

Inspection Output (IOR)

Report Filters

Assets All, and including items not linked to any asset.

Results All

Inspection Information

Inspection Name	8734 Avista DIMP	Operator(s)	AVISTA CORP (31232)	Plan Submitted	11/22/2023
Status	LOCKED	Lead	Derek Norwood	Plan Approval	11/28/2023 by Dennis Ritter
Start Year	2023	Team Members	David Cullom, Lex Vinsel, Anthony Dorrough, Scott Anderson, Tom Green, Jason Hoxit	All Activity Start	10/31/2023
System Type	GD	Observer(s)	John Trier, Marina Rathbun	All Activity End	11/01/2023
Protocol Set ID	GD.2023.02	Supervisor	Dennis Ritter	Inspection Submitted	11/28/2023
		Director	Scott Rukke	Inspection Approval	11/29/2023 by Scott Rukke

Inspection Summary

Inspection Scope and Summary

The inspection included review of records and procedures related to Avista Distribution Integrity Management Program (DIMP). The inspection included records and procedures from 2020 through October 2023. There were no violations or areas of concern as a result of this inspection.

Facilities visited and Total AFOD

Inspection conducted remotely via MS Teams in conjunction with Oregon PUC and Idaho PUC.

1 AFOD

Summary of Significant Findings

(DO NOT Discuss Enforcement options)

There were no violations or areas of concern as a result of this inspection.

Primary Operator contacts and/or participants

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Scope (Assets)

#	Short Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1.	88960 (83)	Avista Utilities Corp - (HQ)	unit	88960	Storage Fields Bottle/Pipe - Holders Offshore GOM OCS Cast or Ductile Iron Copper Pipe Aluminum/Amphoteric	81	81	81	100.0%

1. Percent completion excludes unanswered questions planned as "always observe".

Plans

#	Plan Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent	Notes
1.	88960 (83)	--	GDIM	P, R, O, S	Detail	--

Plan Implementations

#	Activity Name	SMART Act#	Start Date End Date	Focus Directives	Involved Groups/Subgroups	Assets	Qst Type(s)	Planned	Required	Total Inspected	Required % Complete
1.	DIMP	--	10/31/2023 11/01/2023	--	all planned questions	all assets	all types	81	81	81	100.0%

1. Since questions may be implemented in multiple activities, but answered only once, questions may be represented more than once in this table.

2. Percent completion excludes unanswered questions planned as "always observe".

Forms

No.	Entity	Form Name	Status	Date Completed	Activity Name	Asset
1.	Attendance List	DIMP	COMPLETED	11/22/2023	DIMP	88960 (83)

Results (all values, 81 results)

GDIM.PM: Preventive and Mitigative Actions

- Question Result, ID, References: **Sat**, GDIM.PM.IDENTIFYMEASURES.P, 192.1007(d)

Question Text: *Does the plan include procedures to identify when measures, beyond minimum code requirements specified outside of Part 192 Subpart P, are required to reduce risk?*

Assets Covered: 88960 (83)

Result Notes: DIMP Section 8.2.1
- Question Result, ID, References: **Sat**, GDIM.PM.IDENTIFYMEASURES.R, 192.1007(d)

Question Text: *When measures, beyond minimum code requirements specified outside of Part 192 Subpart P, are required to reduce risk, does the plan identify the measures selected, how they will be implemented, and the risks they are addressing?*

Assets Covered: 88960 (83)

Result Notes: Appendix E Table 8.2-4
- Question Result, ID, References: **Sat**, GDIM.PM.LEAKMANAGEMENT.P, 192.1007(d)

Question Text: *Does the plan include an effective leak management program (unless all leaks are repaired when found)?*

Assets Covered: 88960 (83)

Result Notes: Appendix D
DIMP Section 8.1
- Question Result, ID, References: **Sat**, GDIM.PM.IMPLEMENTPM.R, 192.1007(d)

Question Text: *Do records demonstrate implementation of the measures, required by Part 192 Subpart P, to reduce risk?*

Assets Covered: 88960 (83)

Result Notes: Additional actions listed in Appendix E
Reviewed records
Repeat offender tracking/training
State enforcement process
Gas Damage Ratio Spreadsheet and Damage Prevention One Pager sent to district managers

GDIM.IM: Plan Implementation

5. Question Result, ID, References **Sat**, GDIM.QA.PLANIMPLEMENT.P, 192.1005
Question Text *Was the plan written and implemented per the requirement of 192.1005 by 08/02/2011?*
Assets Covered 88960 (83)
Result Notes Original publication was 7/28/2011
6. Question Result, ID, References **Sat**, GDIM.RA.SOURCES.P, 192.1007(a)(1)
Question Text *Do the procedures identify or reference the appropriate sources used to determine certain characteristics (e.g., Design, Operating Conditions, Operating Environmental Factors) necessary to assess the threats and risks to the pipeline?*
Assets Covered 88960 (83)
Result Notes DIMP Section 5.3
Appendix A
Appendix C

GDIM.KN: Knowledge of the System

7. Question Result, ID, References **Sat**, GDIM.RA.INFORMATION.P, 192.1007(a)(2)
Question Text *Do the procedures require the consideration of information gained from past design, operations, and maintenance (e.g., O&M activities, field surveys, One-Call system information, excavation damage, etc.)?*
Assets Covered 88960 (83)
Result Notes DIMP Section 5.2
Appendix A Table 5.2-1 through Table 5.2-16
Appendix B Table 6.1-1
Appendix F Table 9.1-1 through Table 9.5-4
8. Question Result, ID, References **Sat**, GDIM.RA.GAPS.P, 192.1007(a)(3)
Question Text *Does the plan contain procedures to identify additional information that is needed to fill gaps due to missing, inaccurate, or incomplete records?*
Assets Covered 88960 (83)
Result Notes Appendix A Table 5.4-1 and Table 5.5-1
9. Question Result, ID, References **Sat**, GDIM.RA.INFONEEDS.P, 192.1007(a)(3)
Question Text *Do the procedures specify the means to collect the additional information needed to fill gaps due to missing, inaccurate, or incomplete records (e.g., O&M activities, field surveys, One-Call System, etc.)?*
Assets Covered 88960 (83)
Result Notes DIMP Section 5.5 Data Capture for New Construction and Ongoing O&M
Appendix A Table 5.4-1 and Table 5.5-1
10. Question Result, ID, References **Sat**, GDIM.RA.INFONEEDS.R, 192.1007(a)(3)
Question Text *Does the plan list the additional information needed to fill gaps due to missing, inaccurate, or incomplete records?*
Assets Covered 88960 (83)
Result Notes Appendix A Table 5.4-1 and 5.5-1
Exposed Pipe Condition Reports
Form N-2534
GSS 3.44
11. Question Result, ID, References **Sat**, GDIM.RA.NEWPIPEDATA.P, 192.1007(a)(5)
Question Text *Do the procedures require the capture and retention of data on any new pipeline installed?*

Assets Covered 88960 (83)
Result Notes DIMP Section 5.5

12. Question Result, ID, References **Sat**, GDIM.RA.NEWPIPEDATA.R, 192.1007(a)(5)
Question Text *Does the data required for capture and retention include, at a minimum, the location where the new pipeline is installed and the material from which it is constructed?*
Assets Covered 88960 (83)
Result Notes Reviewed sample of Form N-2652

13. Question Result, ID, References **Sat**, GDIM.RA.DEMOKNOWLEDGE.R, 192.1007(a)
Question Text *Do records demonstrate implementation of the element "Knowledge of the System"?*
Assets Covered 88960 (83)
Result Notes All records appeared complete and indicated a thorough knowledge of the system

14. Question Result, ID, References **Sat**, GDIM.RA.DEMOUNDERSTANDING.R, 192.1007(a)
Question Text *Has the operator demonstrated an adequate understanding of the system?*
Assets Covered 88960 (83)
Result Notes All records appeared complete and indicated a thorough knowledge of the system

GDIM.TH: Identify Threats

15. Question Result, ID, References **Sat**, GDIM.RA.INFOCONSIDERED.P, 192.1007(b)
Question Text *Did the operator consider the information that was reasonably available to identify existing and potential threats?*
Assets Covered 88960 (83)
Result Notes DIMP Section 6.0, 6.1 and 6.2
Appendix B Table 6.1-1

16. Question Result, ID, References **Sat**, GDIM.RA.INFOCONSIDERED.R, 192.1007(b)
Question Text *In identifying threats did the information considered include all of the required data and information sources?*
Assets Covered 88960 (83)
Result Notes Appendix A and B
Table 6.1-1

17. Question Result, ID, References **Sat**, GDIM.RA.OUTSIDESOURCES.P, 192.1007(b)
Question Text *Do the procedures consider, in addition to the operator's own information, data from external sources (e.g. trade associations, government agencies, or other system operators, etc.) to assist in identifying potential threats?*
Assets Covered 88960 (83)
Result Notes DIMP Section 6.2
Appendix B Section 6.2-1
Reviewed Potential Threat Documentation Page on Avista SharePoint

18. Question Result, ID, References **Sat**, GDIM.RA.THREATCATEGORIES.P, 192.1007(b)
Question Text *In identifying threats, do the procedures include consideration of all of the required threat categories to each gas distribution pipeline?*
Assets Covered 88960 (83)
Result Notes DIMP Section 6
Appendix B Table 6.1-1

19. Question Result, ID, References **Sat**, GDIM.RA.IMPLEMENTTH.R, 192.1007(b)
Question Text *Do records demonstrate implementation of the element "Identify Threats"?*
Assets Covered 88960 (83)
Result Notes Data provided in Appendix B

GDIM.RR: Evaluate and Rank Risk

20. Question Result, ID, References **Sat**, GDIM.RA.RISKRANKING.P, 192.1007(c)
Question Text *Do the procedures contain the method(s) and/or a model used to determine the relative importance of each threat and estimate and rank the risks posed?*
Assets Covered 88960 (83)
Result Notes DIMP Section 7
Appendix C

21. Question Result, ID, References **Sat**, GDIM.RA.THREATSCONSIDERED.P, 192.1007(c)
Question Text *Do the procedures to evaluate and rank risk consider each applicable current and potential threat?*
Assets Covered 88960 (83)
Result Notes DIMP Section 7
Appendix C

22. Question Result, ID, References **Sat**, GDIM.RA.LIKELIHOOD.P, 192.1007(c)
Question Text *Do the procedures to evaluate and rank risk consider the likelihood of failure associated with each threat?*
Assets Covered 88960 (83)
Result Notes Appendix C

23. Question Result, ID, References **Sat**, GDIM.RA.CONSEQUENCE.P, 192.1007(c)
Question Text *Do the procedures to evaluate and rank risk consider the potential consequence of failure for all applicable threats?*
Assets Covered 88960 (83)
Result Notes Appendix C

24. Question Result, ID, References **Sat**, GDIM.RA.SUBDIVIDE.R, 192.1007(c)
Question Text *If subdivision of system occurs, does the plan subdivide the system into regions with similar characteristics and for which similar actions are likely to be effective in reducing risk?*
Assets Covered 88960 (83)
Result Notes Subdivided at the state level
Data shown in Appendix B

25. Question Result, ID, References **Sat**, GDIM.RA.RESULTS.R, 192.1007(c)
Question Text *Are the results of the risk ranking supported by the risk evaluation model/method?*
Assets Covered 88960 (83)
Result Notes DIMP Section 7.4 shows results of risk ranking with highest risks identified

26. Question Result, ID, References **Sat**, GDIM.RA.RESULTSVALIDATION.R, 192.1007(c)
Question Text *Did the operator validate the results generated by the risk evaluation model/method?*
Assets Covered 88960 (83)

Result Notes DIMP Section 7.5

27. Question Result, ID, References **Sat**, GDIM.RA.IMPLEMENTRR.R, 192.1007(c)
Question Text *Do records demonstrate implementation of the element "Evaluate and Rank Risk"?*
Assets Covered 88960 (83)
Result Notes Appendix B Table 7.4-3 through 7.4-5
DIMP Section 7.4
Table 7.4-1 and 7.4-2

GDIM.EV: Measure Performance and Evaluate Effectiveness

28. Question Result, ID, References **Sat**, GDIM.QA.PERFMEASUREBASELINE.P, 192.1007(e)
Question Text *Does the plan contain procedures for how the operator established a baseline for each performance measure?*
Assets Covered 88960 (83)
Result Notes DIMP Section 9.1
29. Question Result, ID, References **Sat**, GDIM.QA.PERFMEASUREBASELINE.R, 192.1007(e)
Question Text *Does the plan establish a baseline for each performance measure?*
Assets Covered 88960 (83)
Result Notes Appendix F
Table 9.1-1, 9.2-1, 9.3-1, 9.4-1 through 9.4-7
30. Question Result, ID, References **Sat**, GDIM.QA.PERFMEASUREDATA.P, 192.1007(e)
Question Text *Does the operator have procedures to collect the data for each performance measure?*
Assets Covered 88960 (83)
Result Notes DIMP Section 9.7
31. Question Result, ID, References **Sat**, GDIM.QA.PERFMEASUREMONITOR.P, 192.1007(e)
Question Text *Do the procedures require the operator to monitor each performance measure?*
Assets Covered 88960 (83)
Result Notes DIMP Section 9.0
Appendix F
32. Question Result, ID, References **Sat**, GDIM.QA.MEASUREEFFECTIVENESS.P, 192.1007(e)
Question Text *When measures are required to reduce risk, does the plan provide/describe what type and/or what specific performance measures will be used to measure effectiveness?*
Assets Covered 88960 (83)
Result Notes DIMP Section 10.2
33. Question Result, ID, References **Sat**, GDIM.QA.IMPLEMENTEV.R, 192.1007(e)
Question Text *Do records demonstrate implementation of the element "Measure Performance, Monitor Results, and Evaluate Effectiveness"?*
Assets Covered 88960 (83)
Result Notes Additional/Accelerated actions are listed in Appendix F and G
Each item has indicator stating if the performance measure is increasing or decreasing
Current data is compare to the baseline and a 5 year average

GDIM.PE: Periodic Evaluation

34. Question Result, ID, References **Sat**, GDIM.CA.PERIODICEVAL.P, 192.1007(f)
Question Text *Do the procedures for periodic evaluation include all of the requirements of §192.1007(f)?*
Assets Covered 88960 (83)
Result Notes DIMP Section 7.6
DIMP Section 10
Appendix G Table 10.1-1
35. Question Result, ID, References **Sat**, GDIM.CA.PERIODICEVAL.R, 192.1007(f)
Question Text *Do records demonstrate implementation of the element "Periodic Evaluation and Improvement"?*
Assets Covered 88960 (83)
Result Notes Reviewed all data presented in Appendix G Table 10.1-1
Revision Log identifies areas that have been improved

GDIM.RP: Reporting

36. Question Result, ID, References **Sat**, GDIM.RR.ANNUALREPORT.P, 192.1007(g)
Question Text *Does the plan contain or reference procedures for reporting, on an annual basis, the four measures listed in 192.1007(e)(1)(i) through (e)(1)(iv) to PHMSA as part of the annual report required by 191.11 and the State regulatory authority?*
Assets Covered 88960 (83)
Result Notes DIMP Section 11.1
37. Question Result, ID, References **Sat**, GDIM.RR.SUBMITREPORTS.R, 192.1007(g)
Question Text *Has the operator submitted the required reports?*
Assets Covered 88960 (83)
Result Notes Annual Reports submitted by March 15
Reviewed records for 2020-2022

GDIM.RC: Records Required to be Kept

38. Question Result, ID, References **Sat**, GDIM.QA.RECORDREQUIREMENTS.P, 192.1011
Question Text *Are there procedures specifying which records demonstrating compliance with Subpart P will be maintained for at least 10 years?*
Assets Covered 88960 (83)
Result Notes DIMP Section 12
39. Question Result, ID, References **Sat**, GDIM.QA.PLANRETENTION.P, 192.1011
Question Text *Are there procedures specifying that copies of superseded integrity management plans will be maintained for at least 10 years?*
Assets Covered 88960 (83)
Result Notes DIMP Section 12
40. Question Result, ID, References **Sat**, GDIM.QA.RECORDREQUIREMENTS.R, 192.1011
Question Text *Has the operator maintained the required records?*
Assets Covered 88960 (83)
Result Notes Reviewed leak records and valve maintenance from 2014
Reviewed valve maintenance record form 2013

GDIM.IMPL: GDIM Implementation

41. Question Result, ID, References **Sat**, GDIM.QA.ISSUESIMPL.R, 192.1005
Question Text *Have all issues raised in previous DIMP inspections been satisfactorily addressed?*
Assets Covered 88960 (83)
Result Notes Developed 811 risk tool and additional data gathering for damage prevention statistics
No findings from state or PHMSA inspections
42. Question Result, ID, References **Sat**, GDIM.RA.OUTSIDESOURCESIMPL.R, 192.1007(b)
Question Text *Has the operator identified information or data from external sources (e.g. trade associations, operator's consultants, government agencies, other operators, manufacturers, etc.) that may require re-evaluation of threats and risks?*
Assets Covered 88960 (83)
Result Notes Outside sources listed in DIMP Section 6.2
Appendix B Section 6.2-1
43. Question Result, ID, References **Sat**, GDIM.RA.GAPSIMPL.R, 192.1007(a)(3)
Question Text *Is missing or incomplete system information and data needed to fill knowledge gaps to assess existing and potential threats being collected?*
Assets Covered 88960 (83)
Result Notes DIMP Section 5.4 and 5.5
Additional information needed is identified in Appendix A
44. Question Result, ID, References **Sat**, GDIM.RA.SYSINFONEEDSIMPL.R, 192.1007(a)(3)
Question Text *Is missing or incomplete system information and data using the procedures prescribed in the DIMP plan being collected?*
Assets Covered 88960 (83)
Result Notes Appendix A Table 5.4-1 and Table 5.5-1
Collected during normal maintenance activities
45. Question Result, ID, References **Sat**, GDIM.RA.OMINFONEEDSIMPL.R, 192.1007(a)(3)
Question Text *Has any new or missing information identified or acquired during normal operations, maintenance, and inspection activities been incorporated into the DIMP plan?*
Assets Covered 88960 (83)
Result Notes Reviewed exposed pipe condition reports
Appendix A Table 5.4-1 and Table 5.5-1
Reviewed Unknown Pipe Spreadsheet
3 segments in WA, ~22 feet
46. Question Result, ID, References **Sat**, GDIM.RA.NEWPIPEIMPL.R, 192.1007(a)(5)
Question Text *Have required data on any new pipeline installations since August 2, 2011 been captured (e.g., location, wall thickness/SDR, manufacturer, lot/production number)?*
Assets Covered 88960 (83)
Result Notes Reviewed data in AFM, all pipe data available
DIMP Section 5.5. describes process
47. Question Result, ID, References **Sat**, GDIM.RA.DATAFORMIMPL.R, 192.1007(a)
Question Text *Are data collection forms used in conjunction with the operator's DIMP plan being fully and accurately completed?*
Assets Covered 88960 (83)

- Result Notes All forms reviewed appeared complete and accurate
48. Question Result, ID, References **Sat**, GDIM.RA.SMEIMPL.R, 192.1007(a)
- Question Text *If Subject Matter Experts (SMEs), is their documented knowledge and experience being appropriately used in the DIMP Program?*
- Assets Covered 88960 (83)
- Result Notes Appendix B
List of Internal and External Subject Matter Experts
49. Question Result, ID, References NA, GDIM.RA.DEMOUNDERSTANDINGIMPL.O, 192.1007(a)
- Question Text *Do operator personnel in the field understand their responsibilities under the DIMP plan?*
- Assets Covered 88960 (83)
- Result Notes No such activity/condition was observed during the inspection.
50. Question Result, ID, References **Sat**, GDIM.RA.THREATCATEGORIESIMPL.R, 192.1007(b)
- Question Text *Has the operator acquired any new information relevant to system knowledge that may affect its threat identification?*
- Assets Covered 88960 (83)
- Result Notes DIMP Section 6.2
Reviewed Appendix B data from Avista Sharepoint
51. Question Result, ID, References **Sat**, GDIM.RA.INFOCONSIDEREDIMPL.R, 192.1007(b)
- Question Text *Have any changes occurred that require re-evaluation of threats and risks?*
- Assets Covered 88960 (83)
- Result Notes Data shown in Appendix E and F
52. Question Result, ID, References **Sat**, GDIM.RA.IMPLEMENTHUPDATEIMPL.R, 192.1007(c)
- Question Text *Since the last DIMP plan review by the regulatory agency, has the threat identification and risk assessment been updated based on newly acquired information or data relevant to system knowledge?*
- Assets Covered 88960 (83)
- Result Notes Added weighting factor to hazardous leaks which put more emphasis on damage prevention
53. Question Result, ID, References **Sat**, GDIM.RA.IMPLEMENTHUPDATEPLANIMPL.R, 192.1007(c)
- Question Text *If the threat identification and risk evaluation and ranking have been modified, were the revisions made in accordance with the procedure in the DIMP plan?*
- Assets Covered 88960 (83)
- Result Notes Added weighting factor to hazardous leaks which put more emphasis on damage prevention
54. Question Result, ID, References **Sat**, GDIM.RA.SUBDIVIDEADEQIMPL.R, 192.1007(c)
- Question Text *Does the current subdivision process (grouping of materials, geographic areas, etc.) adequately meet the need to properly evaluate and rank the existing and potential threats to the integrity of the system?*
- Assets Covered 88960 (83)
- Result Notes Reviewed risk model results in AFM
System subdivided by state based on available state data
55. Question Result, ID, References NA, GDIM.RA.SUBDIVIDEUPDATEIMPL.R, 192.1007(c)

	Question Text	<i>Have the system subdivisions within the risk evaluation and ranking been added to or modified since the last plan review by the regulatory agency?</i>
	Assets Covered	88960 (83)
	Result Notes	The model has been re-run based on new data but the methods have not changed
56.	Question Result, ID, References	NA, GDIM.RA.SUBDIVIDEDIMPIMPL.R, 192.1007(c)
	Question Text	<i>If system subdivisions have been added or modified, was it done in accordance with the procedures described in the DIMP plan?</i>
	Assets Covered	88960 (83)
	Result Notes	The model has been re-run based on new data but the methods have not changed
57.	Question Result, ID, References	NA, GDIM.RA.SUBDIVIDERESULTIMPL.R, 192.1007(c)
	Question Text	<i>If system subdivisions have been added or modified, did the new system subdivision result in modifications to the risk evaluation and ranking?</i>
	Assets Covered	88960 (83)
	Result Notes	The model has been re-run based on new data but the methods have not changed
58.	Question Result, ID, References	Sat , GDIM.PM.IMPLEMENTPMIMPL.R, 192.1007(d)
	Question Text	<i>Does documentation reviewed demonstrate that measures to reduce risks per the DIMP plan are being implemented?</i>
	Assets Covered	88960 (83)
	Result Notes	Avista reviews the data yearly to determine if performance measures are increasing or decreasing. This data is presented in Appendix E and G
59.	Question Result, ID, References	NA, GDIM.PM.IMPLEMENTPMCOMPLETEIMPL.R, 192.1007(d)
	Question Text	<i>Have any measures to reduce risks resulting in the elimination/mitigation of the associated identified threat been completed (e.g., pipe replacement program completed, etc.)?</i>
	Assets Covered	88960 (83)
	Result Notes	No pipe replacement programs have been completed to date
60.	Question Result, ID, References	NA, GDIM.PM.IMPLEMENTPMREEVALIMPL.R, 192.1007(d)
	Question Text	<i>Have risks been re-evaluated and re-ranked because of the elimination/mitigation of an identified threat?</i>
	Assets Covered	88960 (83)
	Result Notes	No identified threats have been eliminated
61.	Question Result, ID, References	Sat , GDIM.PM.IMPLEMENTPMSPECIFRISKIMPL.R, 192.1007(d)
	Question Text	<i>Does each implemented risk reduction measure identified in the DIMP plan address a specific risk or group of risks?</i>
	Assets Covered	88960 (83)
	Result Notes	Implemented risk reduction measures are listed in Appendix E and are associated with a specific threat
62.	Question Result, ID, References	NA, GDIM.PM.LEAKMANAGEMENTIMPL.R, 192.1007(d)
	Question Text	<i>Can the operator provide documentation to demonstrate that an effective leak management program is being implemented (answer "N/A" if all leaks are repaired when found)?</i>
	Assets Covered	88960 (83)
	Result Notes	Avista does not have a leak management program, leaks are repaired ASAP

63. Question Result, ID, References **Sat**, GDIM.QA.IMPLEMENTEVDATAIMPL.R, 192.1007(e)
 Question Text *Is data being collected for the required performance measures in 192.1007(e)?*
 Assets Covered 88960 (83)
 Result Notes Data is summarized in Appendix F
64. Question Result, ID, References **Sat**, GDIM.QA.IMPLEMENTEVDATADIMPIMPL.R, 192.1007(e)
 Question Text *Based on field observations and/or record reviews, is the data used to measure performance being accurately collected in accordance with the procedures in its DIMP plan?*
 Assets Covered 88960 (83)
 Result Notes Reviewed leak reports during the inspection
65. Question Result, ID, References **Sat**, GDIM.QA.IMPLEMENTEVBASLINEIMPL.R, 192.1007(e)
 Question Text *Is each performance measure being monitored from an established baseline?*
 Assets Covered 88960 (83)
 Result Notes Baseline data summarized in Appendix F
66. Question Result, ID, References **Sat**, GDIM.QA.IMPLEMENTEVRISKIMPL.R, 192.1007(e)
 Question Text *Is each performance measure added since the DIMP plan was last updated tied to a specific risk reduction measure or group of measures?*
 Assets Covered 88960 (83)
 Result Notes Performance measures are listed in Appendix F and are associated with a risk reduction measure
67. Question Result, ID, References **Sat**, GDIM.CA.PERIODICEVALFREQIMPL.R, 192.1007(f)
 Question Text *Have periodic evaluations of the DIMP plan been performed on the frequency specified in the plan? [If a periodic evaluation has not been required since plan implementation or the last inspection, mark questions 27-32 as "N/A".]*
 Assets Covered 88960 (83)
 Result Notes DIMP Section 10.2.3 Periodically NTE 5 years
 Completed annually
 See Rev Log in DIMP Plan
68. Question Result, ID, References **Sat**, GDIM.CA.PERIODICEVALREQTSIMPL.R, 192.1007(f)
 Question Text *Did the periodic evaluation include all required elements?*
 Assets Covered 88960 (83)
 Result Notes DIMP Section 10.2.3 Periodically NTE 5 years
 Completed annually
 See Rev Log in DIMP Plan
 Baseline analysis, accelerated actions, threats and risk ID
69. Question Result, ID, References **Sat**, GDIM.CA.PERIODICEVALHIRISKIMPL.R, 192.1007(f) (192.1007(e))
 Question Text *If any established performance measures indicated an increase in risk beyond an acceptable level (as established in the DIMP plan), were new risk reduction measures implemented along with their associated performance measures?*
 Assets Covered 88960 (83)
 Result Notes No major increases in risk so no new accelerated actions have been implemented
70. Question Result, ID, References **Sat**, GDIM.CA.PERIODICEVALRISKREDIMPL.R, 192.1007(f)

- Question Text *If the periodic evaluation indicates that implemented measures to reduce risks are NOT effective, were risk reduction measures modified, deleted or added?*
- Assets Covered 88960 (83)
- Result Notes Breakaway fittings on MSAs were deemed not effective and Avista is completing analysis to determine if they can be used in their system
71. Question Result, ID, References **Sat**, GDIM.CA.PERIODICEVALPRFMESIMPL.R, 192.1007(f)
- Question Text *Did the periodic evaluation indicate that the selected performance measures are assessing the effectiveness of risk reduction measures, and, if not, were performance measures modified, deleted or added?*
- Assets Covered 88960 (83)
- Result Notes Data presented in Appendix F and G
72. Question Result, ID, References **Sat**, GDIM.CA.PERIODICEVALDIMPIMPL.R, 192.1007(f)
- Question Text *Were procedures followed in conducting periodic evaluations and program improvements?*
- Assets Covered 88960 (83)
- Result Notes DIMP Section 10.2.3 Periodically NTE 5 years
Completed annually
See Rev Log in DIMP Plan
Baseline analysis, accelerated actions, threats and risk ID
73. Question Result, ID, References **Sat**, GDIM.RR.SUBMITREPORTSIMPL.R, 192.1007(g)
- Question Text *Were Parts C and D of the PHMSA Distribution Annual Report (Form 7100.1-1) completed in the submission to PHMSA and the state regulatory authority having jurisdiction, if required, for each year since the last inspection?*
- Assets Covered 88960 (83)
- Result Notes Annual reports were complete and accurate
Reviewed records for 2020-2022
74. Question Result, ID, References **Sat**, GDIM.QA.RECORDREQUIREMENTSIMPL.R, 192.1011
- Question Text *Are records retained demonstrating compliance with Subpart P, as specified in its DIMP plan, for 10 years (or since 08/02/2011)?*
- Assets Covered 88960 (83)
- Result Notes Reviewed leak records and valve maintenance from 2014
Reviewed valve maintenance record form 2013
Reviewed prior version of the DIMP plan from program inception
75. Question Result, ID, References **Sat**, GDIM.QA.RECORDREQTSRETAINIMPL.R, 192.1011
- Question Text *Were copies of superseded DIMP plans retained for 10 years (or since 08/02/2011)?*
- Assets Covered 88960 (83)
- Result Notes Superseded manuals were maintained, reviewed manuals from 2013 and 2015
76. Question Result, ID, References **Sat**, GDIM.QA.RECORDREQTSDIMPIMPL.R, 192.1011
- Question Text *Were DIMP procedures followed as applicable to records retention?*
- Assets Covered 88960 (83)
- Result Notes Reviewed a sample of leak records for 2014 and 2017
Reviewed a sample of valve maintenance from 2013
77. Question Result, ID, References NA, GDIM.PI.PERIODICINSPDEVAPPRVIMPL.R, 192.1013(c)

- Question Text *Has approval been requested or received from PHMSA or the appropriate State Regulatory Authority for alternate (less strict than code) periodic inspection intervals? [If no, mark Subgroup GDIM.IMPL questions 40-44 "N/A".]*
- Assets Covered 88960 (83)
- Result Notes Avista has not requested alternate inspection intervals
78. Question Result, ID, References NA, GDIM.PI.PERIODICINSPDEVPERFRMIMPL.R, 192.1013(c)
- Question Text *Have the periodic inspections been implemented and have they been conducted at the specified (approved) alternate intervals?*
- Assets Covered 88960 (83)
- Result Notes Avista has not requested alternate inspection intervals
79. Question Result, ID, References NA, GDIM.PI.PERIODICINSPDEVREQTIMPL.R, 192.1013(c)
- Question Text *Have all conditions been complied with that were required as part of the alternate inspection interval approval?*
- Assets Covered 88960 (83)
- Result Notes Avista has not requested alternate inspection intervals
80. Question Result, ID, References NA, GDIM.PI.PERIODICINSPDEVPRFMESIMPL.R, 192.1013(c)
- Question Text *Do performance measure records indicate that deviation inspection resources were assigned to higher risk threat(s) and/or that that decreased inspection intervals contributed to an equal or greater overall level of safety has been achieved since the alternate inspection frequency was implemented?*
- Assets Covered 88960 (83)
- Result Notes Avista has not requested alternate inspection intervals
81. Question Result, ID, References NA, GDIM.PI.PERIODICINSPDEVACTIONIMPL.R, 192.1013(c)
- Question Text *If that an equal or greater overall level of safety has not been achieved, has corrective action been taken?*
- Assets Covered 88960 (83)
- Result Notes Avista has not requested alternate inspection intervals