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**Submitted via electronic mail to [mwoodard@utc.wa.gov](mailto:mwoodard@utc.wa.gov)**

October 16, 2013

Mr. David Lykken  
Pipeline Safety Director  
Washington Utilities and Transportation Commission  
PO Box 47250  
Olympia, WA 98504-7250

Re: Avista's response to the WUTC Letter dated 8/13/13 regarding Spokane District Natural Gas Standard Inspection

Dear Mr. Lykken:

Between July 16 and July 25, 2013 Dave Cullom of the WUTC conducted a Natural Gas Standard Inspection of Avista's Spokane District. The following response documents the actions Avista has taken to address the areas of concern (AOC) from the inspection.

**1. WAC 480-93-110 Corrosion Control.**

*(2) Each gas pipeline company must complete remedial action within ninety days to correct any cathodic protection deficiencies known and indicated by any test, survey or inspection. An additional thirty days may be allowed for remedial action if due to circumstances beyond the gas pipeline company's control the company cannot complete remedial action within ninety days. Each gas pipeline company must be able to provide documentation to the commission indicating that remedial action was started in a timely manner and that all efforts were made to complete remedial action within ninety days. (Examples of circumstances allowing each gas pipeline company to exceed the ninety-day timeframe include right of way permitting issues, availability of repair materials, or unusually long investigation or repair requirements.)*

**Finding(s):**

1. The carrier pipe reading at the Interstate 90 and White Road crossing did not meet the -850mV CSE (on) criteria. The reading obtained was -740mV CSE (on) for the carrier pipe and was -650mV CSE (on) on the casing. The operator did note that they were tracing a short in that cathodic protection system that was probably causing interference and indicated they would follow up with a CP survey to find the short at a later date.

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2. The service at 3025 South Geiger Blvd read -730mV at the meter and -740mV when read remotely by spooling out approximately 100 ft from the meter. It was also noted that this service was in the same cathodic protection system, per the operator's records, as the previous finding. The operator did note they would trace the short that was presumed to be causing the low reads and indicated they would follow up with a CP survey to clear the short.

**Avista's Response:**

Avista acknowledges that low CP "on" readings were found on 7/25/13 during the field portion of the inspection as noted in Finding (1) and Finding (2) above. As referenced in these findings, an Avista CP Technician had already uncovered indications back on 7/9/13 that there was a likely short somewhere in CP System #102 and he had already started his investigative work before these low reads were found by the inspector.

Through diligent CP survey and investigative work in the weeks following the inspection, a total of two CP shorts were discovered and fixed. One was found at Graham Road City Gate Station #3 and the other at the gas meter serving the customer at 3025 S. Geiger Blvd. Both shorts were remediated as detailed in the provided three enclosures to this letter (CP Workorder #4847, CP Workorder #5154 and CP Workorder #5156)

Final CP readings were taken on 9/12/13 showing adequate levels of CP protection were once again being maintained. This formally closed out these CP deficiencies in less than the ninety day requirement noted in WAC 490-93-110.

Sincerely,



Don Kopczynski  
Vice President, Energy Delivery  
DK/rkb

Enclosures

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



## CATHODIC PROTECTION WORK ORDER

Date 7-9-13 Source of Order: IVR ESR BI-Monthly Random  
 Address: Big Fink Hwy 2 AND Spotted Rd. Rectifier System Number 102  
 City: Airport Heights State: WV

## Problem:

LOW READ:	NOT LOW "ON" READ BUT LOWER THAN NORMAL -1.148 (Need to check out.)
	8-12-13 AFTER REPLACING UNION -1.201
	8-20-13 AFTER SHORT @ S.3025 GEIGER -1.312
Work done:	4-12-13 RML RELEAS -1.581 ON -1.084 OFF
	7-18-13 RML DROVE TO ALL REG STATIONS AND TOOK OFF IP TO SEE IF ANY MAJOR CHANGES. FOUND NOTHING DEFINITE. DROVE TO GEIGER RD WHERE WE HAVE INSULATED VALVE (LITTLE FINK/T.L.). NO MAJOR CHANGES WHEN SEPARATED. (APPROX 90 MV) HOOKED UP MAPPER AND FOLLOWED H.P. LINE POSSIBLE PROBLEM INSIDE AIRPORT. CALLED JUDGE CONNOR I NEED TO CALL 455-6421 AND GET ESCORT AT GATE "G" RAN OUT OF TIME WILL REHOOK UP VALVE NEXT WK.
	7-23-13 RML CONNECTED WIRES AT INSULATED VALVE RECHECKED CURRENT AT AIRPORT WITH RD4000 MOST OF THAT CURRENT FROM RECTIFIER GOES TO AIRPORT STILL! WILL WORK ON GETTING IN AIRPORT TO FOLLOW LINE.
	8-1-13 RML RE-READ @ FINK HWY 2 @ SPOTTED RD NOW -0.982 HOOKED UP MAPPER AND FOUND INSULATED H.P. FITTING ON ODERANT LINE AT THE GRAHAM RD GATE STA #3. CURRENT TRAVELED UP BRACKETS RIGHT INTO ODERANT SHED. VERIFIED INSULATED UNION WITH ISOLATION TESTER. IT'S SHORTED OUT.

ADDRESS Big Fork Hwy 2 Area WC# 4847  
Spotted Rd.

Cathodic Protection Work Order cont.

Work done

8-1-13 RML CONT. — CALLED Rich INOUE  
LEFT MESSAGE. KENNY GIBSON HAPPEN  
TO SHOW UP. SHOWED HIM THE PROBLEM.  
KENNY TOOK PICTURES AND SAID HE  
WOULD ORDER NEW UNION AND LET ME  
KNOW.

8-5-13 RML Rich TOLD ME NO WORD  
FROM COMPANY WITH NEW PART. Rich AND  
KENNY SAID THEY WOULD REPLACE ASAP.  
WHEN UNION GOT HERE. WE DECIDED  
INSTEAD OF US ALL JUST WAITING FOR  
PART. WE WOULD INSTALL NEXT WK  
ON MONDAY 8-12-13

GARY WAS OUT WITH ME TODAY ALSO  
AND SINCE WE WERE CLOSE TO AIRWAY  
HEIGHTS I SHOWED HIM THE PROBLEM.  
WHILE WE WERE THERE I CHECKED  
TREE WITH AMP CLAMP. SHORTED UNION  
WAS PULLING 500 MA ACROSSER IT. MY  
RECTIFIER IS ONLY PUSHING OUT 1.09 AMPS  
SO APPROX 50% OF CURRENT IS GOING  
THERE. THIS SHOULD FIX LOWER THAN  
NORMAL READ I STARTED WITH. IF NOT  
I WILL CHECK OUT INSIDE AIRPORT.

ALSO ON 7-25-13 SPOKANE HAD ANALYT.  
THEY DID FIND 2 LOW READS AROUND  
-700'S STEVE WROTE UP WORK ORDERS  
FOR BOTH.

8-12-13 RML REPLACED 3/4" H.P. UNION.  
IT WAS FULL OF STEEL SHAVINGS. READS  
WENT UP RIGHT AWAY. WILL LET POLARIZE,  
FOR A WEEK OR SO AND DO ON/OFFS.

ADDRESS Big Fink Hwy 2 spotted WO# 4847

Cathodic Protection Work Order cont.

Work done

9.19.13 RML REREADS NOT GOOD. THEY ARE DOWN AGAIN  $-0.912$  I HAVE ANOTHER SHORT IN THIS ZONE. WILL SET UP MAPPER TOMORROW AND FIND THIS THING.

8.20.13 RML Hooked up mapper and found MR AT S. 3025 Geiger AND A  $1\frac{1}{2}$ " X 10' PIPE WEDGED BETWEEN MR AND FENCING A METAL WALL CONNECTED TO METAL BUILDING. READ AT Hwy 2 spotted went to  $-1.312$ .

I will DO MORE testing tomorrow to MAKE SURE THERE ARE NO MORE PROBLEMS.

8.21.13 RML REREADS TODAY WERE  $-1.358$  HAS GONE UP 46 mV SINCE YESTERDAY. CHANCES ARE THERE ARE NO OTHER SHORTS ON THE SYSTEM.

8.27.13 RML REREAD  $-1.010$  ON  $-0.746$  OFF I HAVE PICKED UP ANOTHER SHORT SINCE FRIDAY. HOOKED UP MAPPER AND FOUND AT GATE STA #3 THE UNION HAS SHORTED AGAIN. Rich AND I will WORK ON THIS THURSDAY 8.29.13

8.29.13 RML TOOK OFF UNION AND FOUND STEEL PARTICLES AND SLUDGE TYPE MATTER ACROSS UNION. CLEANED OUT AND REASSEMBLED UNION, ALSO INSULATED BRACKET AND TUBING FOR EXTRA PROTECTION. REREAD AT FINK WAS  $-1.397$  I will LET POLARIZE AND NEXT WEEK TAKE ON AND OFF READS.

9.3.13 RML REREAD TODAY WAS  $-1.412$  ON AND  $-1.013$  OFF. RESEARCH SHOWED LAST YEAR I HAD APPROX 2 AMPS AT RECT. SAME TAP SETTINGS NOW ARE ONLY 1.2 AMPS. TUNED RECT UP TO 1.77 AMPS THIS WILL HELP → CONT.

ADDRESS Big Fink Hwy 2 & SpottedWO# 4847

Cathodic Protection Work Order cont.

Work done

~~THE OUTER FRINGES OF THIS ZONE. I WILL~~  
~~LET THIS POLARIZE AND RE-READ NEXT WK.~~  
9-5-13 RML Quick READ ON WAS -1.576  
WILL DO ON-OFF READS NEXT WEEK.  
9-12-13 RML RE-READ WITH INTERRUPTER  
-1.581 ON AND -1.084 OFF

## CATHODIC PROTECTION WORK ORDER

Date 7-25-13 Source of Order: IVR ESR Audit  
 Address: 190 - White Rd Rectifier System Number 102  
 City: Spokane State: WA

## Problem:

LOW READ: Steve Winters  
ON - .735 (8-12-13 - 1.142) Replaced UNION  
AFTER SHORT AT S. 3025 Geiger ~~1.254~~ -1.254  
REFER TO WO # 4847 9-12-13 RML -1.531 ON - .917 OFF

## Work done:

8-12-13 RML Replaced 3/4" H.P. UNION  
 AT GATE STA #3 READS ~~1.142~~ to A  
 -1.142 ON. Will let POLARIZE FOR A  
 WEEK AND RE-READ.

8-19-13 RML RE-READ IS NOW ONLY -.935  
 SHOULD BE MUCH BETTER. I HAVE ANOTHER  
 SHORT WILL HOOK UP MAPPER TOMORROW AND  
 FIND PROBLEM.

8-20-13 RML HOOKED UP MAPPER AND FOUND  
 A SHORT AT S. 3025 Geiger. 1 1/2 X 10' STL  
 PIPE WEDGED BEHIND MTR AND TOUCHING A  
 SMALL METAL WALL WHICH IS ATTACHED TO  
 METAL BUILDING. WILL TEST TOMORROW  
 FOR POSSIBLE ANY MORE PROBLEMS.  
 RIGHT AFTER REMOVED PIPE READ WAS 1.254

8-21-13 RML RE-READ TODAY WAS -1.289 UP  
 35 MV SINCE YESTERDAY. MORE THAN LIKELY  
 THIS SYSTEM IS CLEAR OF ANY MORE SHORTS.

8-22-13 RML THIS ORDER SHALL NOT IN GO BOOK.  
 CALLED BMM AND SENT TO HER E-MAIL.

8-27-13 RML RE-READ IS -786 ON AND -482 OFF  
 I NOW HAVE ANOTHER SHORT SINCE FRIDAY.

ADDRESS I-90 - WHITE Rd WO# 5154

Cathodic Protection Work Order cont.

Work done

8-27-13 RML HOOKED UP MAPPEN AND FOUND THAT THE INSULATED UNION AT GATE STA #3 IS SHORTED AGAIN. RECH AND E WLM WORK ON THIS THURSDAY 8-29-13

8-29-13 RML TOOK UNION APART AND FOUND STEEL PARTICLES WITH SLUDGE ACROSS UNION. CLEANED OUT AND PUT BACK TOGETHER. ALSO INSULATED BRACKET AND TUBING. RE-READ ON TRUCK WAS -1.338 RIGHT AWAY. WILL LET POLARIZE AND NEXT WEEK TAKE ON AND OFF READS.

9-3-13 RML RE-READ TODAY WAS -1.352 ON AND -.864 OFF. SHOULD BE HIGHER READS. LAST YEAR REET WAS 2 AMPS APPROX. THIS YEAR SAME TAP SETTINGS ON 1.2 AMPS. TURNED UP REET TO 1.77 AMPS. WILL RE-READ NEXT WEEK.

9-5-13 RML QUICK RECHECK JUST ON READ WAS -1.527 WILL DO ON-OFFS NEXT WEEK.

9-12-13 RML RE-READS WITH INTERRUPTER.  
-1.531 ON AND -.917 OFF



## CATHODIC PROTECTION WORK ORDER

Date

7-25-13

Source of Order: IVR ESR

Audit

Address:

3025 S Geiger

Rectifier System Number

102

City:

Spokane

State:

WA

Problem:

LOW READ:

Steve Winfers

ON -.730 8-12-13 -.961

AFTER REPLACING UNION 8-19-13 -.432

REFER TO WO # 4847 AFTER SHORT ON THIS MTR 8-20-13 -1.054

Work done: 9-12-13 -1.302 ON AND -.856 OFF

8-12-13 RML REPLACED 3/4" H.P. UNION AT GATE STA #3 READS ARE NOW -.961

I WILL LET AREA POLARIZE UP AND RETAKE READS IN A WEEK OR SO.

8-19-13 RML RE-READS TODAY NOT GOOD.

P/S NOW ONLY -.432 I HAVE PICKED UP ANOTHER SHORT IN THIS AREA. WILL HOOK UP MAPPER TOMORROW AND TAKE CARE OF THIS.

8-20-13 RML HOOKED UP MAPPER AND FOUND SHORT AT THIS METER S. 3025 GEIGER. WHAT ARE THE ODDS! A 1 1/2 X 10' STEEL PIPE WEDGED BEHIND MTR AND TOUCHING METAL WRAIL WHICH WAS ATTACHED TO METAL BUILDING. AFTER I PULLED PIPE AWAY FROM MTR SET THE READ WENT TO A -1.054

I WILL DO SOME TESTING TOMORROW TO MAKE SURE NO OTHER PROBLEMS EXIST.

8-21-13 RML RE-READ TODAY WAS -1.081 UP 27 MV SINCE YESTERDAY. GOOD SIGNAL NO OTHER SHORTS IN THIS SYSTEM.

8-27-13 RML RE-READ IS -.737 ON AND -.508 OFF HAVE PICKED UP ANOTHER SHORT SINCE FRIDAY.

ADDRESS 3025 S GEIGER WO# 5156

Cathodic Protection Work Order cont.

Work done

8-27-13 RML Hooked up Mappen Found  
UNION AT GATE STA #3 IS SHORTED  
AGAIN. Rich and I will work on  
this Thursday 8-29-13

8-29-13 RML TOOK UNION APART TO FIND  
STEEL PARTICLES WITH SLUDGE TYPE MATTER  
ACROSS UNION. Cleaned out and put  
back together. Also insulated bracket  
and tubing for extra measures.

RE-READ JAT mtr was  $-1.092$  Right AWAY.  
Will let POLARIZE AND Next week TAKE  
ON AND OFF READS.

9-3-13 RML RE-READ today was  $-1.137$  ON  
AND  $-.777$  OFF. LAST YEAR with trap  
Setting THE SAME. Rect was 2 AMPS.  
THIS YEAR ONLY 1.2 AMPS TURNED UP  
RECTIFIER TO 1.77 AMPS. THIS SHOULD  
HELP OFF READ. IF NOT I WILL DEPOLARIZE  
AND GET STATIC READ TO USE 100 MV  
CRITERIA. Will RE-READ Next wk.

9-5-13 RML Quick RE-READ ON WAS  $-1.347$   
Will DO ON OFFS Next week.

9-12-13 RML RE-READS with interrupter  
 $-1.302$  ON AND  $-.856$  OFF