



1411 E. Mission, PO Box 3727  
Spokane, WA 99220-3727

Submitted to Sean Mayo via electronic mail at [pipelineprogram@utc.wa.gov](mailto:pipelineprogram@utc.wa.gov)

November 22, 2019

Mr. Sean Mayo  
Pipeline Safety Director  
Washington Utility and Transportation Commission  
PO Box 47250  
Olympia, WA 98504-7250

Re: WUTC Drug and Alcohol Program (Inspection No. 7783) – Avista Follow-up Response

Dear Mr. Mayo:

In your letter of August 26, 2019, you requested additional information pertaining to Avista's procedures to monitor contractor / third party administrator compliance with drug and alcohol testing requirements. In this letter we have provided a restatement of your request and Avista's response.

**WUTC Request:**

We have reviewed your response and are requesting that Avista provide us with a procedure that you will incorporate into your Plan that will detail how you plan to monitor contractor/third party administrator compliance with the drug and alcohol testing requirements.

**Avista Response to WUTC Request:**

Avista is committed to ensuring that all contractors working for Avista are fit for duty, performing work safely and in accordance with applicable Avista Standards and federal / state regulations. Avista has implemented a policy and process improvement to verify our contractors are meeting federally mandated requirements with regard to Drug and Alcohol Testing.

Starting on December 1, 2019, Avista will be performing verification of the work currently being performed by our Third Party Administrator, National Compliance Management Systems (NCMS), by conducting a monthly reconciliation of the records captured by NCMS. Avista is allocating an additional quarter full-time employee (1/4 FTE) to manage the reconciliation process and build a digital tracking portfolio for each pipeline contract company. The process will entail monthly Management Information System (MIS) report reconciliation to include review of the following:

- Follow-up Testing
- Reasonable Cause/Suspicion Testing (including applicable Supervisor Observation Documentation)
- Return-to-Duty Testing
- Post-Accident Testing
- PHMSA “pool” size and progress towards meeting annual 50% random testing thresholds
- Supervisor 60/60 Training accomplishment

This detail is illustrated in a new Appendix H to the Avista Anti-Drug and Alcohol Misuse Prevention Plan and is enclosed as an attachment to this letter. Avista believes these changes will resolve the WUTC’s request and markedly improve Avista’s Drug and Alcohol Program.

Respectfully Submitted,



Heather Rosentrater  
Senior Vice President, Energy Delivery  
HR/rkb

Enclosure

Cc: Mike Faulkenberry, Director of Natural Gas  
Karen Cash, Gas Compliance Manager  
Patrick Everitt, Manager HR Analytics and Consulting Services  
Hallie Rowland, Fitness for Duty and HR Compliance Administration  
WUTC Correspondence File



# Avista Contractor Drug and Alcohol Process – Appendix H

Revision Date: 11/11/19

NCMS provides MIS reports to Avista Administrator each month for each pipeline company

Utilizes NCMS reports to do a monthly reconciliation of contractors working on Avista property

Items to reconcile:  
Any follow ups  
Reasonable Suspensions  
Return-to-Duties  
Post Accidents  
Verify contract companies meeting 50% test threshold  
Verify Supervisor 60/60 training

Maintain contractor company contact list and which contract companies are currently working on Avista property

Maintain contractor company contact list and which contract companies are currently working on Avista property

NCMS

Avista Administrator

Avista Contracts Department