



STATE OF WASHINGTON
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
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CERTIFIED MAIL

July 29, 2014

Don Kopczynski
Vice President, Energy Delivery
Avista Utilities Corporation
1411 E. Mission
P.O. Box 3727
Spokane, WA 99220-3727

Dear Mr. Kopczynski:

RE: 2014 Natural Gas Standard Inspection – Ritzville District

We conducted a natural gas inspection during the weeks of June 2, and June 9, 2014, of Avista Utilities Corporation (Avista) Ritzville District. The inspection included a records review and inspection of the pipeline facilities.

No apparent violations were noted as a result of the inspection. One area of concern was noted and is included in the attached report. Please respond to the area of concern by September 2, 2014.

Staff would like to thank Avista's personnel for their cooperation and professionalism during this inspection.

If you have any questions, or if we may be of any assistance, please contact Scott Rukke at (360) 664-1241. Please refer to the subject matter described above in any future correspondence pertaining to this inspection.

Sincerely,


David D. Lykken
Pipeline Safety Director

cc: Mike Faulkenberry, Director of Natural Gas, Avista Utilities Corp.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
2014 Natural Gas Pipeline Safety Inspection
Avista Utilities Corporation – Ritzville District

The following area of concern was noted as a result of the inspection of the Avista Utilities Corporation – Ritzville District. The inspection included a random selection of records, operation and maintenance, emergency response, inventory and field inspection of the pipeline facilities.

Area of Concern

During this inspection, Commission Staff and Avista leak survey personnel discussed procedures used for conducting High Occupancy Structure (HOS) leak surveys in accordance with WAC 480-93-188(3)(b). Avista's Leak Survey Procedure, Standards Specification 5.11, does not clearly detail what facilities should be included in a HOS leak survey. Specifically, it does not state whether mains located in the right-of-way surrounding a HOS or area should be surveyed. Avista's personnel originally indicated that any mains on the HOS or area side of the right-of-way would be included in a HOS leak survey. During a review of survey records, it was clear that this was not always the case. In some instances, there was main in close proximity to a HOS that was not surveyed. There was no consistency in what facilities were included in the leak surveys.

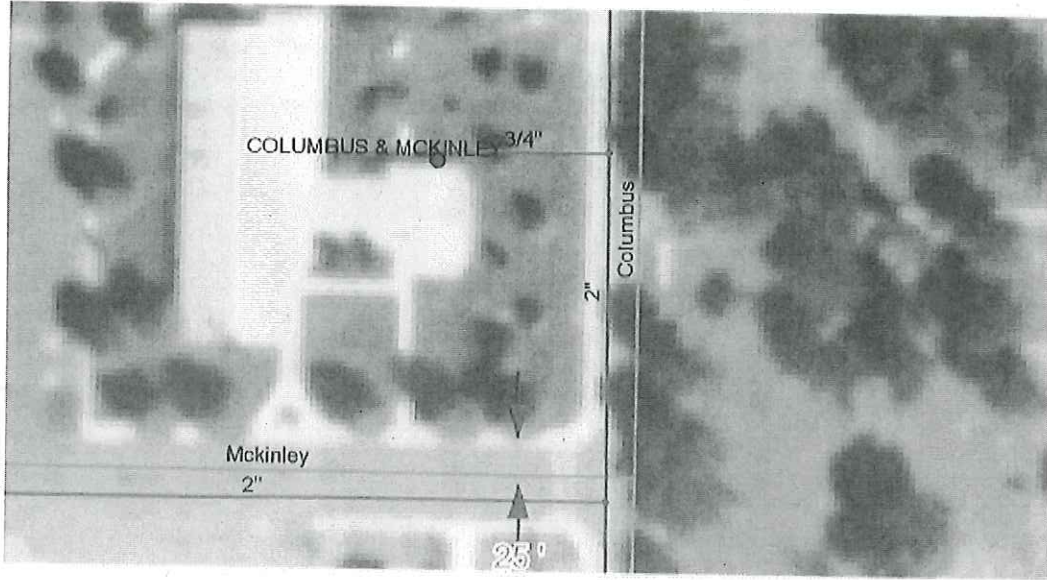
We believe it was the intent of the rule that the entire service and any mains in the right-of-way surrounding the HOS or area should be surveyed. More specifically, any facilities where leakage with migrating gas could reach and enter a building or reach and endanger the public in an area where the public regularly congregates. We concur with Avista's personnel that the rule could be better written so that the intent is more clear.

On December 1, 2011 we asked for an opinion from our assigned Attorney General, who also agreed that although the rule is not perfectly clear, he believes it requires mains in the surrounding right-of-way to be surveyed along with any services to the HOS or area. A copy of this opinion was sent to Avista's personnel on August 25, 2012.

The rule governing Business District leak surveys states that "all mains in the right-of-way adjoining a business district must be included in the survey." Based on the above wording, the wording in WAC 480-93-188(1)(d) that states "where a gas service line exists, the gas pipeline company must conduct a leak survey at the building wall at the point of entrance", and the Attorney General interpretation, we believe the overall intent is to ensure that leakage and migrating gas does not endanger buildings or areas where the public regularly congregate or assemble. We believe that Avista should revise their procedure 5.11 to require leak surveys over mains in the right-of-way where there is the potential for gas to migrate into buildings or to areas of public assembly if leakage occurs. Although this may not completely meet what we believe the intent of the rule is, we believe that until the rule is revised through the rulemaking process that this is the best course to ensure public safety.

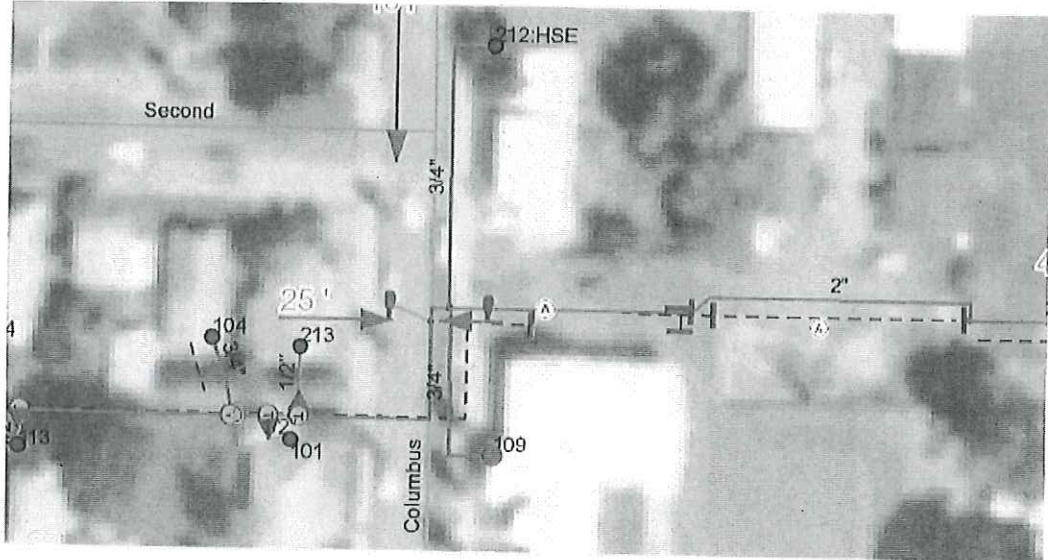
Below are 3 examples of HOS leak surveys where the main was not leak surveyed. In one case, the main was approximately 27' behind the HOS and was not surveyed. It was closer to the structure than segments of the service which were surveyed.

Goldendale, WA



Columbus & McKinley
LDS Church
88' svc
main 14' WCL — not surveyed

Goldendale, WA



109 Columbus
svc surveyed
no main surveyed
main was 27' N of the church (2")

Stevenson, WA

Pipe Properties

Pipe Owner: AVISTA CORPORATION

Unit Assembly Based Attributes

Pipe Type	Main	Material	Plastic
Pressure	Intermediate	Coating	Bare
Diameter	2"	UA Code	P2PCL
Description	2 IN PE PIPE-500 FT COIL		

Attributes | Steel | Plastic

Install Date: 06-15-1996 Set Date: In Service

Specification: Unknown

System MAOP	60	psig
System MAOP ID	3/3006	
Segment ID	0	

Transmission Distribution

DOT Classification: Main

Pipe Length (feet): 130.4

Permit # Drawing #

More Info... Flash Close Save

Map labels: Gropper, Karaka, Connecting Pipe, SWIMMING POOL, 834275253-0%

2" main in purple
not surveyed
annually