



Idaho Public Utilities Commission

PO Box 83720, Boise, ID 83720-0074

Brad Little, Governor

Paul Kjellander, Commissioner
Kristine Raper, Commissioner
Eric Anderson, Commissioner

April 3, 2019

Report # A201901

LETTER OF CONCERN

Mike Faulkenberry
Avista Corporation
1411 Mission Ave, MSC-6
P.O. Box 3727
Spokane, WA. 99220-3727

Dear Mr. Faulkenberry:

On February 26-28, 2019 representatives of the Idaho Public Utility Commission, Pipeline Safety Division, conducted a records compliance inspection of Avista's pipeline safety records for the Idaho natural gas distribution system.

As a result of the inspection, it appears there are areas of concern that do not fully meet the intent of the pipeline safety regulations Title 49, Code of Federal Regulations, Part 192 for calendar year 2018.

The items listed below are 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

§ 192.615(c) Each operator shall establish and maintain liaison with appropriated fire, police and other public officials: (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 or property.

§ 192.605(a) 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 Utilities 2018 Gas Emergency and Service Handbook

Emergency Planning 13.0 Emergency Planning, Training, and Incident Notification.

Communication with Public Officials:

Effective control of emergency situations is performed through partnering with appropriate fire, police, and other public officials.

A liaison program with fire and police shall be documented and maintained by each local construction office that addresses how these agencies and Avista respond and take action to protect life first and then property. This is often accomplished by offering training classes and other materials to the various fire and police departments within each construction area.

In addition, each construction area is responsible to 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 Avista's ability in responding to a gas pipeline emergency.*
- 3. Identify the types of gas pipeline emergencies of which Avista notifies the officials.*
- 4. Plan how Avista and the officials can engage in mutual assistance to minimize hazards to life or property.*

Mock Emergency Drills:

In addition to employee training, the Emergency Operations Plan (EOP) should be exercised to ensure the plan adequately supports operations and ensures applicable personnel are adequately trained in EOP response.

These mock emergency drills should include external stakeholders when applicable. (Fire, police, emergency management (EMS), co-located utility companies, etc.). The Company has commitments to complete mock emergencies as detailed below. (Table on page 3 of 9)(Idaho Annually)

Mock emergency drills should be completed via a table top or field mock emergency and should be evaluated for enhancement opportunities to the Gas EOP. At a minimum, documentation of the following information should be completed for each mock drill conducted with a copy forwarded to the Pipeline Safety Engineer:

- Mock drill scenario*
- Date and time (Include start time, end time, and other significant times)*
- Personnel and entities that participated*
- Things that went well*
- Things that need improvement*
- Follow-up action items with due dates*

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)

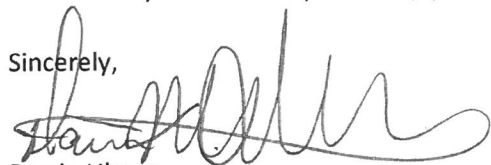
When a contract locator notifies Avista's local office of an un-locatable facility, they shall ~~should~~ take additional actions to identify the location of the facilities within the prescribed timeline of the locate ticket unless documented arrangements with the excavator have been made. Additional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

The above mentioned items were brought to the attention of your representatives during the records compliance inspection. We would request that you review this matter and respond in writing within 30 days regarding the above issue including any planned corrective action.

If you have any questions concerning this notice, please contact me at (208) 334-0331. Also all written responses should be addressed to me at: P.O. Box 83720-0074, Boise, Idaho 83720-0074 or you may fax your response to (208) 334-3762.

Because of the good faith that you have exhibited up to this time, we expect that you will act to bring your program into compliance with pipeline safety regulations. We appreciate your attention to this matter and your effort to promote pipeline safety.

Sincerely,



Darrin Ulmer

Pipeline Program Manager
Idaho Public Utility Commission

