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January 13, 2015

Mr. Dave Lykken
Pipeline Safety Director
Washington Utilities and Transportation Commission
PO Box 47250
1300 S. Evergreen Park Drive SW
Olympia, WA 98504-7250

RECEIVED

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State of Washington
UTC
Pipeline Safety Program

Re: WUTC Letter dated 1/9/15 regarding the 2014 Control Room Management (CRM)
Inspection

Dear Mr. Lykken:

On October 7 and 8, 2014, Lex Vinsel of the WUTC conducted a Natural Gas Control Room Management Program Inspection jointly with representatives from the OPUC and the IPUC. The following response documents the actions Avista has already taken to correct the Probable Violation (PV) from the inspection.

49 CFR 192.631 (d) – Fatigue Mitigation

(d) Fatigue Mitigation. Each operator must implement the following methods to reduce the risk associated with controller fatigue that could inhibit a controller's ability to carry out the roles and responsibilities the operator has defined.

- (2) Educate controllers and supervisors in fatigue mitigation strategies and how off-duty activities contribute to fatigue;*
- (3) Train controller and supervisors to recognize the effects of fatigue;*

Finding(s):

"Control room personnel did not complete required training on fatigue mitigation annually, not to exceed 15 months. Dates between required training exceeded fifteen months from 2011 to 2012."

Avista's Response:

Avista acknowledges that the company's Gas Controllers did not complete their required Fatigue Management Refresher Training in calendar years 2011 and 2012 as prescribed in the CRM Plan document to occur "annually not to exceed fifteen months".

To fix this training accomplishment gap, Avista switched to Veriforce as our fatigue training provider in 2013. Veriforce tracks the training and deadlines of Avista's Gas Controllers in their proprietary system and provides an email alert to Avista when the next training cycle is due to begin and if Controllers are in jeopardy of falling out of compliance in their training requirements. The use of Veriforce has helped us stay in compliance over the past two years as was noted in the Findings section above.

Additionally, in 2014 Avista added a Senior Gas Controller position and one of this person's primary responsibilities is tracking and verifying compliance with the Gas Control Room rule.

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

Sincerely,



Don Kopczynski
Vice President, Energy Delivery
DK/rkb

cc: Gas Integrity and Compliance WUTC Correspondence File
Joe Subsits, WUTC
Jim Fernald, WUTC
Mike Faulkenberry, Avista Utilities
David Howell, Avista Utilities
Randy Gnaedinger, Avista Utilities



AVISTA