



1411 E. Mission, PO Box 3727  
Spokane, WA 99220-3727

Submitted via electronic mail at [pipelineprogram@utc.wa.gov](mailto:pipelineprogram@utc.wa.gov)

August 22, 2025

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

Re: WUTC Spokane District Inspection (Inspection No. 8986) – Avista Response

Dear Mr. Ritter:

In a WUTC letter dated July 24, 2025, we received detail of one notice of probable violation (NOPV) and one area of concern (AOC) discovered during the 2025 Natural Gas Standard Inspection #8986 that was conducted June 9-16, 2025. In this letter we have provided restatements of the NOPV and AOC and Avista's responses.

**Notice of Probable Violation (NOPV) Reference:**

§192.615(b)(3) Emergency Plans

**Description of NOPV:**

- (b) *Each operator shall:*
  - (3) *Review employee activities to determine whether the procedures were effectively followed in each emergency.*

### **Finding(s):**

Avista reviews a sampling of gas trouble orders and provided records during the inspection. However, Avista does not maintain records or have a process in place to review employee activities for **each** emergency. Section 13 of Avista’s Gas Emergency and Service Handbook (GESH) states: “It is the responsibility of Operations Managers to periodically review employee responses to emergencies to determine if applicable procedures were followed and if the procedures are effective.” The GESH further specifies that “each Operations Manager should complete one Emergency Procedures evaluation per quarter per crew.”

This practice does not satisfy the requirements of 49 CFR 192.615(b)(3), which requires that operators review employee activities to determine whether procedures were effectively followed in **each** emergency. Avista should revise its procedures and maintain records that demonstrate compliance with this regulation.

### **Avista Response to NOPV:**

Avista has updated its processes and established two new Glossary Terms for our Gas Standards Manual (GSM) / Gas Emergency and Serviced Handbook (GESH): “Reviewable Gas Emergency” and “Reviewable Gas Emergency Procedure/Action Review”. (These will be promulgated in the 2026 Gas Standards Manual updates.)

**Reviewable Gas Emergency:** A potentially hazardous condition requiring prompt action and / or repairs to protect life, property and the environment. (This includes all confirmed Grade 1 leaks and all Code 9, blowing gas situations.)

**Reviewable Gas Emergency Procedure / Action Review:** Supervisory review of employee response to ensure procedures were effectively followed during a Reviewable Gas Emergency.

In concert with these term additions to the Gas Standards Glossary, GESH Section 13, Sheet 7, “TROUBLE ORDER INSPECTIONS” is being revised for 2026 to provide this updated detail. These edits will change the Trouble Order Review process to now include **all** *Reviewable Gas Emergencies*. Even though the 2026 GESH won’t be in effect until January 1, 2026, the updated processes mentioned above will take effect by October 1, 2025.



**Area of Concern Reference:**

WAC 480-93-018 Records

**Description of Area of Concern AOC:**

- (1) *Each gas pipeline company must maintain records sufficient to demonstrate compliance with all requirements of 49 C.F.R. §§ 191, 192 and chapter 480-93 WAC.*

**Findings:**

During the inspection, Avista provided a record of all exposed pipe reports. Staff reviewed a sample of work orders that identified unbonded coating. In several cases, the records appeared incomplete, as they did not document whether a coating repair was performed or specify the type of coating applied.

**Avista Response to AOC:**

Avista will perform the following actions to address WUTC's concerns:

1. Update the company's Construction Material List (CML) to include wrap/coating detail that will be required to fill out. (Currently the CML does not contain straightforward details to easily document coating wrap used in repair work.)
2. Conduct training / briefing (by 9/30/2025) that checking "Unbonded" on an Exposed Report (EPR) **requires** further comment
3. Conduct training / briefing (by 9/30/2025) that comment on the EPR (Avista Inspectors, Construction Specialists, etc.) needs to occur when field coating repairs are completed and no other documentation of the repair is being done.
4. Write a Maximo query to periodically (monthly) look at "Unbonded/Disbonded" EPR workorders and ensure adequate comments exist for the repair / coating fix.

Respectfully Submitted,



Josh DiLuciano  
Vice President, Energy Delivery  
JD/rkb

Cc: Alicia Gibbs, Director of Natural Gas  
Brian Taylor, Senior Operations Manager, Natural Gas  
Carie Mourin, Manager of Pipeline Integrity and Compliance  
Tim Mair, Gas Operations Manager  
Craig Buchanan, Gas Operations Manager

