

Utilities and Transportation Commission Standard Inspection Report for Intrastate Gas Distribution Systems Records Review and Field Inspection

A completed **Standard Inspection Checklist, OQ Field Validation Protocol form and Cover Letter/Field Report** are to be submitted to the Chief Engineer within **30 days** from completion of the inspection.

Inspection Report			
Docket Number	Reference # 2585		
Inspector Name & Submit Date	Patti Johnson, 10-30-2012		
Chief Eng Name & Review/Date	Joe Subsits, 11/7/2012		
Operator Information			
Name of Operator:	Avista Utilities Corporation	OP ID #:	31232
Name of Unit(s):	Pullman/Clarkston		
Records Location:	Spokane, Pullman and Clarkston offices		
Date(s) of Last (unit) Inspection:	June 7, 2009 – June 21, 2009	Inspection Date(s):	Aug 29 to Sept 6, 2012

<p>Inspection Summary: Note: 1. Clarkston has new 6” 500psig line from Lewiston that parallels the existing 4” 250 psig line. Currently not considered transmission.</p>

<p>HQ Address: 1411 East Mission P.O. Box 3727 Spokane, WA 99220-3727</p>	<p>System/Unit Name & Address: Pullman District 5702 State Route 270, Pullman, WA 99163 Clarkston district 1330 Fair, Clarkston, WA</p>
<p>Co. Official: Mike Faulkenbury Phone No.: (509) 495-8499 Fax No.: Emergency Phone No.:</p>	<p>Phone No.: Fax No.: Emergency Phone No.:</p>

Persons Interviewed	Title	Phone No.
Sandy Bailey	Drug and Alcohol Manager	509 489 0500
Jenny Bushnell	Compliance Tech	208 769 1876
Randy Bareither	Pipeline Safety Engineer	509 489 0500
Bob Larson	CP Tech	509 489 0500
Trevor Salonen	Pressure Controlman	509 489 0500
Bill Spears	Assistance Manager Clarkston	509 489 0500
Glenn Logsdon	Construction Manager Clarkston	509 489 0500
Jenny Blaylock	Construction Manager Pullman	509 489 0500
David Bonte	Pullman Serviceman	509 489 0500
Donna Konen	Construction Service Tech	509 489 0500
Shawn Gallher	Manager Atmospheric Corrosion	509 489 0500
David Howell	Compliance Manager	509 489 0500
Brandon Beierle	Pipeline Specialist	509 489 0500
Kevin Berry	Project Manager Isolated Steel	

WUTC staff conducted an abbreviated procedures inspection on 192 O&M and WAC items that changed since the

**Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Distribution Systems
Records Review and Field Inspection**

last inspection. This checklist focuses on Records and Field items per a routine standard inspection.			
(check one below and enter appropriate date)			
<input type="checkbox"/>	Team inspection was performed (Within the past five years.) or,	Date:	
<input checked="" type="checkbox"/>	Other WUTC Inspector reviewed the O & M Manual (Since the last yearly review of the manual by the operator.)	Date:	4-2012

**Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Distribution Systems
Records Review and Field Inspection**

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

GAS SYSTEM OPERATIONS			
Gas Supplier		Williams	
Services: Residential Clarkston 6549, Pullman 7082 Commercial Clarkston 552, Pullman 1121 Industrial Clarkston 2, Pullman 2 Other Clarkston no, Pullman 1			
Number of reportable safety related conditions last year Clarkston 0, Pullman 0		Number of deferred leaks in system Clarkston 0 Pullman 0	
Number of <u>non-reportable</u> safety related conditions last year Clarkston and Pullman 0		Number of third party hits last year Clarkston 8, Pullman 12	
Miles of transmission pipeline within unit (total miles and miles in class 3 & 4 areas) 0		Miles of main within inspection unit (total miles and miles in class 3 & 4 areas) Total Clarkston is 128.4 miles Class 3 and 4 is 115.6 Total for Pullman is 195.6 Class 3 and 4 is 147.	
Operating Pressure(s):		MAOP (Within last year)	Actual Operating Pressure (At time of Inspection)
Feeder:	Pullman-Vary from 125 to 500 pounds Clarkston – Gate in Idaho		varies
Town	Palouse Albion 500psig, Colton 125 psig, Lacrosse 165 psig, Pullman city feeder 150 psig, Pullman WSU 12 is 383 psig, Rosalie 250 psig, St John is 150 psig, Uniontown 125, Endicott is 150 psig and Pullman E is both 280 psig and 400 psig, Colfax 125	Palouse Albion 500psig, Colton 125 psig, Lacrosse 165 psig, Pullman city feeder 150 psig, Pullman WSU 12 is 383 psig, Rosalie 250 psig, St John is 150 psig, Uniontown 125, Endicott is 150 psig and Pullman E is both 280 psig and 400 psig, Colfax 125	varies
Other:	NA	NA	NA
Does the operator have any transmission pipelines?		Not in Pullman/Clarkston District	
Compressor stations? Use Attachment 1.		None	

Pipe Specifications:			
Year Installed (Range)	Pullman 1968 to current Clarkston 1967 to current	Pipe Diameters (Range)	Pullman-1/2 to 12, Clarkston 1/2-6
Material Type	Steel, PE	Line Pipe Specification Used	API 5L
Mileage	Pullman 180 Clarkston 120	SMYS %	Pullman 18% maximum Clarkston 16.9% Maximum

Operator Qualification Field Validation
Important: Per OPS, the OQ Field Inspection Protocol Form (Rev 3, Feb 08) shall be used by the inspector as part of this standard inspection. When completed, the inspector will upload this information into the PHMSA OQ Database (OQDB) located at http://primis.phmsa.dot.gov/oqdb/home.oq Date Completed 8-29-2012

Integrity Management Field Validation
Important: Per PHMSA, IMP Field Verification Form (Rev 3, March 09) shall be used by the inspector as part of this standard inspection. When completed, the inspector will upload this information into the PHMSA IM Database (IMDB) located at http://primis.phmsa.dot.gov/gasimp/home.gim Date Completed: Avista's IMP audit was conducted in 2006, this is the first mini IMP inspection. In 2012 a full DIMP PHMSA inspection was conducted with Oregon, Idaho and WA. The mini IMP was conducted with the Avista Transmission Inspection.

**Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Distribution Systems
Records Review and Field Inspection**

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

--

PART 199 Drug and Alcohol Testing Regulations and Procedures		S	U	NA	NC
Subparts A - C	Drug & Alcohol Testing & Misuse Prevention Program – Use PHMSA Form #13, Rev 3/19/2010. Do not ask the company to have a drug and alcohol expert available for this portion of your inspection. Form sent to PHMSA and in I drive	x			

REPORTING RECORDS			S	U	N/A	N/C
1.	49 U.S.C. 60132, Subsection (b)	For Gas Transmission Pipelines and LNG Plants. Submission of Data to the National Pipeline Mapping System Under the Pipeline Safety Improvement Act of 2002 Updates to NMPS: Operators are required to make update submissions every 12 months if any system modifications have occurred. <u>If no modifications have occurred since the last complete submission (including operator contact information), send an email to opsgis@rspa.dot.gov stating that fact.</u> Include operator contact information with all updates. Reviewed emails from National Repository dated 4-14-2012, 6-18-2008, 4-21-2009, 2/4/10 and 3/3/11	x			
2.	RCW 81.88.080	Pipeline Mapping System: Has the operator provided accurate maps (or updates) of pipelines, operating over two hundred fifty pounds per square inch gauge, to specifications developed by the commission sufficient to meet the needs of first responders? Email with copy of zip file sent to UTC dated 3/31/10 by Jody Morehouse	x			
3.	191.5	Immediate Notice of certain incidents to NRC (800) 424-8802, or electronically at http://www.nrc.uscg.mil/nrchp.html, and additional report if significant new information becomes available. Operator must have a written procedure for calculating an initial estimate of the amount of product released in an accident. O&M Gas Emergency, under Emergency Operation Plan Section EOP sheet 4 has procedure and Avista uses “Rule of Thumb Gas Loo Calculator” to estimate if incident is reportable	x			
4.	191.7	Reports (except SRCR and offshore pipeline condition reports) must be submitted electronically to PHMSA at https://opsweb.phmsa.dot.gov at unless an alternative reporting method is authorized IAW with paragraph (d) of this section. Avista does report electronically, had one in 9-2011 in Odessa	x			
5.	191.15(a)	30-day follow-up written reports to PHMSA (Form F7100.2) Submittal must be electronically to http://pipelineonlinereporting.phmsa.dot.gov	x			
6.	191.15(c)	Supplemental report (to 30-day follow-up) If one was required would send	x			
7.	191.17	Complete and submit DOT Form PHMSA F 7100-2.1 by March 15 of each calendar year for the preceding year. (NOTE: June 15, 2011 for the year 2010).	x			
8.	191.22	Each operator must obtain an OPID, validate its OPIDs, and notify PHMSA of certain events at https://opsweb.phmsa.dot.gov Reviewed 4-17-2012 email validating DOT information	x			
9.	191.23	Filing the Safety Related Condition Report (SRCR) No SRCR in 2009, 2010, 2011 or current 2012	x			
10.	191.25	Filing the SRCR within 5 days of determination, but not later than 10 days after discovery Would if required, in procedure Section 4.12	x			
11.	.605(d)	Instructions to enable operation and maintenance personnel to recognize potential Safety Related Condition Section 4.1.2, no specific training, the section has been the same for 4 years. All changes are included in annual training.	x			
12.	191.27	Offshore pipeline condition reports – filed within 60 days after the inspections Avista does not have off shore pipeline			x	

Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Distribution Systems
Records Review and Field Inspection

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

REPORTING RECORDS			S	U	N/A	N/C
13.	192.727(g)	Abandoned facilities offshore, onshore crossing commercially navigable waterways reports Crossing at Clearwater and Snake rivers in Clarkston. No crossing have ever been abandoned	x			
14.	480-93-200(1)	Telephonic Reports to UTC Pipeline Safety Incident Notification 1-888-321-9146 (Within 2 hours) for events which results in;				
15.	480-93-200(1)(a)	A fatality or personal injury requiring hospitalization; Clarkston and Pullman 0	x			
16.	480-93-200(1)(b)	Damage to property of the operator and others of a combined total exceeding fifty thousand dollars; Clarkston and Pullman 0	x			
17.	480-93-200(1)(c)	The evacuation of a building, or high occupancy structures or areas; Clarkston 0, Pullman 1(2009)	x			
18.	480-93-200(1)(d)	The unintentional ignition of gas; Clarkston and Pullman 0	x			
19.	480-93-200(1)(e)	The unscheduled interruption of service furnished by any operator to twenty five or more distribution customers; Clarkston and Pullman 0	x			
20.	480-93-200(1)(f)	A pipeline pressure exceeding the MAOP plus ten percent or the maximum pressure allowed by proximity considerations outlined in WAC 480-93-020; Clarkston and Pullman 0	x			
21.	480-93-200(1)(g)	Is significant, in the judgment of the operator, even though it does not meet the criteria of (a) through (f) of this subsection; Clarkston and Pullman 0	x			
22.	480-93-200(2)	Telephonic Reports to UTC Pipeline Safety Incident Notification 1-888-321-9146 (Within 24 hours) for;				
23.	480-93-200(2)(a)	The uncontrolled release of gas for more than two hours; Clarkston 1 and Pullman 1	x			
24.	480-93-200(2)(b)	The taking of a high pressure supply or transmission pipeline or a major distribution supply gas pipeline out of service; Clarkston and Pullman 0	x			
25.	480-93-200(2)(c)	A gas pipeline operating at low pressure dropping below the safe operating conditions of attached appliances and gas equipment; or Clarkston and Pullman 0	x			
26.	480-93-200(2)(d)	A gas pipeline pressure exceeding the MAOP Clarkston and Pullman 0	x			
27.	480-93-200(4)	Did written incident reports (within 30 days of telephonic notice) include the following				
28.	480-93-200(4)(a)	Name(s) and address(es) of any person or persons injured or killed, or whose property was damaged;	x			
29.	480-93-200(4)(b)	The extent of injuries and damage;	x			
30.	480-93-200(4)(c)	A description of the incident or hazardous condition including the date, time, and place, and reason why the incident occurred. If more than one reportable condition arises from a single incident, each must be included in the report; Reviewed written guidance in Gas Engr On Call binder with detailed elements	x			
31.	480-93-200(4)(d)	A description of the gas pipeline involved in the incident or hazardous condition, the system operating pressure at that time, and the MAOP of the facilities involved;	x			
32.	480-93-200(4)(e)	The date and time the gas pipeline company was first notified of the incident;	x			
33.	480-93-200(4)(f)	The date and time the ((operator's)) gas pipeline company's first responders arrived on-site;	x			
34.	480-93-200(4)(g)	The date and time the gas ((facility)) pipeline was made safe;	x			
35.	480-93-200(4)(h)	The date, time, and type of any temporary or permanent repair that was made;	x			
36.	480-93-200(4)(i)	The cost of the incident to the ((operator)) gas pipeline company;	x			
37.	480-93-200(4)(j)	Line type;	x			
38.	480-93-200(4)(k)	City and county of incident; and	x			

**Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Distribution Systems
Records Review and Field Inspection**

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

REPORTING RECORDS			S	U	N/A	N/C
39.	480-93-200(4)(l)	Any other information deemed necessary by the commission.	x			
40.	480-93-200(5)	Supplemental report if required information becomes available after 30 day report submitted	x			
41.	480-93-200(6)	Written report within 5 days of receiving the failure analysis of any incident or hazardous condition due to construction defects or material failure If outside analysis is done a copy is sent to UTC, Reviewed Gas Technology Institute, (Dr Palermo) sent to Avista dated 10-26-11. On monthly basis sent internal analysis. This procedure started in 2012	x			
42.	480-93-200(7)	Annual Reports filed with the commission no later than March 15 for the proceeding calendar year				
43.	480-93-200(7)(a)	A copy of PHMSA F-7100.1-1 and F-7100.2-1 annual report required by U.S. Department of Transportation, PHMSA/Office of Pipeline Safety	x			
44.	480-93-200(7)(b)	Damage Prevention Statistics Report including the following;				
45.	480-93-200(7)(b)(i)	Number of gas-related one-call locate requests completed in the field;	x			
46.	480-93-200(7)(b)(ii)	Number of third-party damages incurred; and	x			
47.	480-93-200(7)(b)(iii)	Cause of damage, where cause of damage is classified as one of the following: (A) Inaccurate locate; (B) Failure to use reasonable care; (C) Excavated prior to a locate being conducted; or (D) Other.	x			
48.	480-93-200(7)(c)	Reports detailing all construction defects and material failures resulting in leakage. Categorizing the different types of construction defects and material failures. The report must include the following: (i) Types and numbers of construction defects; and (ii) Types and numbers of material failures.	x			
49.	480-93-200(8)	Providing updated emergency contact information to the commission and appropriate officials of all municipalities where gas pipeline companies have facilities	x			
50.	480-93-200(9)	Providing by email, reports of daily construction and repair activities no later than 10:00 a.m.	x			
51.	480-93-200(10)	Submitting copy of DOT Drug and Alcohol Testing MIS Data Collection Form when required	x			

Comments:

CUSTOMER and EXCESS FLOW VALVE INSTALLATION NOTIFICATION			S	U	N/A	N/C
52.	192.16	Customer notification - Customers notified, within 90 days , of their responsibility for those service lines not maintained by the operator All new customers get letter, reviewed letter in English and Spanish with “Helpful information about your buried natural gas piping”. Reviewed list with 1732 for WA in 2011	x			
53.	192.381	Does the excess flow valve meet the performance standards prescribed under §192.381? Section 3.16	x			
54.	192.383	Does the operator have an installation and reporting program for excess flow valves and does the program meet the requirements outlined in §192.383? Are records adequate? Section 3.16, All EFV are mapped on GIS mapping system	x			

Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Distribution Systems
Records Review and Field Inspection

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

Comments:

CONSTRUCTION RECORDS			S	U	N/A	N/C
55.	480-93-013	OQ records for personnel performing New Construction covered tasks	x			
56.	192.225	Test Results to Qualify Welding Procedures	x			
57.	192.227	Welder Qualification	x			
58.	480-93-080(1)(b)	Appendix C Welders re-qualified 2/Yr (7.5Months)	x			
59.	480-93-080(2)	Plastic pipe joiners re-qualified 1/Yr (15 Months)	x			
60.	480-93-080(2)(b)	Plastic pipe joiners re-qualified if no production joints made during any 12 month period	x			
61.	480-93-080(2)(c)	Tracking Production Joints or Re-qualify joiners 1/Yr (12Months)	x			
62.	480-93-115(2)	Test leads on casings (without vents) installed after 9/05/1992 Since 1992 all casing installed have test leads. Casing without test leads are in Uniontown at Washington and Church (1966); In Pullman at Bishop and Johnson (1979); In Albion at 3491 Albion RR Xing (1968), In Colfax at Main and Tracts S of Cooper (1959) and In Colfax at first and Railroad Ave (1965)	x			
63.	480-93-115(3)	Sealing ends of casings or conduits on transmission lines and mains Section 3.42 sheet 5	x			
64.	480-93-115(4)	Sealing ends (nearest building wall) of casings or conduits on services Section 3.16 sheet 8	x			
65.	192.241(a)	Visual Weld Inspector Training/Experience OQ requirement	x			
66.	192.243(b)(2)	Nondestructive Technician Qualification No transmission in Clarkston or Pullman			x	
67.	192.243(c)	NDT procedures No transmission in Clarkston or Pullman			x	
68.	192.243(f)	Total Number of Girth Welds No transmission in Clarkston or Pullman			x	
69.	192.243(f)	Number of Welds Inspected by NDT No transmission in Clarkston or Pullman			x	
70.	192.243(f)	Number of Welds Rejected No transmission in Clarkston or Pullman			x	
71.	192.243(f)	Disposition of each Weld Rejected No transmission in Clarkston or Pullman			x	
72.	.273/.283	Qualified Joining Procedures Including Test Results	x			
73.	192.303	Construction Specifications	x			
74.	192.325 WAC 480-93-178(4)(5)	Underground Clearances	x			
75.	192.327	Amount, location, cover of each size of pipe installed	x			
76.	480-93-160(1)	Report filed 45 days prior to construction or replacement of transmission pipelines ≥ 100 feet in length No transmission in Clarkston/Lewiston. Although there was addition HP line 16.9% SYMS from Lewiston to Clarkston			x	

Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Distribution Systems
Records Review and Field Inspection

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

CONSTRUCTION RECORDS			S	U	N/A	N/C
77.	480-93-160(2)	Did report describe the proposed route and the specifications for the pipeline and must include, but is not limited to the following items: No transmission in Clarkston or Pullman			x	
78.	480-93-160(2)(a)	Description and purpose of the proposed pipeline; No transmission in Clarkston or Pullman			x	
79.	480-93-160(2)(b)	Route map showing the type of construction to be used throughout the length of the line, and delineation of class location as defined in 49 CFR Part 192.5, and incorporated boundaries along the route. No transmission in Clarkston or Pullman			x	
80.	480-93-160(2)(c)	Location and specification of principal valves, regulators, and other auxiliary equipment to be installed as a part of the pipeline system to be constructed No transmission in Clarkston or Pullman			x	
81.	480-93-160(2)(d)	MAOP for the gas pipeline being constructed; No transmission in Clarkston or Pullman			x	
82.	480-93-160(2)(e)	Location and construction details of all river crossings or other unusual construction requirements encountered en route. No transmission in Clarkston or Pullman			x	
83.	480-93-160(2)(f)	Proposed corrosion control program to be followed inc specs for coating and wrapping, and method to ensure the integrity of the coating using holiday detection equipment; No transmission in Clarkston or Pullman			x	
84.	480-93-160(2)(g)	Welding specifications; and No transmission in Clarkston or Pullman			x	
85.	480-93-160(2)(h)	Bending procedures to be followed if needed. No transmission in Clarkston or Pullman			x	
86.	480-93-170(1)	Commission notified 2 days prior to pressure testing pipelines with an MAOP producing a hoop stress \geq 20% SMYS? No transmission in Clarkston or Pullman			x	
87.	480-93-170(7)	Pressure tests records at a minimum include required information listed under 480-93-170(a-h) (a) Gas pipeline company's name; (b) Employee's name; (c) Test medium used; (d) Test pressure; (e) Test duration; (f) Line pipe size and length; (g) Dates and times; and (h) Test results. Reviewed job 834277174, 400 SE Grant St, Pullman, 883233377, 1210 Selway Ln Pullman: new regulator and odorizers station #390 in Uniontown; new development off Bishop and Harvest reviewed 3 pressure test. Had 4" and 2"	x			
88.	480-93-170(9)	Individual pressure test records maintained for single installations where multiple pressure tests were performed? Reviewed, See note above	x			
89.	480-93-170(10)	Pressure Testing Equipment checked for accuracy/intervals (Manufacturers Rec or Operators schedule) Section 5.21, every district has its own test bench now. Gas meter shop employee comes and does calibration.	x			
90.	480-93-175(2)	Study prepared and approved prior to moving and lowering of metallic pipelines > 60 psig No lowering of Pipelines in last 3 years in Pullman or Clarkston	x			
91.	480-93-175(4)	Leak survey within 30 days of moving or lowering pipelines \leq 60 psig No lowering in Pullman or Clarkston	x			

Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Distribution Systems
Records Review and Field Inspection

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

Comments:

OPERATIONS and MAINTENANCE RECORDS			S	U	N/A	N/C
92.	192.517(a)	Pressure Testing (operates at or above 100 psig) – useful life of pipeline Reviewed chart for the Clarkston 6” job. 24 hour pressure test, held at 100 psi. Note on back of chart “leak check at 20% SMYS performed at 617psig starting at 12:28pm and ending at 1:24 pm at 615psig. Fixed small fizzer leak on cap of 1” save a valve nipple. Final test started at 2:43pm 12-2-11 at 784.5psig and ended same time on 12-2-11. Nitrogen test medium.	x			
93.	192.517(b)	Pressure Testing (operates below 100 psig, service lines, plastic lines) – 5 years See question 87	x			
94.	192.605(a)	Procedural Manual Review – Operations and Maintenance (1 per yr/15 months) Note: Including review of OQ procedures as <u>suggested</u> by PHMSA - ADB-09-03 dated 2/7/09	x			
95.	192.605(b)(3)	Availability of construction records, maps, operating history to operating personnel Servicemen and pressure control men have computers, crews have hard copy of maps or in office can uses computer	x			
96.	480-93-018(3)	Records, including maps and drawings updated within 6 months of completion of construction activity? Following was fielded and maps reviewed for accuracy at Hillcrest Mobile Home and RV Park. There is at least 2 meters in the Park mtr 126151,pe serv: and one across the street and behind the state patrol office. Had Atmospheric Inspection On 9-16-2009 AND 6-14-12 – no remediation required yet. Probable Violation 2: Avista failed to map the meter less riser located by electric power pole #035069. Probable violation 4 finding 1: Finding a of 480-93-180, Avista failed to followed its O&M and turn in a mapping error found during a leak survey at a meter less riser located near electric power pole #035069, in accordance with O&M Section 4.11		x		
97.	192.605(b)(8)	Periodic review of personnel work – effectiveness of normal O&M procedures Managers review sample of construction as builds at Avista called greens or construction orders.	x			
98.	192.605(c)(4)	Periodic review of personnel work – effectiveness of abnormal operation procedures Managers review all trouble orders on the computer. Look at response time, hand off to crew etc.	x			
99.	192.609	Class Location Study (If applicable) Design to class 4 for everything	x			
100.	192.611	Confirmation or revision of MAOP No revisions	x			
101.	Damage Prevention (Operator Internal Performance Measures)					
102.	192.614	Does the operator have a quality assurance program in place for monitoring the locating and marking of facilities? Do operators conduct regular field audits of the performance of locators/contractors and take action when necessary? (CGA Best Practices v. 6.0, Best Practice 4-18. Recommended only, not required) SCOTT TO COVER ALL AVISTA DAMAGE PREVENTION IN COLVILLE INSPECTION				x

Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Distribution Systems
Records Review and Field Inspection

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
 If an item is marked U, N/A, or N/C, an explanation must be included in this report.

OPERATIONS and MAINTENANCE RECORDS			S	U	N/A	N/C
103.		Does operator including performance measures in facility locating services contracts with corresponding and meaningful incentives and penalties? SCOTT TO COVER ALL AVISTA DAMAGE PREVENTION IN COLVILLE INSPECTION				X
104.		Do locate contractors address performance problems for persons performing locating services through mechanisms such as re-training, process change, or changes in staffing levels? SCOTT TO COVER ALL AVISTA DAMAGE PREVENTION IN COLVILLE INSPECTION				X
105.		Does the operator periodically review the Operator Qualification plan criteria and methods used to qualify personnel to perform locates? SCOTT TO COVER ALL AVISTA DAMAGE PREVENTION IN COLVILLE INSPECTION				X
106.		Review operator locating and excavation <u>procedures</u> for compliance with state law and regulations. SCOTT TO COVER ALL AVISTA DAMAGE PREVENTION IN COLVILLE INSPECTION				X
107.		Are locates are being made within the timeframes required by state law and regulations? Examine record sample. SCOTT TO COVER ALL AVISTA DAMAGE PREVENTION IN COLVILLE INSPECTION				X
108.		Are locating and excavating personnel properly <u>qualified</u> in accordance with the operator’s Operator Qualification plan and with federal and state requirements? SCOTT TO COVER ALL AVISTA DAMAGE PREVENTION IN COLVILLE INSPECTION				X
109.		Follow-up inspection performed on the pipeline where there is reason to believe the pipeline could be damaged .614(c) (6) 1. Is the inspection the done as frequently as necessary during and after the activities to verify the integrity of the pipeline? 2. In the case of blasting, does the inspection include leakage surveys? SCOTT TO COVER ALL AVISTA DAMAGE PREVENTION IN COLVILLE INSPECTION				X
110.		Informational purposes only. Not Required. Does the pipeline operator voluntarily submit pipeline damage statistics into the UTC Damage Information Reporting Tool (DIRT)? Operator may register at https://identity.damagereporting.org/cgareg/control/login.do Y N SCOTT TO COVER ALL AVISTA DAMAGE PREVENTION IN COLVILLE INSPECTION				X

Comments:

111.	Emergency Response Plans	S	U	N/A	N/C
-------------	---------------------------------	----------	----------	------------	------------

Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Distribution Systems
Records Review and Field Inspection

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

112.	192.603(b)	Prompt and effective response to each type of emergency .615(a)(3) Note: Review operator records of previous accidents and failures including third-party damage and leak response In EOP, review annual report information. Goal to dispatch is 10 minutes, and 1st responder to site is one hour.	x			
113.	192.615(b)(1)	Location Specific Emergency Plan Every office has local EOP hardcopy in office. Review Mike Faulkenberry memo on of 4-21-10	x			
114.	192.615(b)(2)	Emergency Procedure training, verify effectiveness of training 1) managers review all trouble orders on computer to see if handled properly, this is documented and this documentation reviewed by manager supervisor 2) Mock emergency training done in in one district in every state every year. In 2009 in Medical Lake; 2010 in Spokane (table top mutual aid); 2011 one done in Colville for WA.; 2012 did table top with community both internal and external personnel. 36 total that took part in table top Including red cross, city of Chewelah, city of Colville, school districts, Stevens county, WSU extension, Wal-Mart, Colville police, Stevens county sheriff, and Stevens county Disaster emergency Services (DES) as well as 17 Avista employees and Colville contractor	x			
115.	192.615(b)(3)	Employee Emergency activity review, determine if procedures were followed. Trouble order reviewed required by district managers and review documented. Reviewed random trouble orders	x			
116.	192.615(c)	Liaison Program with Public Officials Every district attempts to do a Liaison meeting quarterly Clarkston: 1. 11-4-2010, 4th quarter, met with Asotin County Fire Dept and 18 firefighters attended. 2, none for 3rd quarter, 2nd or first quarter Pullman in 2011 1. 3rd and 4th quarter none 2. 2nd quarter on 6-15-11 Provided excavator handbook, APWA uniform color code for marking 4. Stand-alone training with contractor who saw cut aldy pipe at job at 760 S St in Pullman, he was instructed regarding 811, safety hazards to life and property, given stickers and magnets, safety slide charts and repeat offenders explanation and fines.	x			
117.	192.616	Public Awareness Program				
118.	192.616(e&f)	Documentation properly and adequately reflects implementation of operator's Public Awareness Program requirements - Stakeholder Audience identification, message type and content, delivery method and frequency, supplemental enhancements, program evaluations, etc. (i.e. contact or mailing rosters, postage receipts, return receipts, audience contact documentation, etc. for emergency responder, public officials, school superintendents, program evaluations, etc.). See table below:	X			
119.		Operators in existence on June 20, 2005, must have completed their written programs no later than June 20, 2006. See 192.616(a) and (j) for exceptions.				
120.		API RP 1162 Baseline* Recommended Message Deliveries				

**Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Distribution Systems
Records Review and Field Inspection**

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

121.		Stakeholder Audience (LDC's)	Baseline Message Frequency (starting from effective date of Plan)				
		Residence Along Local Distribution System	Annual				
		LDC Customers	Twice annually				
		One-Call Centers	As required of One-Call Center				
		Emergency Officials	Annual				
		Public Officials	3 years				
		Excavator and Contractors	Annual				
		Stakeholder Audience (Transmission line operators)	Baseline Message Frequency (starting from effective date of Plan)				
		Residence Along Local Distribution System	2 years				
		One-Call Centers	As required of One-Call Center				
		Emergency Officials	Annual				
		Public Officials	3 years				
		Excavator and Contractors	Annual				
		122.					
123.	192.616(g)	The program conducted in English and any other languages commonly understood by a significant number of the population in the operator's area.	X				
124.	.616(h)	IAW API RP 1162, the operator's program should be reviewed for effectiveness within four years of the date the operator's program was first completed. <u>For operators in existence on June 20, 2005</u> , who must have completed their written programs no later than June 20, 2006, the first evaluation is due no later than June 20, 2010 . .616(h)	X				
125.	192.616(j)	Operators of a Master Meter or petroleum gas system – public awareness messages 2 times annually: (1) A description of the purpose and reliability of the pipeline; (2) An overview of the hazards of the pipeline and prevention measures used; (3) Information about damage prevention; (4) How to recognize and respond to a leak; and (5) How to get additional information.	X				
126.	192.617	Review operator records of accidents and failures including laboratory analysis where appropriate to determine cause and prevention of recurrence .617 Note: Including excavation damage and leak response records (PHMSA area of emphasis) (NTSB B.10)	X				

Comments:

- **2012 A Full PHMSA PA inspection was conducted**

127.	192.619/621/623	Maximum Allowable Operating Pressure (MAOP) Note: New PA-11 design criteria is incorporated into 192.121 & .123 (Final Rule Pub. 12/24/08) Avista does not use PA11 pipe. Not in design criteria	s			
------	-----------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---	--	--	--

Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Distribution Systems
Records Review and Field Inspection

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

128.	480-93-015(1)	<p>Odorization of Gas – Concentrations adequate Gate station in Colfax to the district reg. About ½ mile is unodorized.</p> <p>Clarkston Reviewed “Monthly Odometer Reads” all sites for Dec 2009 with equipment ID 377. All reads within .28 to .22! Odometer # 377 calibrated by manufacture on 2/11/09</p> <p>Reviewed “Monthly Odometer Reads Report” all sites for December 2010. All reads between .22 and .33. (Standard says anything below .4 is not acceptable) Odometer #377 calibrated by manufacture on 2/16/10</p> <p>Reviewed “Monthly Odometer Reads Report” all sites for December 2011. All reads between .25 and .27. And Odometer # 377 used calibrated by manufacture on 1/28/11. \</p> <p>Pullman Reviewed Monthly Odometer Reads Report Dec 2009, for all sites ok, done with Bacharach odometers ZF1019 and 119 calibrated on 2/14/2001</p> <p>Reviewed Monthly Odometer Reads Report Dec 2010, for all sites ok, done with Bacharach odometers ZF1019 and 119 calibrated on 1/30/2010</p> <p>Reviewed Monthly Odometer Reads Report Dec 2011 for all sites ok, done with Bacharach odometers ZF1019 and 119 calibrated on 1-18-2012</p>	x			
129.	480-93-015(2)	<p>Monthly Odorant Sniff Testing See Monthly odometer Reads in question 128</p>	x			
130.	480-93-015(3)	<p>Prompt action taken to investigate and remediate odorant concentrations not meeting the minimum requirements Section in 4.18 sheet 2 in O&M</p>	x			
131.	480-93-015(4)	<p>Odorant Testing Equipment Calibration/Intervals (Annually or Manufacturers Recommendation) See question 128 for dates</p>	x			
132.	480-93-124(3)	<p>Pipeline markers attached to bridges or other spans inspected? 1/yr(15 months) (4) Where gas pipelines are attached to bridges or otherwise span an area, each gas pipeline company must place pipeline markers at both ends of the suspended pipeline. Each gas pipeline company must conduct surveys of pipeline markers required by this subsection at least annually, not to exceed fifteen months.</p> <p>Avista manual section 3.15 does not have adequately procedure for 480-93-124 (4) Probable Violation 4 finding 2: Avista failed to include a clear procedure for WAC 480-93-124 (4) in the O&M manual when they combined WAC 480-93-124 (1) (2) and (4).</p> <p>9-4- Mike said all markers not intended to be on map. May use GIS in the future. For 5 year survey used maps, maps only have markers that are deemed necessary. Last 5 year survey was done in 2008 and next will be done in 2013.</p> <p>Avista committed to include an update reminder in their “Refresher Minute Bulletin”, For both wood supports, and markers at end of bridge.</p>		x		
133.	480-93-124(4)	<p>Markers reported missing or damaged replaced within 45 days?</p>	x			
134.	480-93-140(2)	<p>Service regulators and associated safety devices tested during initial turn-on In Gas Emergency Book, flow and lockup on meter when turn on. Both emergency and turn on. Section 6 sheet 5. Documented on computer by serviceman, if crew doc on service paper work card</p>	x			
135.	480-93-155(1)	<p>Up-rating of system MAOP to >60 psig? Procedures and specifications submitted 45 days prior? None in Pullman or Clarkston since 2009. Would follow O&M if uprate.</p>			x	

**Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Distribution Systems
Records Review and Field Inspection**

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

136.	480-93-185(1)	<p>Reported gas leaks promptly investigated? Graded in accordance with 480-93-186? Records retained?</p> <p>Section 5.11, procedure for leak survey leak and grading. If grade 1 immediate response from 1st responders, person stays at site till 1st responder team /crew arrives. If grade 2 turned into construction office have 6 months to repair and grade 3 also turned into construction office and have one year.</p> <p>In Pullman Clarkston no leaks carried forward from 2011 for any type of leak. When leak survey crews see digging without locate call 1st responders and 1st responder there with in hour, to inform them of 811 etc.</p> <p>When leak survey cannot get in (they go back 3 times). Then they fill out blue leak survey report (non -leak report) and service man goes back and surveys. Service man tries a minimum of twice and then cert letter is sent. The gas service cut off. This process is typically no longer than 3 months. Note for can't get in leaks are a 30 day resolve for Avista.</p>	x			
137.	480-93-185(3)(a)	<p>Leaks originating from a foreign source. Take appropriate action to protect life and property regarding the pipeline company's own facilities, and;</p> <p>No foreign leaks in Pullman Clarkston area. Clarkston had 1 because of old land fill years ago. Years ago Pullman had one that was result of someone dumping oil when changing tractor oil. Procedure Section 5.11 sheet 4. Reviewed letter sent to Spokane resident 518 E Central. Send in sample for analysis every time they have foreign leak.</p>	x			
138.	480-93-185(3)(b)	<p>Leaks originating from a foreign source reported promptly/notification by mail. Records retained?</p> <p>See question 137</p>	x			
139.	480-93-186(3)	<p>Leak evaluations: Are follow-up inspections performed within 30 days of a leak repair? Yes, order is automatically created from original trouble order and dispatched.</p> <p>Pullman 30 day rechecks for all rechecks in 2009 were 5, for 2010 were 4, for 2011 were 2</p> <p>Clarkston 30 day for all rechecks 2009 were 13, for 2010 were 13, for 2011 were 7</p> <p>Pullman (includes Moscow) all 30 day rechecks 2009 was 13, 2010 was 7, 2011 was 4</p> <p>Clarkston (includes Lewiston) all 30 day rechecks 2009 was 17, 2010 was 23, 2011 was 23.</p>	X			
140.	480-93-186(4)	<p>Leak evaluations: Grade 1 and 2 leaks (if any), downgraded once to a grade 3 without physical repair?</p> <p>In Pullman and Clarkston no leaks downgraded for any reason</p>	X			

**Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Distribution Systems
Records Review and Field Inspection**

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

141.	480-93-187	<p>Gas leak records: at a minimum include required information listed under 480-93-187(1-13)</p> <p>(1) Date and time the leak was detected, investigated, reported, and repaired, and the name of the person conducting the investigation;</p> <p>(2) Location of the leak (sufficiently described to allow ready location by other qualified personnel);</p> <p>(3) Leak grade;</p> <p>(4) Pipeline classification (e.g., distribution, transmission, service);</p> <p>(5) If reported by an outside party, the name and address of the reporting party;</p> <p>(6) Component that leaked (e.g., pipe, tee, flange, valve);</p> <p>(7) Size and material that leaked (e.g., steel, plastic, cast iron);</p> <p>(8) Pipe condition; - ---Not on leak form but in computer leak report with exposed pipe report filed together. Work order # ties 2 together. Leak form specifically states to fill out exposed pipe report. Compliance tech before data entry verifies leak form has associated exposed pipe report.</p> <p>(9) Type of repair;</p> <p>(10) Leak cause;</p> <p>(11) Date pipe installed (if known); -----This is on exposed pipe report. Above ground leaks do not have pipe install date.</p> <p>(12) Magnitude and location of CGI readings left;</p> <p>(13) Unique identification numbers (such as serial numbers) of leak detection equipment.</p>	X											
142.	480-93-188(1)	<p>Gas leak surveys</p> <p>1. Check un odorized gas in Colfax, Reviewed map 1E135-A, 1E135-9, 1E135-C, 1E139-0, from Colfax from gate station to Airport . Is 1796 feet of un odorized pipe</p> <p>2. Reviewed Buss dist in Clarkston, reviewed area by motel,</p> <p>3. Reviewed Asotin Business District</p> <p>4. Reviewed New 6" line is in Park. Reminded Avista this will need to become HOS. Approx. 2 miles</p> <p>Albion</p> <p>Reviewed Business district and 5 year completed in 2012. Compared to 2011, Reviewed map for Meter 227922 and park behind it-no gas</p> <p>Reviewed map at 310 park street is community bldg., no gas in RW around park</p> <p>All of Bishop Blvd being leak surveyed.</p>	X											
143.	480-93-188(2)	<p>Gas detection instruments tested for accuracy/intervals (Mfct recommended or monthly not to exceed 45 days)</p> <p>On every leak survey map has the instrument # and calibration date. Also daily log includes calibration date and instrument number.</p>	X											
144.	480-93-188(3)	Leak survey frequency (Refer to Table Below)	X											
		<table border="1"> <tr> <td>Business Districts (implement by 6/02/07)</td> <td>1/yr (15 months)</td> </tr> <tr> <td>High Occupancy Structures</td> <td>1/yr (15 months)</td> </tr> <tr> <td>Pipelines Operating ≥ 250 psig</td> <td>1/yr (15 months)</td> </tr> <tr> <td>Other Mains: CI, WI, copper, unprotected steel</td> <td>2/yr (7.5 months)</td> </tr> </table>	Business Districts (implement by 6/02/07)	1/yr (15 months)	High Occupancy Structures	1/yr (15 months)	Pipelines Operating ≥ 250 psig	1/yr (15 months)	Other Mains: CI, WI, copper, unprotected steel	2/yr (7.5 months)				
Business Districts (implement by 6/02/07)	1/yr (15 months)													
High Occupancy Structures	1/yr (15 months)													
Pipelines Operating ≥ 250 psig	1/yr (15 months)													
Other Mains: CI, WI, copper, unprotected steel	2/yr (7.5 months)													
* 145.	480-93-188(4)(a)	<p>Special leak surveys - Prior to paving or resurfacing, following street alterations or repairs</p> <p>None in either Pullman or Clarkston in 2012, 4 in Pullman 1 in Clarkston for 2011, Pullman 0 in Clarkston 0 For 2010</p>	X											
146.	480-93-188(4)(b)	<p>Special leak surveys - areas where substructure construction occurs adjacent to underground gas facilities, and damage could have occurred</p> <p>None in Pullman or Clarkston</p>	X											

**Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Distribution Systems
Records Review and Field Inspection**

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

147.	480-93-188(4)(c)	Special leak surveys - Unstable soil areas where active gas lines could be affected None	X															
148.	480-93-188(4)(d)	Special leak surveys - areas and at times of unusual activity, such as earthquake, floods, and explosions None	X															
149.	480-93-188(4)(e)	Special leak surveys - After third-party excavation damage to services, operators must perform a gas leak survey from the point of damage to the service tie-in Pullman 2009 – 2011 are 38 dig ins, reviewed leak survey leak at 212 W 1st Rosalia Clarkston 2009-2011 are 45 dig ins, reviewed leak survey leak at 2410 Shelley Lane, Clarkston.	x															
150.	480-93-188(5)	Gas Survey Records (Min 5 yrs) and at a minimum include required information listed under 480-93-188 (5) (a-f) Reviewed 5 year audit for Pullman NW, map 1E 294-E (a) Description of the system and area surveyed (including maps and leak survey logs); (b) Survey results; (c) Survey method; (d) Name of the person who performed the survey; (e) Survey dates; and (f) Instrument tracking or identification number.	x															
151.	480-93-188(6)	Leak program - Self Audits For the most part, Linda burger does, for the DIMP (a) Leak survey schedules meet the minimum federal and state safety requirements for gas pipelines; (b) Consistent evaluations of leaks are being made throughout the system; (c) Repairs are made within the time frame allowed; (d) Repairs are effective; and (e) Records are accurate and complete. Reviewed Internal Self Audit for Leak Records and Surveys for 2011.	x															
152.	192.709	Patrolling (Transmission Lines) (Refer to Table Below) .705 No Transmission but there is HP in Pullman and Clarkston			X													
<table border="1"> <thead> <tr> <th>Class Location</th> <th>At Highway and Railroad Crossings</th> <th>At All Other Places</th> </tr> </thead> <tbody> <tr> <td>1 and 2</td> <td>2/yr (7½ months)</td> <td>1/yr (15 months)</td> </tr> <tr> <td>3</td> <td>4/yr (4½ months)</td> <td>2/yr (7½ months)</td> </tr> <tr> <td>4</td> <td>4/yr (4½ months)</td> <td>4/yr (4½ months)</td> </tr> </tbody> </table>							Class Location	At Highway and Railroad Crossings	At All Other Places	1 and 2	2/yr (7½ months)	1/yr (15 months)	3	4/yr (4½ months)	2/yr (7½ months)	4	4/yr (4½ months)	4/yr (4½ months)
Class Location	At Highway and Railroad Crossings	At All Other Places																
1 and 2	2/yr (7½ months)	1/yr (15 months)																
3	4/yr (4½ months)	2/yr (7½ months)																
4	4/yr (4½ months)	4/yr (4½ months)																
153.	192.709	Leak Surveys (Transmission Lines) (Refer to Table Below) .706 No Transmission in Pullman or Clarkston districts	x															
<table border="1"> <thead> <tr> <th>Class Location</th> <th>Required</th> <th>Not Exceed</th> </tr> </thead> <tbody> <tr> <td>1 and 2</td> <td>1/yr</td> <td>15 months</td> </tr> <tr> <td>3</td> <td>2/yr</td> <td>7½ months</td> </tr> <tr> <td>4</td> <td>4/yr</td> <td>4½ months</td> </tr> </tbody> </table>							Class Location	Required	Not Exceed	1 and 2	1/yr	15 months	3	2/yr	7½ months	4	4/yr	4½ months
Class Location	Required	Not Exceed																
1 and 2	1/yr	15 months																
3	2/yr	7½ months																
4	4/yr	4½ months																
154.	192.603(b)	Patrolling Business District (4 per yr/4½ months) .721(b)(1) Clarkston no transmission no patrols Pullman only areas of movement are bridges O&M Section 5.15 Pipeline Patrolling Sheet 1 and 3 , reviewed Gas Patrolling Reports for reg Station 417	x															
155.	192.603(b)	Patrolling Outside Business District (2 per yr/7½ months) 192.721(b)(2) Same as previous question	x															
156.	192.603(b)	Leakage Survey - Outside Business District (5 years) 192 .723(b)(1) Reviewed Clarkston and Pullman maps.	x															
157.	192.603(b)	Leakage Survey 192.723(b)(2) <ul style="list-style-type: none"> Outside Business District (5 years)- Reviewed Clarkston and Pullman maps. No Catholically unprotected distribution lines (3 years) 	x															

Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Distribution Systems
Records Review and Field Inspection

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

158.	192.603(b)	Tests for Reinstating Service Lines 192.725 Reviewed bar holes on leak survey map	x			
159.	192.603(b)/.727(g)	Abandoned Pipelines; Underwater Facility Reports 192.727 NO ABANDONDED PIPELINE			x	
160.	192.709	Pressure Limiting and Regulating Stations (1 per yr/15 months) .739 Reviewed Trevor, pressure control man field forms	x			
161.	192.709	Pressure Limiting and Regulator Stations – Capacity (1 per yr/15 months) .743 Engr reviews to ensure adequate capacity	x			
162.	192.709	Valve Maintenance – Transmission (1 per yr/15 months) .745 No transmission in Pullman/Clarkston Districts			x	
163.	192.709	Valve Maintenance – Distribution (1 per yr/15 months) .747 Secondary valves are called VS or VC and no annual maint required. EOP valves are listed on CLM (compliance list manager) system. It lists the inspection date, compliance date and grace date. Clarkston does EOP valves in April Pullman does EOP in February	x			
164.	480-93-100(3)	Service valve maintenance (1 per yr/15 months) Are VM (emergency curb valve) – For HOS Total in Clarkston is 8 Total in Pullman is 55	x			
165.	192.709	Vault maintenance (≥200 cubic feet)(1 per yr/15 months) .749 No vaults in WA			x	
166.	192.603(b)	Prevention of Accidental Ignition (hot work permits) .751 Addressed in Section 3.17 sheet 1 and OQ task for prevention of ignition that all must complete, it is task 221.230.040	x			
167.	192.603(b)	Welding – Procedure 192.225(b)	x			
168.	192.603(b)	Welding – Welder Qualification 192.227/.229	x			
169.	192.603(b)	NDT – NDT Personnel Qualification .243(b)(2)	x			
170.	192.709	NDT Records (pipeline life) .243(f)	x			
171.	192.709	Repair: pipe (pipeline life); Other than pipe (5 years)	x			
172.	192.905(c)	Periodically examining their transmission line routes for the appearance of newly identified area's (HCA's)	x			

Comments:

CORROSION CONTROL RECORDS			S	U	N/A	N/C
173.	192.455(a)(1)	Pipeline coatings meet requirements of 192.461 (for buried pipelines installed after 7/31/71) Section 2.32, 3.12 sheets 3-7, cp maintenance 5.14	x			
174.	192.455(a)(2)	CP system installed on and operating within 1 yr of completion of pipeline construction (after 7/31/71) Section 2.32 sheet 5, 3.12 sheets 3-7, cp maintenance 5.14	x			

Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Distribution Systems
Records Review and Field Inspection

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
 If an item is marked U, N/A, or N/C, an explanation must be included in this report.

CORROSION CONTROL RECORDS			S	U	N/A	N/C
175.	192.465(a)	Annual Pipe-to-soil Monitoring (1 per yr/15 months) for short sections (10% per year; all in 10 years) Clarkston from 2003 to 2012 is 68 : 0 for 2002-0 because just put on computer, 2003 less than 100 feet is 35, 2004 less than 100 feet is 7, 2005 less than 100 feet is 9, 2006 less than 100 feet is 7, 2007 less than 100 feet is 9, 2008 less than 100 feet is 0, 2009 less than 100 feet is 0 and 2010 less than 100 feet is 1. For over 100 feet is monitored on annual survey with casing and annual test site Pullman has 5 greater than 100 feet isolated mains, Clarkston has 18 isolated risers. This is not a problem area. Ritzville has isolated services with dresser coupling etc. Pullman Individual year numbers don't mean anything because facilities are removed and added. In Pullman have 177 isolated sections less than 100 feet MOST are isolated risers. Services and mains over 100 feet done with annual survey (it includes casings and annual test site reads) Per Kevin Clarkston area has 21 less than 100 feet. This is accurate. To keep 10% going forward 2 need to be done a yr. Working to improve inspections for 10% so created new position which was started in March 2011. Based on isolated steel 2010 audit. Checking every riser in system, currently in identifying in Spokane for another 2 years, remaining 2 years in complaint will be in out laying area. 2012 starts the 5 years. Information is found in update to Dave Lykken quarterly. Changing out isolated as work load permits. Goal is to eliminate all isolated less than 100 feet by 2021. Now all isolated steel less than 100ft have a job order to replace if isolated, this includes underground pipe and risers. 2012 companywide have replace 765, last year replaced well over 1000.	x			
176.	192.491	Test Lead Maintenance .471 Section 2.32 sheets 8-10	x			
177.	192.491	Maps or Records .491(a) Reviewed maps. Clarkston has 7 zones. Means 7 separate CP systems. (Actually 6 plus Asotin). Reviewed Pullman maps. Pullman has 3 zones. No galvanic in Pullman or Clarkston there is galvanic in Colfax.	x			
178.	192.491	Examination of Buried Pipe when exposed .459 In Clarkston: 140 exposed (steel) pipe reports includes 33 in 2009, and 56 in 2010, 51 in 2011 for all types. 2011 there are 9 dig ins (includes pe), 2010 there are 13 dig ins and 2009 is 23 dig ins. Also exposed pipe found leaks for 2011 there are 34 found on leak surveys.	x			
179.	480-93-110(8)	CP test reading on all exposed facilities where coating has been removed See question 179	x			
180.	192.491	Annual Pipe-to-soil monitoring (1 per yr/15 months) .465(a)	x			

Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Distribution Systems
Records Review and Field Inspection

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
 If an item is marked U, N/A, or N/C, an explanation must be included in this report.

CORROSION CONTROL RECORDS			S	U	N/A	N/C
181.	192.491	Rectifier Monitoring (6 per yr/2½ months) .465(b) Clarkston 2009 8 rectifiers, 2010 11 rectifiers (including Asotin), 2011 12 rectifiers (including Asotin) Pullman 2009 11 rectifiers for all Pullman district towns 2010 11 rectifiers for all Pullman district towns 2011 11 rectifiers for all Pullman district towns	x			
182.	192.491	Interference Bond Monitoring – Critical (6 per yr/2½ months) .465(c) None for Clarkston and None for Pullman	x			
183.	192.491	Interference Bond Monitoring – Non-critical (1 per yr/15 months) .465(c) None for Clarkston and None for Pullman	x			
184.	480-93-110(2)	Remedial action taken within 90 days (Up to 30 additional days if other circumstances. Must document) .465(d) 1. Can't get in is 30 days 2. Buried valve or corroded is 90 days 3. Riser in concrete or asphalt field before end of calendar year to make sure isn't a missing wire.	x			
185.	480-93-110(3)	CP equipment/ instrumentation maintained, tested for accuracy, calibrated, and operated in accordance with manufactures recommendations, or at appropriate schedule determined by gas company if no recommendation. Reviewed Pullman Bob Larsen and folks with volt meters and half cells for Clarkston and Pullman. In Pullman Bob and 8 employees plus one contractor In Clarkston Bob and 5 employees and one contractor for both areas. Avista also calibrates contractor's volt meters and half cells. Calibrations always done in December	x			
186.	192.491	Unprotected Pipeline Surveys, CP active corrosion areas (1 per 3 cal yr/39 months) .465(e)	x			
187.	192.491	Electrical Isolation (Including Casings) .467 Steel casings are annual. 5 without test leads. All casing installed after 92 have test leads. Casing without test leads are in Uniontown at Washington and Church (1966): In Pullman at Bishop and Johnson (1979): In Albion at 3491 Albion RR Xing (1968), In Colfax at Main and Tracts S of Cooper (1959) and In Colfax at first and Railroad Ave (1965).The above casings have vents no have no test leads	x			
188.	480-93-110(5)	Casings inspected/tested annually not to exceed fifteen months 55 in Pullman, 7 in Clarkston for 2011. Verified a marker at casing at RR tracks near A and Leslie in Lacrosse.	x			
189.	480-93-110(5)(a)	Casings w/no test leads installed prior to 9/05/1992. Demonstrate other acceptable test methods none	x			
190.	480-93-110(5)(b)	Possible shorted conditions – Perform confirmatory follow-up inspection within 90 days 55 in Pullman district 55, 7 in Clarkston One shorted casing in Pullman	x			
191.	480-93-110(5)(c)	Casing shorts cleared when practical The shorted casings will be cleared when Rd project come in to area.	x			
192.	480-93-110(5)(d)	Shorted conditions leak surveyed within 90 days of discovery. Twice annually/7.5 months Yes, Pullman twice a year.	x			
193.	192.491	Interference Currents .473 none	x			
194.	192.491	Internal Corrosion; Corrosive Gas Investigation .475(a) No corrosive gas per contract with Williams and TransCanada	x			

**Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Distribution Systems
Records Review and Field Inspection**

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

CORROSION CONTROL RECORDS			S	U	N/A	N/C
195.	192.491	Internal Corrosion; Internal Surface Inspection; Pipe Replacement .475(b) No corrosive gas per contract with Williams and TransCanada, Steel inspection report	x			
196.	192.491	Internal Corrosion Control Coupon Monitoring (2 per yr/7½ months) .477 No corrosive gas per contract with Williams and TransCanada	x			
197.	192.491	Atmospheric Corrosion Control Monitoring (1 per 3 cal yr/39 months onshore; 1 per yr/15 months offshore) .481 2009 and 2012 is Atmospheric for WA. In 2009 identified all meter less risers and in 2012 were surveyed. In 2009 summer students did, in 2012 company called Scope Services is doing atmospheric corrosion. They paint and rewrap to 3-4 inches below grade. <ul style="list-style-type: none"> • When buried valve is reported the procedure is to turn in if they can't dig it out • Last atmospheric on stub at 1265 Port Dr, Clearwater Seed, Clarkston – atmospheric corrosion found settled meter, job order turned in found 5-1-12 – have until the end of the next calendar year preceding year before next atmospheric corrosion inspection to complete remediation. <p>Probable Violation 1: Avista failed to conduct an atmospheric corrosion inspection of a meter less riser found by electric power pole #035069.</p> <p>Probable Violation 3: Avista has failed to inspect pipe at pipe supports and at spans over water. Avista failed to inspect pipe a pipe supports at industrial meter 3034. During the inspection the pipe was lifted and atmospheric corrosion was found and remediated.</p> <p>Probable Violation 4 finding c: WAC 480-93-180 Finding C Avista's O&M fails to require that pipe on all pipe supports be inspected for atmospheric corrosion in accordance with CFR 192.481 (b).</p>		X		
198.	192.491	Remedial: Replaced or Repaired Pipe; coated and protected; corrosion evaluation and actions .483/.485 Section 3.32, coat all pipe	x			

Comments:

PIPELINE INSPECTION (Field)			S	U	N/A	N/C
199.	192.161	Supports and anchors At two locations in Pullman wood blocks were being used as supports. The locations are: <ol style="list-style-type: none"> 1. Paul's Place, 907 S Mill Street, Pullman 2. Pullman Denny's meter 500939 Wood Blocks were removed from both locations during the inspection.	x			
200.	480-93-080(1)(d)	Welding procedures located on site where welding is performed?	x			
201.	480-93-080(1)(b)	Use of testing equipment to record and document essential variables	x			

Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Distribution Systems
Records Review and Field Inspection

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

PIPELINE INSPECTION (Field)			S	U	N/A	N/C
202.	480-93-080(2)(a)	Plastic procedures located on site where welding is performed?	x			
203.	480-93-080(3)	Identification and qualification cards/certificates w/name of welder/joiner, their qualifications, date of qualification and operator whose qualification procedures were followed.	x			
204.	480-93-013	Personnel performing “New Construction” covered tasks OQ qualified?	x			
205.	480-93-015(1)	Odorization	x			
206.	480-93-018(3)	Updated records, inc maps and drawings made available to appropriate operations personnel?	x			
207.	192.179	Valve Protection from Tampering or Damage	x			
208.	192.455	Pipeline coatings meet requirements of 192.461 (<i>for buried pipelines installed after 7/31/71</i>)	x			
209.	192.463	Levels of cathodic protection	x			
210.	192.465	Rectifiers	x			
211.	192.467	CP - Electrical Isolation	x			
212.	192.476	Systems designed to reduce internal corrosion	x			
213.	192.479	Pipeline Components exposed to the atmosphere	x			
214.	192.481	Atmospheric Corrosion: monitoring	x			
215.	192.491	Test Stations – Sufficient Number .469	x			
216.	480-93-115(2)	Casings – Test Leads (casings w/o vents installed after 9/05/1992)	x			
217.	480-93-115(2)	Mains or transmission lines installed in casings/conduit. Are casing ends sealed?	x			
218.	480-93-115(4)	Service lines installed in casings/conduit. Are casing ends nearest to building walls sealed?	x			
219.	192.605(a)	Appropriate parts of manuals kept at locations where O&M activities are conducted	x			
220.	192.605	Knowledge of Operating Personnel	x			
221.	480-93-124	Pipeline markers Marker requirement in general are adequate, although O&M needs clarification of 480-93-124 (1) and (4)	x			
222.	480-93-124(4)	Markers reported missing or damaged replaced within 45 days?	x			
223.	192.719	Pre-pressure Tested Pipe (Markings and Inventory)	x			
224.	192.195	Overpressure protection designed and installed where required?	x			
225.	192.739/743	Pressure Limiting and Regulating Devices (Mechanical/Capacities)	x			
226.	192.741	Telemetry, Recording Gauges	x			
227.	192.751	Warning Signs	x			
228.	192.355	Customer meters and regulators. Protection from damage	x			
229.	192.355(c)	Pits and vaults: Able to support vehicular traffic where anticipated.	x			
230.	480-93-140	Service regulators installed, operated and maintained per state/fed regs and manufacturers recommended practices? Crew does not look under supports during inspection of industrial meter sets or district regulator stations. During field inspection did lift off support at College industrial meter set and found atmospheric corrosion	x			
231.	480-93-178(2)	Plastic Pipe Storage facilities – Maximum Exposure to Ultraviolet Light (2yrs)	x			
232.	480-93-178(4)	Minimum Clearances from other utilities. For parallel lines a minimum of twelve inches. Where a minimum twelve inches of separation is not possible, must take adequate precautions, such as inserting the plastic pipeline in conduit, to minimize any potential hazards.	x			
233.	480-93-178(5)	Minimum Clearances from other utilities. For perpendicular lines a minimum of six inches of separation from the other utilities. Where a minimum six inches of	X			

**Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Distribution Systems
Records Review and Field Inspection**

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

PIPELINE INSPECTION (Field)			S	U	N/A	N/C
		separation is not possible, must take adequate precautions, such as inserting the plastic pipeline in conduit, to minimize any potential hazards				
234.	480-93-178(6)	Are there Temporary above ground PE pipe installations currently? Yes No x				
235.	480-93-178(6)(a)	If yes, is facility monitored and protected from potential damage?	X			
236.	480-93-178(6)(b)	If installation exceeded 30 days, was commission staff notified prior to exceeding the deadline?	X			
237.	192.745	Valve Maintenance (Transmission)	X			
238.	192.747	Valve Maintenance (Distribution)	X			

Facility Sites Visited:

Facility Type	Facility ID Number	Location

Comments:

Recent Gas Pipeline Safety Advisory Bulletins: (Last 2 years)

<u>Number</u>	<u>Date</u>	<u>Subject</u>
ADB-09-01	May 21, 2009	Potential Low and Variable Yield and Tensile Strength and Chemical Composition Properties in High Strength Line Pipe
ADB-09-02	Sept 30, 2009	Weldable Compression Coupling Installation
ADB-09-03	Dec 7, 2009	Operator Qualification Program Modifications

Utilities and Transportation Commission
Standard Inspection Report for Intrastate Gas Distribution Systems
Records Review and Field Inspection

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
 If an item is marked U, N/A, or N/C, an explanation must be included in this report.

ADB-09-04	Jan 14, 2010	Reporting Drug and Alcohol Test Results for Contractors and Multiple Operator Identification Numbers
ADB-10-02	Feb 3, 2010	Implementation of Revised Incident/Accident Report Forms for Distribution Systems, Gas Transmission and Gathering Systems, and Hazardous Liquid Systems
ADB-10-03	March 24, 2010	Girth Weld Quality Issues Due to Improper Transitioning, Misalignment, and Welding Practices of Large Diameter Line Pipe
ADB-10-04	April 29, 2010	Pipeline Safety: Implementation of Electronic Filing for Recently Revised Incident/Accident Report Forms for Distribution Systems, Gas Transmission and Gathering Systems, and Hazardous Liquid Systems
ADB-10-05	June 28, 2010	Pipeline Safety: Updating Facility Response Plans in Light of Deepwater Horizon Oil Spill
ADB-10-06	August 3, 2010	Pipeline Safety: Personal Electronic Device Related Distractions
ADB-10-07	August 31, 2010	Liquefied Natural Gas Facilities: Obtaining Approval of Alternative Vapor-Gas Dispersion Models
ADB-10-08	November 3, 2010	Pipeline Safety: Emergency Preparedness Communications
ADB-11-01	January 4, 2011	Pipeline Safety: Establishing Maximum Allowable Operating Pressure or Maximum Operating Pressure Using Record Evidence, and Integrity Management Risk Identification, Assessment, Prevention, and Mitigation
ADB-11-02	February 9, 2011	Dangers of Abnormal Snow and Ice Build-up on Gas Distribution Systems

For more PHMSA Advisory Bulletins, go to <http://phmsa.dot.gov/pipeline/regs/advisory-bulletin>

Attachment 1

Distribution Operator Compressor Station Inspection

Unless otherwise noted, all code references are to 49CFR Part 192. S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
If an item is marked U, N/A, or N/C, an explanation must be included in this report.

239. .605(b)		COMPRESSOR STATION PROCEDURES	S	U	N/A	N/C
240.		.605(b)(6) Maintenance procedures, including provisions for isolating units or sections of pipe and for purging before returning to service			x	
241.		.605(b)(7) Starting, operating, and shutdown procedures for gas compressor units			x	
242.		.731 Inspection and testing procedures for remote control shutdowns and pressure relieving devices (1 per yr/15 months), prompt repair or replacement			x	
243.		.735 (a) Storage of excess flammable or combustible materials at a safe distance from the compressor buildings			x	
244.		(b) Tank must be protected according to NFPA #30			x	
245.		.736 Compressor buildings in a compressor station must have fixed gas detection and alarm systems (must be performance tested), unless:			x	
246.		• 50% of the upright side areas are permanently open, or			x	
247.		• It is an unattended field compressor station of 1000 hp or less			x	

Comments:
Avista does not have a compressor station

COMPRESSOR STATION O&M PERFORMANCE AND RECORDS			S	U	N/A	N/C
248.	.709	.731(a) Compressor Station Relief Devices (1 per yr/15 months)			x	
249.		.731(c) Compressor Station Emergency Shutdown (1 per yr/15 months)			x	
250.		.736(c) Compressor Stations – Detection and Alarms (Performance Test)			x	

Comments:
AVISTA DOES NOT HAVE A COMPRESSOR STATION. NA FROM HERE TO END OF FORM

COMPRESSOR STATIONS INSPECTION (Field)			S	U	N/A	N/C
(Note: Facilities may be “Grandfathered”)						
251.	.163	(c) Main operating floor must have (at least) two (2) separate and unobstructed exits			x	
252.		Door latch must open from inside without a key			x	
253.		Doors must swing outward			x	
254.		(d) Each fence around a compressor station must have (at least) 2 gates or other facilities for emergency exit			x	
255.		Each gate located within 200 ft of any compressor plant building must open outward			x	
256.		When occupied, the door must be opened from the inside without a key			x	
257.		(e) Does the equipment and wiring within compressor stations conform to the National Electric Code, ANSI/NFPA 70?			x	
258.	.165	(a) If applicable, are there liquid separator(s) on the intake to the compressors?			x	
259.		(b) Do the liquid separators have a manual means of removing liquids?			x	

Attachment 1

Distribution Operator Compressor Station Inspection

Unless otherwise noted, all code references are to 49CFR Part 192. S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
 If an item is marked U, N/A, or N/C, an explanation must be included in this report.

COMPRESSOR STATIONS INSPECTION (Field)			S	U	N/A	N/C
(Note: Facilities may be “Grandfathered”)						
260.		If slugs of liquid could be carried into the compressors, are there automatic dumps on the separators, Automatic compressor shutdown devices, or high liquid level alarms?			x	
261.	.167	(a) ESD system must:				
262.		- Discharge blowdown gas to a safe location			x	
263.		- Block and blow down the gas in the station			x	
264.		- Shut down gas compressing equipment, gas fires, electrical facilities in compressor building and near gas headers			x	
265.		- Maintain necessary electrical circuits for emergency lighting and circuits needed to protect equipment from damage			x	
266.		ESD system must be operable from at least two locations, each of which is:				
267.	.167	- Outside the gas area of the station			x	
268.		- Not more than 500 feet from the limits of the station			x	
269.		- ESD switches near emergency exits?			x	
270.		(b) For stations supplying gas directly to distribution systems, is the ESD system configured so that the LDC will not be shut down if the ESD is activated?			x	
271.		(c) Are ESDs on platforms designed to actuate automatically by...				
272.		- For unattended compressor stations, when:				
273.		▪ The gas pressure equals MAOP plus 15%?			x	
274.		▪ An uncontrolled fire occurs on the platform?			x	
275.		- For compressor station in a building, when				
276.		▪ An uncontrolled fire occurs in the building?			x	
277.		▪ Gas in air reaches 50% or more of LEL in a building with a source of ignition (facility conforming to NEC Class 1, Group D is not a source of ignition)?			x	
278.	.171	(a) Does the compressor station have adequate fire protection facilities? If fire pumps are used, they must not be affected by the ESD system.			x	
279.		(b) Do the compressor station prime movers (other than electrical movers) have over-speed shutdown?			x	
280.		(c) Do the compressor units alarm or shutdown in the event of inadequate cooling or lubrication of the unit(s)?			x	
281.		(d) Are the gas compressor units equipped to automatically stop fuel flow and vent the engine if the engine is stopped for any reason?			x	
282.		(e) Are the mufflers equipped with vents to vent any trapped gas?			x	
283.	.173	Is each compressor station building adequately ventilated?			x	
284.	.457	Is all buried piping cathodically protected?			x	
285.	.481	Atmospheric corrosion of aboveground facilities			x	
286.	.603	Does the operator have procedures for the start-up and shut-down of the station and/or compressor units?			x	
287.		Are facility maps current/up-to-date?			x	
288.	.615	Emergency Plan for the station on site?			x	
289.	.619	Review pressure recording charts and/or SCADA			x	
290.	.707	Markers			x	
291.	.731	Overpressure protection – relief’s or shutdowns			x	
292.	.735	Are combustible materials in quantities exceeding normal daily usage, stored a safe distance from the compressor building?			x	

Attachment 1

Distribution Operator Compressor Station Inspection

Unless otherwise noted, all code references are to 49CFR Part 192. S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked
If an item is marked U, N/A, or N/C, an explanation must be included in this report.