S – Satisfactory U – Unsatisfactory N/A – Not Applicable  $N/\overline{C}$  – Not Checked If an item is marked U, N/A, or N/C, an explanation must be included in this report.

A completed **Standard Inspection Checklist, Cover Letter and Field Report** is to be submitted to the Chief Engineer within 30 days from completion of the inspection.

		Inspection Report			
Inspection ID/Docket number	•	8032			
Inspector Name & Submit Date		Anthony Dorrough, 10/22/2020			
Chief Eng. Name & Review Date		Joe Subsits,			
		Operator Information			
Name of Operator:	Avi	sta Utilities Corporation		OP ID #:	31232
Name of Unit(s):	Tra	nsmission			
Records Location:	Spo	kane WA			
Date(s) of Last (unit) Inspection:	4/10	0-4/12/18 & 7/24-7/25/18	Inspection Date(s):	6/16 & 8/26	5-27/2020

#### **Inspection Summary:**

This Standard Comprehensive Gas Transmission inspection covered procedure, records review questions and a pipeline field review, as well as related questions that included WAC requirements. The last Standard GT inspection had no recommended follow up actions. A verbal exit interview was conducted on 8/27/2020 with Randy Bareither/Avista Pipeline Safety Engineer.

A portion of this inspection was conducted on Tue-6/16 online via a Microsoft Teams Meeting due to COVID-19 restrictions. This part of the inspection covered a pre-selected portion of procedure and records review questions that were completed by Avista prior to the online meeting and emailed to staff for review. During the meeting staff was able to ask further questions and request greater detail with Avista SME included in the discussion.

The field verification portion of this inspection was moved due to COVID-19 restrictions to Tue-8/25 thru Fri-8/28. This part of the inspection covered a brief review of transmission pipeline records located at a district office, afterwards staff conducted field reviews of transmission pipelines. There were no apparent violations or areas of concern.

HQ Address:			System/Unit Name & Addres	s:
1411 East Mission			Avista HQ	
PO Box 3727			Same	
Spokane WA 99220-372	27			
Co. Official:	Heather Rosen	trater/VP Energy Delivery	Phone No.:	
Phone No.:	(509) 495-443	0	Fax No.:	
Fax No.:			Emergency Phone No.:	
Emergency Phone No.:	:			
Persons Interv	riewed	T	itle	Phone No.
Randy Barei	Randy Bareither		fety Engineer	(509) 434-6783
Paul Good		Operation	ns Manager	(208) 929-1132
Rich Inouye		Pressure Controlman		(509) 994-9652
Bob Larso	on	СР	Tech	(509) 981-4748

	UTC staff conducted abbreviated procedures inspection on 192 O&M and WAC items that changed since the last inspection. This checklist focuses on Records and Field items per a routine standard					
	inspection.					
	(check one below and enter appropriate date)					
	Team inspection was performed (Within the past five years.) or,	Date:				
$\boxtimes$	UTC Inspector (Anthony Dorrough) reviewed the O & M Manual	Date:	10/2020			

	GAS SYSTEM OPERATIONS							
Gas Suppli	er Williams							
Number of	reportable safety related conditions last year 0	Number of deferred leaks in system	m 0					
Number of	non-reportable safety related conditions last year 0	Number of third party hits last year	r 0					
Miles of tra	nsmission pipeline within unit (total miles and miles in areas) 72.67 (2)							
	Operating Pressure(s):	MAOP (Within last year)  Actual Operating Pressur (At time of Inspection)						
Feeder:	485	500						
Town:								
Other:								
Does the op	erator have any transmission pipelines?	yes						
Compressor	stations? Use Attachment 4.	0						
Have incide	Have incident reports and the annual report been reviewed for accuracy and analyzed for trends and operator issues? Yes ⊠ No□							
Comments								
No follow-u	ip needed.							

Pipe Specifications:							
Year Installed (Range)	1966	Pipe Diameters (Range) 6-	i-8 inch				
Material Type	Steel	Line Pipe Specification A Used	API 5L				
Mileage	72.67	SMYS %	7.3% max smys				
Supply Company	Williams	Class Locations 1,	,2 & 3				

		REPORTING RECORDS	S	U	N/A	N/C
1.	RCW 81.88.080	Pipeline Mapping System: Has the operator submitted information into NPMS database along with changes made after the original submission and have they provided accurate maps (or updates) of pipelines, operating over two hundred fifty pounds per square inch gauge, to specifications developed by the commission sufficient to meet the needs of first responders?Submitted by Avista on 2/11/2020 (staff documented)	X			
2.	480-93-200(1)	Telephonic Reports to UTC Pipeline Safety Incident Notification 1-888-321-9144 (Within 2 hours) for events which (regardless of cause);				
3.	480-93-200(1)(a)	Result in a fatality or personal injury requiring hospitalization;			X	
4.	480-93-200(1)(b)	Results in damage to property of the operator and others of a combined total exceeding fifty thousand dollars;  Note: Report all damages regardless if claim was filed with pipeline company or not.			X	
5.	480-93-200(1)(c)	Results in the evacuation of a building, or high occupancy structures or areas;			X	
6.	480-93-200(1)(d)	Results in the unintentional ignition of gas;			X	

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked If an item is marked U, N/A, or N/C, an explanation must be included in this report.

		REPORTING RECORDS	S	U	N/A	N/C
7.	480-93-200(1)(e)	Results in the unscheduled interruption of service furnished by any operator to twenty five or more distribution customers;			X	
8.	480-93-200(1)(f)	Results in a pipeline or system pressure exceeding the MAOP plus ten percent or the maximum pressure allowed by proximity considerations outlined in WAC 480-93-020;			X	
9.	480-93-200(1)(g)	Is significant, in the judgment of the operator, even though it does not meet the criteria of (a) through (e) of this subsection; or			X	
10.	480-93-200(2)	Telephonic Reports to UTC Pipeline Safety Incident Notification 1-888-321-9144 (Within 24 hours) for;			X	
11.	480-93-200(2)(a)	The uncontrolled release of gas for more than two hours;			X	
12.	480-93-200(2)(b)	The taking of a high pressure supply or transmission pipeline or a major distribution supply pipeline out of service;			X	
13.	480-93-200(2)(c)	A pipeline operating at low pressure dropping below the safe operating conditions of attached appliances and gas equipment; or			X	
14.	480-93-200(2)(d)	A pipeline pressure exceeding the MAOP			X	

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Q3-Q14 No telephonic reports for 2018-19

15.	480-93-200(5)	Written incident reports (within 30 days) including the following;	S	U	N/A	N/C
16.	480-93-200(4)(a)	Name(s) and address(es) of any person or persons injured or killed, or whose property was damaged;			X	
17.	480-93-200(4)(b)	The extent of injuries and damage;			X	
18.	480-93-200(4)(c)	A description of the incident or hazardous condition including the date, time, and place, and reason why the incident occurred. If more than one reportable condition arises from a single incident, each must be included in the report;			X	
19.	480-93-200(4)(d)	A description of the gas pipeline involved in the incident or hazardous condition, the system operating pressure at that time, and the MAOP of the facilities involved;			X	
20.	480-93-200(4)(e)	The date and time the gas pipeline company was first notified of the incident;			X	
21.	480-93-200(4)(f)	The date and time the ((operators')) gas pipeline company's first responders arrived on-site;			X	
22.	480-93-200(4)(g)	The date and time the gas ((facility)) pipeline was made safe;			X	
23.	480-93-200(4)(h)	The date, time, and type of any temporary or permanent repair that was made;			X	
24.	480-93-200(4)(i)	The cost of the incident to the ((operator)) gas pipeline company;			X	
25.	480-93-200(4)(j)	Line type;			X	
26.	480-93-200(4)(k)	City and county of incident; and			X	
27.	480-93-200(4)(1)	Any other information deemed necessary by the commission.			X	
28.	480-93-200(5)	Submit a supplemental report if required information becomes available			X	
29.	480-93-200(6)	Written report within 45 days of receiving the failure analysis of any <b>incident or</b> hazardous condition due to construction defects or material failure			X	

Comment	c.
Comment	о.

Q15-Q29 No telephonic reports for 2018-19

30.	480-93-200(7)	Filing Reports of Damage to Gas Pipeline Facilities to the commission. (eff 4/1/2013) (Via the commission's Virtual DIRT system or on-line damage reporting form) Avista uploads Damage reporting information to the Virtual DIRT on a monthly basis. No damage to the Transmission line has been reported in 2018-19.			
31.	49 CFR 192.617	Did the operator have appropriate records of previous accidents and failures including third party damage and leak response to ensure appropriate operator response? Procedures are addressed in GESH Section 17 including flow chart at end of the section. Also see "Material Failure" in GSM Spec. 4.11, Sheets 2 & 3. Avista Gas Materials Specialist (Dan Wisdom) keeps records & puts out Quarterly Materials One Pager emails to Gas Managers for Distribution to all company gas employees. Field folks are directed to fill out Form N-2614, all filled out forms are located within binders at Mr. Wisdom's desk and on his database. Local managers have copies of any formal incident investigation that have occurred in their areas and Mr. Bareither has access to these files as well. (There were no investigations for 2018-19 in Washington for the transmission line.)	X		
32.	480-93-200(7)(a)	Does the operator report to the commission the requirements set forth in RCW 19.122.053(3) (a) through (n) Avista uploads Damage reporting information to Virtual DIRT on a monthly basis which covers the requirements of RCW 19.122.053(a)-(n). No damage to the Transmission line has been reported for 2018-19.	X		
33.	480-93-200(7)(b)	Does the operator report the name, address, and phone number of the person or entity that the company has reason to believe may have caused damage due to excavations conducted without facility locates first being completed? Avista uploads Damage reporting information to Virtual DIRT including name, address and phone number on a monthly basis. No damage to the Transmission line has been reported in 2018-19.	X		
34.	480-93-200(7)(c)	Does the operator retain all damage and damage claim records it creates related to damage events reported under 93-200(7)(b), including photographs and documentation supporting the conclusion that a facilities locate was not completed?  Note: Records maintained for two years and made available to the commission upon request The Avista Claims Department maintains all records required in 480-93-200(7)(b) for a minimum of two years.	X		
35.	480-93-200(8)	Does the operator provide the following information to excavators who damage gas pipeline facilities?			
36.	480-93-200(8)(a)	Notification requirements for excavators under RCW 19.122.050(1)		X	
37.	480-93-200(8)(b)	A description of the excavator's responsibilities for reporting damages under RCW 19.122.053; and		X	
38.	480-93-200(8)(c)	Information concerning the safety committee referenced under RCW 19.122.130, including committee contact information, and the process for filing a complaint with the safety committee.		X	

39.	480-93-200(9)	Reports to the commission only when the operator or its contractor observes or becomes aware of the following activities  • An excavator digs within thirty-five feet of a transmission pipeline, as defined by RCW 19.122.020(26) without first obtaining a facilities locate; (200(9)(a)  A person intentionally damages or removes marks indicating the location or presence of gas pipeline facilities. 200(9)(b) Procedure is addressed in GSM Spec. 4.13, Sheets  12-13. Avista has not had an occurrence of either of these issues on the Transmission Line in 2018-19.		X	
40.	480-93-200(7)	Filing Reports of Damage to Gas Pipeline Facilities to the commission. (eff 4/1/2013) (Via the commission's Virtual DIRT system or on-line damage reporting form) Avista uploads Damage reporting information to the Virtual DIRT on a monthly basis. No damage to the Transmission line has been reported in 2018-19.		X	
41.	442(c)(6)	Does the operator have directional drilling/boring procedures which include taking actions necessary to protect their facilities from the dangers posed by drilling and other trenchless technologies?See GSM Spec. 3.19	X		
42.		Does the operator have a quality assurance program in place for monitoring the locating and marking of facilities? Do operators conduct regular field audits of the performance of locators/contractors and take action when necessary? (CGA Best Practices v. 6.0, Best Practice 4-18. Recommended only, not required) Avista is proactively doing QA audits on our Locating Contractor (ELM) through our QA Department. ELM also has an internal QA Audit process which includes good photographs of all locates completed. Avista does take action when necessary, usually facilitated as needed by the Damage Prevention Program Manager, Linda Burger.	X		
43.		Does operator including performance measures in facility locating services contracts with corresponding and meaningful incentives and penalties? The only actual penalties in the contract are that locating company will not get paid if they don't perform to the contract requirements. The Avista Claims Department bills the Locating Company for at fault damages as a result of locating shortcomings.	X		
44.	Damage Prevention (Operator Internal Performance Measures) PHMSA – State Program Evaluation Questions	Do locate contractors address performance problems for persons performing locating services through mechanisms such as re-training, process change, or changes in staffing levels ELM does a large number of audits on their locators, looking for trends so they know how to appropriately address issues. If a locator is not performing satisfactorily, they are a liability to the company and so they either get retrained or let go depending on the situation.	X		
45.		Does the operator periodically review the Operator Qualification plan criteria and methods used to qualify personnel to perform locates? Damage Prevention Program Administrator reviews the damage prevention (OQ) module and reviews locating evaluation.	X		
46.		Review operator locating and excavation <u>procedures</u> for compliance with state law and regulations See GSM Spec. 4.13	X		
47.		Are locates are being made within the timeframes required by state law and regulations? Examine record sampleStaff reviewed records	X		
48.		Are locating and excavating personnel properly <u>qualified</u> in accordance with the operator's Operator Qualification plan and with federal and state requirements? ELM's OQ records are housed in Avista's Learning Network System. Damage Prevention Administrator reviews qualifications on a regular basis and notifies ELM Local Managers of upcoming expirations.	X		

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked If an item is marked U, N/A, or N/C, an explanation must be included in this report.

49.	480-93-200(10)	Annual Reports filed with the commission no later than March 15 for the proceeding calendar year. (NOTE: PHMSA extension to June 15, 2013 for the year 2012) Annual reports submitted annually by Pipeline Integrity Program Manager. Latest ones were submitted to UTC on 2/11/20 for calendar year 2019.	S	U	N/A	N/C
50.	480-93-200(10)(a)	A copy of PHMSA F-7100.1-1 and F-7100.2-1 annual report required by U.S. Department of Transportation, PHMSA/Office of Pipeline Safety	X			
51.	49 CFR 195.402	Did the operator follow written procedures pertaining to notification of excavation, marking, positive response ant the availability and use of the one call system?See GSM Spec. 4.13	X			
52.	480-93-200(10)(b)	Reports detailing all construction defects and material failures resulting in leakage.  Categorizing the different types of construction defects and material failures. The report must include the following:  (i) Types and numbers of construction defects; and  (ii) Types and numbers of material failures Most recent Construction Defect and Material Failure Report was submitted to UTC on 2/10/20 for 2019 data.	X			
53.	480-93-200(11)	Providing updated emergency contact information to the commission and appropriate officials of all municipalities where gas pipeline companies have facilities Emergency contact information updated with UTC at the recent Operator Conference on 2/18/20. Contact information updates with appropriate emergency officials occurs with local operations manager interaction as part of Public Awareness.	X			
54.	480-93-200(12)	Providing by email, reports of daily construction and repair activities no later than 10:00 a.mSee GSM Spec. 4.19	X			
55.	480-93-200(13)	Submitting copy of DOT Drug and Alcohol Testing MIS Data Collection Form when required The DOT report was submitted to WUTC on 2/20/20	X			

#### **Comments:**

Q36-Q38 Avista sends out applicable letters to all entities who damage Avista Gas facilities in accordance with WAC 480-93-200(8). Zero letters were sent out in 2018-19 involving damage to the transmission line.

	CONSTRUCTION RECORDS					N/C
56.	480-93-080(1)(b)	Use of testing equipment to record and document essential variables Weld procedure qualifications and periodic welder qualifications document essential variables.	X			
57.	480-93-115(2)	Test leads on casings (without vents) installed after 9/05/1992 All casings on the Kettle Falls Transmission Line have test leads installed.	X			
58.	480-93-115(3)	Sealing ends of casings or conduits on transmission pipelines and main Casing ends are sealed as discussed in Spec. 3.42, Sheet 1. No casings installed on Kettle Falls Transmission Line during this inspection cycle.	X			

		CONSTRUCTION RECORDS	S	U	N/A	N/C
59.	480-93-115(4)	Sealing ends (nearest building wall) of casings or conduits on services Casing / conduit ends nearest to building are sealed as discussed in Spec. 3.42, Sheet 1. No service line casings / conduits installed on Kettle Falls Transmission Line during this inspection cycle.	X			
60.	480-93-160(1)	Detailed report filed 45 days prior to construction or replacement of transmission pipelines ≥ 100 feet in length Avista notifies the WUTC regarding such occurrences as was done back on 4/24/20. (Project has subsequently been put on hold.)	X			
61.	480-93-170(3)	Pressure Tests Performed on new and replacement pipelinesSee GSM Spec 3.18, no pressure tests during this construction cycle.			X	
62.	480-93-170(10)	Pressure Testing Equipment checked for Accuracy/Intervals (Manufacturers recommendation or operators schedule)See GSM Spec. 5.21	X			
63.	480-93-175(1)	Study prepared and approved prior to moving and lowering of metallic pipelines > 60 psig Steel pipe lowering and moving is handled as described in GSM Spec. 3.12, Sheets 13 and 16. No transmission pipe moved or lowered in 2018-19.			X	

Comments:			
1			

		OPERATIONS and MAINTENANCE RECORDS	S	U	N/A	N/C
64.		Damage Prevention Program		•	•	
65.	480-93-250(3)	Are locates are being made within the timeframes required by RCW 19.122? Examine record sample.	X			
66.	480-93-015(1)	Odorization of Gas – Concentrations adequate? Avista odorizes gas 2.5x greater than WAC requires.	X			
67.	480-93-015(2)	Monthly Odorant Sniff Testing	X			
68.	480-93-015(3)	Prompt action taken to investigate and remediate odorant concentrations not meeting the minimum requirementsSee GSM Spec. 4.18	X			
69.	480-93-015(4)	Odorant Testing Equipment Calibration/Intervals (Annually or Manufacturers Recommendation) See GSM Spec. 5.15	X			
70.	480-93-124(3)	Pipeline markers attached to bridges or other spans inspected? 1/yr(15 months)No bridges on transmission line.			X	
71.	480-93-124(4)	Markers reported missing or damaged replaced within 45 days?	X			
72.	480-93-185(1)	Reported gas leaks investigated promptly/graded/record retained	X			
73.	480-93-185(3)	Leaks originating from a foreign source reported promptly/notification by mail/record retained No leaks 2018-19 inspection cycle.			X	
74.	480-93-187	Gas Leak records – Content Avista's Leak Survey Location Report (N-2511) shows items required in WAC 480-93-187. Date pipe installed is found in Avista's AFM (GIS) system.	X			
75.	480-93-188(1)	Gas Leak surveys - Coverage	X			
76.	480-93-188(2)	Gas detection instruments tested for accuracy/intervals (Mfct rec or monthly not to exceed 45 days)	X			
77.	480-93-188(3)	Leak survey frequency (Refer to Table Below)	X			

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked If an item is marked U, N/A, or N/C, an explanation must be included in this report.

		OPERATIONS and MAINTENAN	CE RECORDS	S	U	N/A	N/C
		Business Districts (By 6/02/07)	1/yr (15 months)				
		High Occupancy Structures	1/yr (15 months)				
		Pipelines Operating ≥ 250 psig	1/yr (15 months)				
	Other M	ains: CI, WI, copper, unprotected steel	2/yr (7.5 months)				
78.	480-93-188(4)(a)	Special leak surveys - Prior to paving or r	resurfacing, following street alterations or repairs			X	
79.	480-93-188(4)(b)	Special leak surveys - areas where substrunderground gas facilities, and damage co				X	
80.	480-93-188(4)(c)	Special leak surveys - Unstable soil areas	where active gas lines could be affected			X	
81.	480-93-188(4)(d) Special leak surveys - areas and at times of unusual activity, such as earthquake, floods, and explosions				X		
82.	480-93-188(4)(e)	Special leak surveys - After third-party excavation damage, operators must perform a gas leak survey to eliminate the possibility of multiple leaks and underground migration into nearby buildings.				X	
83.	480-93-188(5)	Gas survey records: Retention/Content				X	
84.	480-93-188(6)	Leak Survey Program/Self Audits				X	

C	'n	m	m	en	ts

Q78-Q84 No such occurrences during 2018-19 inspection cycle.

	CORROSION CONTROL RECORDS					N/C
85.	480-93-110(8)	CP test reading on all exposed facilities where coating has been removed			X	
86.	480-93-110(2)	Remedial action taken within 90 days (Up to 30 additional days if other circumstances. Must document) .465(d)			X	
87.	480-93-110(3)	CP Test Equipment and Instruments checked for Accuracy/Intervals (Mfct Rec or Opr Sched)	X			
88.	480-93-110(5)	Casings inspected/tested annually not to exceed fifteen months	X			
89.	480-93-110(5)(a)	Casings w/no test leads installed prior to 9/05/1992. Demonstrate other acceptable test methods			X	
90.	480-93-110(5)(b)	Possible shorted conditions – Perform confirmatory follow-up inspection within 90 days			X	
91.	480-93-110(5)(c)	Casing shorts cleared when practical			X	
92.	480-93-110(5)(d)	Shorted conditions leak surveyed within 90 days of discovery. Twice annually/7.5 months			X	

#### **Comments:**

Q85-Q86 No such occurrences during 2018-19 inspection cycle.

Q89-Q92 No such occurrences during 2018-19 inspection cycle.

S – Satisfactory U – Unsatisfactory N/A – Not Applicable N/C – Not Checked If an item is marked U, N/A, or N/C, an explanation must be included in this report.

PIPELINE INSPECTION (Field)				U	N/A	N/C
93.	480-93-015(1)	Odorization levels	X			
94.	480-93-115(2)	Casings – Test Leads (Casings w/o vents installed after 9/05/1992)	X			

EXIT INTERVIEW/		
/Exit Interview Conducted? Yes		0.000
Items Covered: All items planned for inspection	Date:	8/27/2020

For PHMSA Advisory Bulletins, go to <a href="https://www.phmsa.dot.gov/regulations-fr/notices">https://www.phmsa.dot.gov/regulations-fr/notices</a>

**Comments:**