

**Form A- Annual Review 8572**

UTC Standard Annual Review Inspection Report  
 Intrastate Operators  
 FORM A: Annual Review

**Inspector and Operator Information**

<b>Inspection ID</b> 8572	<b>Inspection Link</b> 8572	<b>Inspector - Lead</b> Lex Vinsel	<b>Inspector - Assist</b> Haggen, Joice
<b>Operator</b> Avista Corporation	<b>Unit</b> Headquarters (HQ)	<b>Records Location - City &amp; State</b> Spokane WA	
<b>Inspection Start Date</b> 05-03-2023	<b>Inspection Exit Interview Date</b> 05-03-2023	<b>Engineer Submit Date</b> 09-22-2023	

**Inspection Summary**

You must include the following in your inspection summary:

- \*Inspection Scope and Summary
- \*Facilities visited and Total AFOD
- \* Summary of Significant Findings
- \* Primary Operator contacts and/or participants

<label for="fid\_21">You must include the following in your inspection summary:

\*Inspection Scope and Summary</label>  
 <label for="fid\_21">Annual Review to check up on chages to Locate system. Are they getting better?</label>  
 <label for="fid\_21">Last complaint was on August 2022</label>  
 <label for="fid\_21"> \*Facilities visited and Total AFOD</label>  
 <label for="fid\_21">Avista Dollar Road site</label>  
 <label for="fid\_21">Total AFOD 3</label>  
 <label for="fid\_21"> \* Summary of Significant Findings</label>  
 <label for="fid\_21">Review showed that Avista had made improvements in procedures and the hiring of more Locator staff to reduce number of not marked locate requests (One Call) .</label>  
 <label for="fid\_21"> \* Primary Operator contacts and/or participants</label>  
 <label for="fid\_21">Randy Bareither Pipeline Safety Engineer (509)495-8716</label>

**Instructions and Ratings Definitions**

**INSPECTION RESULTS: Annual Review**

<b>Satisfactory Responses</b> 28	<b>Satisfactory List</b> 1,3,4,5,6,9,10,12,13,14,15,21,22,23,24,25,26,27,28,29,30,31,32,35,37,39,40,	<b>Number of Unanswered Questions</b> 0	<b>Unanswered List</b>
<b>Unsatisfactory Responses</b> 0	<b>Unsatisfactory List</b>		
<b>Area of Concern Responses</b> 0	<b>Area of Concern List</b>		
<b>Not Applicable Responses</b> 10	<b>Not Applicable List</b> 7,8,16,17,18,19,20,42,43,44		
<b>Yes Responses</b> 3	<b>Yes List</b> 34,36,38,	<b>No Responses</b> 1	<b>No List</b> 41
<b>Not Checked / Evaluated Responses</b> 0	<b>Not Checked / Evaluated List</b>		

\*\*If an item is marked Unsat, AOC, N/A, or N/C, an explanation must be included in the "Notes" block for that question and also summarized in the " SUMMARY OF REQUIRED COMMENTS" section at the end of this inspection form.

**ANNUAL REPORT: ACCURACY/TRENDS**

**Question #1.** Was the Annual Report reviewed for accuracy and trends? If any trends were discovered, please describe.  
**1. Result** Satisfactory

**1. Notes**

Question #1 - Reviewed Annual Report for accuacy and trends. Although the changes to the Locating Procedures have not shown positive improvements in the annual Locator missmarks the Procedure and Locator changes should address our issues with inadequate locator marks going forward. No complaints since August 2022.  
 Question 1-A - Operators Manuals appear current and up to date.  
 Question #1-B - Operator contacts are up to date.

**Access to Complete Distribution Annual Report**

Year	Operator	SYSTEM TOTAL Miles of Main	Miles of Service	SYSTEM TOTAL NO. of Services	Average Service Length
2022	Avista Corporation	3557	2,660.48	169,245	83
2021	Avista	44,211.79	2,633.00	126,810.483	83

**Access to Complete Transmission Annual Report**

YEAR	Operator	Commodity Group	Total Total Miles
Avista Corporation (8 Report records)			
2022	Avista Corporation	Natural Gas	76.554

**Access to Complete Hazardous Liquid Annual Report**

YEAR	Operator	Commodity Group
No Report records found		

Year	Operator	SYSTEM TOTAL Miles of Main	Miles of Service	SYSTEM TOTAL NO. of Services	Average Service Length	YEAR	Operator	Commodity Group	Total Total Miles
	Corporation					2021	Avista Corporation	Natural Gas	76.568
2020	Avista Corporation	3507.559	2,598.98	165,333	83	2020	Avista Corporation	Natural Gas	76.562
2020	Avista Corporation	3507.559	2,598.98	165,333	83	2019	Avista Corporation	Natural Gas	76.562
2019	Avista Corporation	3484.897	2,572.72	163,662	83	2018	Avista Corporation	Natural Gas	76.573
2018	Avista Corporation	3457.304	2,562.70	161,084	84	2015	Avista Corporation	Natural Gas	72.692
2017	Avista Corporation	3430.169	2,515.10	158,092	84	2016	Avista Corporation	Natural Gas	72.591
2016	Avista Corporation	3401.195	2,460.36	154,651	84	2017	Avista Corporation	Natural Gas	72.589
2015	Avista Corporation	3374.75	2,437.92	151,438	85				

## DAMAGE PREVENTION

### Annual Report Damage Prevention data

Year	Operator	Number of Excavation Tickets	Total Number of Excavation Damages By Apparent Root Cause:	Locating Practices Not Sufficient:	One-Call Notification Practices Not Sufficient:	Excavation Practices Not Sufficient:	Other:	Number of Services	Total Leaks - Excavation Damage	Total Main Leaks	Miles of Service MAIN
2022	Avista Corporation	44,346	203	30	93	69	11	169,245	30	71	3557
2021	Avista Corporation	49,034	248	37	95	100	16	126,810.48	41	138	44,211.79
2020	Avista Corporation	46,242	185	14	93	66	12	165,333	134	45	3507.559
2019	Avista Corporation	47,232	211	17	90	89	15	163,662			
2018	Avista Corporation	48,673	199	19	91	74	15	161,084			
2017	Avista Corporation	44,325	213	31	79	88	15	158,092			
2016	Avista Corporation	46,871	163	37	47	68	11	154,651			
2015	Avista Corporation	46,513	197	31	60	87	19	151,438			

### DIRT data on mismarks for prior year

Company - Name	Avista	Totals
Damage Cause	Number of Reports	Number of Reports
<u>Facility marked inaccurately due to incorrect facility record/maps</u>	11	11
<u>Facility marked inaccurately due to locator error</u>	29	29
<u>Facility marked inaccurately due to tracer wire issue</u>	11	11
<u>Facility not marked due to incorrect facility records/maps</u>	29	29
<u>Facility not marked due to locator error</u>	20	20
<u>Facility not marked due to no response from operator/contract locator</u>	1	1
<u>Facility not marked due to tracer wire issue</u>	1	1
<u>Facility not marked due to unlocatable facility</u>	8	8
<u>Marked inaccurately due to Locator error</u>	7	7
<u>Not marked due to Incorrect facility records/maps</u>	5	5
<u>Not marked due to Locator error</u>	8	8
<u>Site marked but incomplete at damage location</u>	16	16
<u>Unlocatable facility</u>	2	2
<b>Totals (13 groups)</b>	148	148

### DIRT Timeliness - Prior Year Reports

SubmitCompanyID - UTCfinalN

No Report records found

### Question #2.

Review the following damage prevention items:

#### Q2. Is the damage prevention information in the annual report complete?

Annual Report damage information appears complete

#### Q2.b. Is the annual report damages

Annual Report root cause informatio

**Q2.d Does the operator follow a process to evaluate the cause of "Locating practices not sufficient" category?**

Yes, the Damage Prevention Administrator (Tyler Prozek) works with the locating contractor on locating issues to determine root causes and determine if additional training is necessary or if requalification is needed. We also discuss if a procedure change is required.

**Q2.e. Is the operator or its contract**

Yes, locators are operator qualified a

**Q2.g. What is the number of damages resulting from mismarks?**

14

**Q2.h. What is the number of damag**

1 damage as a result of not location v  
the ticket. WO:1026940083

**Q2.j. Are mapping corrections timely and according to written procedures?**

A total of 8 damages due to mapping occurred in 2022. All mapping corrections were made within 6 months per GSM Spec. 4.11.

**Q2.k. Does the operator follow a pr  
Sufficient"?**

Yes, the Damage Prevention Admini:  
damage trends for excavation practi

## 2. Notes

Avista is a partner in the Annual IEUCC Contractor Breakfast and provides education related to safe digging and damage prevention to local contractors based on previous year's damage causes.

## NPMS SUBMISSIONS/CHANGES

### Question #3.

For transmission operators, has the operator submitted information to the NPMS database, along with changes made after the original submission?

### 3. Result

Satisfactory

### 3. Notes

NPMS updates are completed annually by Chris Francis. The most recent update was completed on 3/9/23. - Reviewed OSAVE Notification - No issues.

## INCIDENT/SRC/AOC REPORTS REVIEW

### Question #4

Were there any federally reportable incidents during the previous year? Are there any discernable trends to these incidents?

### 4. Results

Satisfactory

### 4. Notes

Q4 - 04/08/2022 - NRC# 20220029-36565

No discernable trends.

#### Q4: Federally reportable incidents

NotificationID	Operator	Company	NRC #	Assigned Engineer	Date & Time of Incident	Street Address of event/incident	Incident Address: City	Closure Date	Reporting Level
3988	Avista Corporation	Avista Corporation	1330648	Darren Tinnerstet	03-03-2022 06:08 PM	E Empire Ave. and N Crestline St.	Spokane	05-09-2022	Federal

### Question #5.

Review operator records of previous year's accidents and failures including reported third party damage and leak response. Is the operator ensuring appropriate evaluation and response as required in 192.617 (Gas) or 195.402 (HL) to determine cause of failure? Is the operator taking appropriate steps to minimize the possibility of reoccurrence?

### 5. Result

Satisfactory

### 5. Notes

Incident records for 2021 and 2022 show a high level of incidents due to locates not being completed in a timely manner. On Oct 2022 Avista incorporated various changes to the contract (ELM's) by increasing the ticket rate to improve staffing levels, increasing total staffing (including supervisors, auditors, and a full-time trainer), and establish minimum audit requirements for each Locator.

The new ELM contract for 2023 included an ELM ticket increase with performance standards for accuracy and timeliness of locates.

Gas locates within the 2 business days period to maintain a margin of 96.0-97.0% for On Time Gas Locates, there are incentives for being better than 97.0% and disincentives for going lower than 96.0%.

Gas Damage Ratio of 0.180 to 0.220 damages per 1000 gas locates tickets performed. There are incentives for better performance and disincentives for poor performance.

Missed Gas Locate Ratio of 0.350 to 0.450 locating failures per 1000 gas locate tickets performed.

ELM uses a "Ticket Tag" system that allows field personnel to select options that initiate automatic email notifications to ticket requestors based on the location results.

The Locator can select responses that are sent to the ticket requestor. An email Notification to requestor for Locates Complete or Unable to locate for any reason, such as unclear marking instructions, no access, or unable to locate facility.

**Question #6.**

Review incident reports for the previous year for accuracy and identify any trends. If any trends discovered please describe. (Please see list of incident data at end of this report)

**Q6: Incident Reports**

**6. Result**  
Satisfactory

NotificationID	Inspector	Company	Street Address of event/incident	Date & Time of Incident	Is 30-Day Report Received?	Reporting Level
4245	Jason Hoxit	Avista Corporation	606 E Wellington Drive	09-25-2023 09:48 AM	<input type="checkbox"/>	State
4241	Thomas Green	Avista Corporation	2507 W Wellesley Ave	09-18-2023 02:25 PM	<input type="checkbox"/>	State
4237	Scott Anderson	Avista Corporation	15510 E. Sprague St.	09-11-2023 07:25 AM	<input type="checkbox"/>	State
4233	Anthony Dorrrough	Avista Corporation	3948 3rd Ave	08-27-2023 05:16 AM	<input checked="" type="checkbox"/>	State
4228	Scott Anderson	Avista Corporation	2002 E. Bridgeport Ave.	08-18-2023 06:18 PM	<input checked="" type="checkbox"/>	State
4229	Scott Anderson	Avista Corporation	407 S Prentiss St	08-18-2023 02:19 PM	<input checked="" type="checkbox"/>	State
4226	David Cullom	Avista Corporation	4725 E Fredrick	08-12-2023 01:55 PM	<input checked="" type="checkbox"/>	State
4217	David Cullom	Avista Corporation	2110 N Dora Rd	08-07-2023 04:07 PM	<input checked="" type="checkbox"/>	State
4212	Derek Norwood	Avista Corporation	3511 E 36th Ave	07-30-2023 10:58 AM	<input checked="" type="checkbox"/>	State
4203	Derek Norwood	Avista Corporation	850 W Maple St	07-11-2023 02:15 PM	<input checked="" type="checkbox"/>	State
4171	Anthony Dorrrough	Avista Corporation	16210 N Green Bluff Road	04-11-2023 06:09 AM	<input checked="" type="checkbox"/>	State
4168	Scott Anderson	Avista Corporation	12111 Gibbs Rd	03-30-2023 11:53 AM	<input checked="" type="checkbox"/>	State
4147	Lex Vinsel	Avista Corporation	2320 S Salnave Rd	02-09-2023 07:21 AM	<input checked="" type="checkbox"/>	State
4139	Derek Norwood	Avista Corporation	2500 N Substation Rd	01-31-2023 08:58 AM	<input checked="" type="checkbox"/>	State
4104	Dennis Ritter	Avista Corporation	1300 3rd Regulator 417	11-18-2022 12:08 PM	<input checked="" type="checkbox"/>	State
4101	Lex Vinsel	Avista Corporation	209 N S St	11-11-2022 01:11 PM	<input checked="" type="checkbox"/>	State
4094	Scott Anderson	Avista Corporation	21281 E. Valley Vista Dr	10-27-2022 10:40 AM	<input checked="" type="checkbox"/>	State
4074	Scott Anderson	Avista Corporation	8110 S Allora Rd.	09-15-2022 09:49 AM	<input checked="" type="checkbox"/>	State
4062	Scott Anderson	Avista Corporation	1610 W. Grace Ave	08-14-2022 04:31 PM	<input checked="" type="checkbox"/>	State
4049	Dennis Ritter	Avista Corporation	519 N Sycamore St	07-29-2022 12:22 PM	<input checked="" type="checkbox"/>	State
4044	Scott Anderson	Avista Corporation	4411 W. Shawnee Ave	07-21-2022 10:57 AM	<input checked="" type="checkbox"/>	State
4030	Lex Vinsel	Avista Corporation	1015 Salnave Road	06-28-2022 09:51 AM	<input checked="" type="checkbox"/>	State
4019	Lex Vinsel	Avista Corporation	3914 Heroy Ave	05-25-2022 09:56 AM	<input checked="" type="checkbox"/>	State
4018	Dennis Ritter	Avista Corporation	1502 Cambridge Lane	05-23-2022 10:34 AM	<input checked="" type="checkbox"/>	State
4021	David Cullom	Avista Corporation	1508 E Cambridge Ln	05-20-2022 08:09 AM	<input checked="" type="checkbox"/>	State
4013	Derek Norwood	Avista Corporation	502 E 23rd Ave	05-02-2022 05:55 PM	<input checked="" type="checkbox"/>	State
4012	Darren Tinnerstet	Avista Corporation	9711 E Walton Lane	04-30-2022 03:21 PM	<input checked="" type="checkbox"/>	State
4011	Darren Tinnerstet	Avista Corporation	26 W 40th Ave.	04-28-2022 11:06 AM	<input checked="" type="checkbox"/>	State
4005	Derek Norwood	Avista Corporation	4300 N Chronicle Rd	04-12-2022 09:03 AM	<input checked="" type="checkbox"/>	State
4003	Derek Norwood	Avista Corporation	923 S Mariam St	04-11-2022 10:45 AM	<input checked="" type="checkbox"/>	State
3995	David Cullom	Avista Corporation	2829 West Beacon Ave	03-22-2022 12:31 PM	<input checked="" type="checkbox"/>	State
3994	David Cullom	Avista Corporation	2501 West Boone Ave	03-21-2022 06:43 AM	<input checked="" type="checkbox"/>	State
3988	Darren Tinnerstet	Avista Corporation	E Empire Ave. and N Crestline St.	03-03-2022 06:08 PM	<input checked="" type="checkbox"/>	Federal
3983	Derek Norwood	Avista Corporation	101 W Beck Way	02-14-2022 10:48 AM	<input type="checkbox"/>	Non-Reportable
3981	Scott Anderson	Avista Corporation	1411 W. Knox Ave. #1	01-23-2022 01:09 AM	<input checked="" type="checkbox"/>	State

**6. Notes**

Area of concern - Improvement of Locate Ticket performance should be indicated by reviewing the 2023 quarterly reports to Avista.

**Question #7.**

Were there reportable or unreportable safety related conditions during the previous year? If yes please describe.

**Q7: Report of SRCs**

**7. Result**  
Not Applicable

NotificationID	Company	Safety-Related Condition	SafetyRelatedConditionChoices	Reportable?	Date & Time of Incident	Company Notified Date	Report Date
No Incident Notification records found							

**7. Notes**

N/A - No SRC's for Avista in Washington for 2022.

**Question #8.**

For transmission systems, were there any abnormal operating conditions (as described in 192.605 (c) or 195.402(d)) since the last annual review? If yes please describe.

**8. Result**  
Not Applicable

**8. Notes**

N/A - As noted in 49 CFR 192.605(c)(5), "The requirements of this paragraph (c) do not apply to natural gas distribution operators that are operating transmission lines in connection with their distribution system."

## O&M & EMERGENCY PROGRAMS

<b>Question #9.</b> Is the O&M Manual up to date and were changes made in the previous year?	Operator Manuals on Sharepoint	<b>9. Result</b> Satisfactory
<b>9. Notes</b> The Gas Standards Manual (GSM) and the Gas and Emergency Service Handbook (GESH) were updated in December 2022. The new revision of these documents are good until 12/31/2023 and changes are noted at the front of the documents. An electronic copy of the manuals was sent to UTC on 12/21/22.		
<b>Question #10.</b> If changes to the O&M were made, are changes acceptable?	<b>10. Result</b> Satisfactory	
<b>10. Notes</b>		
<b>Question #11.</b> Were emergency plans changed during the previous year?		
<b>11. Result</b> Satisfactory		
<b>11. Notes</b>		
<b>Question #12.</b> Were any changes to emergency plans satisfactory?		
<b>12. Result</b> Satisfactory		
<b>12. Notes</b>		

## INTEGRITY MANAGEMENT PROGRAMS

<b>Question #13</b> Were there changes to the Integrity Management programs (TIMP, DIMP or both, as applicable)?		<b>13. Result</b> Satisfactory
<b>13. Notes</b>		
<b>Question #14.</b> Is the DIMP/TIMP up to date? What are the results of the operator's program review (effectiveness evaluation) (DIMP every 5 years)?		<b>14. Result</b> Satisfactory
<b>14. Notes</b>		
<b>Question #15</b> Are IMP program changes acceptable?		<b>15. Result</b> Satisfactory
<b>15. Notes</b>		
<b>Question #16</b> Was appropriate assessment/ repair work conducted during the past year? (monitor progress of IMP activities)		<b>16. Results</b> Not Applicable
<b>16. Notes</b> N/A - No assessment or repair work was required to completed in 2022.		
<b>Question #17</b> Does the operator's HCA location data correspond to the positional data located in UTC GIS?		<b>17. Results</b> Not Applicable
<b>17. Notes</b> N/A - Avista has zero current HCAs in Washington.		
<b>Question #18</b> What assessment work is planned for the upcoming year?		<b>18. Results</b> Not Applicable
<b>18. Notes</b> N/A - Avista has no assessment work planned for the upcoming year.		
<b>Question #19</b> Within the operator's DIMP, are low pressure systems evaluated for overpressure threats?		<b>19. Results</b> Not Applicable
<b>19. Notes</b> N/A - Avista has no low-pressure systems in Washington.		
<b>Question #20</b> Did the operator develop and follow specific procedures for low pressure system construction or maintenance projects? (Note: this question is revisited in greater detail in the ADB review section)		<b>20. Results</b> Not Applicable
<b>20. Notes</b> N/A - Avista has no low-pressure systems in Washington.		
<b>Question #21</b> Are plastic pipe and components that have shown a record of defects/leaks being mitigated through the DIMP plans?		<b>21. Results</b> Satisfactory
<b>21. Notes</b> Yes, all Aldyl-A main pipe, Aldyl-A service tees, and Aldyl-A services off steel service tees subject to bending stress are monitored, and risk ranked by DIMP. Use of Continental stab couplings was stopped and is being monitored by DIMP (Asset Mangement review showed infant mortality curve on the leak trends).		
<b>Question #22</b> Has appropriate DIMP remediation work occurred during the past year? (monitor progress of DIMP activities)		<b>22. Results</b> Satisfactory
<b>22. Notes</b> Ongoing GFRP - Gas Facility REplacement Program (Aldyl-A replacement Program) and the Deteriotated Pipe Replacement Program continues. A Utility Cross Bore Post-Camera Inspection Program was started in 2019 and continues.		
<b>Question #23</b>		<b>23. Results</b>

**23. Notes**

GFRP (Aldyl-A), Deteriorated Pipe and Utility Cross Bore Post-Camera Inspection will continue in 2023.

**QQ PROGRAM**

**Question #24**

Is the OQ program up to date? Were there changes to the Operator Qualification (OQ) program in the last year? If yes, please describe.

**24. Results**

Satisfactory

**24. Notes**

**Question #25**

Are the OQ plan updates satisfactory?

**25. Results**

Satisfactory

**25. Notes**

**Question #26**

Are personnel performing covered tasks (including contractors) properly qualified and requalified at intervals determined in the operator's plan?

**26. Results**

Satisfactory

**26. Notes**

**PUBLIC AWARENESS PROGRAM**

**Question #27**

Is the PA program up to date? And were there changes to the Public Awareness (PA) program within the last year?

**27. Results**

Satisfactory

**27. Notes**

**Question #28**

Are changes to the PA program satisfactory?

**28. Results**

Satisfactory

**28. Notes**

**CONTROL ROOM PROGRAM**

**Question #29**

Is the CRM program up to date? And were there changes to the Control Room Management (CRM) program within the last year?

**29. Results**

Satisfactory

**29. Notes**

**Question #30**

Are the CRM program changes satisfactory?

**30. Results**

Satisfactory

**30. Notes**

**SAFETY MANAGEMENT SYSTEM API 1173**

**Question #31**

Is the operator developing and implementing an API 1173 Safety Management System?

**31. Results**

Satisfactory

**31. Notes**

Avista has been actively developing and implementing an API 1173 Safety Management System since 2016agement Syst

**INSPECTOR ASSESSMENT OF INSPECTION UNITS**

**Question #32**

Are inspection units broken down appropriately? Do you recommend any changes to inspection units?

**32. Results**

Satisfactory

**32. Notes**

**Q32: List of current inspection units**

Unit Name	Distribution/Transmission	Intrastate or Interstate?	GAS or LIQUID	UTC Unit ID	UTC Operator ID
<b>Avista Corporation (7 Unit records)</b>					
Avista Utilities Corp - Colville	Distribution	Intrastate	Gas	1789	112
Avista Utilities Corp - Pullman/Clarkston	Distribution	Intrastate	Gas	1788	112
Avista Utilities Corp - Spokane	Distribution	Intrastate	Gas	1914	112
Avista Utilities Corp - Ritzville	Distribution	Intrastate	Gas	1915	112
Avista Utilities Corp - Transmission	Transmission	Intrastate	Gas	1907	112
Avista Corporation- Headquarters	Distribution	Intrastate	Gas	83	112
Avista Spokane North	Distribution	Intrastate	Gas	1966	112

**OPERATOR'S PUBLIC WEB PAGE**

**Question #33**

For informational purposes: Using the drop down selections available in the "Results" block, indicate whether the operator's web page contains the information listed by placing a check in the box adjacent to all items that are present.

**33. Results**

Q33.A Pipeline Purpose and Reliability ; Q33.B Damage Prevention ; Q33.C Pipe Location Information ; Q33.D How to get additional information ; Q33.G Potential Hazards ; Q33.H Prevention Measures ; Q33.I Leak/Damage Recognition ; Q33.J ROW Encroachment ; Q33.K Pipeline Location Information ; Q33.M Emergency Preparedness

**33. Notes**

## ADVISORY BULLETIN REVIEW

### Question #34

Is there potential for damage to the operator's pipeline facilities caused by flooding, river scour, or channel migration?

ADB 2019-01

ADB 2019-01 Flood Mitigation

34. Results

YES

#### 34. Notes

Avista typically makes a formal "response to file" for PHMSA Advisory Bulletins. Avista has reviewed PHMSA's Advisory Bulletin on flooding, river scour, and river channel migration.

Avista has reviewed PHMSA's Advisory Bulletin on flooding, river scour, and river channel migration. Avista's Gas Standards take into account the threats concerned in this bulletin in its design, reporting, leak survey, and OQ qualifications (Sections 2.12, 2.13, 2.14, 2.15, 4.12, 5.11 and 4.31). Avista continues to improve our Emergency Response plan and has emergency valves in place for zoning off larger portions of the system strategically in case of natural disasters.

### Question #35

If "YES" to Q34, did the operator take appropriate action in accordance with the guidance contained ADB 2019-01? Discuss ADB's guidance with operator's representative, and annotate any concerns.

ADB 2019-01

ADB 2019-01: Flood Mitigation

35. Results

Satisfactory

#### 35. Notes

Between 2016 and 2018, Avista's DIMP program hired outside geological firms to help develop a more detailed and robust natural forces risk model that takes into account waterway crossings, river scour, fault lines, landslide, erosion, liquefaction, and others for all three states they serve.

The geological hazards survey did confirm waterway crossings of the Kettle Falls Transmission Line (NE Washington) require attention. The crossing of the Colville River at MP 47 was rebored Summer 2021 due to it being exposed. Another crossing of the Colville River on the outskirts of the city of Kettle Falls, WA has been found to have reduced cover over the pipeline as well and a remediation plan is still being developed.

### Question #36

Is there potential for the operator's system to be damaged by earth movement or other seismic/geological activities?

ADB 2019-02

ADB 2019-02: Earth Movement/Geological Hazards

36. Results

YES

#### 36. Notes

Avista has reviewed PHMSA's Advisory Bulletin on earth movement and other geologic hazards. Avista's Gas Standards take in account the threats concerned in this bulletin in its design, reporting, leak survey, and OQ qualifications (Sections 2.12, 2.13, 2.14, 2.15, 4.12, 5.11 and 4.31). Avista continues to improve our Emergency Response plan and has emergency valves in place for zoning off larger portion of the system strategically in case of natural disasters

### Question #37

If "YES" to Q36, did the operator take appropriate action according to ADB 2019-02? Discuss suggested actions from ADB with operator's representative and annotate any concerns.

ADB 2019-02

ADB 2019-02: Earth Movement/Geological Hazards

37. Results

Satisfactory

#### 37. Notes

Avista has reviewed PHMSA's Advisory Bulletin on earth movement and other geologic hazards. Avista's Gas Standards take into account the threats concerned in this bulletin in its design, reporting, leak survey, and OQ qualifications (Sections 2.12, 2.13, 2.14, 2.15, 4.12, 5.11 and 4.31). Avista continues to improve our Emergency Response plan and has emergency valves in place for zoning off larger portions of the system strategically in case of natural disasters

Between 2016 and 2018, Avista's DIMP program hired outside geological firms to help develop a more detailed and robust natural forces risk model that takes into account waterway crossings, river scour, fault lines, landslide, erosion, liquefaction, and others for all three states they serve. The geological hazards survey performed includes all of Avista's service territory, but was focused in more detail on Avista's transmission pipelines.

### Question #38

Does the operator have any indoor meter sets or regulators in their system?

ADB 2020-01

ADB 2020-01 Inside Meter Sets

38. Results

YES

#### 38. Notes

### Question #39

If operator's system has indoor meter sets/regulators, did the operator review ADB 2020-0115? Discuss ADB guidance with operator's representative and annotate any concerns. Particular attention must be given to the operator's plan to conduct leak surveys, AC inspections, and other maintenance activities in locations that are difficult to access, as well as the inclusion of inside meters/regulators within the operator's DIMP plan, as applicable.

ADB 2020-01

ADB 2020-01 Inside Meter Sets

39. Results

Satisfactory

#### 39. Notes

Avista has inside meter sets/regulators in Washington State. The vast majority are in Spokane Construction District.

Avista has reviewed PHMSA's Advisory Bulletin on requirements for inside meters and regulator. Avista currently has approximately 500 inside meter sets in their gas system. Avista also has had a budget in place for several years for meter move-outs and continues to move out the higher risk inside meter sets each year.

In response to the advisory bulletin, Avista made two updates to the Gas Standards in Specification 2.22 back in 2021. The updates to the Gas Standards included a new requirement for approval from Gas Engineering before any new meter or regulator can be installed inside a building and specifies: "Efforts should be made to move inside meter sets outside anytime work is required on the meter, regulator, or service piping. If it is proposed to leave the meter set inside, contact Gas Engineering. Gas Engineering will review the existing installation and determine if it meets current installation requirements". Also, in response, Avista has made changes to the consequence scoring of the DIMP risk model to account for additional consequence risk where inside meter sets are currently located.

### Question #40

Is the operator's record of locations for all indoor meter sets/regulators within their system complete and sufficiently detailed??

ADB 2020-01

ADB 2020-01 Inside Meter Sets

40. Results

Satisfactory

#### 40. Notes

### Question #41

Does the operator have any low pressure systems?

ADB 2020-02

41. Results



ADB 2020-02 Low Pressure Systems

NO

**41. Notes**

Avista does not have any low pressure systems.

**Question #42**

If "YES" to Q41, did the operator review ADB 2020-0025 for Overpressure Protection of Low-Pressure Natural Gas Distribution Systems? Review ADB guidance with operator and annotate any concerns.

ADB 2020-02

ADB 2020-02 Low Pressure Systems

**42. Results**

Not  
Applicable

**42. Notes**

Avista does not have any low pressure systems.

**Question #43**

For low pressure construction/maintenance projects, does the operator have a process for review of engineering plans and constructibility reviews that are carried out through all applicable departments? Do all applicable departments review project plans for accuracy, completeness and correctness? How are control procedures developed that could identify system threats that could result in a common failure mode? How is the operator mitigating risk in their low pressure system?

ADB 2020-02

ADB 2020-02 Low Pressure Systems

**43. Results**

Not  
Applicable

**43. Notes**

Avista does not have any low pressure systems.

**Question #44**

Does the operator include all low-pressure system risks in their DIMP program appropriately?

ADB 2020-02

ADB 2020-02 Low Pressure Systems

**44. Results**

Not  
Applicable

**44. Notes**

Avista does not have any low pressure systems.

 **SUMMARY OF REQUIRED COMMENTS**

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**COMMENTS: Required for any ratings other than Satisfactory. Summarize/consolidate entries from the "Notes" blocks above. Ensure you annotate the question number for each comment.**

7 - N/A - No SRC's for Avista in Washington for 2022.

8 - N/A - As noted in 49 CFR 192.605(c)(5) , "The requirements of this paragraph (c) do not apply to natural gas distribution operators that are operating transmission lines in connection with their distribution system."

16 - N/A - No assessment or repair work was required to completed in 2022.

17 - N/A - Avista has zero current HCAs in Washington.

18 - N/A - Avista has no assessment work planned for the upcoming year.

19 - N/A - Avista has no low-pressure systems in Washington.

20 - N/A - Avista has no low-pressure systems in Washington.

41 - No, Avista does not have any low pressure systems.

42 - N/A - Avista does not have any low pressure systems.

43 - N/A - Avista does not have any low pressure systems.

44 - N/A - Avista does not have any low pressure systems.