



STATE OF WASHINGTON

**UTILITIES AND TRANSPORTATION COMMISSION**

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**Sent via email and Certified Mail**

April 19, 2017

Mr. Grant M. Yoshihara  
Vice President of Utility Operations  
NW Natural  
220 NW Second Avenue  
Portland, OR 97209

Dear Mr. Yoshihara:

**RE: 2017 NW Natural Compliance Investigation - (Insp. No. 7416)**

Staff from the Washington Utilities and Transportation Commission (staff) conducted a compliance investigation on March 7, of the NW Natural (NWN) Clark County distribution gas system. The investigation included a review of 30-Day Incident Report records submitted to the commission by NWN for calendar years 2015 and 2016.

Our investigation cross-referenced the 30-Day Incident Reports against emergency response call records obtained from the Vancouver Fire Department for the same time period. The result of staff's investigation indicated nine probable violations as noted in the enclosed documentation.

**Your response needed**

Please review the attached report and respond in writing by May 22. Your response is to include an explanation describing why the incidents referenced in the attached report were not reported to the commission in accordance with the referenced rule.

**What happens after you respond to this letter?**

The attached report presents staff's decision on probable violations and does not constitute a finding of violation by the commission at this time.

After you respond in writing to this letter, there are several possible actions the commission, in its discretion, may take with respect to this matter. For example, the commission may:

- Issue an administrative penalty under RCW 81.04.405; or

- Issue a complaint under RCW 81.88.040, seeking monetary penalties, changes in the company's practices, or other relief authorized by law, and justified by the circumstances. Any pipeline company that violates any pipeline safety provision of any commission order, or any rule in this chapter including those rules adopted by reference, or chapter 81.88 RCW is subject to a civil penalty not to exceed two hundred thousand dollars for each violation for each day that the violation persists. The maximum civil penalty for a related series of violations is two million dollars; or
- Consider the matter resolved without further commission action.

We have not yet decided whether to pursue a penalty or complaint in this matter. Should the commission decide to assess a penalty or initiate a complaint, your company will have an opportunity to respond and formally present its position.

If you have any questions or if we may be of any assistance, please contact Anthony Dorrrough at (360) 664-1318. Please refer to the subject matter described above in any future correspondence pertaining to this inspection.

Sincerely,



Alan E. Rathbun  
Pipeline Safety Director

cc: Samantha Burt, Pipeline Safety Compliance, NWN  
Joe S. Karney, P.E., Sr. Manager, Compliance Code, NWN

**WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**  
**2017 Compliance Investigation**  
**NW Natural - Clark County**

The following probable violations of WAC 480-93 were noted as a result of a compliance investigation of NWN, Clark County. The investigation included a comprehensive review of 30-Day Incident Reports and emergency response call records for calendar years 2015 and 2016.

**PROBABLE VIOLATIONS**

**WAC 480-93-200 Reporting Requirements**

- (1) *Each gas pipeline company must give notice to the commission by telephone using the emergency notification line (see WAC 480-93-005(8)) within two hours of discovering an incident or hazardous condition arising out of its operations that results in:*
- (c) *The evacuation of a building, or a high occupancy structure or area;*

**Finding(s):**

1. On September 4, 2015, Vancouver Fire Department (VFD) reported they responded to an incident at 3615 Kauffman Ave, Vancouver, where the gas meter regulator had been sheared off the supply riser when a resident fell off of a deck. VFD established a 100-ft hot zone around the two-story structure that had been previously evacuated.

NWN responded to the incident, but failed to report the evacuation to the commission.

2. On September 18, 2015, VFD reported they responded to an incident at 11900 7th St, Vancouver, where a homeowner was digging in his yard and struck the gas line. VFD noted that the residents had been evacuated west of the home prior to their arrival.

NWN responded to the incident, but failed to report the evacuation to the commission.

3. On October 13, 2015, VFD reported they responded to an incident at 815 34th St, Vancouver, where a homeowner was digging in his backyard and hit the natural gas line. VFD Haz Mat crew facilitated the evacuation of the residence.

NWN responded to the incident, but failed to report the evacuation to the commission.

4. On October 16, 2015, VFD reported they responded to an incident at 9405 6th St, Vancouver, where a homeowner digging next to house caused a gas leak. VFD closed the street and evacuated neighboring houses.

NWN responded to the incident, but failed to report the evacuations to the commission.

5. On December 28, 2015, VFD reported they responded to an incident at 12th & Broadway, Vancouver, where a contractor had damaged a 1-inch natural gas line while removing a stump. VFD informed Chase Bank of the situation and the bank was evacuated.

NWN responded to the incident, but failed to report the evacuation to the commission.

6. On January 7, 2016, VFD reported they responded to an incident at 1933 Fort Vancouver Way, Vancouver, where a contractor hit a 1-inch or 2-inch gas line. VFD evacuated a building to the west of the leak.

NWN responded to the incident, but failed to report the evacuation to the commission.

7. On September 21, 2016, VFD reported they responded to an incident at 11117 NE 121st Ct, Vancouver, where a contractor hit a natural gas line. VFD requested everyone evacuate the construction site.

NWN responded to the incident, but failed to report the evacuation to the commission.

8. On November 30, 2016, VFD reported they responded to an incident at NE 94th Ave, Vancouver, where a contractor hit a 4-inch natural gas line. VFD evacuated a home at 9500 NE 107th St.

NWN responded to the incident, but failed to report the evacuation to the commission.

9. On December 10, 2016, VFD reported they responded to an incident at 4543 NE 66th Ave, Vancouver, where a gas meter was found leaking with natural gas bubbling from the ground. VFD noted that the gas was shut-off and the occupant evacuated to a main building complex.

NWN responded to the incident, but failed to report the evacuation to the commission.