UTC Standard Inspection Report Intrastate Gas Distribution R C - State Statutes and Rules Records Review and Field Inspections

Inspector and Operator Information

Inspection Link Inspector - Lead

8417 Tinnerstet, Darren

Operator Unit Records Location - City & State

Avista Utilities Ritzville Spokane, WA

Inspection Start Date Inspection Exit Interview Date Engineer Submit Date

09-12-2022 09-15-2022

Inspection Summary

Inspection Scope and Summary

2022 Goldendale / Ritzville unit inspection of Avista. The unit is located in Skamania, Yakima, Adams, and Lincoln Counties in Washington State. Major population centers in this unit include Stevenson, Goldendale, Connell, Warden, Lind, Ritzville, Odessa, and Sprague. This unit has 177 miles of distribution mains. Total miles of steel pipeline is 95.61 as well as 140.95 miles of plastic pipeline. There are also 3,774 services lines in this district. This inspection reviewed code required records for reporting, maintenance and operations, cathodic protection, MAOP and field inspection of operator assets. Field assets visited are noted in Form R in the 8417 inspection database.

Inspector - Assist

Facilities visited and Total AFOD

Records were reviewed remotely using MS Teams. Additional records not amenable to remote review, leak surveys and construction records, were reviewed on-site in Spokane, WA on August 17, 2022. Operator assets and locations visited are recorded on Form R.

Total AFODs with operator: records and field - 7 days

Exit Interview conducted on site in Sprague, WA, September 19, 2022. Randy Bareither, Avista, Tim Mair, Avista, Darren Tinnerstet, WUTC.

Summary of Significant Findings

(DO NOT Discuss Enforcement options)

No violations or areas of concern identified during inspection.

Primary Operator contacts and/or participants

Randy Bareither - Principal Gas Pipeline Safety Engineer

randy.bareither@avistacorp.com

Operator executive contact and mailing address for any official correspondence

Heather Rosentrater - Senior Vice President, Energy Delivery and Shared Services.

1411 East Mission Ave.

PO Box 3727

INSTRUCTIONS

Spokane, WA 99220-3727

heather.rosenstrater@avistacorp.com

Instructions and Ratings Definitions

S - Satisfactory Satisfactory Responses Satisfactory List

INSPECTION RESULTS

	8	1,2,3,4,5,6,7,8,
U - Unsatisfactory	Unsatisfactory Responses O	Unsatisfactory List
Area Of Concern	Area of Concern Responses O	Area of Concern List
N/A - Not Applicable (does not apply in this inspection)	Not Applicable Responses O	Not Applicable List
N/C - Not Checked/Evaluated (was not inspected during this inspection)	Not Checked / Evaluated Responses O	Not Checked / Evaluated List
Unanswered Questions	Unanswered Questions List	

**If an item is marked Form a- annual review. U, N/Form a- annual review or N/C, an explanation must be included in this report.

Records, Procedures and Reports

Question #1.

Do records indicate that the operator appropriately addresses discovered mapping errors, including all mapping errors that have resulted in excavation damage?

Statutory Reference WAC 480- 93-018	1. Result	1. Notes
	Satisfactory	Avista procedures require this in GSM Spec. 4.11. 2 mapping errors that resulted in damages per Tyler Proszek for 2019-2021 audit period.
		Reviewed following records
		2019 Goldendale 7/17/2019. Maps updated 7/25/2019 mapping error
		2020 No mapping issues.
		2021 Ritzville 6/10/21 mapping error. Map updated 6/25/2021.

Question #2.

Do records indicate that the operator's mapping corrections are made in a timely manner and in accordance with the operator's written procedures?

Statutory Reference	2. Result	2. Notes
WAC 480-93-018	Satisfactory	Avista procedures require this in GSM Spec. 4.11.

Mapping errors reviewed were corrected within 6 months time frame.

Question #3

Do records indicate that the operator has and follows a quality assurance program for monitoring the locating and marking of facilities? Do records show that the operator conducts regular field audits of the performance of locators/contractors and takes action when necessary?

Reference:	3. Results	3. Notes
Operator Internal Performance Measures; PHMSA State Program Guidelines	Satisfactory	Avista performs audits on locating personnel. ELM also performs audits on their locators, looking for trends so they know how to appropriately address issues. If a locator is not performing satisfactorily, they are a liability to the company and so it is in their best interest to retrain or let go of the locator depending on the situation.
		Device and according of internal OA and to for ELAA during 2010 2021 and to paried No.

Reviewed sample of internal QA audits for ELM during 2019-2021 audit period. No issues.

Question #4.

Does operator include performance measures in facility locating services contracts with corresponding and meaningful incentives and penalties?

Statutory Reference WAC 480-93- 007	Statutory Reference WAC 480-93- 013	Reference: PHMSA State Program Guidelines	4. Result Satisfactory	4. Notes The only penalties in the contract are that locating company will not get paid if they don't perform to the contract requirements. The Avista Claims Department bills ELM for at fault damages as a result of their locating shortcomings. Excavators tend to also bill for their downtime.
				Operator holds contractor ELM to a 96% on-time locate completion (2 business days).
				ELM conducts their own incentive program called the "Elite Winner Program". Justyn Newell won the award in 2022 (for 2021) and he covers the Ritzville area as part of his duties.

Question #5.

Do operator contracted (or organic) locators address performance problems for persons performing locating services through mechanisms such as re-training, process change, or changes in staffing levels?

Statutory	Statutory	5. Result	5. Notes
Reference WAC 480-93- 007	Reference WAC 480-93- 013	Satisfactory	ELM performs audits on their locators, looking for trends so they know how to appropriately address issues. If a locator is not performing satisfactorily, they are a liability to the company and so it is in their best interest to retrain or let go of the locator depending on the situation. Staffing is always being evaluated as ticket volumes fluctuate due to season and regional construction.

Upcoming contract renewal will include record requirement for documenting any re-training or evaluation issues.

Question #6.

Does the operator periodically review the Operator Qualification plan criteria and methods used to qualify personnel to perform

Statutory	Statutory	6. Result	6. Notes
Reference	Reference	Satisfactory	The Damage Prevention Administrator reviews the damage prevention OQ
WAC 480-93- 007	WAC 480-93- 013		module and reviews the hands-on locating evaluation. Reviewed last performance evaulation conducted on 4/19/21.

Question #7.

Are locating and excavating personnel properly qualified in accordance with the operator's Operator Qualification plan and with federal and state requirements?

Statutory Reference	Statutory Reference	7. Result	7. Notes
WAC 480-93-007	WAC 480-93-013	Satisfactory	Reviewed OQ records for:
			ELM Contractors
			La Ciara

Joe Sisco - expires 12/31/2023 Charles Voelker - expires 12/31/2024 Ashley Edwards - expires 12/31/2022

Raymond Shepherd - expires 12/31/2025

Patrick Monnin - expires 12/31/2022

Avista In-house locators

Kelly Duff - expires 12/31/2023

Don Williams - expires 12/31/2024

Question #8.

Do records indicate that the operator has and follows a procedure for leaks caused by excavation damage near buildings such that the procedure adequately addresses the possibility of multiple leaks and underground migration of gas into nearby buildings/structures?

Reference: 8. Result 8. Notes

Satisfactory

PHMSA State Program

Guidelines
Operator Internal Performance
Measures

See Gas Emergency Service Handbook, Section 2, Leak and Odor

Investigation.

Reference:

PHMSA State Program Guidelines Operator Internal Performance Measures

Comments - Records, Procedures & Reports

RECORDS REVIEW SUMMARY: Comments are required for any rating other than "Satisfactory". Summarize the "Notes" blocks above, and ensure you annotate the question number for each comment.

FIELD INSPECTION OBSERVATIONS

Comments - Field Observations

FIELD OBSERVATION SUMMARY: Comments are required for any rating other than "Satisfactory". Summarize the "Notes" blocks above, and ensure you annotate the question number for each comment.

Inspection Output (IOR)

Report Filters

Assets All, and including items not linked to any asset. Results All

Inspection Information

Standard #8417

Status PLANNED Start Year 2022

System Type GD Protocol Set ID WA.GD.2022.01

Inspection Name Avista Ritzville - Operator(s) AVISTA CORP (31232)

Lead Darren Tinnerstet

Observer(s) David Cullom, Dennis Ritter, Lex Vinsel, Anthony Dorrough, Derek Norwood,

Scott Anderson

Supervisor Scott Rukke Director Sean Mayo

Plan Submitted 07/28/2022 Plan Approval 07/28/2022

> by Scott Rukke

All Activity Start 07/28/2022 All Activity End 09/14/2022

Inspection Submitted --Inspection Approval --

Inspection Summary

Inspection Scope and Summary

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Facilities visited and Total AFOD

Records were reviewed remotely using MS Teams. Additional records not amenable to remote review, leak surveys and construction records, were reviewed on-site in Spokane, WA, on August 17, 2022. Operator assets and locations visited are recorded on Form R.

Total AFODs with operator: records and field - 7 days

Exit Interview conducted on site in Sprague, WA, September 19, 2022. Randy Bareither, Avista, Tim Mair, Avista, Darren Tinnerstet, WUTC.

Summary of Significant Findings

(DO NOT Discuss Enforcement options)

No violations or areas of concern identified during inspection.

Primary Operator contacts and/or participants

Randy Bareither - Principal Gas Pipeline Safety Engineer

randy.bareither@avistacorp.com

Operator executive contact and mailing address for any official correspondence

Heather Rosentrater - Senior Vice President, Energy Delivery and Shared Services.

1411 East Mission Ave.

PO Box 3727

Spokane, WA 99220-3727

heather.rosenstrater@avistacorp.com

Scope (Assets)

# Short Name Long Name	Asset Type	Asset IDs	Excluded Topics	Planned Re	equired Ins	Total spected	Required % Complete
1. 90867 (1915) Avista Utilities Corp- RITZVILLE	unit	90867	Storage Fields Bottle/Pipe - Holders Offshore GOM OCS Copper Pipe Aluminum/Amphoteric Cast or Ductile Iron Abandoned	145	145	145	100.0%

1. Percent completion excludes unanswered questions planned as "always observe".

Plans

Involved

Plan Assets Focus Directives Groups/Subgroups Ost Type(s) Extent Notes
1. 90867 (1915) WUTC Standard Inspection PRO, PRR, FR, GDIM, LPGIM, MISCTOPICS, GENERIC P, R, O, S Detail --

Plan Implementations

										Require d
	SMAR	Start	Focus	Involved		Qst			Total	%
	Т	Date	Directive	Groups/Subgrou	Asset	Type(s	Planne	Require	Inspecte	Complet
# Activity Name	Act#	End Date	S	ps	S)	d	d	d	е
Avista Ritzville Standa rd		07/28/202 2 09/14/202 2		all planned questions	all assets	all types	145	145	145	100.0%

- 1. Since questions may be implemented in multiple activities, but answered only once, questions may be represented more than once in this table.
- 2. Percent completion excludes unanswered questions planned as "always observe".

Forms

No.	Entity	Form Name	Status	Date Completed	Activity Name	Asset
1	. Attendance List	Avista Ritzville Standard	COMPLETED	09/19/2022	Avista Ritzville Standard	

Results (all values, 145 results)

PRO.SUBLNORMOPS: Normal Operating And Maintenance

1. Question Result, ID, Sat, MO.GO.ODDOR.P, 192.605(a) (192.605(b)(11))
References

Question Text Does the process require prompt response to the report of a gas odor inside or near a building? Assets Covered 90867 (1915)

Result Notes See Gas Emergency and Service Handbook (GESH), Section 1, Priority of Service Requests.

PRR.REPORT: Reporting

2. Question Result, ID, NA, RPT.RR.IMMEDREPORT.R, 191.5(a) (191.7(a), 191.7(d)) References

Question Text *Do records indicate immediate notifications of incidents were made in accordance with 191.5?*Assets Covered 90867 (1915)

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

3. Question Result, ID, NA, RPT.RR.INCIDENTREPORT.R, 191.9(a)

Question Text Do records indicate reportable incidents were identified and reports were submitted to DOT on Form 7100.1 within the required time frame?

Assets Covered 90867 (1915)

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

4. Question Result, ID, NA, RPT.RR.INCIDENTREPORTSUPP.R, 191.9(b)

Question Text Do records indicate accurate supplemental incident reports were filed and within the required timeframe? Assets Covered 90867 (1915)

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

5. Question Result, ID, Sat, RPT.RR.ANNUALREPORT.R, 191.11(a) References

Question Text Have complete and accurate Annual Reports been submitted?

Assets Covered 90867 (1915)

Result Notes Reviewed annual reports submitted for 2019-2021 audit period. No issues.

6. Question Result, ID, Sat, RPT.RR.UTCANNUALREPORTS.R, References

Question Text Have complete and accurate annual reports been submitted to the commission?

Assets Covered 90867 (1915)

Result Notes Reviewed annual reports submitted to UTC for 2019-2021 audit period. No issues.

7. Question Result, ID, References Sat, RPT.RR.MISDATAREPORTS.R,

Question Text Has the operator submitted a copy of DOT Drug and Alcohol Testing MIS Data Collection Form to the commission when required?

Assets Covered 90867 (1915)

Result Notes Reviewed MIS reports submitted for 2019-2021 audit period. No issues.

8. Question Result, ID, References Sat, GDIM.RR.MECHANICALFITTINGDATAIMPL.R, 192.1009 (191.12) (also presented in: GDIM.IMPL)

Question Text Have accurate records been maintained documenting mechanical fitting failures that resulted in hazardous leaks?

Assets Covered 90867 (1915)

Result Notes Reviewed Mechanical Fitting Failure reports submitted for 2019-2021 audit period. No issues.

9. Question Result, ID, NA, RPT.RR.SRCR.R, 191.23(a) (191.23(b), 191.25(a), 191.25(c))
References

Question Text Do records indicate safety-related condition reports were filed as required?

Assets Covered 90867 (1915)

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

10. Question Result, ID, NA, RPT.RR.MAOPINCREASENOTIFY.R, References

Question Text Do records indicate submittal of a written plan of procedures to the commission at least forty-five days before uprating to a MAOP greater than 60 psig?

Assets Covered 90867 (1915)

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

11. Question Result, ID, Sat, RPT.RR.THIRTYDAYRPT.R,

Question Text Has the operator submitted a written report within 30 days following each reportable incident?

Assets Covered 90867 (1915)

Result Notes Reviewed incidents for 2019-2021 audit period. No issues with 30 day reports.

12. Question Result, ID, Sat, MO.GO.CUSTNOTIFY.R, 192.16(d) (192.16(a), 192.16(b), 192.16(c)) References

Question Text Do records indicate the customer notification process satisfies the requirements of 192.16?

Assets Covered 90867 (1915)

Result Notes Reviewed customer insert form which is sent to new and existing customers.

Document: Buried Natural Gas Insert Form N-2645

13. Question Result, ID, Sat, RPT.RR.DAILYCONSTRUCTIONRPT.R, References

Question Text Do records indicate daily construction and repair activities were emailed to the commission no later than 10 AM each day work is scheduled?

Assets Covered 90867 (1915)

Result Notes Reviewed daily construction reports submitted to pipeline inbox. Spot checked for daily submittals during the audit period.

14. Question Result, ID, Sat, RPT.RR.PIPELINEMAPPING.R, References

Question Text Has the operator provided accurate maps (or updates) of all pipelines operating over 250 psig to specifications developed by the commission sufficient to meet the needs of first responders?

Assets Covered 90867 (1915)

Result Notes Reviewed most recent NPMS update submitted by operator on 2/23/2022.

Document: 2022 Annual UTC Submittal - Pipelines over 250 psig

PRR.CORROSION: Corrosion Control

15. Question Result, ID, Sat, TQ.QU.CORROSION.R, 192.453 (192.807(a), 192.807(b))

Question Text Do records indicate qualification of personnel implementing pipeline corrosion control methods?

Assets Covered 90867 (1915)

Result Notes Reviewed NACE certificate for the following Avista CP personnel:

Bob Larson - CP 2 (expires 8/31/2023)

Steven Winters - CP 2 (expires 10/31/2024)

Curt Lystad - CP 2 (expires 10/31/2024)

Gary Douglas - CP 4 (expires 5/31/2023)

Timothy Harding - CP 4 (expires 9/29/2023)

Documents:

Bob Larson CP 2 Qualification - expires 8/31/2023

Winters CP 2 - expires 10-2024

Lystad CP 2 - expires 10-2024

Harding CP 4 Certificate

Gary Douglas CP 4 Qualification - expires 5-31-2023

16. Question Result, ID, Sat, TD.CP.RECORDS.R, 192.491(a) (192.491(b), 192.491(c)) References

> Question Text Do records indicate the location of all corrosion control items listed in §192.491(a)? Assets Covered 90867 (1915)

17. Question Result, ID, Sat, TD.CPMONITOR.CURRENTTEST.R, 192.491(c) (192.465(b)) References

> Question Text Do records document details of electrical checks of sources of rectifiers or other impressed current sources?

Assets Covered 90867 (1915)

Result Notes All rectifiers get an inspection bi-monthly, not to exceed 2.5 months. Data pulled from Maximo (Avista internal compliance software).

Reviewed records. Reviewed calibration records for 2019-2021. No issues.

Documents:

2018-2021 RIT Cathodic Rectifiers

2018-2021 GOS Cathodic Rectifiers

18. Question Result, ID, Sat, TD.CPEXPOSED.EXPOSEINSPECT.R, 192.491(c) (192.459) References

> Question Text Do records adequately document that exposed buried piping was examined for corrosion? Assets Covered 90867 (1915)

Result Notes All exposed steel piping gets an "Exposed Pipe Inspection". Data pulled from Maximo.

Follow up on:

Ritzville: Gas Pipe Activity, EXPOSEDPIPE, 6/15/1975 Jun 10, 2021 1020482342 Harty, Justin -0.6480 UNBONDED 2710742 1020482593 FOLLOWUP NEW READ OFF -0.8890, ON -1.1030

Reviewed work order.1020482593 for follow up. Was shorted and dry conditions. Tech rectified onsite and no further issues.

Documents:

2019-2021 RIT Exposed Pipe

2019-2021 GOS Exposed Pipe

19. Question Result, ID, Sat, TD.CPMONITOR.TEST.R, 192.491(c) (192.465(a))

Question Text *Do records adequately document cathodic protection monitoring tests have occurred as required?*Assets Covered 90867 (1915)

Result Notes Reviewed annual CP tests and 10% tests on short sections.

All CP readings below -850 mV were notated with native reads and met 100 mV shift criteria.

Documents:

2018-2021 RIT Cathodic Annuals

2018-2021 GOS Cathodic Annuals

CP Ten Percent Ritzville - Goldendale Audit

20. Question Result, ID, Sat, TD.CPMONITOR.REVCURRENTTEST.R, 192.491(c) (192.465(c)) References

Question Text Do records document details of electrical checks interference bonds, diodes, and reverse current switches?

Assets Covered 90867 (1915)

Result Notes These critical and non-critical are checked bi-monthly or annually.

Documents:

2019-2021 RIT Critical Bonds

21. Question Result, ID, Sat, TD.CPMONITOR.DEFICIENCY.R, 192.491(c) (192.465(d))

Question Text Do records adequately document actions taken to correct any identified deficiencies in corrosion control? Assets Covered 90867 (1915)

Result Notes Avista takes prompt remedial action to correct any deficiencies indicated in monitoring in accordance with GOS 5.14. Remediate issue within 90 days unless circumstances are extenuating which allow for 120 days.

See question #4 regarding low reading for buried exposed pipe.

Documents:

2019-2021 RIT Exposed Pipe Follow Up

2019-2021 GOS Exposed Pipe Follow Up (No data or occurrences during audit period)

2018-2021 RIT Cathodic Annuals

2018-2021 GOS Cathodic Annuals

22. Question Result, ID, NA, TD.CP.UNPROTECT.R, 192.491(c) (192.465(e))

Question Text Do records adequately document that exposed buried piping was examined for corrosion and deteriorated coating?

Assets Covered 90867 (1915)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

Avista does not have unprotected (bare) pipelines to our knowledge in these Districts. Code is specific to buried, unprotected. All exposed pipe reports show that examinations are done.

23. Question Result, ID, NA, FS.FG.CASINGTESTLEAD.R, References

Question Text Do records indicate that all casings without vents installed after September 5, 1992 had separate test lead wires installed?

Assets Covered 90867 (1915)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

24. Question Result, ID, NA, FS.FG.CASINGSEALS.R, References

Question Text Do records indicate that mains and service lines installed in casing or conduit are sealed at the ends as required?

Assets Covered 90867 (1915)

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

No casings or conduit were installed in district during 2019-2021 period.

25. Question Result, ID, Sat, TD.CP.ELECISOLATE.R, 192.491(c) (192.467(a), 192.467(b), 192.467(c), 192.467(d), 192.467(e)) References

Question Text Do records adequately document electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?

Assets Covered 90867 (1915)

Result Notes Pipes in casings are isolated with "thinsulators" and casings/carrier pipes are tested annually to verify isolation. This is discussed in Spec. 3.42, Casing and Conduit Installation.

Reviewed annual casing testing records. No issues.

26. Question Result, ID, Sat, TD.CP.CASINGINSPECT.R, References

Question Text Do records indicate that annual casing inspections have been performed to ensure electrical isolation from the pipeline?

Assets Covered 90867 (1915)

Result Notes All casings are inspected annually not to exceed 15 months.

No shorted casings were indicated in annual casing records. No casings for Goldendale area.

Documents:

2018-2021 RIT Cathodic Casings

2018-2021 GOS Cathodic Casing

27. Question Result, ID, Sat, TD.CPMONITOR.TESTSTATION.R, 192.469

Question Text Do records identify the location of test stations and show a sufficient number of test stations? Assets Covered 90867 (1915)

Result Notes Reviewed GIS records in ArcMap for the following locations:

Goldendale - 13 test sites

Connell - 14 test sites.

Warden - 12 test sites

Lind - 30 test sites

Ritzville - 17 test sites

Sprague - 15 test sites

Odessa - 5 test sites

28. Question Result, ID, NA, TD.CPMONITOR.TESTLEAD.R, 192.491(c) (192.471(a), 192.471(b), 192.471(c))

Question Text Do records document that pipelines with cathodic protection have electrical test leads installed in accordance with requirements of Subpart I?

Assets Covered 90867 (1915)

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

See Spec. 3.12, "Test Leads" and "CADWELD PROCEDURE", for Avista's procedures regarding installation of test leads. Installed pipelines are pressure tested and all details of installation are attested to have followed Avista's Gas Standards. (See pressure test sticker in Spec. 3.18) Dylan pulled an extract of all TPCs (Test Point Containers) on steel facilities installed 2019-2021 and there were actually NONE installed this reporting cycle for these districts.

29. Question Result, ID, Sat, TD.CPMONITOR.INTFRCURRENT.R, 192.491(c) (192.473(a)) References

Question Text Do records document an effective program is in place to minimize detrimental effects of interference currents and that detrimental effects of interference currents from CP systems on other underground metallic structures are minimized?

Assets Covered 90867 (1915)

Result Notes See GSM Spec. 2.32, "System Isolation". No ongoing interference currents are proactively being monitored at the time of inspection.

30. Question Result, ID, NA, TD.ICP.CORRGAS.R, 192.491(c) (192.475(a))

Question Text Do the records demonstrate that the corrosive effect of the gas in the pipeline has been investigated and if determined to be corrosive, steps be taken to minimize internal corrosion?

Assets Covered 90867 (1915)

Result Notes No such activity/condition was observed during the inspection.

Avista's gas is non-corrosive.

31. Question Result, ID, Sat, TD.ICP.EXAMINE.R, 192.491(c) (192.475(a), 192.475(b))

Question Text Do records document examination of removed pipe for evidence of internal corrosion? Assets Covered 90867 (1915)

Result Notes Reviewed data pulled from Maximo for internal inspections done of exposed steel pipe.

Documents:

2019-2021 RIT Exposed Pipe Internal Inspections

2019-2021 GOS Exposed Pipe Internal Inspections.

32. Question Result, ID, NA, TD.ICP.CORRGASACTION.R, 192.491(c) (192.477) References

> Question Text Do records document the actions taken when corrosive gas is being transported by pipeline? Assets Covered 90867 (1915)

Result Notes No such activity/condition was observed during the inspection.

Avista's gas is non-corrosive.

References

33. Question Result, ID, Sat, TD.ATM.ATMCORRODEINSP.R, 192.491(c) (192.481(a), 192.481(b), 192.481(c))

Question Text Do records document inspection of aboveground pipe for atmospheric corrosion?

Assets Covered 90867 (1915)

Result Notes AC program is managed by Nick Messing. AC inspections occur every 3 years (NTE 39 months). Each calendar year Avista surveys one third of the state. The AC program surveys all meters and idle risers using a contractor. Reg Stations are AC inspected annually during regulator maintenance. Farm taps (SSFTs) are surveyed every 3 years NTE 39 months by pressure control.

Documents:

2019-2021 GOS AC SR's

2019-2021 RIT AC SRs

34. Question Result, ID, Sat, TD.COAT.NEWPIPE.R, 192.491(c) (192.455(a), 192.461(a), 192.461(b), 192.483(a)) References

Question Text Do records document that each buried or submerged pipeline installed after July 31, 1971 has been externally coated with a suitable coating material?

Assets Covered 90867 (1915)

Result Notes Gas Standards, Spec. 3.12 "Tape Wrap" discusses requirement for pipe to be coated prior to burying. Installed pipelines are pressure tested and all details of installation are attested to have followed Avista's Gas Standards. (See pressure test sticker in Spec. 3.18). Spec. 3.32 calls for coating on all repairs.

Document:

Remove Threaded Valve - Goldendale 2020.

References

35. Question Result, ID, NA, TD.ICP.EVALUATE.R, 192.491(c) (192.487)

Question Text Do records document adequate evaluation of internally corroded pipe?

Assets Covered 90867 (1915)

Result Notes No such activity/condition was observed during the inspection.

DIMP Manager searched for records of distribution line pipe in Ritzville and Goldendale District in 2019-2021 that required replacement or repair due to corrosion. There were ZERO corrosion leaks for this time period in these districts.

References

36. Question Result, ID, NA, AR.RCOM.REPAIR.R, 192.487 (192.489)

Question Text Do records document the repair or replacement of pipe that has been internally corroded to an extent that there is not sufficient remaining strength in the pipe wall?

Assets Covered 90867 (1915)

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

PRR.PT: Pressure Test

37. Question Result, ID, NA, DC.PTLOWPRESS.PRESSTESTLOWSTRESS.R, 192.517(a) (192.507(a), 192.507(b), 192.507(c))

Question Text Do records indicate that pressure testing is conducted in accordance with 192.507?

Assets Covered 90867 (1915)

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

There were zero HP jobs for this inspection cycle for Goldendale and Ritzville Districts

38. Question Result, ID, Sat, DC.PTLOWPRESS.PRESSTEST100PSIG.R, 192.517(b) (192.509(a), 192.509(b)) References

Question Text Do records indicate that pressure testing is conducted in accordance with 192.509(a) (except for service lines and plastic pipelines)?

Assets Covered 90867 (1915)

Result Notes Reviewed samples of as-built construction records for GOS/Ritzville unit to verify pressure tests were being conducted according to procedures and state and federal codes. No issues identified.

39. Question Result, ID, Sat, DC.PT.SERVICELINE.R, 192.517(b) (192.511(a), 192.511(b), 192.511(c))

Question Text Do records indicate that pressure testing is conducted in accordance with 192.511?

Assets Covered 90867 (1915)

Result Notes Reviewed samples of as-built construction records for GOS/Ritzville unit to verify pressure tests were being conducted according to procedures and state and federal codes. No issues identified.

40. Question Result, ID, Sat, DC.PT.PRESSTESTPLASTIC.R, 192.517(b) (192.513(a), 192.513(b), 192.513(c), 192.513(d))

Question Text Do records indicate that pressure testing is conducted in accordance with 192.513?

Assets Covered 90867 (1915)

Result Notes Reviewed samples of as-built construction records for GOS/Ritzville unit to verify pressure tests were being conducted according to procedures and state and federal codes. No issues identified.

PRR.UPRATE: Uprating

41. Question Result, ID, NA, MO.GOUPRATE.MAOPINCREASE.R, 192.553(a) (192.553(b), 192.553(c)) References

Question Text Do records indicate that increases in MAOP of pipeline were determined in accordance with 192.553? Assets Covered 90867 (1915)

Result Notes No such activity/condition was observed during the inspection.

NO uprates in the Goldendale or Ritzville Districts for 2019-2021 period.

42. Question Result, ID, NA, MO.GOUPRATE.MAOPINCREASELIMIT.R, 192.553(b) (192.553(c), 192.553(d), 192.557(a))

Question Text Do records indicate that increases in MAOP are limited in accordance with 192.619 and 192.621? Assets Covered 90867 (1915)

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

43. Question Result, ID, NA, MO.GOUPRATE.MAOPINCREASEPREP.R, 192.553(b) (192.553(c), 192.553(a), 192.557(b), References 192.557(c))

Question Text Do records indicate that increases in MAOP were preceded by the actions specified in 192.557? Assets Covered 90867 (1915)

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

PRR.OM: Operations And Maintenance

44. Question Result, ID, Sat, MO.GO.OMANNUALREVIEW.R, 192.605(a)

Question Text Have annual reviews of the written procedures or processes in the manual been conducted as required? Assets Covered 90867 (1915)

Result Notes Gas Standards Manual / GESH is updated annually. Current edition expires on December 31 of this

Reviewed change logs for changes to manuals during 2019-2021 period. No issues.

References

45. Question Result, ID, Sat, MO.GO.OMHISTORY.R, 192.605(a) (192.605(b)(3))

Question Text Are construction records, maps and operating history available to appropriate operating personnel? Assets Covered 90867 (1915)

Result Notes Construction records are available at each district office and all intermediate as-built records are housed there. Maps are GIS-based and available on all Go-Books and on the Company GIS site. Operating history is a combination of the above and from Control Room / Gas Engineering.

References

46. Question Result, ID, Sat, MO.GO.OMEFFECTREVIEW.R, 192.605(a) (192.605(b)(8))

Question Text Do records indicate periodic review of the work done by operator personnel to determine the effectiveness, and adequacy of the processes used in normal operations and maintenance and modifying the processes when deficiencies are found?

Assets Covered 90867 (1915)

Result Notes Procedures are reviewed as part of Annual Review of O&M that is described in GSM Spec.

1.4. Additionally, the QA/QC Program does hundreds of O&M Procedures reviews every year as discussed in GSM Spec.4.61. Local Construction Managers receive copies of such reviews for their personnel and contractors working in their construction areas. There were many audits performed in Goldendale and Ritzville Districts in 2019 - 2021.

Spot checked a sample during the MS Teams portion of the audit. QA Manager Matt Mullineaux was

47. Question Result, ID, NA, MO.GOCLASS.CLASSLOCATESTUDY.R, 192.605(b)(1) (192.609(a), 192.609(b), 192.609(c), References 192.609(d), 192.609(e), 192.609(f))

Question Text Do records indicate performance of the required study whenever the population along a pipeline increased or there was an indication that the pipe hoop stress was not commensurate with the present class location?

Assets Covered 90867 (1915)

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

Procedure is discussed in Spec. 4.16, Sheet 3. Specification notes that the Class Location Review is conducted for pipelines that operate above 20% SMYS. No pipelines > 20% SMYS in Goldendale or Ritzville

References

48. Question Result, ID, Sat, EP.ERG.POSTEVNTREVIEW.R, 192.605(a) (192.615(b)(1), 192.615(b)(3))

Question Text Do records indicate review of employee activities to determine whether the procedures were effectively followed in each emergency?

Assets Covered 90867 (1915)

Result Notes All supervisors have a copy of the Emergency Procedures (GESH) - 49 CFR 192.615 (b)(1).

Area Manager Tim Mair was SME

Reviewed records in Maximo for follow up work orders on emergency responses.

Reviewed analysis spreadsheet (Managers Review of gas trouble orders)

2021 - Goldendale 105 total reviews (48 required)

Ritzville 64 total reviews (46 required)

2020 - Goldendale 50 total reviews (50 required)

Ritzville 65 total reviews (65 required)

2019 Goldendale 87 total reviews (86 required)

Ritzville 65 total reviews (65 required)

Document reviewed:

Managers Review of Gas Trouble Orders 2019-2021 (Maximo)

49. Question Result, ID, Sat, EP.ERG.TRAINING.R, 192.605(a) (192.615(b)(2))

Question Text Has the operator trained the appropriate operating personnel on emergency procedures and verified that the training was effective in accordance with its procedures?

Assets Covered 90867 (1915)

Result Notes Several OQ tasks are really ERT to include Avista Side Leak and Odor Investigation, Prevention of Accidental Ignition, etc. New Incident Command Training was started at refresher training in 2019 and continued into 2020.

Documents:

Final 2019 Gas Refresher Schedule

GAS IC V.4 - 2019 Gas IC Training

Attendee lists Refresher Training 2019

2020 JSTC Refresher Training Detail Explanation

Tabletop Gas Emergency Response Refresher 2020

2020 Gas Refresher Schedule Jan. 2020

50. Question Result, ID, Sat, EP.ERG.LIAISON.R, 192.605(a) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), References 192.616(c), ADB-05-03) (also presented in: MISCTOPICS.PUBAWARE)

Question Text Do records indicate liaisons established and maintained with appropriate fire, police and other public officials and utility owners in accordance with procedures?

Assets Covered 90867 (1915)

Result Notes Area Manager Tim Mair is SME

Reviewed Capabilities Meeting Minutes which were presented to local officials.

Reviewed notifications to UTC regarding changes to operator personnel.

Documents reviewed

Capabilities Meeting Minutes Memo for 2019-2021

51. Question Result, ID, Sat, PD.PA.LANGUAGE.R, 192.616(g) (API RP 1162 Section 2.3.1) (also presented in: References MISCTOPICS.PUBAWARE)

Question Text Were materials and messages developed and delivered in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?

Assets Covered 90867 (1915)

Result Notes PA brochures are available with Spanish and Russian footnotes showing how these language speakers can get more information. PA Plan discusses other languages on Page 11.

Reviewed sample of operator's public materials printed with footnotes in Spanish and Russian languags.

52. Question Result, ID, Sat, PD.PA.EVALEFFECTIVENESS.R, 192.616(c) (API RP 1162 Section 8.4) (also presented in: References MISCTOPICS.PUBAWARE)

Question Text Do records indicate program effectiveness evaluation(s) have been performed and cover all program requirements and all systems covered by the program?

Assets Covered 90867 (1915)

Result Notes Effectiveness evaluation is completed every 4 years. Most recent one was begun by Culver Company in 2021 and will be wrapping in 2022. Reviewed previous effectiveness study conducted in 2017.

Documents:

Avista 2017 Effectiveness Research Summary All Audiences 11.30.18

53. Question Result, ID, NA, PD.PA.MSTRMETER.R, 192.616(j) (192.616(h), API RP 1162 Section 2.7 (Step 12), API RP 1162 References Section 8.5) (also presented in: MISCTOPICS.PUBAWARE)

Question Text Do records indicate the public awareness program for a master meter or petroleum gas system operator has met the requirements of Part 192?

Assets Covered 90867 (1915)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

References

54. Question Result, ID, Sat, EP.ERG.INCIDENTANALYSIS.R, 192.605(a) (192.617)

Question Text Do records indicate actions initiated to analyze accidents and failures, including the collection of appropriate samples for laboratory examination to determine the causes of the failure and minimize the possibility of recurrence, in accordance with its procedures?

Assets Covered 90867 (1915)

Result Notes See GESH Section 17 including flow chart at end of the section. Also see "Material Failure" in GSM Spec. 4.11, Sheets 2 & 3. Gas Materials Specialist (Dan W.) keeps records & puts out Quarterly Materials One Pager emails (See Outlook Folder "Material Issues"). Field folks are directed to fill out Form N-2614 (blank copy in audit electronic folder). Local managers have copies of any formal incident investigation (assessments) that have occurred in their areas. Total of (0) assessments for 2019, (0) for 2020 and (0) for 2021 in Ritzville and Goldendale Districts.)

QA/QC Manager Matt Mullineaux is SME

Reviewed Quality Assurance Audit presentation

Reviewed example QA report for 12/13/2021 Spokane district incident for substance and thoroughness.

55. Question Result, ID, Sat, PD.DP.PDPROGRAM.R, 192.614(c) References

> Question Text Does the damage prevention program meet minimum requirements specified in 192.614(c)? Assets Covered 90867 (1915)

Result Notes Spec. 4.13 in Avista's Gas Standards Manual (GSM). Avista participates in the Washington Utilities Notification Center.

 Question Result, ID, Sat, MO.GOMAOP.MAOPDETERMINE.R, 192.619(a) (192.619(b), 192.621(a), 192.621(b), 192.623(a), References 192.623(b))

Question Text Do records indicate determination of the MAOP of pipeline segments in accordance with 192.619 and limiting of the operating pressure as required?

Assets Covered 90867 (1915)

Result Notes Josh Fort is SME for Operator

Reviewed MAOP records in Avista Facility Management viewer.

Ritzville - 30 psig MAOP

Goldendale - 40 psig MAOP

Sprague - 60 psig MAOP

Connel - 60 psig MAOP

Warden - 60 psig MAOP

57. Question Result, ID, Sat, MO.GOODOR.ODORIZE.R, 192.709(c) (192.625(a), 192.625(b), 192.625(c), 192.625(d), References 192.625(e), 192.625(f))

Question Text Do records indicate appropriate odorization of its combustible gases in accordance with its processes and conduct of the required testing to verify odorant levels met requirements?

Assets Covered 90867 (1915)

Result Notes reviewed records of annual reviews of tests points, monthly readings and equipment calibrations. Any reading higher than 0.40% requires a follow-up read / explanation.

Documents:

2019-2021 GOS DTEX Reads

2019-2021 RIT DTFX Reads

Followed up on these readings higher than 0.40%

Ritzville

March 2019 Test #15 - Warden #1 (0.52%) - appears to be follow up test same day at 0.17%

October 2019 Test #15 - Warden #1 (0.44%) - follow up same day at 0.15% (second high reading at this location.)

August 2021 Test #8 - Warden #1 (0.79%) - follow up same day at 0.25% (3rd high reading at this location).

Discussed readings with operator local rep Kori Wormsbecker. No specific issues with this test site which are noteworthy. She stated it seems to be a random issue with this location and all the other monthly readings were adequate. Could not check during field visit to Warden due to the unavailability of a DTEX odorometer due to backlog issues with manufacturer calibration process.

58. Question Result, ID, Sat, MO.RW.DISTPATROL.R, 192.603(b) (192.721(a), 192.721(b))

Question Text *Do records indicate distribution patrolling was conducted as required?*Assets Covered 90867 (1915)

Documents:

2019-2021 RIT HP Annual Patrolling

2019-2021 RIT Bridge Crossings

2019-2021 GOS Bridge Crossings

2019-2021 RIT HP Annual Patrolling

59. Question Result, ID, Sat, MO.RW.LEAKFOLLOW.R,

References

Question Text Do records indicate that a follow-up inspection was performed not more than thirty days following a repair where residual gas remained in the ground?

Assets Covered 90867 (1915)

Result Notes Reviewed residual follow up records.

Documents:

2019-2021 GOS Residual Follow Up

2019-2021 RIT Residual Follow Up

60. Question Result, ID, NA, MO.RW.DOWNGRADELEAKREPAIR.R,

Question Text Do records indicate that leaks that have been downgraded are repaired within twenty-one months? Assets Covered 90867 (1915)

Result Notes No such activity/condition was observed during the inspection.

61. Question Result, ID, Sat, MO.RW.LEAKREPAIRTIME.R, References

> Question Text Do records indicate that leaks were repaired and re-evaluated in the timeframes specified in WAC 480-93-18601?

Assets Covered 90867 (1915)

Result Notes Reviewed leak records in Maximo during Avista Headquarters visit during pre-field audit. Reviewed 10 total leak records for district during 2018-2021. 3 were grade 1 and were repaired immediately.

62. Question Result, ID, Sat, MO.RW.LEAKRECORDS.R, References

Question Text Have gas leak records been prepared and maintained as required?

Assets Covered 90867 (1915)

Result Notes Leak Survey Location Report (Form N-2511) has required information on it. Date of pipe installation is located within Avista GIS Mapping System.

> Reviewed ESRI digital leak survey maps at Avista Headquarters during pre-field audit. Also reviewed leak records in Maximo. Records contained the required information.

63. Question Result, ID, Sat, MO.RW.DISTPATROLLEAKAGE.R, 192.603(b) (192.723(a), 192.723(b))

Question Text Do records indicate distribution leakage surveys were conducted as required?

Assets Covered 90867 (1915)

Result Notes Reviewed ESRI digital leak survey maps at Avista Headquarters. Reviewed annual and 5 years surveys for 2019-2021 audit period. Reviewed leaks for follow up. No issues.

64. Question Result, ID, NA, MO.RW.CASINGLEAKSURVEY.R,

Question Text Do records indicate shorted casings were leak surveyed as required?

Assets Covered 90867 (1915)

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

There were a total of (0) shorted casings in existence as of 12/31/21 in Ritzville and Goldendale Districts.

65. Question Result, ID, References Sat, MO.RW.MARKERSURVEY.R,

Question Text Do records indicate that pipeline marker surveys were completed in the timeframe specified by WAC 480-93-124?

Assets Covered 90867 (1915)

Result Notes Reviewed marker surveys in ESRI database for last 5 year survey done in 2021 for Ritzville District. Next survey to be completed in 2026.

Operator completes 20% of Washington assets every year to satisfy 5 year requirement.

66. Question Result, ID, Sat, MO.RW.MARKERREPLACE.R,

Question Text Do records indicate that damaged or missing markers were replaced within forty-five days of discovery? Assets Covered 90867 (1915)

Result Notes Reviewed marker surveys in ESRI database for last 5 year survey done in 2021 for Ritzville District. Specifically reviewed damaged or replaced marker repaired dates. No issues.

67. Question Result, ID, References Sat, AR.RMP.TESTREINSTATE.R, 192.603(b) (192.725(a), 192.725(b))

Question Text From the review of records, did the operator properly test disconnected service lines?

Assets Covered 90867 (1915)

Result Notes Code 9 reference (blowing gas) where pressure test occurred on a re-instatement of service.

Documents:

2019-2021 GOS Code 9

2019-2021 RIT Code 9

68. Question Result, ID, Sat, MO.GMOPP.PRESSREGTEST.R, 192.709(c) (192.739(a), 192.739(b))

Question Text Do records indicate inspection and testing of pressure limiting, relief devices, and pressure regulating stations?

Assets Covered 90867 (1915)

Result Notes Procedure is detailed in GOS 5.12. Reviewed records for regulator station inspections.

Documents:

2018-2021 RIT Regulator Stations Dist Reg

2018-2021 GOS Regulator Stations Dist Reg

69. Question Result, ID, Sat, MO.GMOPP.PRESSREGCAP.R, 192.709(c) (192.743(a), 192.743(b), 192.743(c))

Question Text Do records indicate testing or review of the capacity of each pressure relief device at each pressure limiting station and pressure regulating station as required?

Assets Covered 90867 (1915)

Result Notes Procedure is detailed in GOS 5.12. Reviewed relief capacity reviews.

Documents:

2018-2021 GOS Relief Capacity Reviews (blank - no reliefs in GOS area)

2018-2021 RIT Relief Capacity Reviews

70. Question Result, ID, References Sat, DC.METERREGSVC.REGTEST.R,

Question Text Do records indicate that service regulators have been installed, operated, maintained, tested during initial turn-on and tested when customers experience pressure problems?

Assets Covered 90867 (1915)

Result Notes Reviewed records documenting when service regulators are tested at installation and for trouble calls from customers. Flow testing and lock up are completed in service regulators as applicable.

Documents:

High Low Pressure RIT, GOS 2019-2021

Service Regulators - RIT GOS

71. Question Result, ID, Sat, MO.GM.DISTVALVEINSPECT.R, 192.603(b) (192.747(a), 192.747(b))
References

Question Text Do records indicate proper inspection of each distribution system valve that might be required in an emergency at intervals not exceeding 15 months, but at least once each calendar year, and prompt remedial action to correct any valve found inoperable?

Assets Covered 90867 (1915)

Result Notes Procedure is detailed in GOS 5.13, Reviewed valve maintenance records.

Documents:

2018-2021 GOS Valves

2018-2021 RIT Valves

72. Question Result, ID, NA, FS.FG.VAULTINSPECT.R, 192.709(c) (192.749(a), 192.749(b), 192.749(c), 192.749(d)) References

Question Text Do records document the adequacy of inspections of all vaults having an internal volume =200 cubic feet (5.66 cubic meters) that house pressure regulating/limiting equipment?

Assets Covered 90867 (1915)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

73. Question Result, ID, References Sat, MO.GM.IGNITION.R, 192.709 (192.751(a), 192.751(b), 192.751(c))

Question Text Do records indicate personnel followed processes for minimizing the danger of accidental ignition where the presence of gas constituted a hazard of fire or explosion?

Assets Covered 90867 (1915)

Result Notes Reviewed crew tailboards (JSA) which provide list of items covered and implemented on jobsites.

Document:

Goldendale Ritzville Audit Request - Prevention of Accidental Ignition.

74. Question Result, ID, Sat, DC.DPC.FLANGE.R, 192.147(a) (192.147(b), 192.147(c))

Question Text Do records indicate flanges and flange accessories meet the requirements of 192.147?

Assets Covered 90867 (1915)

Result Notes All flanges used by Avista can be found in the 2021 Avista Gas Materials Catalog. All meet specifications ASME/ANSI B16.5. ANSI 150 can be used up to MAOP of 275 psig. ANSI 300 can be used up to 720 psig. With regard to specification MSS SP-44, that specification covers flanges 12 inches and greater in size which are not inventory item for Avista.

Document:

Pages from 2021 Avista Gas Materials Catalog V4 Flanges.

75. Question Result, ID, References Sat, DC.WELDPROCEDURE.WELD.R, 192.225(a) (192.225(b))

Question Text Do records indicate weld procedures are being qualified in accordance with 192.225?

Assets Covered 90867 (1915)

Result Notes Reviewed operator welding procedures. Qualification is in accordance with 192.225.

76. Question Result, ID, Sat, DC.WELDPROCEDURE.ESSENTIAL.R,

Question Text Do records indicate that essential variables were measured and documented when welders and procedures were qualified?

Assets Covered 90867 (1915)

Result Notes Welding procedures and records document essential variables as required.

77. Question Result, ID, Sat, TQ.QUOMCONST.WELDER.R, 192.227(a) (192.227(b), 192.229(a), 192.229(b), 192.229(c), References 192.229(d), 192.328(a), 192.328(b), 192.807(a), 192.807(b))

Question Text Do records indicate adequate qualification of welders?

Assets Covered 90867 (1915)

Result Notes Reviewed welder qualification records for operator and contractor NPL. No issues.

78. Question Result, ID, NA, TQ.QUOMCONST.NDT.R, 192.243(b)(2) (192.807(a), 192.807(b), 192.328(a), 192.328(b)) References

Question Text Do records indicate the qualification of nondestructive testing personnel?

Assets Covered 90867 (1915)

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

79. Question Result, ID, Sat, DC.CO.PLASTICJOINTPROCEDURE.R, 192.273(b) (192.283(a), 192.283(b), 192.283(c))
References

Question Text Have plastic pipe joining procedures been qualified in accordance with 192.283?

Assets Covered 90867 (1915)

Result Notes Gas Standards GSM Spec. 3.23, 3.24 and 3.25 for details on qualification of joining procedures.

80. Question Result, ID, Sat, DC.CO.PLASTICJOINTQUAL.R, 192.285(d) (192.285(a), 192.285(b), 192.285(c), 192.807(a), References 192.807(b))

Question Text Do records indicate persons making joints in plastic pipelines are qualified in accordance with 192.285? Assets Covered 90867 (1915)

Result Notes Reviewed PE OQ's for all Avista and contractor personnel qualified to fuse joints.

Document:

Pipe Joining Compliance Reports.

81. Question Result, ID, References Sat, DC.CO.PLASTICJOINTINSP.R, 192.287 (192.807(a), 192.807(b)) Question Text Do records indicate persons inspecting the making of plastic pipe joints have been qualified?

Assets Covered 90867 (1915)

Result Notes This is included as part of the PE Joining qualification and is detailed in the description of the tasks in Spec. 4.31 App. A. The OQ records for joining provided for Question #43 above therefore cover it

82. Question Result, ID, Sat, DC.CO.PLASTICPIPESEP.R, References

Question Text Do records indicate minimum separation requirements are met for plastic pipelines?

Assets Covered 90867 (1915)

Result Notes reviewed as builts.

83. Question Result, ID, Sat, MO.GM.EQUIPPLASTICJOINT.R, 192.603(b) (192.756)
References

Question Text Do records indicate equipment used in joining plastic pipe by heat fusion was maintained in accordance with the manufacturer's recommended practices or with written procedures that have been proven by test and experience to produce acceptable joints?

Assets Covered 90867 (1915)

Result Notes This procedure is discussed in GSM Spec. 3.23, Sheet 2: "For Avista and its contractors, documentation of this requirement shall be completed through the signing of the Pressure Test Information Sticker (Form N-240 or similar) on the applicable as-built construction document."

84. Question Result, ID, NA, MO.GM.RECORDS.R, 192.605(b)(1) (192.243(f), 192.709(a), 192.709(b), 192.709(c)) References

Question Text Do records indicate that records are maintained of each pipe/"other than pipe" repair, NDT required record, and (as required by subparts L or M) patrol, survey, inspection or test?

Assets Covered 90867 (1915)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

No Transmission lines in Goldendale / Ritzville districts.

85. Question Result, ID, NA, MO.GM.MOVEANDLOWER.R, References

Question Text Do records indicate that a study was prepared before moving or lowering a steel gas pipeline as required? Assets Covered 90867 (1915)

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

No pipeline moves or lowerings in 2019 – 2021 in Ritzville or Goldendale Districts requiring a study to be completed

86. Question Result, ID, NA, MO.GM.MOVEANDLOWERSURVEY.R, References

Question Text Do records indicate that a leak survey was conducted not more than thirty days after moving and/or lowering a metallic pipeline?

Assets Covered 90867 (1915)

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

87. Question Result, ID, Sat, MO.RW.MARKERSMAPSDRAW.R, References

Question Text Are records sufficient to indicate class location and other areas where pipeline markers are required? Assets Covered 90867 (1915)

Result Notes Reviewed marker surveys in ESRI database for last 5 year survey done in 2021 for Ritzville District. Class locations are imported from AFM database into ESRI to indicate location areas.

FR.FIELDPIPE: Pipeline Inspection (Field)

88. Question Result, ID, Sat, DC.MA.MARKING.O, 192.63(a) (192.63(b), 192.63(c), 192.63(d))
References

Question Text Are pipe, valves, and fittings properly marked for identification in accordance with the requirements of 192.63?

Assets Covered 90867 (1915)

Result Notes Checked pipe markings at district offices in Goldendale and Ritzville. No issues or expired pipe.

89. Question Result, ID, NA, DC.DPC.FLANGE.O, 192.141 (192.147(a), 192.147(b), 192.147(c))

Question Text Do flanges and flange accessories meet the requirements of 192.147?

Assets Covered 90867 (1915)

Result Notes No such activity/condition was observed during the inspection.

90. Question Result, ID, Sat, DC.DPC.GDVALVEPLACEMENT.O, 192.141 (192.181(a), 192.181(b), 192.181(c))

Question Text Are distribution line valves being installed as required of 192.181?

Assets Covered 90867 (1915)

91. Question Result, ID, Sat, DC.CO.PLASTICPIPEPROC.O, References

Question Text Is plastic pipe handled, stored and installed in accordance with manufacturer's recommendations, including maximum ultraviolet exposure?

Assets Covered 90867 (1915)

92. Question Result, ID, NA, DC.CO.PLASTICPIPESEP.O, References

Question Text Are plastic pipelines installed with the minimum separation from other utilities as required?

Assets Covered 90867 (1915)

Result Notes No such activity/condition was observed during the inspection.

93. Question Result, ID, References Sat, DC.CO.PLASTICBACKFILL.O,

Question Text Is plastic pipe buried in essentially rock-free material or material recommended by the pipe manufacturer?

Assets Covered 90867 (1915)

94. Question Result, ID, NA, DC.CO.PLASTICSQUEEZING.O,

Question Text Verify that the operator has limits in place for squeezing plastic pipe.

Assets Covered 90867 (1915)

Result Notes No such activity/condition was observed during the inspection.

95. Question Result, ID, Sat, DC.METERREGSVC.CUSTMETERREGLOC.O, 192.351 (192.353(a), 192.353(b), 192.353(c), References 192.353(d))

Question Text Are meters and service regulators being located consistent with the requirements of 192.353? Assets Covered 90867 (1915)

96. Question Result, ID, Sat, DC.METERREGSVC.CUSTMETERREGPROT.O, 192.351 (192.355(a), 192.355(b), 192.355(c))

Question Text Are meters and service regulators being protected from damage consistent with the requirements of 192.355?

Assets Covered 90867 (1915)

97. Question Result, ID, NA, DC.METERREGSVC.CUSTMETERREGINSTALL.O, 192.351 (192.357(a), 192.357(b), 192.357(c), References 192.357(d))

Question Text Based on the meters and service regulators observed being installed, are the installations consistent with the requirements of §192.357?

Assets Covered 90867 (1915)

Result Notes No such activity/condition was observed during the inspection.

98. Question Result, ID, NA, DC.METERREGSVC.CUSTMETEROPPRESS.O, 192.351 (192.359(a), 192.359(b), 192.359(c))

Question Text Are customer meter operating pressures consistent with the requirements of 192.359?

Assets Covered 90867 (1915)

Result Notes No such activity/condition was observed during the inspection.

99. Question Result, ID, NA, DC.METERREGSVC.SVCLINEINSTALL.O, 192.351 (192.361(a), 192.361(b), 192.361(c), 192.361(d), References 192.361(e), 192.361(f), 192.361(g))

Question Text Are customer service lines being installed consistent with the requirements of 192.361?

Assets Covered 90867 (1915)

Result Notes No such activity/condition was observed during the inspection.

100. Question Result, ID, NA, DC.METERREGSVC.SVCLINEVLVLOCATEREQT.O, 192.351 (192.363(a), 192.363(b), 192.363(c), References 192.365(a), 192.365(b), 192.365(c))

Question Text Are customer service line valves being installed meeting the valve and locations requirements of 192.363 and 192.365?

Assets Covered 90867 (1915)

Result Notes No such activity/condition was observed during the inspection.

101. Question Result, ID, NA, DC.METERREGSVC.SVCLINECONNECT.O, 192.351 (192.367(a), 192.367(b), 192.369(b), 192.369(b))
References

Question Text Are customer service lines being installed with connections meeting the requirements of 192.367 and 192.369?

Assets Covered 90867 (1915)

Result Notes No such activity/condition was observed during the inspection.

102. Question Result, ID, Sat, DC.METERREGSVC.SVCLINEMATERIAL.O, 192.351 (192.371, 192.373(a), 192.373(b), 192.373(c), References 192.375(a), 192.375(b), 192.377)

Question Text Are customer service lines being installed constructed appropriately for the types of materials used? Assets Covered 90867 (1915)

103. Question Result, ID, NA, DC.METERREGSVC.NEWSVCLINENOTUSED.O, 192.351 (192.379, 192.379(a), 192.379(b), References 192.379(c))

Question Text Are new customer service lines not in use configured in accordance with the requirements of 192.379? Assets Covered 90867 (1915)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

104. Question Result, ID, Peterspace NA, DC.METERREGSVC.EXCSFLOWVLVLOCATE.O, 192.351 (192.381(c), 192.381(d), 192.381(e))

Question Text Are service line excess flow valves located and identified in accordance with the requirements of 192.381?

Assets Covered 90867 (1915)

Result Notes No such activity/condition was observed during the inspection.

105. Question Result, ID, References NA, DC.METERREGSVC.REGTEST.O,

Question Text Are service regulators operated, maintained, installed and tested during the initial turn-on in accordance with manufacturer's recommendations and WAC requirements?

Assets Covered 90867 (1915)

Result Notes No such activity/condition was observed during the inspection.

106. Question Result, ID, NA, DC.WELDPROCEDURE.ONSITE.O, References

Question Text Are qualified written welding procedures located onsite where welding is being performed? Assets Covered 90867 (1915)

Result Notes No such activity/condition was observed during the inspection.

107. Question Result, ID, References NA, DC.WELDPROCEDURE.ESSENTIAL.O,

Question Text Does the operator document essential variables when qualifying welders and weld procedures? Assets Covered 90867 (1915)

Result Notes No such activity/condition was observed during the inspection.

108. Question Result, ID, NA, TD.COAT.NEWPIPEINSTALL.O, 192.461(d)

Question Text Is external protective coating being protected from damage that could result from adverse ditch conditions or supporting blocks?

Assets Covered 90867 (1915)

Result Notes No such activity/condition was observed during the inspection.

109. Question Result, ID, Sat, TD.CPMONITOR.MONITORCRITERIA.O, 192.465(a) (192.463(b), 192.463(c), 192.463(a))

Question Text Are methods used for taking CP monitoring readings that allow for the application of appropriate CP monitoring criteria?

Assets Covered 90867 (1915)

Result Notes See Form R Field Notes for CP readings conducted during the field inspection.

110. Question Result, ID, Sat, TD.CPMONITOR.CURRENTTEST.O, 192.465(b)

Question Text Do field observations confirm impressed current sources are properly maintained and are functioning properly?

Assets Covered 90867 (1915)

Result Notes See Form R Field Notes for Rectifier readings conducted during the field inspection.

111. Question Result, ID, NA, TD.CP.ELECISOLATE.O, 192.467(a) (192.467(b), 192.467(c), 192.467(d), 192.467(e))

Question Text Are measures performed to ensure electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?

Assets Covered 90867 (1915)

Result Notes No such activity/condition was observed during the inspection.

112. Question Result, ID, Sat, TD.CP.CASINGINSPECT.O,

Question Text Are casings electrically isolated from the pipeline?

Assets Covered 90867 (1915)

Result Notes See Form R Field Notes for casing readings conducted during the field inspection.

113. Question Result, ID, References Sat, TD.CPMONITOR.TESTSTATION.O, 192.469

Question Text Do cathodically protected pipelines have a sufficient number of test stations?

Assets Covered 90867 (1915)

Result Notes See Form R Field Notes for CP readings conducted during the field inspection.

114. Question Result, ID, Sat, TD.CPMONITOR.TESTLEAD.O, 192.471(a) References

Question Text Do pipelines with cathodic protection have electrical test leads installed in accordance with requirements of Subpart I?

Assets Covered 90867 (1915)

115. Question Result, ID, NA, TD.CPMONITOR.INTFRCURRENT.O, 192.473(a)

Question Text Are areas of potential stray current identified, and if found, the detrimental effects of stray currents minimized?

Assets Covered 90867 (1915)

Result Notes No such activity/condition was observed during the inspection.

116. Question Result, ID, NA, TD.CP.ADJACENTMETAL.O, 192.473(b) References

Question Text Do field observations confirm impressed current type cathodic protection systems and galvanic anode systems are installed so as to minimize any adverse effect on existing adjacent underground metallic structures?

Assets Covered 90867 (1915)

Result Notes No such activity/condition was observed during the inspection.

117. Question Result, ID, NA, TD.ICP.CORRGASPRVNT.O, 192.475(a) References

Question Text If the transportation of corrosive gas is not allowed, is the transportation of corrosive gas prevented? Assets Covered 90867 (1915)

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

118. Question Result, ID, NA, TD.ICP.CORRGASACTION.O, 192.477

Question Text Are adequate actions taken when corrosive gas is being transported by pipeline?

Assets Covered 90867 (1915)

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

119. Question Result, ID, Sat, TD.ATM.ATMCORRODEINSP.O, 192.481(b) (192.481(c), 192.479(a), 192.479(b), 192.479(c)) References Question Text Do field observations indicate that pipe exposed to atmospheric corrosion is properly coated? Assets Covered 90867 (1915) Result Notes See Form R Field Notes for exposed bridge crossing inspection conducted during field audit. 120. Question Result, ID, NA, PD.DP.ONECALL.O, 192.614(c)(3) Question Text Observe operator process a "One Call" ticket. Assets Covered 90867 (1915) Result Notes No such activity/condition was observed during the inspection. 121. Question Result, ID, Sat, MO.GOODOR.ODORIZE.O, 192.625(a) (192.625(c), 192.625(d), 192.625(e), 192.625(f)) Question Text Is sampling of combustible gases adequate using an instrument capable of determining the percentage of gas in air at which it becomes readily detectable? Assets Covered 90867 (1915) Result Notes See Form R Field Notes for odorant readings conducted during the field inspection. 122. Question Result, ID, NA, MO.GO.PURGE.O, 192.629(a) (192.629(b)) References Question Text Are lines being purged in accordance with 192.629? Assets Covered 90867 (1915) Result Notes No such activity/condition was observed during the inspection. 123. Question Result, ID, Sat, MO.RW.ROWMARKER.O, 192.707(a) (192.707(b), 192.707(d), CGA Best Practices, v4.0, Practice 2-References 5, CGA Best Practices, v4.0, Practice 4-20) Question Text Are line markers placed and maintained as required? Assets Covered 90867 (1915) 124. Question Result, ID, Sat, MO.RW.ROWMARKERABOVE.O, 192.707(c) (CGA Best Practices, v4.0, Practice 2-5, CGA Best References Practices, v4.0, Practice 4-20) Question Text Are line markers placed and maintained as required for above ground pipelines? Assets Covered 90867 (1915) 125. Question Result, ID, Sat, MO.GMOPP.PRESSREGTEST.O, 192.739(a) (192.739(b)) References Question Text Are field or bench tests or inspections of regulating stations, pressure limiting stations or relief devices adequate? Assets Covered 90867 (1915) Result Notes See Form R Field Notes for pressure control checks at regulator stations conducted during the field inspection. 126. Question Result, ID, Sat, MO.GMOPP.PRESSREGMETER.O, 192.741(a) (192.741(b), 192.741(c)) Question Text Are telemetering or recording gauges properly utilized as required for distribution systems? Assets Covered 90867 (1915) 127. Question Result, ID, NA, MO.GMOPP.MULTIPRESSREG.O, Question Text Are regulator stations installed in a manner to provide protection between regulator stages? Assets Covered 90867 (1915) Result Notes No such relevant facilities/equipment existed in the scope of inspection review. 128. Question Result, ID, Sat, MO.GM.DISTVALVEINSPECT.O, 192.747(a) (192.747(b)) References Question Text Is proper inspection being performed for each distribution system valve that might be required in an emergency, and prompt remedial action to correct any valves found inoperable?

Question Text Are all casings bare steel and do they have test leads installed on new casings without vents?

Result Notes See Form R Field Notes for valve inspections conducted during the field inspection.

Assets Covered 90867 (1915)

129. Question Result, ID, Sat, FS.FG.CASING.O, References

Assets Covered 90867 (1915)

Result Notes See Form R Field Notes for casing readings conducted during the field inspection.

130. Question Result, ID, NA, FS.FG.CASESEAL.O,

References

Question Text Does the operator seal both ends of casings/conduits for mains and transmission lines and seal the end nearest the building for service lines?

Assets Covered 90867 (1915)

Result Notes No such activity/condition was observed during the inspection.

References

131. Question Result, ID, NA, FS.FG.VAULTINSPECT.O, 192.749(a) (192.749(b), 192.749(c), 192.749(d))

Question Text Are inspections of selected vaults with internal volume = 200 cubic feet (5.66 cubic meters) housing pressure regulating/limiting equipment adequate?

Assets Covered 90867 (1915)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

132. Question Result, ID, Sat, AR.RMP.IGNITION.O, 192.751(a) (192.751(b), 192.751(c)) References

> Question Text Perform observations of selected locations to verify that adequate steps have been taken by the operator to minimize the potential for accidental ignition.

Assets Covered 90867 (1915)

References

133. Question Result, ID, NA, DC.CO.PLASTICWEAKLINK.O, 192.329(b) (192.376(b), 192.303)

Question Text Do field observations confirm plastic lines and plastic service lines are being installed using a "weak link" (as defined by §192.3) to ensure the pipeline will not be damaged by any excessive forces during the pulling process?

Assets Covered 90867 (1915)

Result Notes No such activity/condition was observed during the inspection.

134. Question Result, ID, NA, MO.GM.EQUIPPLASTICJOINT.O, 192.756 References

> Question Text Is proper maintenance being performed on equipment used in joining plastic pipe by heat fusion in accordance with the manufacturer's recommended practices or with written procedures that have been proven by test and experience to produce acceptable joints?

Assets Covered 90867 (1915)

Result Notes No such activity/condition was observed during the inspection.

135. Question Result, ID, Sat, MO.GM.ONSITEPROCS.O,

Question Text Are procedures applicable to the work being done located onsite where the work is being done? Assets Covered 90867 (1915)

136. Question Result, ID, NA, AR.PTI.PLASTICPRESSURETEST.O,

Question Text Is plastic pipe installed and backfilled prior to pressure testing?

Assets Covered 90867 (1915)

Result Notes No such activity/condition was observed during the inspection.

137. Question Result, ID, Sat, AR.PTI.EQUIPCALIB.O, References

> Question Text Is pressure testing equipment calibrated according to calibration schedules and procedures? Assets Covered 90867 (1915)

GDIM.IMPL: GDIM Implementation

References

138. Question Result, ID, Sat, GDIM.RR.MECHANICALFITTINGDATAIMPL.R, 192.1009 (191.12) (also presented in: PRR.REPORT)

Question Text Have accurate records been maintained documenting mechanical fitting failures that resulted in hazardous leaks?

Assets Covered 90867 (1915)

Result Notes Reviewed Mechanical Fitting Failure reports submitted for 2019-2021 audit period. No issues.

139. Question Result, ID, Sat, GDIM.RR.MECHANICALFITTINGRPTIMPL.R, 192.1009 (191.12) References

Question Text Did the operator report all mechanical fitting failures that resulted in a hazardous leak for the previous calendar year to PHMSA and State authorities, as appropriate, by March 15th of the next calendar year, and did the reports contain the information required by Department of Transportation Form PHMSA F-7100.1-2?

Assets Covered 90867 (1915)

Result Notes Reviewed mechanical fitting failure reports for 2019-2021 period. No issues.

MISCTOPICS.PROT9: OQ Field Inspection

140. Question Result, ID, NA, TQ.PROT9.CORRECTION.O, 192.801(a) (192.809(a))

Question Text Have potential issues identified by the OQ plan inspection process been corrected at the operational level?

Assets Covered 90867 (1915)

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

141. Question Result, ID, Sat, TQ.PROT9.QUALIFICATIONSTATUS.O, 192.801(a) (192.809(a)) References

Question Text Verify the individuals performing the observed covered tasks are currently qualified to perform the covered tasks.

Assets Covered 90867 (1915)

Result Notes Verified OQ status for all CP, Pressure Control, Odorant, and valve operation personnel. See Form R for OQ specific information.

142. Question Result, ID, Sat, TQ.PROT9.TASKPERFORMANCE.O, 192.801(a) (192.809(a))
References

Question Text Verify the qualified individuals performed the observed covered tasks in accordance with the operator's procedures or operator approved contractor procedures.

Assets Covered 90867 (1915)

Result Notes Reviewed procedures with each of operator's personnel prior to conducting field inspection.

143. Question Result, ID, Sat, TQ.PROT9.AOCRECOG.O, 192.801(a) (192.809(a)) References

Question Text Verify the individuals performing covered tasks are cognizant of the AOCs that are applicable to the tasks observed.

Assets Covered 90867 (1915)

Result Notes Observed AOC at rectifier # 042924 in Odessa during field inspection. CP tech Curt Lystad performed a stray current check with a voltage pen and detected 35 volts of current coming from the rectifier housing box. He advised me of the AOC condition and discussed in detail the proper procedure for dealing with it. He proceeded to contact Avista power and provided relevant information to them regarding situation (pole number, condition, voltage detected, location). Avista Power immediately dispatched a field tech to fix the issue and it was promptly corrected with approximately one hour of discovery.

144. Question Result, ID, Sat, TQ.PROT9.VERIFYQUAL.O, 192.801(a) (192.809(a))
References

Question Text Observe in the field (job site, local office, etc.) that the foreman/supervisor/manager has verified the qualification of the individual performing the task, that the qualification records are current, and ensure the personal identification of all individuals performing covered tasks are checked, prior to task performance.

Assets Covered 90867 (1915)

MISCTOPICS.OPTRQUAL: Operator Qualification

145. Question Result, ID, Sat, TQ.OQ.OQPLAN.O, 192.805(h) References

Question Text Do individuals performing covered tasks demonstrate adequate skills, knowledge, and ability? Assets Covered 90867 (1915)

Result Notes All operator personnel inspected demonstrated adequate knowledge, skills, and ability. See Form R Field Notes for list of operator personnel inspected.

146. Question Result, ID, References Sat, TQ.OQ.ABNORMAL.O, 192.803

Question Text Do individuals performing covered tasks have adequate knowledge to recognize and react to abnormal operating conditions?

Assets Covered 90867 (1915)

Result Notes Observed AOC at rectifier # 042924 in Odessa during field inspection. CP tech Curt Lystad performed a stray current check with a voltage pen and detected 35 volts of current coming from the rectifier housing box. He advised me of the AOC condition and discussed in detail the proper procedure for dealing with it. He proceeded to contact Avista power and provided relevant information to them regarding situation (pole number, condition, voltage detected, location). Avista Power immediately dispatched a field tech to fix the issue and it was promptly corrected with approximately one hour of discovery.

MISCTOPICS.PUBAWARE: Public Awareness Program Effectiveness

147. Question Result, ID, Sat, EP.ERG.LIAISON.R, 192.605(a) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), References 192.616(c), ADB-05-03) (also presented in: PRR.OM)

Question Text Do records indicate liaisons established and maintained with appropriate fire, police and other public officials and utility owners in accordance with procedures?

Assets Covered 90867 (1915)

Result Notes Area Manager Tim Mair is SME

Reviewed Capabilities Meeting Minutes which were presented to local officials.

Reviewed notifications to UTC regarding changes to operator personnel.

Documents reviewed

Capabilities Meeting Minutes Memo for 2019-2021

148. Question Result, ID, Sat, PD.PA.LANGUAGE.R, 192.616(g) (API RP 1162 Section 2.3.1) (also presented in: PRR.OM) References

Question Text Were materials and messages developed and delivered in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?

Assets Covered 90867 (1915)

Result Notes PA brochures are available with Spanish and Russian footnotes showing how these language speakers can get more information. PA Plan discusses other languages on Page 11.

Reviewed sample of operator's public materials printed with footnotes in Spanish and Russian languags.

149. Question Result, ID, Sat, PD.PA.EVALEFFECTIVENESS.R, 192.616(c) (API RP 1162 Section 8.4) (also presented in: PRR.OM)

Question Text Do records indicate program effectiveness evaluation(s) have been performed and cover all program requirements and all systems covered by the program?

Assets Covered 90867 (1915)

Result Notes Effectiveness evaluation is completed every 4 years. Most recent one was begun by Culver Company in 2021 and will be wrapping in 2022. Reviewed previous effectiveness study conducted in 2017.

Documents:

Avista 2017 Effectiveness Research Summary All Audiences 11.30.18

150. Question Result, ID, NA, PD.PA.MSTRMETER.R, 192.616(j) (192.616(h), API RP 1162 Section 2.7 (Step 12), API RP 1162 References Section 8.5) (also presented in: PRR.OM)

Question Text Do records indicate the public awareness program for a master meter or petroleum gas system operator has met the requirements of Part 192?

Assets Covered 90867 (1915)

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

Except as required to be disclosed by law, any inspection documentation, including completed protocol forms, summary reports, executive summary reports, and enforcement documentation are for internal use only by federal or state pipeline safety regulators. Some inspection documentation may contain information which the operator considers to be confidential. In addition, supplemental inspection guidance and related documents in the file library are also for internal use only by federal or state pipeline safety regulators (with the exception of documents published in the federal register, such as advisory bulletins). Do not distribute or otherwise disclose such material outside of the state or federal pipeline regulatory organizations. Requests for such information from other government organizations (including, but not limited to, NTSB, GAO, IG, or Congressional Staff) should be referred to PHMSA Headquarters Management.