



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

Submitted to Joe Leckie via electronic mail at [joe.leckie@puc.idaho.gov](mailto:joe.leckie@puc.idaho.gov)

December 14, 2018

Mr. Joe Leckie  
Executive Director/Program Manager  
Idaho Public Utilities Commission  
PO Box 83720  
Boise, ID 83720-0074

Re: Response to IPUC letter dated December 6, 2018

Dear Mr. Leckie:

In your letter of December 6, 2018, you documented one area of concern discovered during the IPUC Pipeline Safety Records Audit on March 6 and March 7, 2018. Please find herein a restatement of the area of concern / findings and Avista's response.

**Area of Concern:**

- 1. 49 CFR 192.747(a) – Valve Maintenance Distribution Systems**  
*Each valve, the use of which may be necessary for the safe operation of a distribution system, must be checked and serviced at intervals not exceeding 15 months, but at least once each calendar year.*

**Findings:**

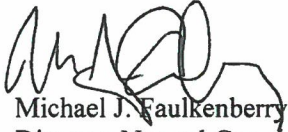
Upon review of the records, it was noted that valve LEC 709 was out of compliance regarding the required time intervals. The valve in question was installed on Jan 8, 2016 and was inspected on Apr 26, 2017. The inspection was approximately two weeks past due.

**Avista Response to the above NOPVs:**

Avista concurs that the company did not maintain valve LEC 709 in accordance with 49 CFR 192.747(a). As a result of this valve maintenance gap, a process change was instituted. When a new valve is installed, it will be scheduled for maintenance before the end of the calendar year by the applicable Gas Compliance Technician if the valve was not documented to have received maintenance during installation. In addition to this aforementioned verification, the required ongoing annual maintenance is scheduled in Maximo (Avista's Compliance Maintenance System) as you are likely aware.

We now also have a process whereby when a compliance due date is within two weeks of passing, Compliance Technicians receive a notification within the Maximo System. Gas Operations managers are alerted at this time of the pending risk to compliance and the need to expeditiously ensure maintenance is completed.

Respectfully Submitted,



Michael J. Faulkenberry  
Director, Natural Gas  
MJF/rkb

Enclosure

Cc: Paul Good, Compliance Manager  
Steve Aubuchon, Lewiston/Clarkston Operations Manager  
IPUC Correspondence File



**AVISTA**