



STATE OF WASHINGTON
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
1300 S. Evergreen Park Dr. S.W., P.O. Box 47250 • Olympia, Washington 98504-7250
(360) 664-1160 • TTY (360) 586-8203

CERTIFIED MAIL

August 13, 2013

Don Kopczynski
Vice President, Energy Delivery
Avista Utilities Corporation
1411 E. Mission
P.O. Box 3727
Spokane, WA 99202-3727

Dear Mr. Kopczynski:

RE: 2013 Natural Gas Standard Inspection – Avista Utilities - Spokane District

Staff from the Washington Utilities and Transportation Commission (staff) conducted a standard inspection from July 16-18 and July 23-25, 2013, of the Avista Utilities Corporation (Avista) - Spokane District pipeline system. The inspection included a records review and inspection of Avista's pipeline facilities.

No probable violations were noted as a result of the inspection.

Staff did note one area of concern regarding the lack of sufficient levels of cathodic protection on two gas distribution facilities.

Your response needed

Please review the attached report and respond in writing by October 23, 2013. The response should include documentation that action to remediate the deficiencies was started in a timely manner and that all efforts were made to complete remedial action within 90 days of discovery as provided for under 480-93-110 (2) WAC.

Staff would like to thank Avista's personnel for their professionalism and cooperation during this inspection.

Avista Utilities Corporation
2013 Natural Gas Standard Inspection – Avista Utilities - Spokane District
August 13, 2013
Page 2

If you have any questions or if we may be of any assistance, please contact Dave Cullom at (360) 664-1141. Please refer to the subject matter described above in any future correspondence pertaining to this inspection.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Lykken', with a long, sweeping horizontal line extending to the right.

David D. Lykken
Pipeline Safety Director

Enclosure

cc: Mike Faulkenberry, Chief Gas Engineer, Avista

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
2013 Natural Gas Standard Pipeline Safety Inspection
Avista Utilities - Spokane District

The following area of concern of WAC 480-93 was noted as a result of the 2013 inspection of the Avista Utilities - Spokane District. The inspection included a random selection of records, operation and maintenance (O&M), emergency response, inventory, and field inspection of the pipeline facilities.

AREAS OF CONCERN OR FIELD OBSERVATIONS

2. **WAC 480-93-110 Corrosion control.**

(2) Each gas pipeline company must complete remedial action within ninety days to correct any cathodic protection deficiencies known and indicated by any test, survey, or inspection. An additional thirty days may be allowed for remedial action if due to circumstances beyond the gas pipeline company's control the company cannot complete remedial action within ninety days. Each gas pipeline company must be able to provide documentation to the commission indicating that remedial action was started in a timely manner and that all efforts were made to complete remedial action within ninety days. (Examples of circumstances allowing each gas pipeline company to exceed the ninety-day time frame include right of way permitting issues, availability of repair materials, or unusually long investigation or repair requirements.)

Finding(s):

1. The carrier pipe reading at the Interstate 90 and White Road crossing did not meet the -850mV CSE (on) criteria. The reading obtained was -740mV CSE (on) for the carrier pipe and was -650mV CSE (on) on the casing. The operator did note that they were tracing a short in that cathodic protection system that was probably causing interference and indicated they would follow up with a CP survey to find the short at a later date.
2. The service at 3025 South Geiger Blvd read -730mV at the meter and -740mV when read remotely by spooling out approximately 100ft from the meter. It was also noted that this service was in the same cathodic protection system, per the operator's records, as the previous finding. The operator did note that they would trace the short that was presumed to be causing the low reads and indicated they would follow up with a CP survey to clear the short.