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**Submitted via electronic mail to [mwoodard@utc.wa.gov](mailto:mwoodard@utc.wa.gov)**

November 4, 2014

Mr. David Lykken  
Pipeline Safety Director  
Washington Utilities and Transportation Commission  
PO Box 47250  
Olympia, WA. 98504-7250

Re: Avista's response to WUTC Letter dated 10/8/14 regarding the 2014 TIMP Inspection

Dear Mr. Lykken:

On September 17, Scott Rukke of the WUTC conducted a Natural Gas Transmission Integrity Management Program Inspection (Insp. #5812) jointly with a representative from the Oregon PUC. The following response documents the actions Avista proposes to undertake to address the Probable Violation (PV) from the inspection.

**49 CFR 192.150 – Passage of Internal Inspection Devices.**

*(a) Except as provided in paragraph (b) and (c) of this section, each new transmission line and each replacement of line pipe, valve, fitting, or other line component in a transmission line must be designed and constructed to accommodate the passage of instrumented internal inspection devices.*

**Finding(s) – Paraphrased from WUTC Letter:**

A 2014 leak survey of the Spokane to Kettle Falls Transmission Line revealed a grade 3 leak in a Class 3 location. The grade 3 leak was repaired by installing TDW M-Stopp fittings, full radius 90 degree elbows and approximately 98' of 8", Grade B, 0.322" wall thickness pipe. This design does not meet the requirement of the aforementioned Federal Code since instrumented internal inspection devices cannot be navigated through the new arrangement of pipe and fittings.

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State of Washington  
UTC  
Pipeline Safety Program

**Avista's Response:**

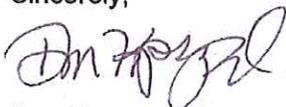
Avista acknowledges that the offset piping design noted above does not allow for passage of instrumented internal inspection devices using currently available technology.

Avista will design and install a repair to this offset arrangement that will accommodate the passage of instrumented internal inspection devices during the non-peak flow period of calendar year 2015 to resolve this issue.

Please see the attached design schematic that briefly exhibits how Avista plans to accomplish this task.

Should you have any questions or concerns, please contact Mike Faulkenberry at 509-495-8499.

Sincerely,



Don Kopczynski  
Vice President, Energy Delivery  
DK/rkb

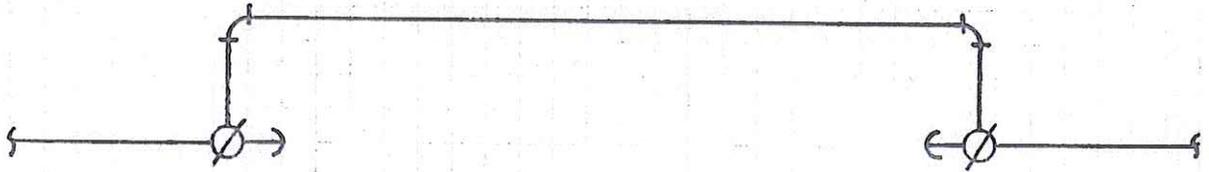
Enclosure

cc: Gas Integrity and Compliance WUTC Correspondence File  
Mike Faulkenberry, Avista Utilities  
David Howell, Avista Utilities  
Linda Burger, Avista Utilities



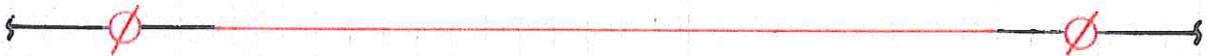
AVISTA

### Avista's Spokane to Kettle Falls Transmission Pipeline



Existing Piping Configuration

plan view  
scale: none



Proposed Piping Configuration

plan view  
scale: none

Legend	
	Existing 8" gas pipe/ fittings
	Proposed 8" gas pipe/ fittings
	Mueller H-17276 Fitting with Pig Plug
	TOW MSTOPP Fitting
	weld Cap
	weld Elbow