



October 30, 2018

**Via Email Only**

Mr. Sean Mayo  
Pipeline Safety Director  
Washington Utility and Transportation Commission  
1300 S. Evergreen Park Dr. S.W.  
PO Box 47250  
Olympia, WA 98504-7250  
pipelineprogram@utc.wa.gov

**RECEIVED**  
State of Washington  
**OCT 30 2018**  
UTC  
Pipeline Safety Program

Re: 2017 Natural Gas Transmission Integrity Management Program Inspection (TIMP)  
Avista Utilities Corporation – Headquarters (Insp. No. 7259)

Dear Mr. Mayo:

Avista has received and reviewed PHMSA's interpretation letter sent in response to the WUTC's December 8, 2017 letter requesting an interpretation of the definition of a transmission line under 49 C.F.R. § 192.3. In its September 27, 2018 interpretation letter, PHMSA concluded that the initial 3.8 miles of pipeline downstream of the Nine Mile Falls City Gate Station is a transmission line under 49 C.F.R. § 192.3.

In response to PHMSA's September 27, 2018 interpretation letter, Avista has, as a caution, updated its GIS database and mapping to show the change in the designation of the 3.8 miles of pipeline in question from high pressure distribution to transmission. Avista has also completed an initial HCA review of the pipeline section in question and has found that no HCA/Identified Sites exist along this 3.8 mile section. At the time of the TIMP Inspection, there was a privately owned golf course (Sun Dance Golf Course) operating near this section of pipeline. As of September 30, 2018, the golf course is permanently closed (please see the attached letter). Avista will continue to monitor future developments of this property for the possibility of a new HCA/Identified Site as part of Avista's annual HCA patrolling.

Based on the initial HCA review of this pipeline section, a full implementation of Avista's Integrity Management Program is not required as there are still no "covered sections" anywhere on Avista's Washington Transmission System. In the next 12 months, Avista will incorporate this section of pipeline into its existing preventative and mitigative measures with the rest of its transmission pipelines, complete a class location analysis of this section of pipeline, and perform another HCA patrol of this section of pipeline.

Avista continues to view the Nine Mile Falls City Gate Station as a Distribution Center and our understanding of PHMSA's interpretation is the 3.8 mile section of pipeline in question only meets the functional definition of a "transmission line" as defined in condition (1) of § 192.3 because it is fed directly upstream by a transmission pipeline and is connected to a transmission pipeline directly downstream. Avista understands that a change in the designation of the downstream pipeline from transmission to high pressure distribution would result in a change in the designation of the 3.8 mile pipeline section in question from transmission to distribution. Further system integrity analysis and system load modeling may eventually lead us to determine that this downstream pipeline system no longer needs to operate as a transmission pipeline.

Respectfully Submitted,



Heather Rosentrater  
Vice President, Energy Delivery  
HR/bss

Cc: Joe Subsits (via electronic mail at [jsubsits@utc.wa.gov](mailto:jsubsits@utc.wa.gov))  
Scott Rukke (via electronic mail at [srukke@utc.wa.gov](mailto:srukke@utc.wa.gov))  
Mike Faulkenberry, Director, Natural Gas  
Paul Good, Compliance Manager  
WUTC Correspondence File



August 1, 2018

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Pipeline Safety Program



To our valued customers and neighbors:

It is with much sadness that we announce that Sun Dance Golf Course will be permanently closing on September 30, 2018.

As most of you are aware, our family sold Sun Dance Golf Course in 2017 to Brad and Renee West. Their company name is Sun Dance West, LLC. It is the decision of the new ownership that after the 2018 season, the property will cease to operate as a golf course.

We have decided to close the course earlier than normal to give us time to prepare for winter and ensure a smooth transition with the new owners. We know this cuts your golf season short and we are truly sorry. After September 30, 2018, we will be giving a pro-rated refund for passes that were bought for the 2018 season.

If you have cart storage with a balance due, please bring it up to date. We will also give a pro-rated refund if you decide to take your cart out before December 31, 2018. The Wests will still offer cart storage to those customers that are interested for 2019.

Please use any credit, gift cards, certificates or punch cards you have by September 30<sup>th</sup>, 2018. After said date, these will be voided.

We loved walking the course over the years taking great pride with the care and hard work that made Sun Dance so beautiful. Of course, we have had many loyal and awesome employees and customers that have made Sun Dance, Sun Dance!

The course has been part of our family for almost 50 years! We know that it has been part of your family too. We appreciate your friendships and loyalty over the years. It is always hard to say good bye.

*Shelly + Gil Price*

Sincerely,  
Shelly and Gil Price

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Nine Mile Falls, WA 99026  
(509) 466 4040