AIVISTA

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Submitted to Denise Crawford via electronic email at dcrawfor@utc.wa.gov

January 26, 2016

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

Re: WUTC Colville District Inspection No. 6193, Avista Response

Dear Mr. Rathbun:

In your letter of December 31, 2015 you documented one probable violation discovered during the Colville District Audit that was conducted in late 2015. Please find herein a restatement of the probable violation and Avista's response.

Probable Violation Reference:

WAC 480-93-200(9)(b)

Description of Probable Violation (NOPV):

Each gas pipeline company must report to the commission the details of each instance of the following when the company or its contractor observes or becomes aware of either of these events:

(b) A person intentionally damages or removes marks indicating the location or presence of gas pipeline facilities. The company must only report information to the extent that an employee or contractor of the company observes or becomes aware of these events.

Findings:

Condition that a person will report the removal or damage of locate marks was not included in Gas Service Manual Spec. 4.13 sheets 7 & 8.

Avista Response to the above NOPV:

Avista concurs that our 2015 O&M Procedures did not contain reference as to a requirement for the reporting of damaged or removed locate marks. The 2016 Gas Standards Manual has been recently updated (and forwarded to the commission) and Specification 4.13, Sheets 7 & 8 now reference the aforementioned WAC code and the proper response to take when such circumstances are detected.

Respectfully Submitted,

Heather Rosentrater
Vice President, Energy Delivery
HR/rkb

Cc: Mike Faulkenberry, Director, Natural Gas
        Karen Cash, Compliance Manager
        Ken Sampson, Colville District Gas Local Representative
        WUTC Correspondence File