States
- D -- Incident Investigations
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- F -- Field Inspection
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2009 Natural Gas State Program Evaluation -- CY 2009

Natural Gas

State Agency: Washington
Rating:
Agency Status:
60105(a): Yes **60106(a):** No **Interstate Agent:** Yes
Date of Visit: 04/19/2010 - 04/21/2010
Agency Representative: David Lykken, Pipeline Safety Director
Steven King, Director Safety & Consumer Protection
Joe Subsits, Chief Engineer
Jim Fernald, Operations Manager
Alan Lundeen, Policy & Outreach Manager
PHMSA Representative: Glynn Blanton, DOT/PHMSA State Programs
Commission Chairman to whom follow up letter is to be sent:
Name/Title: Jeffrey D. Goltz, Chairman
Agency: Wasington Utilities and Transportation Commission
Address: 1300 S. Evergreen Park Drive SW, PO Box 47250
City/State/Zip: Olympia, WA 98504-7250

INSTRUCTIONS:

Complete this evaluation in accordance with the Procedures for Evaluating State Pipeline Safety Program. The evaluation should generally reflect state program performance during CY 2009 (not the status of performance at the time of the evaluation). All items for which criteria have not been established should be answered based on the PHMSA representative's judgment. A deficiency in any one part of a multiple part question should be scored as needs improvement. Determine the answer to the question then select the appropriate point value. If a state receives less then the maximum points, include a brief explanation in the space provided for general comments/regional observations. If a question is not applicable to a state, select NA. Please ensure all responses are COMPLETE and ACCURATE, and OBJECTIVELY reflect state program performance. Increasing emphasis is being placed on performance. This evaluation together with selected factors reported in the state's annual certification/agreement attachments provide the basis for determining the state's pipeline safety grant allocation.

Field Inspection (PART F):

The field inspection form used will allow different areas of emphasis to be considered for each question. Question 13 is provided for scoring field observation areas. In completing PART F, the PHMSA representative should include a written summary which thoroughly documents the inspection.

Scoring Summary

PARTS		Possible Points	Points Scored
A	General Program Qualifications	26	26
B	Inspections and Compliance - Procedures/Records/Performance	25	24.3
C	Interstate Agent States	6	6
D	Incident Investigations	7	7
E	Damage Prevention Initiatives	9	9
F	Field Inspection	12	10
G	PHMSA Initiatives - Strategic Plan	10	10
H	Miscellaneous	3	3
I	Program Initiatives	9	9
TOTALS		**107**	**104.3**
State Rating			**97.5**

PART A - General Program Qualifications

		Points(MAX)	Score
1	Did the state submit complete and accurate information on the attachments to its most current 60105(a) Certification/60106 (a) Agreement? (NOTE: PHMSA Representative to verify certification/agreement attachments by reviewing appropriate state documentation. Score a deficiency in any one area as "needs improvement". Attachment numbers appear in parenthesis) Previous Question A.1, Items a-h worth 1 point each Yes = 8 No = 0 Needs Minor Improvement = 3-7 Needs Major Improvement = 2	8	8

- a. State Jurisdiction and agent status over gas facilities (1) ☒
- b. Total state inspection activity (2) ☒
- c. Gas facilities subject to state safety jurisdiction (3) ☒
- d. Gas pipeline incidents (4) ☒
- e. State compliance actions (5) ☒
- f. State record maintenance and reporting (6) ☒
- g. State employees directly involved in the gas pipeline safety program (7) ☒
- h. State compliance with Federal requirements (8) ☒

SLR Notes:

WUTC has distribution authority over 26 private, 3 municipal, 15 master meter, 2 LPG, 1 LNG, 3 hydrogen and 1 Bio-gas pipelines. On the transmission jurisdication authority it has responsible for 10 intrastate, 12 interstate and 1 liquified natural gas facility and pipelines. A review of all inspection units, activities, records, personnel, and compliance requirements found the information to be in compliance.

2	Did the state have an adequate mechanism to receive operator reporting of incidents to ensure state compliance with 60105(a) Certification/60106(a) Agreement requirements (fatality, injury requiring hospitalization, property damage exceeding $50,000 - Mechanism should include receiving "after hours" reports)? (Chapter 6) Previous Question A.2 Yes = 1 No = 0	1	1

SLR Notes:

Incident reporting is required under WUTC's rule 480-93-200, section 1. The telephone number for reporting is 1-888-321-9146.

3	Has the state held a pipeline safety TQ seminar(s) in the last 3 years? (NOTE: Indicate date of last seminar or if state requested seminar, but T&Q could not provide, indicate date of state request for seminar. Seminars must be held at least once every 3 calendar years.) (Chapter 8.5) Previous Question A.4 Yes = 2 No = 0	2	2

SLR Notes:

Yes, the T&Q seminar was held in Portland, OR on June 17-18, 2009. This was a cooperative effort between Oregon, Washington and Idaho to sponsor this seminar to help provide a central location for the operators in their states to attend this meeting. File folder did not contain list of attendees at the meeting. However, this information was requested during the evaluation review from Michael Thompson's office and was provided and filed in file folder by David Lykken. A majority of the operators located in Washington State did attend the seminar.

4	Were pipeline safety program files well-organized and accessible?(NOTE: This also includes electronic files) (Chapter 5) Previous Question A.5 Yes = 1 No = 0	1	1

SLR Notes:

Yes, I reviewed WUTC's Pipeline Safety Data Base with David Lykken. This program is location on the network drive and can be assessed by field personnel via VPN. File folders and information provided during the review were well organized in individual file folders. I reviewed the record center location where all these files are maintained and it was in a security location and fire protected.

5	Did state records and discussions with the state pipeline safety program manager indicate adequate knowledge of PHMSA program and regulations? (Chapter 4.1, Chapter 8.1) Previous Question A.6 Yes = 2 No = 0 Needs Improvement = 1	2	2

SLR Notes:

Yes, David Lykken has a good working knowledge about documents that need to be submitted. He was successful in logging-in to FedStar and demonstrated his abilities to use the Standards Library program. Information on financial dollars spend by WUTC on the pipeline safety program is entered by the WUTC accounting people and David Lykken reviews and submits the final documents. All documents are reviewed before being submitted into the Annual Certification and Year End Payment Request. David Lykken was promoted and moved into the Program Manager's position in November, 2009. He started his career with the WUTC in 2000 and has over10 years of experience in pipeline safety serving as Chief Engineer for 6 years.

6	Did the state respond in writing within 60 days to the requested items in the Chairman's letter following the Region's last program evaluation? (No response is necessary if no items are requested in letter and mark "Yes") (Chapter 8.1) Previous Question A.8 Yes = 1 No = 0	1	1

SLR Notes:

No response necessary. Letter sent to the WUTC Chairman on December 21, 2009 did not required a response.

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7 What actions, if necessary, did the State initiate as a result of issues raised in the Chairperson's letter from the previous year? Did actions correct or address deficiencies from previous year's evaluation? (No response is necessary if no items are requested in letter and mark "Yes") (Chapter 8.1) Previous Question A.8/A.9

Yes = 1 No = 0

1 1

SLR Notes:

No action was required by WUTC because the letter to the Chairman did not describe any items of concern.

Personnel and Qualifications

8 Has each inspector fulfilled the 3 year TQ training requirement? If No, has the state been granted a waiver regarding TQ courses by the Associate Administrator for Pipeline Safety? (NOTE: If the State has new inspectors who have not attended all TQ courses, but are in a program which will achieve the completion of all applicable courses within 3 years of taking first course (5 years to sucessfully complete), or if a waiver has been granted by the applicable Region Director for the state, please answer yes.) (Chapter 4.4) Previous Question A.10

Yes = 3 No = 0

3 3

SLR Notes:

Yes, all WUTC pipeline safety engineers have completed the three year requirement courses except Stephanie Zuehlke who has completed six T&Q courses and under the three year time schedule. She completed course PL3291 in 09/2009 and scheduled to attend the remaining courses in 2010. Currently, she is attending the OQ seminar in Denver this week, pigging class in June & ECDA class in Sept, 2010.

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9 Brief Description of Non-TQ training Activities:

Info Only = No Points

Info Only Info Only

For State Personnel:
On October 13, 2009 staff attended a Shoring/Excavation Safety class conducted by the state Labor & Industry Office. All Engineers except one attended the training. Listed below are the individuals that attended: Kuang Chu, Lex Vinsel, Alan Lundeen, Stephanie Zuehlke, Scott Rukke, Jim Fernald, Anne Soiza and Al Jones. Stephanie Zuehlke also attended Hazwoper training in January 12-16, 2009.

For Operators:

None.

For Non-Operator Entities/Parties, Information Dissemination, Public Meetings:
Key staff attended the Citizens Committee on Pipeline Safety meetings in part to provide educate to members on pipeline safety related issues and general pipeline 101 information.

SLR Notes:

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10 Did the lead inspectors complete all required T&Q OQ courses and Computer Based Training (CBT) before conducting OQ Inspections? (Chapter 4.4.1) Previous Question A.12

Yes = 1 No = 0

1 1

SLR Notes:

Yes, all lead and non-lead engineers have completed the required T&Q courses and computer based training before conducting OQ inspections.

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11 Did the lead inspectors complete all required TQ Integrity Management (IMP) Courses/Seminars and CBT before conducting IMP Inspections? (Chapter 4.4.1) Previous Question A.13

Yes = 1 No = 0

1 1

SLR Notes:

Yes, Joe Subsits, Scott Rukke, Al Jones, Chu Kuang are the lead engineers and have completed all courses.

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12 Was the ratio acceptable of Total inspection Person-days to Total Person-days charged to the program by state inspectors? (Region Director may modify points for just cause) (Chapter 4.3) Previous Question B.12

Yes = 5 No = 0

5 5

A. Total Inspection Person Days (Attachment 2):

B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):

Ratio: A / B

If Ratio >= 0.38 Then Points = 5, If Ratio < 0.38 Then Points = 0

SLR Notes:

A. 636.14 total inspection person days: B: (220 x 6.36=1399.2) A/B= 636.14/1399.2= 0.4546 meets the larger amount of .38 requirement for an award of five points in this category.

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13 Have there been modifications or proposed changes to inspector-staffing levels? (If yes, describe) Previous Question B.13 — Info Only — Info Only

Info Only = No Points

SLR Notes:

No. However, if approval is granted by State Legislature next year, 2011. They will grow the program by one or two engineers to assume enforcement authority for damage prevention.

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14 Part-A General Comments/Regional Observations — Info Only — Info Only

Info Only = No Points

SLR Notes:

No comments or observations noted.

Total points scored for this section: 26

Total possible points for this section: 26

PART B - Inspections and Compliance - Procedures/Records/ Performance

Points(MAX) **Score**

Inspection Procedures

1 Does the State have a written inspection plan to complete the following? (all types of operators including LNG) (Chapter 5.1) Previous Question B.1 + Chapter 5 Changes + Incorporate LNG — 6.5 — 5.75

Yes = 6.5 No = 0 Needs Improvement = 50% Deduction

a	Standard Inspections (Including LNG) (Max points = 2)	Yes ◉	No ○	Needs Improvement ○
b	IMP Inspections (Including DIMP) (Max points = .5)	Yes ◉	No ○	Needs Improvement ○
c	OQ Inspections (Max points = .5)	Yes ◉	No ○	Needs Improvement ○
d	Damage Prevention (Max points = .5)	Yes ○	No ○	Needs Improvement ◉
e	On-Site Operator Training (Max points = .5)	Yes ◉	No ○	Needs Improvement ○
f	Construction Inspections (Max points = .5)	Yes ◉	No ○	Needs Improvement ○
g	Incident/Accident Investigations (Max points = 1)	Yes ◉	No ○	Needs Improvement ○
h	Compliance Follow-up (Max points = 1)	Yes ○	No ○	Needs Improvement ◉

SLR Notes:

a: Yes, WUTC Pipeline Safety Section Policy & Procedures Manual, Section 14, 15 & 16 address this item.
b: Yes, WUTC Pipeline Safety Section Policy & Procedures Manual, Section 22.
c: Yes, WUTC Pipeline Safety Section Policy & Procedures Manual, Section 17.
d: Needs Improvement, WUTC Pipeline Safety Section Policy & Procedures Manual, Section 31 (Under development). A placeholder has been established but information was not completed on Damage Prevention.
e: Yes, WUTC Pipeline Safety Section Policy & Procedures Manual, Section 27 (Operator Training & Technical Assistance) ? Has been developed and the effective date is Feb. 1, 2010. This was one of two items mentioned in Tom' Finch's letter to program manager.
f: Yes, WUTC Pipeline Safety Section Policy & Procedures Manual, Section 21.
g: Yes, WUTC Pipeline Safety Section Policy & Procedures Manual, Section 20
h: Needs Improvement, WUTC Pipeline Safety Section Policy & Procedures Manual, Section 26 (Under development). A placeholder has been established but not complete with information on follow-up.

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2 Did the written Procedures for selecting operators adequately address key concerns? (Chapter 5.1) Previous Question B.2, items a-d are worth .5 point each — 2 — 2

Yes = 2 No = 0 Needs Improvement = 50% Deduction

a	Length of time since last inspection	Yes ◉	No ○	Needs Improvement ○
b	History of Operator/unit and/or location (including leakage , incident and compliance history)	Yes ◉	No ○	Needs Improvement ○
c	Type of activity being undertaken by operator (construction etc)	Yes ◉	No ○	Needs Improvement ○
d	For large operators, rotation of locations inspected	Yes ◉	No ○	Needs Improvement ○

SLR Notes:

Yes, WUTC Pipeline Safety Section Policy & Procedures Manual and data base program includes these items. Each inspection is determined by a risk ranking method and not to exceed three years.

Inspection Performance

3 Did the state inspect all types of operators and inspection units in accordance with time intervals established in its written procedures? (Chapter 5.1) Previous Question B.3 — 2 — 2

Yes = 2 No = 0

SLR Notes:

Yes. WUTC has identified 15 master meter operators to be inspected during calendar year 2010 to meet their procedures for Prioritizing Operator Inspections in accordance to Section 13.

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4 Did the state inspection form cover all applicable code requirements addressed on the Federal Inspection forms? (Chapter 5.1 (3)) Previous Question B.4 — 1 — 1

Yes = 1 No = 0

SLR Notes:

Yes. A review of the inspection forms indicated all items in the federal inspection document match their forms.

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5 Did state complete all applicable portions of inspection forms? (Chapter 5.1 (3)) Previous Question B.5 — 1 — 1

Yes = 1 No = 0

SLR Notes:

Yes, WUTC has included WUTC's commission rules with the federal regulations on their inspection forms. The form was found to be complete and being used by staff members.

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6 Did the state initiate appropriate follow-up actions to Safety Related Condition Reports? (Chapter 6.3) Previous Question B.6 — .5 — .5

Yes = .5 No = 0

SLR Notes:

Yes, two safety related reports were submitted and followed up on by staff members in 2009. The company and locations are Cascade Natural Gas Corporation at 2009 Lewis River Road in Cowlitz County on 2/28/09 and Cascade Natural Gas Corporation on R15 Jones Road in Sedro Woolley on 12/2/09. The follow-ups were performed by Al Jones and Patricia Johnson. I reviewed the file and reports and found them to be complete and accurate.

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7 Did the state review operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization and if necessary remedial action was taken? (NTSB) Previous Question B.7 — .5 — .5

Yes = .5 No = 0

SLR Notes:

Yes, the State of Washington does not have cast-iron pipelines. All cast-iron was removed by the natural gas distribution operators and verified by staff members in July, 2007. However, this item is in their inspection review and check list.

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8 Did the state review operator procedures for surveillance of cast iron pipelines, including appropriate action resulting from tracking circumferential cracking failures, study of leakage history, or other unusual operating maintenance condition? (Note: See GPTC Appendix G-18 for guidance) (NTSB) Previous Question B.8 — .5 — .5

Yes = .5 No = 0

SLR Notes:

Yes, the State of Washington does not have cast-iron pipelines. All cast-iron was removed by the natural gas operators and verified by WUTC staff members in July, 2007. However, this item is in their inspection review and check list.

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9 Did the state review operator emergency response procedures for leaks caused by excavation damage near buildings and determine whether the procedures adequately address the possibility of multiple leaks and underground migration of gas into nearby buildings Refer to 4/12/01 letter from PHMSA in response to NTSB recommendation P-00-20 and P-00-21? (NTSB) Previous Question B.9 — .5 — .5

Yes = .5 No = 0

SLR Notes:

Yes, WUTC has a state rule, WAC 480-93-186 Leak Evaluation, that address this requirement and it is included in their inspection form.

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10 Did the state review operator records of previous accidents and failures including reported third party damage and leak response to ensure appropriate operator response as required by 192.617? (NTSB) Previous Question B.10 — 1 — 1

Yes = 1 No = 0

SLR Notes:

Yes, this information is covered in the standard inspection report for intrastate gas distribution listed under item 100. A review of the inspection report for the system of Pullman/Clarkston District on 8/27-29/09 indicated this information was checked.

Compliance - 60105(a) States

11 Did the state adequately document sufficient information on probable violations? (Chapter 5.2) Previous Question B.14 — 1 — 1

Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

Yes, A review of the probable violations cited against Avista Utilities Corporation on June 7 and June 21-23, 2009 was checked. The documentation was followed in accordance with their procedures.

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12 Does the state have written procedures to identify the steps to be taken from the discovery to the resolution of a probable violation as specified in the "Guidelines for State Participating in the Pipeline Safety Program"? (Chapter 5.1) Previous Question D(1).1 — 1 — 1

Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

Yes, this information is completed and described in WUTC Pipeline Safety Policy & Procedures Manual in Section 34, Safety & Consumer Protection Division Compliance & Enforcement Manual.

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13 Does the state have written procedures to notify an operator when a noncompliance is identified as specified in the "Guidelines for States Participating in the Pipeline Safety Program"? (Chapter 5.1(4)) Previous Question D (1).2 — 1 — 1

Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

Yes, this information is completed and described in WUTC Pipeline Safety Policy & Procedures in Section 34, Safety & Consumer Protection Division Compliance & Enforcement Manual, pages 49 thru 65.

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14 Does the state have a written procedure for routinely reviewing the progress of compliance actions to prevent delays or breakdowns of the enforcement process, as required by the "Guidelines for States Participating in the Pipeline Safety Program"? (Chapter 5.1(5)) Previous Question D(1).3 — 1 — 1

Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

Yes, this is information is located in the WUTC "Project Tracking System". The Pipeline Safety Policy & Procedures section 25 identifies this process.

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15 Has the State issued compliance actions for all probable violations discovered? (Note : PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation) Previous Question D(1).4 — 1 — 1

Yes = 1 No = 0

SLR Notes:

Yes. They do issue compliance action in the form of either accepting the operators response to their letter on the violations found or may offer a proposed settlement before going to a formal complaint.

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16 Did the state follow its written procedures for reviewing compliance actions and follow-up to determine that prompt corrective actions were taken by operators, within the time frames established by the procedures and compliance correspondence, as required by the "Guidelines for States Participating in the Pipeline Safety Program"? Previous Question D(1).5 — 1 — 1

Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

Yes, WUTC Pipeline Safety Policy & Procedures in Section 26, Compliance Follow-up Inspection is under development but they do perform this requirement via the standard inspection guidelines. Section 16 states, "Review the company's response. If appropriate, schedule a follow-up inspection to conduct field verification."

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17 If compliance could not be established by other means, did state pipeline safety program staff request formal action, such as a "Show Cause Hearing" to correct pipeline safety violations? (check each states enforcement procedures) Previous Question D(1).6 — 1 — 1

No = 0 Yes = 1

SLR Notes:

Yes, WUTC requested a formal complaint and action was taken against the City of Enumclaw (City) on August 24, 2009. The Commission issued a complaint against the City for 651 violations of the Commission's rules and a maximum penalty of $11 million.

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18 Did the state adequately document the resolution of probable violations? (Chapter 5.1 (6)) Previous Question D(1).7 — 1 — 1

Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

Yes, City of Enumclaw. Letter was sent to the Mayor pertaining to the areas of non-compliance. A formal hearing was conducted on June 25, 2009. A settlement was proposed and entered into by the City. The case was closed on August 24, 2009.

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19 Were compliance actions sent to a company officer? (manager or board member if municipal/government system) (Chapter 5.1(4)) Previous Question D(1).8 — .5 — .5

Yes = .5 No = 0

SLR Notes:

Yes, a review of the letter sent to the Mayor of the City of Enumclaw indicated all compliance actions were being sent to the manager of the city. All correspondence to each city Mayor or Manager includes a copy of the letter to each council members. All compliance letters to private companies go to the President or Vice-President Representative.

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20 Did the compliance proceedings give reasonable due process to all parties? (check each states enforcement procedures) Previous Question D(1).9 — 1 — 1

Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

Yes, this information is described in WUTC's Pipeline Safety Policy & Procedures in Section 34, Safety & Consumer Protection Division Compliance & Enforcement Manual.

Compliance - 60106(a) States

21 Did the state use the current federal inspection form(s)? Previous Question D(2).1 — 1 — NA

Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

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22 Are results adequately documented demonstrating inspection units were reviewed in accordance with state inspection plan? Previous Question D(2).2 — 1 — NA

Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

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23 Were any probable violations identified by state referred to PHMSA for compliance? (NOTE: PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation.) Previous Question D(2).3 — 1 — NA

Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

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24 Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? Previous Question D(2).4 — 1 — NA

Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

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25 Did the state give written notice to PHMSA within 60 days of all probable violations found? Previous Question D(2).5 — 1 — NA

Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

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26 Did the state initially submit adequate documentation to support compliance action by PHMSA on probable violations? Previous Question D(2).6 — 1 — NA

Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

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27 Part B: General Comments/Regional Observations — Info Only — Info Only

Info Only = No Points

SLR Notes:

Total points scored for this section: 24.25
Total possible points for this section: 25

PART C - Interstate Agent States

		Points(MAX)	Score
1	Did the state use the current federal inspection form(s)? Previous Question D(3).1 Yes = 1 No = 0 Needs Improvement = .5	1	1

SLR Notes:

Yes, they are using the federal documents. I also reviewed the inspection performed on Puget Sound Energy on July 13, 2009 by Al Jones to verify this requirement.

2	Are results documented demonstrating inspection units were reviewed in accordance with "PHMSA directed inspection plan"? Previous Question D(3).2 Yes = 1 No = 0 Needs Improvement = .5	1	1

SLR Notes:

Yes, this information was well documented and demonstrated the inspection units were reviewed in accordance with "PHMSA directed inspection plan".

3	Did the state submit documentation of the inspections within 60 days as stated in its latest Interstate Agent Agreement form? Previous Question D(3).3 Yes = 1 No = 0	1	1

SLR Notes:

Yes, information is submitted by WUTC to PHMSA within thirty days as provided in their "Project Tracking System".

4	Were any probable violations identified by state referred to PHMSA for compliance? (NOTE: PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation.) Previous Question D(3).4 Yes = 1 No = 0	1	1

SLR Notes:

Yes, per the letter of concerns pertaining to Cascada Natural Gas-Kelso-Beaver Pipeline Interstate. The inspection was conducted on June 29-July 3, 2009. Another example, the inspection performed on TransCanada's GTN System on August 24-27 and September 8-11, 2009.

5	Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? Previous Question D(3).5 Yes = 1 No = 0 Needs Improvement = .5	1	NA

SLR Notes:

No imminent safety concerns were reported in 2009.

6	Did the state give written notice to PHMSA within 60 days of all probable violations found? Previous Question D(3).6 Yes = 1 No = 0	1	1

SLR Notes:

Yes, information is submitted by WUTC to PHMSA within thirty days as provided in their "Project Tracking System".

7	Did the state initially submit documentation to support compliance action by PHMSA on probable violations? Previous Question D(3).7 Yes = 1 No = 0 Needs Improvement = .5	1	1

SLR Notes:

Yes, this information is submitted by WUTC along with the federal reporting form.

8	Part C: General Comments/Regional Observations Info Only = No Points	Info Only	Info Only

SLR Notes:

Total points scored for this section: 6

Total possible points for this section: 6

PART D - Incident Investigations

Points(MAX) **Score**

1 Are state personnel following the procedures for Federal/State cooperation in case of an incident? (See Appendix in "Guidelines for States Participating in the Pipeline Safety Program") (Chapter 6.1) Previous Question E.1 — 1 — 1

Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

Yes, they follow their written procedures pertaining to working with PHMSA in cases involving an incident. I reviewed the Williams Gas Pipeline incident that occurred on 1/08/09. The report and file contained information shared with PHMSA about the pin leak on the 30 inch girth weld that was found and corrected. I reviewed the Puget Sound Energy-King County East incident. This incident occurred when a contractor excavated next to the 6 inch high pressure pipeline and damaged a 1 1/4 inch stub. All information reviewed indicated state personnel are following the procedures for Federal/State cooperation regarding incidents.

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2 Are state personnel familiar with the jurisdictional authority and Memorandum of Understanding between NTSB and PHMSA? (See Appendix in "Guidelines for States Participating in the Pipeline Safety Program") (Chapter 6 ? Appendix D) Previous Question E.2 — .5 — .5

Yes = .5 No = 0

SLR Notes:

Yes, David Lykken and Joe Subsits response, "the memorandum of understanding is located in the Guidelines for States Participating in the Pipeline Safety". Each WUTC staff member has a copy of the 2009 Guidelines for States Participating in the Pipeline Safety Program in their office.

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3 Did the state keep adequate records of incident notifications received? Previous Question E.3 — 1 — 1

Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

Yes, all six federally required incident reports were recorded and maintained by WUTC. Additionally, WUTC had 97 state reportable incidents in calendar year 2009. WUTC requires each operator to report leaks and damages that occur on their facilities to their agency. This requirement is found in WUTC rule WAC 480-93-200 "Reporting Requirements".

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4 If an onsite investigation of an incident was not made, did the state obtain sufficient information by other means to determine the facts and support the decision not to go on-site? Previous Question E.4 — 1 — 1

Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

Yes. Onsite investigation was not performed on Cascade Natural Gas in Yakima County, Cascade Natural Gas in Bremerton and Puget Sound Energy in King County due to the circumstances of the incidents. Category D and H.

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5 Were investigations thorough and conclusions and recommendations documented in an acceptable manner? Previous Question E.5, comprehensive question worth 2 points total — 2 — 2

Yes = 2 No = 0 Needs Improvement = 1

a.	Observations and Document Review	Yes ◉	No ○	Needs Improvement ○
b.	Contributing Factors	Yes ◉	No ○	Needs Improvement ○
c.	Recommendations to prevent recurrences where appropriate	Yes ◉	No ○	Needs Improvement ○

SLR Notes:

Information reviewed in the files and folders indicate the investigations were thorough and conclusive to the findings of fact.

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6 Did the state initiate enforcement action for violations found during any incident investigation(s)? Previous Question E.6 Variation — 1 — 1

Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

Yes, no enforcement action was required by WUTC on the gas incidents that occurred in 2009. However, they have taken action against Cascade Natural Gas Corporation on the safety related reporting requirement pertaining to the overpressure event that occurred on Jones Road and east Birch Lane on 12/2/09.

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7 Did the state assist region office by taking appropriate follow-up actions related to the operator incident reports to ensure accuracy and final report has been received by PHMSA? (validate annual report data from operators concerning incidents/accidents and investigate discrepancies) (Chapter 6) Previous Question E.7/E.8 — .5 — 0.5

Yes = .5 No = 0

SLR Notes:

WUTC has been responding to the PHMSA Western Region within ten days of an accident or information pertaining to DOT Form 7100. (Information provided by PHMSA Western Region office) Per our Accident Incident Coordinator Peter Katchmar - "I would answer a resounding yes for both questions D.6 & D.7".

8	Part D: General Comments/Regional Observations Info Only = No Points	Info Only	Info Only

SLR Notes:

Total points scored for this section: 7
Total possible points for this section: 7

PART E - Damage Prevention Initiatives

		Points(MAX)	Score
1	Has the state reviewed directional drilling/boring procedures of each pipeline operator or its contractor to determine if they include actions to protect their facilities from the dangers posed by drilling and other trench less technologies? Previous Question B.11 Yes = 2 No = 0 Needs Improvement = 1	2	2

SLR Notes:

Yes. This item was mentioned in the 2008 state evaluation and corrective action letter to David Lykken. Action was taken to correct this item per David Lykken letter dated December 30, 2009. A review of WUTC Form "V": Intra Gas, Procedure and Plan Review, section 297 shows this item is included and meets this requirement.

2	Did the state inspector check to assure the pipeline operator is following its written procedures pertaining to notification of excavation, marking, positive response and the availability and use of the one call system? New 2008 Yes = 2 No = 0	2	2

SLR Notes:

Yes, this requirement is located on WUTC inspection form C.

3	Did the state encourage and promote the adoption of the Common Ground Alliance Best Practices document to its regulated companies as a means of reducing damages to all underground facilities? Previous Question A.7 Yes = 2 No = 0 Needs Improvement = 1	2	2

SLR Notes:

Yes, WUTC staff members are encouraging stakeholder groups at local and regional meetings to use the Common Ground Alliance Best Practices document as a means to prevention damages from occurring to underground facilities. Alan Lundeen is working closely with several stakeholder groups in proposing changes in their state damage prevention law to have WUTC be the enforcement agency.

4	Has the agency or another organization within the state collected data and evaluated trends on the number of pipeline damages per 1,000 locate requests? New 2008 Yes = 1 No = 0	1	1

SLR Notes:

Yes, WUTC has a State Damage Prevention Statistics Mandatory Reporting form requirement for those operators under their commission's jurisdiction to report damages. They have recently implemented the Virtual DIRT program. One company is reporting this information into Virtual DIRT and additional companies will be using the program in the future.

5	Did the state review operators' records of accidents and failures due to excavation damage to ensure causes of failure are addressed to minimize the possibility of recurrence as required by 192.617? Yes = 2 No = 0	2	2

SLR Notes:

Yes, this item is reviewed by staff members on their inspection visits and available on the federal standard inspection form. This review is found on WUTC's Form C Intrastate Gas Distribution, Section 36-40.

6	Part E: General Comments/Regional Observations Info Only = No Points	Info Only	Info Only

SLR Notes:

Total points scored for this section: 9

Total possible points for this section: 9

PART F - Field Inspection

		Points(MAX)	Score
1	Operator, Inspector, Location, Date and PHMSA Representative Info Only = No Points	Info Only	Info Only

Name of Operator Inspected:
City of Ellensburg Energy Service Department & City of Enumclaw Gas Department

Name of State Inspector(s) Observed:
Patti Johnson, Pipeline Safety Engineer

Location of Inspection:
Ellensburg & Encumclaw, WA

Date of Inspection:
May 19-20, 2010

Name of PHMSA Representative:
Glynn Blanton, PHMSA State Programs

SLR Notes:

Patti Johnson was observed two days performing random inspections of two natural gas distribution operators. Gas pipeline operators are required by WAC 480-93-160 to notify the Commission 45 days prior to beginning construction of transmission pipeline equal to or greater than 100 feet in length. This allows Pipeline Safety Staff (PSS) time to carefully review company plans and to confer with the company regarding any potential issues. During the construction phase, operators are required to submit their daily construction schedules no later than 10:00 AM the day construction takes place. Generally, the operator emails the construction schedule to the PSS and, based on the nature of the construction and staff time, an engineer may conduct an inspection of the construction site. On May 19th, the following individuals were present during the first field inspection performed in Ellensburg, WA. Mr. Steve Prue, Gas Engineer & Mr. Rodney Paul, Welder, Mr. Mike Helgeson & Mr. Marcell Martinez. On May 20th, the following individuals were present during the second field inspection performed at the gate station on Auburn Academy Way & Enumclaw Highway in Encumclaw, WA. Mr. Ed Hawthorne, Gas Manager and Mark VanWergien, Gas Superintendent.

2	Was the operator or operator's representative notified and/or given the opportunity to be present during inspection? New 2008 Yes = 1 No = 0	1	1

SLR Notes:

Yes, each operator was notified prior to the inspection by a telephone call from Patti Johnson and their representatives were present during the entire inspection period.

3	Did the inspector use an acceptable inspection form/checklist and was the form/checklist used as a guide for the inspection? (New regulations shall be incorporated) Previous Question F.2 Yes = 2 No = 0	2	0

SLR Notes:

The WUTC Random Inspection Form - Gas Distribution Revised January, 2007, was given to this observer at the start of the first inspection. The inspector used a note pad to record information from the operator on items asked and reviewed during the two day inspection visits. The form was not used as a guide to perform the inspection. Information on items checked and reviewed was transferred from the note pad to an electronic version of the form at the end of the day or inspection visits. The form lacks a reference regulation or rule next to the items checked by the inspector in determining areas of compliance or non-compliance. Suggest the WUTC Random Inspection form be updated to include the federal regulations and WUTC rules in items checked and reviewed by the inspector. Two points are being deducted due to failure of inspector to indicate each item on the form was "inspected or not applicable "as a guide during the inspections performed.

4	Did the inspector thoroughly document results of the inspection? Previous Question F.3 Yes = 2 No = 0	2	2

SLR Notes:

Yes. Patti Johnson documented the results of the items she requested and reviewed during the two inspection visits on a note pad. Patti completed the Random Inspection form via the internet after each inspection visit. The WUTC inspector was thorough in reviewing personnel on OQ or welding cards and having a copy of the company's operation and maintenance manual available at the construction site. In an area of concern, City of Ellensburg monthly calibration of leak detection equipment, the inspector was quick to request information from the operator verbally and via the internet.

5	Did the inspector check to see if the operator had necessary equipment during inspection to conduct tasks viewed? (Maps, pyrometer, soap spray, CGI, etc.) New 2008 Yes = 1 No = 0	1	1

SLR Notes:

Yes. The WUTC inspector reviewed and checked the leak detection equipment and other items used by the operators in the performance of the scheduled work. The inspector was quick in requesting additional information about items of concern pertaining to calibration of gas detection equipment and new bonding material used by the operator on coating support connection to the existing pipeline. She checked each operator's O&M plans to insure the documents were available on the construction sites. Observed the inspector reviewing several of the written procedures with the operators as work was being performed at the construction sites in Ellensburg and Enumclaw, WA.

---

6 What type of inspection(s) did the state inspector conduct during the field portion of the state evaluation? (i.e. Standard, Construction, IMP, etc) New 2008 — Info Only — Info Only

Info Only = No Points

SLR Notes:

The WUTC inspector conducted a Random Inspection-Gas Distribution on two natural gas distribution systems located in Ellensburg and Enumclaw, WA. These are municipally owned and operated systems and under WUTC jurisdictional authority for safety only.

---

7 Did the inspector adequately review the following during the field portion of the state evaluation? (check all that apply on list) New 2008, comprehensive question worth 2 points total — 2 — 2

Yes = 2 No = 0 Needs Improvement = 1

a.	Procedures	☒
b.	Records	☒
c.	Field Activities/Facilities	☒
d.	Other (Please Comment)	☐

SLR Notes:

Yes, the WUTC inspector performed a thorough review of the operator's O&M procedures; WUTC requires the manual be available at the work site at all times. The inspector did check all records and field activities to insure the work performed was followed in accordance with their written procedures. The WUTC inspector was observed verifying written documents, OQ cards, material list, installation of piping and pressure testing a residential meter set in Ellensburg and Enumclaw, WA.

---

8 Did the inspector have adequate knowledge of the pipeline safety program and regulations? (Liaison will document reasons if unacceptable) Previous Question F.8 — 2 — 2

Yes = 2 No = 0

SLR Notes:

Yes, the WUTC inspector demostrated a good working knowledge of the pipeline safety regulations and WA rules. Ms. Johnson has previous natural gas distribution experience before coming to work at WUTC ten years ago.

---

9 Did the inspector conduct an exit interview? (If inspection is not totally complete the interview should be based on areas covered during time of field evaluation) Previous Question F.10 — 1 — 1

Yes = 1 No = 0

SLR Notes:

Yes, the WUTC inspector was observed discussing areas of concern and requesting additional information from the operators prior to completing the inspection visits. The exit interviews were observed as being timely and helpful to the operators in understanding their compliance with the pipeline safety regulations and WUTC rules. The inspector was observed stating a violation may be cited pertaining to monthly calibration of the Sentic Gold Gas Detector equipment but will wait to receive additional information from the operator before the violation is issued.

---

10 During the exit interview, did the inspector identify probable violations found during the inspections? Previous Question F.11 — 1 — 1

Yes = 1 No = 0

SLR Notes:

Yes, the WUTC inspector was observed stating a violation may be cited pertaining to monthly calibration of the Sentic Gold Gas Detector equipment but would wait to receive additional information from the operator before the violation is issued. This observer has received additional emails from the WUTC inspector on the status of this potential violation or area of concern but at the writing of this document no violation has been cited.

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11 What did the inspector observe in the field? (Narrative description of field observations and how inspector performed) — Info Only — Info Only

Info Only = No Points

SLR Notes:

The WUTC inspector notified the operator two hours prior to our arrival on May 19th pertaining to a random inspection visit. The following individuals were present during the first inspection: Mr. Steve Prue, Gas Engineer & Mr. Rodney Paul, Welder. The inspection was conducted on 5th Avenue & Pacific Street in Ellensburg, WA. Observed the WUTC inspector reviewing Mr. Paul's performance in completing maintenance on a two inch valve. The inspector requested and checked Mr. Paul's welding and OQ card for certification and completeness. Mr. Paul was using a Sentic Gold Gas Detector to check the valve box for any potentials leaks before and after the valve was turned. The gas detector was found not calibrated for the months of January, February or March, 2010. Operator was requested to provide information on the last date the device was calibrated. Observed the inspector writing down information on a note pad pertaining to the information discussed with the operator and not using the Random Inspection Form-Gas Distribution developed by WUTC. Later in the day, observed the WUTC inspector reviewing the work of two City of Ellensburg Gas Service personnel, Mike Helgeson and Marcello Martinez, in changing out a meter located at 1103 Second Avenue. All maintenance procedures and operator qualification cards were reviewed by the inspector prior to the work being performed. On May 20, 2010, the second inspection was observed. The WUTC inspector notified the operator of a random inspection visit by calling the operator by telephone. A random inspection was performed on the City of Enumclaw Gas Department in Enumclaw, WA. The following individuals were present at the gate station located on Auburn Academy Way & Enumclaw Highway, Mr. Ed Hawthorne, Gas Manager and Mark VanWergien, Gas Superintendent. Observed the WUTC inspector checking the installation of approximately one hundred feet of 2 inch PE pipeline, eight 20 lb anodes, and one 2 inch Rockwell valve. The operating pressure on the existing pipeline being replaced with the new PE pipe was 40 psig. The operator's O&M written procedures were located in the truck and the WTUC inspector reviewed and discussed the document with the operator prior to the exit interview. An exit interview was performed and no areas of concerns or violations were mentioned or cited against the operator.

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12 Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices) Info Only Info Only

Info Only = No Points

SLR Notes:

Gas pipeline operators are required by WAC 480-93-160 to notify the Commission 45 days prior to beginning construction of transmission pipeline equal to or greater than 100 feet in length. This allows Pipeline Safety Staff (PSS) time to carefully review company plans and to confer with the company regarding any potential issues. During the construction phase, operators are required to submit their daily construction schedules no later than 10:00 AM the day construction takes place. Generally, the operator emails the construction schedule to the PSS and, based on the nature of the construction and staff time, an engineer may conduct an inspection of the construction site.

---

13 Field Observation Areas Observed (check all that apply) Info Only Info Only

Info Only = No Points

a.	Abandonment	☒
b.	Abnormal Operations	☒
c.	Break-Out Tanks	☐
d.	Compressor or Pump Stations	☐
e.	Change in Class Location	☐
f.	Casings	☐
g.	Cathodic Protection	☒
h.	Cast-iron Replacement	☐
i.	Damage Prevention	☐
j.	Deactivation	☐
k.	Emergency Procedures	☐
l.	Inspection of Right-of-Way	☐
m.	Line Markers	☐
n.	Liaison with Public Officials	☐
o.	Leak Surveys	☐
p.	MOP	☒
q.	MAOP	☐
r.	Moving Pipe	☐
s.	New Construction	☒
t.	Navigable Waterway Crossings	☐
u.	Odorization	☐
v.	Overpressure Safety Devices	☐
w.	Plastic Pipe Installation	☒
x.	Public Education	☐
y.	Purging	☐
z.	Prevention of Accidental Ignition	☐
A.	Repairs	☐
B.	Signs	☐
C.	Tapping	☐
D.	Valve Maintenance	☒
E.	Vault Maintenance	☐
F.	Welding	☐
G.	OQ - Operator Qualification	☒
H.	Compliance Follow-up	☐
I.	Atmospheric Corrosion	☐
J.	Other	☒

SLR Notes:

The WUTC inspector checked and reviewed in discussions with the operators the items listed above. In addition, the WUTC inspector witnessed the testing and replacement of a residential meter set with a new remote reading meter located in Ellensburg, WA.

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14 Part F: General Comments/Regional Observations Info Only Info Only

Info Only = No Points

SLR Notes:

The WUTC Random Inspection Form - Gas Distribution Revised January, 2007, was available but not used by the WUTC inspector on the inspection visits. The inspector used a note pad to record information from the operator on items asked and reviewed during the two day inspection visits. The form was not used as a guide to perform the inspection. Information on items checked and reviewed was transferred from the note pad to an electronic version of the form at the end of the day or inspection visits. The form lacks a reference regulation or rule next to the items checked by the inspector in determining areas of compliance or non-compliance. Suggest the WUTC Random Inspection form be updated to include the federal regulations and WUTC rules in items checked and reviewed by the inspector. Two points are being deducted in Part F because of failure of the WUTC inspector to not use the random inspection form as a guide in the performance of the inspection.

Total points scored for this section: 10
Total possible points for this section: 12

PART G - PHMSA Initiatives - Strategic Plan

		Points(MAX)	Score

Risk base Inspections - Targeting High Risk Areas

1 Does state have process to identify high risk inspection units? — 1.5 — 1.5

Yes = 1.5 No = 0

Risk Factors (criteria) to consider may include:

Miles of HCA's, Geographic area, Population Density

Length of time since last inspection

History of Individual Operator units (leakage, incident and compliance history, etc.)

Threats - (Excavation Damage, Corrosion, Natural Forces, Other Outside Forces, Material or Welds, Equipment, Operations, Other)

SLR Notes:

Yes, WUTC maintains a GIS mapping system on the location of all pipelines in Washington State that is used in establishing their inspection reviews. WUTC assigns a risk ranking factor on each operator based on their previous inspection of the system, length of time from previously inspected and other risk factors contained in their procedures. Each operator is inspected not to excess three years or based on the risk rating established.

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2 Are inspection units broken down appropriately? (see definitions in Guidelines) — .5 — 0.5

Yes = .5 No = 0

SLR Notes:

Yes, a review of the 2009 master work plan spreadsheet indicated all units are broken down correctly.

---

3 Consideration of operators DIMP Plan? (if available and pending rulemaking) — Info Only — Info Only

Info Only = No Points

SLR Notes:

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4 Does state inspection process target high risk areas? — .5 — 0.5

Yes = .5 No = 0

SLR Notes:

Yes, they address high risk areas each year in their inspection program. This is mentioned in their WUTC's Pipeline Safety Policy & Procedures manual.

Use of Data to Help Drive Program Priority and Inspections

5 Does state use data to analyze effectiveness of damage prevention efforts in the state? (DIRT or other data, etc) — .5 — 0.5

Yes = .5 No = 0

SLR Notes:

Yes, they have implemented the Virtual DIRT program to assist in the collection of data from there operators.

---

6 Has state reviewed data on Operator Annual reports for accuracy? — .5 — 0.5

Yes = .5 No = 0

SLR Notes:

Yes, they review these reports each year and call the operator when errors are found. Information in the reports is used in their risk rating review.

---

7 Has state analyzed annual report data for trends and operator issues? — .5 — 0.5

Yes = .5 No = 0

SLR Notes:

Yes, they look at leakage and damages during their office and field review inspections.

---

8 Has state reviewed data on Incident/Accident reports for accuracy? — .5 — 0.5

Yes = .5 No = 0

SLR Notes:

Yes, this information is reviewed in their database and inspection reports.

9 Does state do evaluation of effectiveness of program based on data? (i.e. performance measures, trends, etc.) .5 0.5

Yes = .5 No = 0

SLR Notes:

Yes, they have the GMAP, General Management Accountability and Performance, to measure their goals and initiatives that is submitted to the WUTC Chairman and Governor annually. GMAP is the tool that helps Washington state agencies measure and improve their performance.

---

10 Did the State input all operator qualification inspection results into web based database provided by PHMSA in a timely manner upon completion of OQ inspections? Previous Question B.15 .5 0.5

Yes = .5 No = 0

SLR Notes:

Yes, this information has been entered after each inspection was performed by a WUTC staff member. This information is listed on all standard inspection forms page 3 of 26.

---

11 Did the State submit their replies into the Integrity Management Database (IMDB) in response to the Operators notifications for their integrity management program? Previous Question B.16 .5 0.5

Yes = .5 No = 0

SLR Notes:

Yes, this information is entered and on the standard inspection form page 3 of 26 below the operator qualification field validation section.

---

12 Have the IMP Federal Protocol forms been uploaded to the IMDB? Previous Question B.17 .5 0.5

Yes = .5 No = 0

SLR Notes:

Yes, notifications are reviewed by David Lykken and entered into the database. Kinder Morgan, Weyerhaeuser and Georgia Pacific were uploaded into the database in 2009.

---

13 Did the State ask Operators to identify any plastic pipe and components that has shown a record of defects/leaks and what those operators are doing to mitigate the safety concerns? Previous Question B.18 .5 0.5

Yes = .5 No = 0

SLR Notes:

Yes, this is an annual reporting requirement by WUTC to all gas operators. Each operator is required to submit a description of possible defective material(s) found in any type of pipe or component used in their system. This is WAC rule 480-93-200 7(c).

---

14 Has state confirmed transmission operators have submitted information into National Pipeline Mapping System (NPMS) database along with any changes made after original submission? .5 0.5

Yes = .5 No = 0

SLR Notes:

Yes, this information is included in WUTC Form C page 3 of 26. Also, WUTC has sent a letter to each operator about updates on reporting and submitting information into the National Pipeline Mapping System database..

Accident/Incident Investigation Learning and Sharing Lessons Learned

15 Has state shared lessons learned from incidents/accidents? (i.e. NAPSR meetings and communications) .5 0.5

Yes = .5 No = 0

SLR Notes:

Yes, information is shared and discussed with NAPSR members informatively during the NAPSR Western Region meeting. An article was published in the Seattle Times written by WUTC Chairman Jeff Goltz about the work and investigations performed by the commission's pipeline safety program.

---

16 Does the State support data gathering efforts concerning accidents? (Frequency/Consequence/etc) .5 0.5

Yes = .5 No = 0

SLR Notes:

Yes, they response to PHMSA and other individual asking for information in this area. Tom Finch, Western Region CAT, acknowledged their support in data gathering efforts.

---

17 Does state have incident/accident criteria for conducting root cause analysis? Info Only Info Only

Info Only = No Points

SLR Notes:

Yes, Joe Subsits and Scott Rukke have attending the root cause course at T&Q. The more senior engineers will be attending the course in the coming months.

18 Does state conduct root cause analysis on incidents/accidents in state? Info Only Info Only

Info Only = No Points

SLR Notes:

Yes, after the NOPV is issued for an incident they conduct a root cause analysis.

---

19 Has state participated on root cause analysis training? (can also be on wait list) .5 0.5

Yes = .5 No = 0

SLR Notes:

Yes, PL3600 Root Cause course-these individuals attended in 2009; Al Jones attend 2/13/09: Joe Subsits and Scott Rukke attended the course in Denver, CO on 4/5/10.

Transparency - Communication with Stakeholders

20 Other than pipeline safety seminar does State communicate with stakeholders? (Communicate program data, pub awareness, etc.) .5 0.5

Yes = .5 No = 0

SLR Notes:

Yes, WUTC has list server available to all operators, general public or individuals who want to subscribe and receive or review information from their organization about their pipeline safety program or other departments activities. Additional information on several of these activities is available on the WUTC website.

---

21 Does state share enforcement data with public? (Website, newsletters, docket access, etc.) .5 0.5

Yes = .5 No = 0

SLR Notes:

Yes, this information is posted and available on WUTC website.

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22 Part G: General Comments/Regional Observations Info Only Info Only

Info Only = No Points

SLR Notes:

Total points scored for this section: 10

Total possible points for this section: 10

PART H - Miscellaneous

		Points(MAX)	Score
1	What were the major accomplishments for the year being evaluated? (Describe the accomplishments, NAPSR Activities and Participation, etc.) Yes = .5 No = 0	.5	0.5

SLR Notes:

David Lykken serves on the ASME B31 Q committee, Plastic Pipe Ad Hoc committee, APGA Security and Integrity Foundation Board representing the NAPSR organization.

Kuang Chu is a member on the ASME B31.4/11 Liquid and Slurry Piping Transportation Systems and serves on the GTI Leak-Rupture Boundary Study Committee.

Damage Prevention initiatives during calendar year 2009 include the following:

Governor issued proclamations, Damage Prevention Month (May 2009) & Pipeline Safety Day (June 10, 2009) in recognition of the 10th anniversary of the Bellingham incident.

WUTC staff appearance on Seattle gardening show (Radio), and Consumer News segment on Seattle TV station. Seattle Times op-ed piece written by WUTC Chairman Jeff Goltz highlighting damage prevention initiative and work done by the commission's pipeline safety program.

Damaged Prevention booth manned at annual Governors Industrial Safety and Health Conference. Promoted WUTC Consumer Affairs Hotline for excavators to report issues with timeliness or inaccurate locates. Formed Dig law stakeholder workgroup and conducted meetings in an effort to make improvements to the WA damage prevention program as part of meeting the nine elements of the PIPES Act of 2006.

2	What legislative or program initiatives are taking place/planned in the state, past, present, and future? (Describe initiatives (i.e. damage prevention, jurisdiction/authority, compliance/administrative, etc.) Yes = .5 No = 0	.5	0.5

SLR Notes:

Damage prevention initiatives to change the state law to allow WUTC to become the enforcement agency for the State of Washington's damage prevention law is underway. WTUC has conducted several stakeholder meetings about this concept and shared information on the use of the Virtual DIRT program they have implemented.

3	Any Risk Reduction Accomplishments/Projects? (i.e. Cast iron replacement projects,bare steel,third-party damage reductions, etc.) Yes = .5 No = 0	.5	0.5

SLR Notes:

Yes, All cast iron has been removed in the State of Washington by the operators. PSE is under WUTC order on a bare steel replacement program and required to remove all material by 2014. They have completed fifty percentage of the required footage. Total to be replaced is 1,092,960 feet.

4	Did the state participate in/respond to surveys or information requests from NAPSR or PHMSA? Yes = 1 No = 0	1	1

SLR Notes:

Yes, they response to all PHMSA and NAPSR surveys in a timely matter.

5	Sharing Best Practices with Other States - (General Program) Yes = .5 No = 0	.5	0.5

SLR Notes:

WTUC staff and program manager share information on reports, documents, and best practices on performing inspections with other state agencies. David Lykken has provided information to his neighboring state agencies, Oregon and Idaho, about their inspections and areas of concerns on an operator who operates in each state. This was valuable information to each state agency in making sure consistent enforcement was being maintained on the operator. David Lykken has provided WTUC's job classifications and descriptions to Paul Metro with the Pennsylvania Public Service Commission to assist in the development of new positions for the Pennsylvania natural gas or hazardous liquid safety programs.

6	Part H: General Comments/Regional Observations Info Only = No Points	Info Only	Info Only

SLR Notes:

Total points scored for this section: 3
Total possible points for this section: 3

PART I - Program Initiatives

		Points(MAX)	Score

Drug and Alcohol Testing (49 CFR Part 199)

1 Has the state verified that operators have drug and alcohol testing programs? — 1 — 1

Yes = 1 No = 0

SLR Notes:

Yes, WUTC has performed and verified the operator's drug and alcohol testing since 2000. PSE was cited in 2000 for violation of the drug and alcohol testing rule and this action resulted in collection of a large penalty from the operator in 2001. David Lykken would like to see training in the enforcement of 199 part 40 and how to use the forms correctly.

---

2 Is the state verifying that operators are conducting the drug and alcohol tests required by the operators program (random, post-incident, etc.) — .5 — 0.5

Yes = .5 No = 0

SLR Notes:

Yes, they perform and check this item in their O&M Headquarters Inspection document which is a part of their WUTC D&A inspection forms.

---

3 Is the state verifying that any positive tests are responded to in accordance with the operator's program? — .5 — 0.5

Yes = .5 No = 0

SLR Notes:

Yes, the operators are required to report this item to their agency as a reporting requirement. This requirement is found in WUTC rule WAC 480-93-200 (10).

Qualification of Pipeline Personnel (49 CFR Part 192 Subpart N)

4 Has the state verified that operators have a written qualification program? — 1 — 1

Yes = 1 No = 0

SLR Notes:

Yes, they verified this information on their initial inspections which include construction and other types of inspections.

---

5 Has the state reviewed operator qualification programs for compliance with PHMSA rules and protocols? — .5 — 0.5

Yes = .5 No = 0

SLR Notes:

Yes, they verify this information and insure the operator's qualification programs compliance with PHMSA rules and protocols on each inspection performed.

---

6 Is the state verifying that persons who perform covered tasks for the operator are qualified in accordance with the operator's program? — .5 — 0.5

Yes = .5 No = 0

SLR Notes:

Yes, this item is listed on WUTC's standard inspection form.

---

7 Is the state verifying that persons who perform covered task for the operator are requalified at the intervals specified in the operator's program? — .5 — 0.5

Yes = .5 No = 0

SLR Notes:

Yes, during the field inspection they review the individual's covered task card to insure the person has been re-qualified at the intervals described in the operator's program. This review item is listed in their standard inspection form.

Gas Transmission Pipeline Integrity Management (49 CFR Part 192 Subpart O)

8 Has the state verified that all operators with transmission pipelines have either adopted an integrity management program (IMP), or have properly determined that one is not required? — 1 — 1

Yes = 1 No = 0

SLR Notes:

Yes, this information was verified by David Lykken and other staff members by the use of their GIS mapping system. The mapping system is updated each year and all HCA's are reviewed to insure the gas transmission pipelines in those areas have an IMP program in place.

---

9 Has the state verified that in determining whether a plan is required, the operator correctly calculated the potential impact radii and properly applied the definition of a high consequence area? — .5 — 0.5

Yes = .5 No = 0

SLR Notes:

Yes, they have the ability to check this item on their GIS system. However, most operators are using class location as the base for their high consequence areas.

---

10 Has the state reviewed operator IMPs for compliance with Subpart O? (In accordance with State Inspection plan) .5 0.5

Yes = .5 No = 0

SLR Notes:

Yes, IMP inspections have been performed on all gas operators. Georgia Pacific was completed on July 7-8, 2009.

---

11 Is the state monitoring operator progress on the inspections, tests and remedial actions required by the operator's IMP, including that they are being done in the manner and schedule called for in its IMP? .5 0.5

Yes = .5 No = 0

SLR Notes:

Yes, this item is completed in their IMP field verification which is located in standard inspection form.

---

12 Is the state verifying that operators are periodically examining their transmission line routes for the appearance of new HCAs? .5 0.5

Yes = .5 No = 0

SLR Notes:

Yes, this information is checked in the field verification and GIS updates.

Public Awareness (49 CFR Section 192.616)

13 Has the state verified that each operator has developed a continuing public awareness program? (due date was 6/20/06 for most operators, 6/20/07 for certain very small operators,6/13/08 for master meters) .5 0.5

Yes = .5 No = 0

SLR Notes:

Yes, these items are checked on their Records & Field Inspection Form C, Section 98 thru 104.

---

14 Has the state reviewed the content of these programs for compliance with 192.616 (by participating in the Clearinghouse or by other means)? .5 0.5

Yes = .5 No = 0

SLR Notes:

Yes, this information is entered and reviewed with the operator as described in Section 98 thru 104 of Records & Field Inspection Form C.

---

15 Is the state verifying that operators are conducting the public awareness activities called for in its program? .5 0.5

Yes = .5 No = 0

SLR Notes:

Yes, this information is reviewed in WUTC's inspection forms. WUTC staff also contact and discuss with first responders about public awareness items to insure this information is being provided to them by the operator.

---

16 Is the state verifying that operators have evaluated their Public Awareness programs for effectiveness as described in RP1162? Info Only Info Only

Info Only = No Points

SLR Notes:

Yes, this item is in WUTC check list inspection.

---

17 Part I: General Comments/Regional Observations Info Only Info Only

Info Only = No Points

SLR Notes:

Total points scored for this section: 9

Total possible points for this section: 9