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Submitted to Sean Mayo via electronic mail at pipelineprogram@utc.wa.gov

September 1, 2022

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

Re: WUTC Natural Gas Annual Review Inspection (Inspection No. 8416) – Avista Response

Dear Mr. Mayo:

In your letter of August 12, 2022, you listed one area of concern discovered during the 2022 WUTC Natural Gas Annual Review Inspection (Inspection No. 8416) that was conducted August 9, 2022. In this letter we have provided a restatement of the area of concern and Avista's response.

Area of Concern (AOC) Reference:

WAC 480-93-250 – Damage Prevention

Description of AOC #1:

Each gas pipeline company must comply with chapter 19.122 RCW, including:

- 1. Subscribe to the appropriate one-number locator service;*
- 2. Provide, upon receipt of locate notice, reasonably accurate information as to its locatable underground facilities by surface-marking the location of the facilities;*
- 3. Respond with locate markings within two business days after receipt of the notice or within a time mutually agreed upon between the operator and the excavator requesting the utility locate information.*

Finding(s):

Staff noted trends of concern regarding Avista's ability to consistently meet facility locating requirements outlined in RCW 19.122.

Avista Response to AOC:

Avista is aware of a decrease in locating performance during the 2022 construction season. Avista's locating contractor, ELM, has struggled to find and retain quality locaters in the current labor market to keep up with locate request demands. Avista's Manager of Pipeline Integrity and Compliance and the Damage Prevention Administrator have been in regular discussions with ELM over the past two months to work on solutions to address these performance issues.

Additional financial support was given to ELM this spring to allow them to increase wages in an effort to support employee hiring and retention. Avista has also recently developed and implemented an internal and external missed locate report form to provide additional, timely documentation of missed locates in the field by Avista's own crews and contractors and by external contractors. This form is currently being used to quickly address issues with ELM around missed locates. Avista is also working with ELM to enhance the processes and automated responses around unlocatable utilities to provide more detailed communication with the locate requester and improve Avista's response to addressing unlocatable utilities in a timely manner and in coordination with the locate requester. Avista is also currently developing additional performance metrics to be incorporated into the next locating contract.

Avista is aware that WUTC staff concerns are a result of complaints filed with the Washington Dig Law Safety Committee over the last year. All of the complaints that have been filed against Avista in the last year have been from one individual contractor. Avista has met with the contractor face to face twice in the last 12 months to hear their concerns and attempt to work out possible solutions moving forward. The last meeting was on July 20th and was moderated by the Project Coordinator of the Washington Dig Law Safety Committee, Jon Cornelius. To date Avista has met all the expectations discussed in that meeting and continues to work with Jon and the aforementioned contractor to improve Avista's utility locating program.

Respectfully Submitted,



Josh DiLuciano
Vice President, Energy Delivery
JD/rkb

Enclosures

Cc: Jody Morehouse, Director of Natural Gas
Brian Schultz, Manager of Pipeline Integrity and Compliance

