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Dominion Energy®

3/1/2019

Mr. Joe Leckie
Executive Director
Idaho Public Utility Commission
PO Box 83720
Boise, Idaho 83720

Dear Mr. Leckie,

Dominion Energy Idaho (DEI) has received your letter dated November 16, 2018 and appreciates the opportunity to respond. DEI acknowledges its delayed response to the letter due to internal issues receiving the paper copy of the letter. DEI Compliance thanks the Idaho PSC for forwarding the letter through e-mail. The following probable violations were described in your letter:

> *Item 1: 49 CFR 192.739(a) and 192.740(b)- "During the inspection it was noted that 1 regulator (FC0001) failed to lock-up when tested and 6 other reg stations (FR0001, FC0001, FC0003, FC0004, FC0005, and FC0006) being inspected were not plumbed for lock-up. Measurement and Control Technicians were unable to demonstrate that the regulators were functioning properly and were able to lock-up when the necessity arrives."*
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> *Item 2: 49 CFR 192.479(a)(b)- "During the inspection it was noted that 3 regulating stations (FC0001, FC0004, and FC0005) had some coating issues/corrosion concerns."*

During the inspection and testing of FC0001, the monitor regulator did not perform a complete lock-up. There was some pressure bypassing due to a defective regulator boot. Our technician was able to replace the boot during the inspection and demonstrate that the station was operating properly prior to leaving the site. The worker regulator and the relief device functioned properly during the test.

49 CFR 192.739 outlines inspection and testing requirements for pressure limiting and regulating stations. Under 192.739(a)(3) the code states "...except as provided in paragraph (b) of this section, set to control or relieve at the correct pressure consistent with the pressure limits of 192.201(a)". DEI Standard Practice 5-55-02, Pressure Limiting and Regulating Station Inspection and Testing, documents two acceptable methods for inspection of regulators: (1) disassembly and inspection of regulators or (2) performing a lock-up test. During the annual inspection, DEI Technicians will either dis-assemble and inspect a regulator and/or perform a lock-up test. If only dis-assembly is performed, the regulator(s) are thoroughly inspected for any debris or other material that may prematurely fail or cause the regulator to operate irregularly. Once placed back into service after disassembly or a lock-up test, the regulator is carefully adjusted, while monitoring downstream pressure, to ensure it is regulating at the correct pressure – consistent with the requirements of 192.739(a)(3). In addition to the pressure regulator, Company standard configurations will have either a secondary regulator or a full-size relief valve for over-pressure protection in the event a primary regulator does not lock-up.

There are station designs in the Company system where lock-up tests are not achievable due to piping configuration and the necessity to maintain supply to downstream customers. These stations are periodically reviewed and assessed for replacement. The current Company station standards (revised September of 2017), have additional pressure taps and configurations that make it possible to perform lock-up tests on all standard station assemblies.

In response to Item 2, Company's Standard Practice 5-55-02, Pressure Limiting and Regulating Station Inspection and Testing, documents the processes used by Measurement and Control Technicians to complete the inspections. Inspection for signs of atmospheric corrosion is part of the annual inspection of the FC0001, FC0004, and FC0005 regulating stations (Section 6.19 and 6.20 of SP 5-55-02). Additionally, if atmospheric corrosion was encountered, Technicians would complete a Corrosion Detection Report and denote the issue on the annual inspection form. Annual Inspection Reports from 2017 and 2018 do not denote atmospheric corrosion as an issue. However, DEI acknowledges there may be signs of light surface oxide at the above mentioned regulating stations. Company will ensure that the regulating stations are cleaned and painted during the 2019 annual inspection to protect against atmospheric corrosion. Any signs of existing corrosion will be documented in accordance with our Standard Practice.

Respectfully,

Colleen Larkin Bell
VP and General Manager, Western Gas Distribution
Dominion Energy Idaho

cc:
Matt Bartol
Reid Hess
Chris Noble
Lauren Skufca
Darrin Ulmer