



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

Submitted to Darrin Ulmer via electronic mail at Darrin.Ulmer@puc.idaho.gov

April 26, 2019

Mr. Darrin Ulmer
Program Manager
Idaho Public Utilities Commission
PO Box 83720
Boise, ID 83720-0074

Re: Response to IPUC letter dated April 3, 2019

Dear Mr. Ulmer:

In your letter of April 3, 2019, you documented two areas of concern discovered during the IPUC Pipeline Safety Records Audit on February 26 – 28, 2019. Please find herein an overview of the areas of concern / findings and Avista's responses.

Area of Concern #1:

Avista could not demonstrate compliance with 49 CFR §192.615(c) Emergency Plans, 49 CFR 192.605(a) Procedural manual for operations, maintenance and emergencies and Avista Gas Emergency and Service Handbook section 13 Emergency Planning. At our request the Public Safety Specialist provided documentation of all events that took place in 2018. IPUC noted inconsistencies in the required training/mock drills, documentation, personnel/entities attendance and after action plans across all construction areas including those required items underlined below.

Summarization / Description of Findings for Area of Concern #1:

1. Avista did not meet the requirements of §192.615(c) which says: "Each operator shall establish and maintain liaison with appropriate fire, police and other public officials to: (1) Learn the responsibility and resources of each government organization that may respond to a gas pipeline emergency; (2) Acquaint the officials with the operator's ability in responding to a gas pipeline emergency; (3) Identify the types of gas pipeline emergencies of which the operator notifies the officials; and (4) Plan how the operator and officials can engage in mutual assistance to minimize hazards to life and property."
2. Avista did not meet the requirements of §192.605(a) which says: "Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response." Avista did not follow its procedures found in Gas Emergency and Service Handbook, Section 13, Emergency Planning, specifically the sections named "Communication with Public Officials" and "Mock Emergency Drills".

Avista Response to Area of Concern #1:

1. Avista concurs that the company did not meet the requirements of §192.615(c) and specifically the company could not show each Idaho construction office had maintained the appropriate liaisons and documented the meetings. Moving forward, Avista will require each construction manager to complete a Capabilities Survey annually with their applicable first responders. Additionally, each manager will be required to keep their documentation of all Public Safety Liaison Meetings (ex: PUBLIC SAFETY FORM 2019.xlsm) up to date and accurate to include attendee lists and training covered as applicable.
2. Avista concurs that the company did not meet the requirements of §192.605(a) when company managers did not follow written procedures found in Gas Emergency and Service Handbook, Section 13, "Communication with Public Officials". This portion of the company's standards will be followed as described in #1 above.

Avista does not concur that the company did not meet the requirements of §192.605(a) when company managers supposedly did not follow written procedures found in Gas Emergency and Service Handbook, Section 13, "Mock Emergencies". Avista managers in all five construction offices did actually perform / participate in mock drills in 2018. Avista may not have shown documentation of the drills during the audit or in follow-up correspondence but has attached documentation herein of the mock drill completions for 2018.

Area of Concern #2:

It is the recommendation of the IPUC that the wording contained in Avista Operations Damage Prevention Program Spec. 4.13 Pg. 6 Paragraph 8 be changed (See Below)

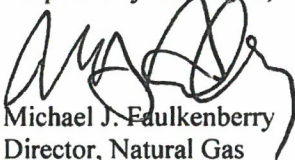
Summarization / Description of Findings for Area of Concern #2:

The IPUC recommends that Spec. 4.13 be changed to read: When a contract locator notifies Avista's local office of an un-locatable facility, they ~~shall~~ ~~should~~ take additional actions to identify the location of the facilities within the prescribed timeline of the locate ticket unless documented arrangements with the excavator have been made. Additional actions may include but are not limited to:

Avista Response to Area of Concern #2:

Avista will make the recommended change to the 2020 edition of the Gas Standards Manual.

Respectfully Submitted,



Michael J. Faulkenberry
Director, Natural Gas
MJF/rkb

Enclosure

Cc: Paul Good, Compliance Manager
IPUC Correspondence File



TTX Sign In Sheet

TTX Name: Ross Ranch Pipeline Rupture		Date: April 19, 2018	
Location: CDA Service Center		Facilitator: Steve Schacher	
Name	Department	Position	Phone Number/EXT
Kevin Bridge	CDA	GAS Foreman	208-929-1130
Dylon Beckstedahl	CDA	Gas Journeyman	208-620-7876
Monte Slinkard	CDA	Gas Foreman	208-929-1150
Garrett Gbeller	Spokane/dollar rd.	APP. Gas Maint ^{step 1} fitter	509-660-0064
Doug Basenberg	CDA	App Gas Man-Fitter	208-659-2095
Taylor Sudbrink	CDA	CREWman	217-502-2100
JEROME MOSS	CDA GAS	APP MAINFITTER	208-819-4286
CJ Leonard	CDA	Mainfitter	509 795 4092
Paul Good	CDA	Ops Mgr.	208-929-1132
Les Huber	CDA	Gas Foreman	208-929-1149
David McGregor	Kellogg	loc REP	208-660-0239
Ed Berg	CDA	Mainfitter	509-290-8148
JD Scribner	CDA	Mainfitter	208-449-6831
RYAN SAGER	CDA	MAINFITTER	208-889-7596
NATE CONLEY	CDA	GAS CREWMAN	208-818-1051
Dawn Donahoo	CDA Public Safety	" "	509 495 2646
Jordan Bedwell	CDA	Gas Crewman	208-582-2930
Riggy Blowers	Spokane - Gas Control	Mgr. Gas Control	509 495 4789
Tim Harding	Gas Eng	Engineer	509-495-2784
Jodie Lamb	Gas Corp	Mgr. PL Safety Plan	509-495-2660
Curtiss Moses	rd gas	Appr Gas Svrsm	206-914-4035
CHRIS SANDS	Kellogg / ST. MARKS	MANAGER	208-582-0767
Steve Finney	CDA	Gas Pressure Controlman	208-699-5134
Jesse Butler	Sandpoint	Manager	208-290-8222
JOYCE CAROWELL	CDA	SERVICEMAN	509-995-7809
DAN HOLDEN	CDA	GAS SERVICEMAN	208-446-6258
Russ Shaw	CDA / ?	GAS SERVICEMAN?	208-929-1126
Jason Stevens	CDA	GAS SERVICEMAN	(509) 7M. 4399
Michelle Hoskott	JSTC	Craft Training	X7920

Additional spaces on back

Pullman Mock Emergency

Sign-in Sheet

December 27, 2018

PRINTED NAME	WORK LOCATION	EMP #	SIGNATURE
PAUL GOOD	SPO	2065	<i>Paul D Good</i>
Donna Konec	PULL	3695	<i>Donna Konec</i>
Russ Hoisington	Pullman	01054	<i>Russ Hoisington</i>
Allison Blalock	Pullman/Klg	07095	<i>A Blalock</i>
Jim Woods	Pullman	03184	<i>J. Woods</i>
Jake Morris	Pullman	05766	<i>J. Morris</i>
Dallas Willey	Pullman	04154	<i>Dallas Willey</i>
Bryon Umphenour	Pullman	04955	<i>Bryon Umphenour</i>
Jake Nielsen	Pullman	04814	<i>Jake Nielsen</i>
Mark Wytcherley	Pullman	00212	<i>Mark Wytcherley</i>
Jason S Johnson	Pullman	05285	<i>Jason S Johnson</i>
JAMES MODER	PULLMAN	04647	<i>J. Moder</i>

