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Submitted via email to Rhonda Huynh at rhuynh@utc.wa.gov

August 18, 2014

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

Re: Avista's Response to WUTC Letter Dated 7/29/14 regarding Ritzville District Standard Inspection

Dear Mr. Lykken:

Between June 3 and June 12, 2014, Scott Rukke conducted a Natural Gas Standard Inspection of Avista's Ritzville, Goldendale and Stevenson, Washington Districts. The following response documents the actions Avista is pursuing to address the Areas of Concern from the inspection.

Summarization of Areas of Concern:

During the inspection, Commission Staff noted a lack of written company procedures to meet the requirements of WAC 480-93-188(3)(b). Avista's leak survey personnel verbally communicated the company's procedures regarding leak survey of High Occupancy Structures (HOS) and High Occupancy Areas (HOA) but upon spot checking several such locations in the towns of Goldendale and Stevenson, Staff discovered inconsistent leak survey of pipelines near the HOS buildings in question. Staff believes the general intent of subject WAC code is to require leak survey of the entire service and any mains in the right-of-way surrounding the HOS or area and specifically to leak survey mains and services where leakage and possible migrating gas could reach a HOS or HOA.

On a related note, Staff also noted concern with a lack of written procedures regarding leak survey of business districts. WAC 480-93-188(3)(a) addresses business district leak survey and requires that "All mains in the right of way adjoining a business district must be included in the survey." As noted in the letter, Staff believes the best course of action is "...to require leak surveys over mains in the right of way where there is the potential for gas to migrate into buildings or to areas of public assembly if leakage occurs."

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Avista's Response

Avista concurs that leak survey of High Occupancy Structure (HOS) and High Occupancy Area (HOA) sites is not adequately documented on our O&M Plan. This has led to inconsistent leak survey of such sites as was discovered during the inspection. Avista also concurs that leak survey of Business Districts is not adequately documented in our O&M plan.

In the 2015 Edition of the Gas Standards Manual, Specification 5.11, Leak Survey, Avista will formally document our company's procedures around leak survey of High Occupancy Structures, High Occupancy Areas and Business Districts to meet the requirements of WAC 480-93-188. A copy of the 2015 Gas Standards Manual will be forwarded, as is done every year, by 12/31/14 to the UTC.

Sincerely,



Don Kopczynski
Vice President, Energy Delivery
DK/rkb

cc: Mike Faulkenberry, Avista Utilities
Jody Morehouse, Avista Utilities
David Howell, Avista Utilities
Tim Mair, Avista Utilities
Avista Integrity and Compliance Correspondence File

