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May 24, 2017

Mr. Kevin Hennessy  
Chief, Pipeline Safety  
Utility Safety & Reliability  
Oregon Public Utility Commission  
P. O. Box 1088  
Salem, Oregon 97308-1088

Subject: NW Natural Response to Stipulation 17-127

Dear Mr. Hennessy:

On March 30, 2017 stipulation 17-127 was made, entered and effective between the Oregon Public Utility Commission (OPUC) and NW Natural. Attached are the requested materials.

**Stipulation Language:**

*NORTHWEST NATURAL GAS COMPANY, dba NW Natural, must provide to Complainant's safety staff, Kevin Hennessy, within 55 days following the entry of this order:*

- (a) Training materials for defendant's training program provided to company employees responsible for providing notice to the Oregon Utility Notification Center (OUNC); and*
- (b) Defendant's company job classifications or positions that receive this training, how often, and when such training will occur.*

**NW Natural Response:**

- (a) NW Natural provided the formal training on May 24, 2017. The power point presentation used is attached.
- (b) NW Natural provided the training to the employees of Resource Management Center (RMC) responsible for providing notification to the OUNC. The sign in sheet is attached. The training will be provided to new employees as part of their new employee training. Refresher training will be provided if necessary.

Sincerely,

A handwritten signature in blue ink that reads 'Joe S. Karney'.

Joe S. Karney, P.E.  
Sr. Manager, Code Compliance



# Providing notice to the Oregon Utility Notification Center 811

# Expectations

## 952-001-0040 Pre-Marking Required by the Excavator; Exemption

- Except as provided in paragraph (2) of this rule, prior to notifying the Oregon Utility Notification Center, an excavator shall pre-mark with the color white the immediate area of the proposed excavation within both the public rights-of-way and underground easements.
- An excavator need not pre-mark as required in paragraph (1) of this rule if:
  - The operator can determine precisely the direction, length and location of the proposed excavation by referring to a locate ticket; or
  - The excavator and operator have had a meeting prior to the beginning of the proposed project, at the construction site for the exchange of information required under paragraph (1) of this rule.

# Expectations

## 952-001-0050 Excavator to Give Notice of Proposed Work; Exemption

- 1) Except as provided in section (2) of this rule, at least two (2) business days, but not more than ten (10) business days before commencing an excavation, the excavator shall notify the Oregon Utility Notification Center of the date and location of the proposed excavation, and the type of work to be performed.
- 2) The notice requirement of section (1) of this rule shall not apply if the excavation is in response to an emergency, or if all of the following apply:
  - 1) The excavator is a tenant or an owner of private property;
  - 2) The excavation is on private property of that owner or tenant;
  - 3) The excavation is less than twelve (12) inches in depth; and
  - 4) The excavation is not within an established easement.
- 3) An excavator, when giving notice in compliance with section (1) of this rule, shall furnish information as to how the excavator can be contacted.
- 4) If an excavator intends to perform work at multiple sites or over a large area, the excavator shall take reasonable steps to work with the facility operators, including preconstruction meetings, so that the operators may locate their facilities at a time reasonably in advance of the actual start of excavation for each phase of the work.

# Expectations

## 952-001-0060 When Excavator May Give Less than Forty-Eight (48) Business Day Hour Notice

An excavator may provide less than two (2) business days (48) hours prior notice if:

- (1) The excavator is responding to an emergency, so long as the excavator notifies the Oregon Utility Notification Center immediately and so long as the excavator takes reasonable care to protect underground facilities;
- (2) The excavator has an agreement with each operator of underground facilities that marks will be provided on a regular basis as the excavator progresses through a project; or
- (3) The excavator discovers an underground facility in an area where the operator of underground facilities had previously indicated there were no facilities.

# Questions

