

November 13, 2024

VIA ELECTRONIC FILING

Jeff Killip,
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop S.E.
Lacey, Washington 98503

Re: PG-240560—NW Natural Response to Notice of Opportunity to File Written Comments

Dear Mr. Killip:

Northwest Natural Gas Company, dba NW Natural (NW Natural or Company), appreciates the opportunity to respond to the Washington Utilities and Transportation Commission's (Commission) October 25, 2024, Notice of Opportunity to File Written Comments (Notice) in docket PG-240560.

On October 21, 2024, the Washington Utilities and Transportation Commission (Commission) filed with the Code Reviser a Preproposal Statement of Inquiry (CR-101) to consider potential changes to current rules in Washington Administrative Code (WAC) 480-93 applicable to leak surveys and how they are to be performed, reporting requirements and what must be reported to the Commission in pipeline emergencies, and removal of redundant outdated language found in the reporting rule. The Commission filed the CR-101 under Docket PG-240560.

NW Natural Response to WAC 480-93-200(1) amendment (redundancy and clarification):

The proposed WAC 480-93-200(1) amendments remove redundant requirements that are also found in the Federal Pipeline Safety rules under Title 49, Code of Federal Regulations (CFR) Parts 192 and 191, and to clarify what type of evacuations will be reportable during gas pipeline emergencies. Currently, WAC 480-93-200(1)(a) and (b) are also reportable under Title 49, CFR, Part 191.5 where they fall under the definition of an Incident (CFR Part 191.3). NW Natural proposes removing these two requirements from the WAC and replace them with a single requirement to report "Incidents" as defined in CFR Part 191.3. Currently CFR Part 191.3 defines what an "Incident" is, and under CFR Part 191.5 incidents are required to be reported to the National Response Center which in turn contacts the Pipeline and Hazardous Materials Administration (PHMSA) and the Commission to investigate. The PHMSA definition of an incident captures the requirements to report a fatality and damages over \$50,000, so the current Commission rules are redundant with federal reporting requirements.

NW Natural Response to WAC 480-93-200(1) amendment (reporting on evacuations):

Currently, WAC 480-93-200(1)(c) requires the reporting of all evacuations. When this rule went into effect in 2003, evacuations were a rare occurrence. After the 2011 amendments to RCW 19.122, it became a requirement to call first responders (fire departments) each time third-party damage resulted in a gas leak. This increase in fire department response resulted in a dramatic increase in evacuations, and an increase in the required reporting to the Commission. Presently, evacuation reports account for approximately 80 percent or more of incident notifications that NW Natural's on-call engineers receive. This has been burdensome on both Commission staff and on pipeline operator staff with no benefit to pipeline safety, or public safety, and no gain of any useful statistical data used to monitor pipeline incidents. NW Natural proposes a change to the definition of what evacuations should be reported to include a High Occupancy Structure or Area as defined in WAC 480-93-005(14).

NW Natural Response to WAC 480-93-188(1) amendment:

The proposed WAC 480-93-188(1) amendments are to revise the current leak survey language to allow alternative technology to be utilized in conducting leak surveys. Current language states that leak surveys must be conducted "over" all pipeline facilities, next to other utilities, and in cracks in paving. This language was based on older technology where the leak detection instrument had to be placed on the surface of the ground over the pipeline to detect the leak. Current technology allows atmospheric sampling near pipelines and does not have to be placed over pipeline facilities. Alternative technology provides for a comparable level of safety and, in some circumstances, a more thorough and economical leak survey. We propose to remove the word "over" all pipeline facilities that currently limits the type of leak detection instrumentation that can be utilized.

Conclusion:

NW Natural agrees with the Commission that making these changes to Pipeline Safety rules is warranted and in the interest of public safety. These changes will allow the use of alternative technologies in conducting leak surveys that provide comparable or better leak detection which ultimately improves public safety. In addition, these changes will allow better utilization of pipeline safety staff and operator personnel time by not having to report and assimilate data on all evacuations regardless of cause or affect. Most evacuations are conducted out of an abundance of caution and there is no need to track or report this type of event.

NW Natural appreciates the opportunity to provide these comments and looks forward to continuing to actively participate in this docket.

Please contact me with any questions regarding this filing, with a copy to:

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Sincerely,

/s/ Amy Schulties

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