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WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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Ref. Docket PG-060208

**VIA CERTIFIED MAIL**

July 12, 2006

Michael S. McCoy  
Executive Vice President  
Northwest Natural Gas Company  
220 Northwest Second Avenue  
One Pacific Square  
Portland, Oregon 97209

Dear Mr. McCoy:

**Subject: Request for Information to Complete 2006 Standard Inspection-Clark County, (Docket PG-060208)**

In May 2006, we conducted a pipeline safety inspection of Northwest Natural Gas Company's (NWNNG) natural gas facilities and operations located in Washington within the Clark County District. To finish this inspection, we need information from NWNNG.

**The information we need**

You should interpret the following information descriptions to apply to NWNNG's facilities located in Washington, and not other states. The term "primary service regulator" has the same meaning as that term is defined in NWNNG's Operating Manual.

1. Maps showing all pipelines that operate above 60 psig from the point where NWNNG takes ownership from Williams Pipeline to the point where pressure is reduced to less than or equal to 60 psig.
2. Maps with sufficient resolution to indicate and show regulator stations, services and primary service regulators.
3. One or more maps that can be used as a key sheet(s) showing the pipelines identified in items 1 and 2 above in relationship to NWNNG's service territory. The scale only needs to be of sufficient resolution to show the general configuration of the pipeline in relationship to the service territory. Scale should be approximately 1-foot equals 24,000-feet, but NWNNG may use available maps if they show the pipelines in relationship to the service territory.



*RAMS*

4. A list of all pressure regulator stations that are maintained by NWNG under 49 CFR §192.739.
5. A list of all primary service regulators.
6. Maintenance records for three years (2003-2005) for all primary service regulators and regulator stations maintained by NWNG under 49 CFR §192.739.
7. The Maximum Allowable Operating Pressure (MAOP) of all pipelines operating above 60 psig - to correspond with the maps provided in items 1-2 above.
8. The actual normal operating pressure of all pipelines operating above 60 psig - to correspond with the maps.
9. Leak survey records for three years (2003-2005) or the last two leak surveys, (whichever covers the greater time period), for all pipelines operating above 60 psig.
10. Patrol records for 3 years (2003-2005) for all pipelines operating above 60 psig.
11. A list of all pipelines operating above 20% SMYS.
12. A list of all transmission lines.

**When do we need it**

The commission requests NWNG send the following information within 10 business days of the receipt of this letter. We are making this request in lieu of a subpoena under RCW 80.04.020 or a commission order under RCW 80.04.070. If you require a subpoena or an order before you will provide the information requested, we would appreciate hearing from you immediately, but in no event later than the same ten business day period.

**Why we need it**

The information listed above is needed for us to establish what types of facilities NWNG has in Washington and what safety standards should apply to them.

**Why we are making a formal request for this information**

During the May inspection, we requested to view maps on the company's on-line mapping system. While NWNG staff initially denied our inspector access to this system, he was eventually allowed to look at the maps on a computer. When we asked for copies of certain area maps for documentation purposes, we were refused. Mr. Bruce Paskett and David Lykken, UTC senior pipeline safety engineer, made a verbal agreement that NWNG would provide copies of maps subject to us signing a release drafted by NWNG. This offer was rescinded by Mr. Paskett via e-mail on June 2, 2006. Since we need some of above information to complete our inspection, we are making this formal request.

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**For further information**

If you have any questions, or if the commission may be of any assistance to you in providing this information, please contact Scott Rukke at (360) 664-1241 or David Lykken at (360) 664-1219.

Sincerely,



Carole J. Washburn  
Executive Secretary

cc: Bruce Paskett, P.E., Chief Engineer, NWN  
Gary Bauer, Manager Government Relations, NWN