



STATE OF WASHINGTON

UTILITIES AND TRANSPORTATION COMMISSION

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December 8, 2017

Heather Rosentrater, Vice President, Energy Delivery  
Avista Utilities Corporation  
1411 East Mission  
PO Box 3727  
Spokane, WA 99220-3727

**RE: 2017 Natural Gas Transmission Integrity Management Program Inspection (TIMP)  
Avista Utilities Corporation – Headquarters (Insp. No. 7259)**

Dear Ms. Rosentrater:

Staff from the Washington Utilities and Transportation Commission (staff) conducted a TIMP inspection on Sept.13-15, and Nov. 14, of Avista Utilities Corporation (Avista), Headquarters Unit. The inspection included a records review and a field inspection of the pipeline facilities.

No apparent violations were noted as a result of this inspection. This inspection will be closed as of Dec. 8.

It should be noted that at the time of this inspection Avista has not identified any High Consequence Areas or Identified Sites<sup>1</sup> along the approximately 70 mile Kettle Falls Transmission<sup>2</sup> pipeline so they are not required to have a full TIMP program. The first 4 mile segment of the Kettle Falls Transmission pipeline was replaced in 2010 with heavier wall pipe subsequently dropping its stress level to below 20% of specified minimum yield strength (SMYS) (approximately 19% SMYS). For this reason Avista believes the pipeline is no longer classified as a transmission pipeline. Staff believe that this 4 mile segment of pipeline may still meet the functional definition of a transmission pipeline and have asked PHMSA for an interpretation of the definition of “transmission” as found in §192.3 Definitions: Transmission, (1).<sup>3</sup> Since there is an Identified Site along the route of this segment of pipeline, if PHMSA determines that it meets the functional definition of transmission, Avista will have to implement their full TIMP program.

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<sup>1</sup> §192.903 - Definitions

<sup>2</sup> Operates above 20-percent of the specified minimum yield strength

<sup>3</sup> §192.3 Definitions, Transmission, (1) Transports gas from a gathering line or storage facility to a gas distribution center, storage facility, or large volume customer that is not down-stream from a gas distribution center;

Staff would like to thank Avista personnel for their professionalism and cooperation during this inspection. If you have any questions or if we may be of any assistance, please contact Scott Rukke at (360) 664-1241.

Sincerely,



Sean C. Mayo  
Pipeline Safety Director

cc: Mike Faulkenberry, Director of Natural Gas, Avista