



STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

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Sent via email

July 24, 2025

Josh DiLuciano
Vice President of Energy Delivery
Avista Corporation
1411 East Mission Ave PO Box 3727
Spokane, WA 99220

**RE: 2025 Natural Gas Standard Inspection – Avista Corporation – Spokane District –
(Insp. No. 8986)**

Dear Mr. DiLuciano:

Staff from the Washington Utilities and Transportation Commission (staff) conducted a Standard Inspection of Avista Corporation (Avista), Spokane District from June 9, 2025, to June 26, 2025. This inspection included a records review and inspection of the pipeline facilities.

Our inspection indicates one probable violation as noted in the enclosed report. We also noted one area of concern, which unless corrected, could potentially lead to future violation of state and/or federal pipeline safety rules.

Your response needed

Please review the attached report and respond in writing by August 25, 2025. The response should include how and when you plan to bring the probable violations into full compliance.

What happens after you respond to this letter?

The attached report presents staff's decision on probable violations and does not constitute a finding of violation by the commission at this time.

After you respond in writing to this letter, there are several possible actions the commission, in its discretion, may take with respect to this matter. For example, the commission may:

- Issue an administrative penalty under [RCW 81.04.405](#); or
- Issue a complaint under [RCW 81.88.040](#), seeking monetary penalties, changes in the company's practices, or other relief authorized by law, and justified by the circumstances. Any pipeline company that violates any pipeline safety provision of any commission order, or any rule in this chapter including those rules adopted by reference, or chapter

81.88 RCW is subject to a civil penalty not to exceed \$272,926 for each violation for each day that the violation persists. The maximum civil penalty for a related series of violations is \$2,729,245; or

- Consider the matter resolved without further commission action.

We have not yet decided whether to pursue a penalty or complaint in this matter. Should the commission decide to assess a penalty or initiate a complaint, your company will have an opportunity to respond and formally present its position.

If you have any questions or if we may be of any assistance, please contact Derek Norwood at (360) 259-2525. Please refer to the subject matter described above in any future correspondence pertaining to this inspection.

Sincerely,

Scott Rukke
Director, Pipeline Safety

cc: Alicia Gibbs, Director of Natural Gas, Avista
Brian Taylor, Senior Manager of Gas Operations, Avista
Carie Mourin, Manager of Natural Gas Pipeline Integrity and Compliance, Avista
Randy Bareither, Principal Gas Pipeline Safety Engineer, Avista

UTILITIES AND TRANSPORTATION COMMISSION
2025 Natural Gas Pipeline Safety Inspection
Avista Corporation – Spokane District

The following probable violation and area of concern of Title 49 CFR Part 192 and WAC 480-93 were noted as a result of the 2025 inspection of the Avista Corporation – Spokane District. The inspection included a random selection of records and field inspection of the pipeline facilities.

PROBABLE VIOLATION

1. **49 CFR §192.615 Emergency plans.**

(b) *Each operator shall:*

(3) *Review employee activities to determine whether the procedures were effectively followed in each emergency.*

Findings:

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.

AREA OF CONCERN OR FIELD OBSERVATIONS

1. **WAC 480-93-018 Records.**

(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.