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Submitted to Denise Crawford via electronic email at dcrawfor@utc.wa.gov

January 26, 2016

Mr. Alan Rathbun
Pipeline Safety Director
Washington Utility and Transportation Commission
1300 S. Evergreen Park Dr. S.W.
PO Box 47250
Olympia, WA 98504-7250

Re: WUTC Pullman/Clarkston District Inspection No. 6194, Avista Response

Dear Mr. Rathbun:

In your letter of December 31, 2015 you documented one probable violation discovered during the Pullman/Clarkston District Audit that was conducted in late 2015. Please find herein a restatement of the probable violation and Avista's response.

Probable Violation Reference:

WUTC Docket PG-082253; Settlement Agreement; Paragraph 4

Description of Probable Violation (NOPV):

Avista will perform annual leak surveys of Aldyl-A mains installed prior to 1987.

Findings:

There were two instances in Pullman where the annual leak survey for Aldyl-A main was not performed.

Avista Response to the above NOPV:

Avista concurs that the company did not perform an annual leak survey of two sections of gas main in the Pullman District as required by the aforementioned Stipulated Agreement. Upon further research, it was determined that the GIS query used to identify the pre-1987 Aldyl A main was flawed and had the potential to miss 1-1/4" Aldyl-A main in its analysis. Additionally, any mislabeled pipelines being represented as services had the potential to be missed in the query.

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Avista has since rerun the query and found a total of seven segments of Aldyl A main that were missed with the annual Aldyl-A main survey in Washington. Each of these segments was promptly leak surveyed after the inspection.

As part of the company's ongoing GIS system improvements, any time mapping errors are detected (including mains misrepresented as services) by company personnel or contractors, the electronic maps are updated within six months per the requirements of WAC 490-93-018(5).

Respectfully Submitted,



Heather Rosentrater
Vice President, Energy Delivery
HR/rkb

Cc: Mike Faulkenberry, Director, Natural Gas
Karen Cash, Compliance Manager

WUTC Correspondence File

