

Form A- Annual Review 8799

UTC Standard Annual Review Inspection Report
Intrastate Operators
FORM A: Annual Review

Inspector and Operator Information

| | | | |
|--|---|--|---------------------------|
| Inspection ID 8799 | Inspection Link 8799 | Inspector - Lead Scott Anderson | Inspector - Assist |
| Operator Northwest Natural Gas | Unit Clark County | Records Location - City & State Portland, OR | |
| Inspection Start Date 04-30-2024 | Inspection Exit Interview Date 04-30-2024 | Engineer Submit Date | |

Inspection Summary

You must include the following in your inspection summary:

- *Inspection Scope and Summary
- *Facilities visited and Total AFOD
- * Summary of Significant Findings
- * Primary Operator contacts and/or participants

Inspection Scope and Summary

Annual review of NW Natural Gas' annual report, changes to manuals, and incidents from 2023. The inspection was conducted remotely via Microsoft Teams. There were no concerns or probable violations noted during the inspection.

Facilities visited and Total AFOD

No facilities visited, inspection completed remotely

1 AFODs

Summary of Significant Findings

There were no concerns or probable violations noted during the inspection.

Primary Operator contacts and/or participants

Samantha Rookstool, NW Natural, Compliance Specialist

Andy Fortier, NW Natural, Compliance Engineer

Instructions and Ratings Definitions

INSPECTION RESULTS: Annual Review

| | | | |
|---|---|--|------------------------|
| Satisfactory Responses 21 | Satisfactory List 1,5,9,10,12,13,14,15,18,24,25,26,27,28,29,30,31,32,39,40, | Number of Unanswered Questions 0 | Unanswered List |
| Unsatisfactory Responses 0 | Unsatisfactory List | | |
| Area of Concern Responses 0 | Area of Concern List | | |
| Not Applicable Responses 17 | Not Applicable List 3,4,6,7,8,16,17,19,20,21,22,23,35,37,42,43,44 | | |
| Yes Responses 3 | Yes List 34,36,38, | No Responses 1 | No List 41 |
| Not Checked / Evaluated Responses 0 | Not Checked / Evaluated List | | |

**If an item is marked Unsat, AOC, N/A, or N/C, an explanation must be included in the "Notes" block for that question and also summarized in the " SUMMARY OF REQUIRED COMMENTS" section at the end of this inspection form.

ANNUAL REPORT: ACCURACY/TRENDS

Question #1. Was the Annual Report reviewed for accuracy and trends? If any trends were discovered, please describe.
1. Result Satisfactory

1. Notes

NWN updates annually.

Access to Complete Distribution Annual Report

| Year | Operator | SYSTEM TOTAL Miles of Main | Miles of Service | SYSTEM TOTAL NO. of Services | Average Service Length |
|-------------------------|----------|----------------------------|------------------|------------------------------|------------------------|
| No Report records found | | | | | |

Access to Complete Transmission Annual Report

| YEAR | Operator | Commodity Group | Total Total Miles |
|-------------------------|----------|-----------------|-------------------|
| No Report records found | | | |

Access to Complete Hazardous Liquid Annual Report

| YEAR | Operator | Commodity Group |
|-------------------------|----------|-----------------|
| No Report records found | | |

DAMAGE PREVENTION

Annual Report Damage Prevention data

| Year | Operator | Number of Excavation Tickets | Total Number of Excavation Damages By Apparent Root Cause: | Locating Practices Not Sufficient: | One-Call Notification Practices Not Sufficient: | Excavation Practices Not Sufficient: | Other: | Number of Services | Total Leaks - Excavation Damage | Total Main Leaks | Miles of Service MAIN | Number of Leaks per Mile of MAIN | Tc Lei 1,0 Loca |
|--------------------------|----------|------------------------------|--|------------------------------------|---|--------------------------------------|--------|--------------------|---------------------------------|------------------|-----------------------|----------------------------------|-----------------------|
| No Damages records found | | | | | | | | | | | | | |

DIRT data on mismarks for prior year

DIRT Timeliness - Prior Year Reports must be submitted within 45 days of the damage.

| Damage Cause | Number of Reports |
|-------------------------|-------------------|
| No Report records found | |

| SubmitCompanyID - UTCfinalName | Number of Reports |
|--------------------------------|-------------------|
| No Report records found | |

Question #2.

Review the following damage prevention items:

Q2. Is the damage prevention information in the annual report complete?

Y

Q2.b. Is the annual report damages root cause information complete and accurate?

Y

Q2.d. Does the operator follow a process to evaluate the cause of "Locating practices not sufficient" category?

Y

Q2.e. Is the operator or its contractor qualified and following procedures for locating and

Y

Q2.g. What is the number of damages resulting from mismarks?

0

Q2.h. What is the number of damages resulting from not locating within the time require

0

Q2.j. Are mapping corrections timely and according to written procedures?

Updated as required

Q2.k. Does the operator follow a process to evaluate causes for damages listed "Excavati

Y

2. Notes

Adequate.

NPMS SUBMISSIONS/CHANGES

Question #3.

For transmission operators, has the operator submitted information to the NPMS database, along with changes made after the original submission?

3. Result

Not Applicable

3. Notes

Not a transmission inspection.

INCIDENT/SRC/AOC REPORTS REVIEW

Question #4

Were there any federally reportable incidents during the previous year? Are there any discernable trends to these incidents?

4. Results

Not Applicable

4. Notes

No Federally Reportable incidents.

Q4: Federally reportable incidents

| NotificationID | Operator | Company | NRC # | Assigned Engineer | Date & Time of Incident | Street Address of event/incident | Incident Address: City | Closure Date | Reporting Level |
|--|----------|---------|-------|-------------------|-------------------------|----------------------------------|------------------------|--------------|-----------------|
| No Incident Notification records found | | | | | | | | | |

Question #5.

Review operator records of previous year's accidents and failures including reported third party damage and leak response. Is the operator ensuring appropriate evaluation and response as required in 192.617 (Gas) or 195.402 (HL) to determine cause of failure? Is the operator taking appropriate steps to minimize the possibility of recurrence?

5. Result

Satisfactory

5. Notes

A root cause is performed for any excavation damage.

Question #6.

Review incident reports for the previous year for accuracy and identify any trends. If any trends discovered please describe. (Please see list of incident data at end of this report)

Q6: Incident Reports

6. Result

| NotificationID | Inspector | Company | Street Address of event/incident | Date & Time of Incident | Is 30-Day Report Received? | Reporting Level | Not Applicable |
|--|-----------|---------|----------------------------------|-------------------------|----------------------------|-----------------|----------------|
| No Incident Notification records found | | | | | | | |

6. Notes

NWN had 6 incidents in 2023, mostly evacuation.

Question #7.

Were there reportable or unreportable safety related conditions during the previous year? If yes please describe.

Q7: Report of SRCs

| NotificationID | Company | Safety-Related Condition | SafetyRelatedConditionChoices | Reportable? | Date & Time of Incident | Company Notified Date | Report Date | 7. Result Not Applicable |
|--|---------|--------------------------|-------------------------------|-------------|-------------------------|-----------------------|-------------|--------------------------|
| No Incident Notification records found | | | | | | | | |

7. Notes

No SRCs

Question #8.

For transmission systems, were there any abnormal operating conditions (as described in 192.605 (c) or 195.402(d)) since the last annual review? If yes please describe.

8. Notes

No AOCs.

O&M & EMERGENCY PROGRAMS

Question #9.

Is the O&M Manual up to date and were changes made in the previous year?

Operator Manuals on Sharepoint

9. Result

Satisfactory

9. Notes

Reviewed NWN manuals, all are up to date and changes are in the revisions log.

Question #10.

If changes to the O&M were made, are changes acceptable?

10. Result

Satisfactory

10. Notes

Reviewed NWN manuals, all are up to date and changes are in the revisions log.

Question #11.

Were emergency plans changed during the previous year?

11. Result

Satisfactory

11. Notes

Reviewed NWN manuals, all are up to date and changes are in the revisions log.

Question #12.

Were any changes to emergency plans satisfactory?

12. Result

Satisfactory

12. Notes

Reviewed NWN manuals, all are up to date and changes are in the revisions log.

INTEGRITY MANAGEMENT PROGRAMS

Question #13

Were there changes to the Integrity Management programs (TIMP, DIMP or both, as applicable)?

13. Notes

Reviewed NWN manuals, all are up to date and changes are in the revisions log.

Question #14.

Is the DIMP/TIMP up to date? What are the results of the operator's program review (effectiveness evaluation) (DIMP every 5 years)?

14. Notes

Reviewed NWN manuals, all are up to date and changes are in the revisions log.

Question #15

Are IMP program changes acceptable?

15. Notes

Reviewed NWN manuals, all are up to date and changes are in the revisions log.

Question #16

Was appropriate assessment/ repair work conducted during the past year? (monitor progress of IMP activities)

16. Notes

Camas Transmission line had an ILL run in 2023, no immediates, scheduled, or monitored.

Question #17

Does the operator's HCA location data correspond to the positional data located in UTC GIS?

17. Notes

The UTC needs an actual GIS program for this location data to go into.

Question #18

What assessment work is planned for the upcoming year?

18. Notes

Camas Transmission line had an ILL run in 2023. Prudent operator excavations will be performed in Summer 2024.

Question #19

13. Result
Satisfactory

14. Result
Satisfactory

15. Result
Satisfactory

16. Results
Not Applicable

17. Results
Not Applicable

18. Results
Satisfactory

19. Results

Within the operator's DIMP, are low pressure systems evaluated for overpressure threats?

Not Applicable

19. Notes

No low pressure in NWN's system.

Question #20

Did the operator develop and follow specific procedures for low pressure system construction or maintenance projects? (Note: this question is revisited in greater detail in the ADB review section)

20. Results
Not Applicable

20. Notes

No low pressure in NWN's system.

Question #21

Are plastic pipe and components that have shown a record of defects/leaks being mitigated through the DIMP plans?

21. Results
Not Applicable

21. Notes

No defects/leaks on PE pipe in 2023

Question #22

Has appropriate DIMP remediation work occurred during the past year? (monitor progress of DIMP activities)

22. Results
Not Applicable

22. Notes

No remediation work was necessary in 2023

Question #23

What DIMP remediation work is anticipated for upcoming year?

23. Results
Not Applicable

23. Notes

None anticipated in 2024.

OQ PROGRAM

Question #24

Is the OQ program up to date? Were there changes to the Operator Qualification (OQ) program in the last year? If yes, please describe.

24. Results
Satisfactory

24. Notes

Reviewed NWN manuals, all are up to date and changes are in the revisions log.

Question #25

Are the OQ plan updates satisfactory?

25. Results
Satisfactory

25. Notes

Reviewed NWN manuals, all are up to date and changes are in the revisions log.

Question #26

Are personnel performing covered tasks (including contractors) properly qualified and requalified at intervals determined in the operator's plan?

26. Results
Satisfactory

26. Notes

Field technicians are qualified.

PUBLIC AWARENESS PROGRAM

Question #27

Is the PA program up to date? And were there changes to the Public Awareness (PA) program within the last year?

27. Results
Satisfactory

27. Notes

Reviewed NWN manuals, all are up to date and changes are in the revisions log.

Question #28

Are changes to the PA program satisfactory?

28. Results
Satisfactory

28. Notes

Reviewed NWN manuals, all are up to date and changes are in the revisions log.

CONTROL ROOM PROGRAM

Question #29

Is the CRM program up to date? And were there changes to the Control Room Management (CRM) program within the last year?

29. Results
Satisfactory

29. Notes

Reviewed NWN manuals, all are up to date and changes are in the revisions log.

Question #30

Are the CRM program changes satisfactory?

30. Results
Satisfactory

30. Notes

Reviewed NWN manuals, all are up to date and changes are in the revisions log.

SAFETY MANAGEMENT SYSTEM API 1173

Question #31

Is the operator developing and implementing an API 1173 Safety Management System?

31. Results
Satisfactory

31. Notes

Currently, NWN is implementing MOC and incident investigation per API RP 1173.

INSPECTOR ASSESSMENT OF INSPECTION UNITS

Question #32

Are inspection units broken down appropriately? Do you recommend any changes to inspection units?

32. Results
Satisfactory

32. Notes

Units are good.

Q32: List of current inspection units

| Unit Name | Distribution/Transmission | Intrastate or Interstate? | GAS or LIQUID | Operator - OPID | Unit ID |
|-----------------------|---------------------------|---------------------------|---------------|-----------------|---------|
| No Unit records found | | | | | |

OPERATOR'S PUBLIC WEB PAGE

Question #33

For informational purposes: Using the drop down selections available in the "Results" block, indicate whether the operator's web page contains the information listed by placing a check in the box adjacent to all items that are present.

33. Notes

Adequate

33. Results

Q33.A Pipeline Purpose and Reliability ; Q33.B Damage Prevention ; Q33.D How to get additional information ; Q33.H Prevention Measures ; Q33.I Leak/Damage Recognition ; Q33.M Emergency Preparedness

ADVISORY BULLETIN REVIEW

Question #34

Is there potential for damage to the operator's pipeline facilities caused by flooding, river scour, or channel migration?

ADB 2019-01

ADB 2019-01 Flood Mitigation

34. Notes

NWN does have program for this but no damages have ever occurred. Natural Forces program in TIMP/DIMP.

34. Results

YES

Question #35

If "YES" to Q34, did the operator take appropriate action in accordance with the guidance contained ADB 2019-01? Discuss ADB's guidance with operator's representative, and annotate any concerns.

ADB 2019-01

ADB 2019-01: Flood Mitigation

35. Notes

No such event has occurred

35. Results

Not Applicable

Question #36

Is there potential for the operator's system to be damaged by earth movement or other seismic/geological activities?

ADB 2019-02

ADB 2019-02: Earth Movement/Geological Hazards

36. Notes

A seismic study was performed in 2020.

36. Results

YES

Question #37

If "YES" to Q36, did the operator take appropriate action according to ADB 2019-02? Discuss suggested actions from ADB with operator's representative and annotate any concerns.

ADB 2019-02

ADB 2019-02: Earth Movement/Geological Hazards

37. Notes

No event has occurred

37. Results

Not Applicable

Question #38

Does the operator have any indoor meter sets or regulators in their system?

ADB 2020-01

ADB 2020-01 Inside Meter Sets

38. Notes

Reviewed NWN Customer Information Software lists identifying all indoor meter sets in Clark County.

38. Results

YES

Question #39

If operator's system has indoor meter sets/regulators, did the operator review ADB 2020-0115? Discuss ADB guidance with operator's representative and annotate any concerns. Particular attention must be given to the operator's plan to conduct leak surveys, AC inspections, and other maintenance activities in locations that are difficult to access, as well as the inclusion of inside meters/regulators within the operator's DIMP plan, as applicable.

ADB 2020-01

ADB 2020-01 Inside Meter Sets

39. Notes

NWN Engineering Procedure Services D-14.

39. Results

Satisfactory

Question #40

Is the operator's record of locations for all indoor meter sets/regulators within their system complete and sufficiently detailed??

ADB 2020-01

ADB 2020-01 Inside Meter Sets

40. Notes

NWN Customer Information Software lists all the inside meter set locations in Clark County. Reviewed spreadsheet.

40. Results

Satisfactory

Question #41

Does the operator have any low pressure systems?

ADB 2020-02

ADB 2020-02 Low Pressure Systems

41. Notes

No low pressure.

41. Results

NO

Question #42

If "YES" to Q41, did the operator review ADB 2020-0025 for Overpressure Protection of Low-Pressure Natural Gas Distribution Systems? Review ADB guidance with operator and annotate any concerns.

ADB 2020-02

ADB 2020-02 Low Pressure Systems

42. Notes

No low pressure.

42. Results

Not Applicable

Question #43

For low pressure construction/maintenance projects, does the operator have a process for review of engineering plans and constructibility reviews that are carried out through all applicable departments? Do all applicable departments review project plans for accuracy, completeness and correctness? How are control procedures developed that could identify system threats that could result in a common failure mode? How is the operator mitigating risk in their low pressure system?

ADB 2020-02

ADB 2020-02 Low Pressure Systems

43. Results
Not
Applicable

43. Notes

No low pressure.

Question #44

Does the operator include all low-pressure system risks in their DIMP program appropriately?

ADB 2020-02

ADB 2020-02 Low Pressure Systems

44. Results
Not
Applicable

44. Notes

No low pressure.

SUMMARY OF REQUIRED COMMENTS

COMMENTS: Required for any ratings other than Satisfactory. Summarize/consolidate entries from the "Notes" blocks above. Ensure you annotate the question number for each comment. Notes are in the Notes box under each question.