

EXECUTIVE OFFICES

INTERMOUNTAIN GAS COMPANY

555 SOUTH COLE ROAD • P.O. BOX 7608 • BOISE, IDAHO 83707 • (208) 377-6000 • FAX: 377-6097

April 3, 2020

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

Subject: Response to 2020 Natural Gas Construction Inspection – Boise District (Project 20JUS-26)

Dear Mr. Ulmer,

This letter is intended to address one probable violation regarding the general installation process of an excess flow valve (EFV) for a residential service. Specifically, we are addressing how we plan to bring the probable violation into full compliance. The inspection was conducted on March 12, 2020 at the construction site for project 20JUS-26 located at 2137 and 2119 East Trophy Street in Kuna, Idaho.

PROBABLE VIOLATIONS

1. §192.605(a) General

Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.

2. Standard Operating Procedures (SOP) 4308.4 – Excess Flow Valves

Installation Requirements

3.6. The general process for installation of an EFV for residential service is:

3.6.(2) Using air or inert gas purge the upstream and downstream service line pipe clear of debris. In service stubs (i.e. stub extensions) require a short purge to remove possible debris, reference procedure 3206 – Pipeline Purging and Cleaning.

Finding:

Employees of the IPUC were observing a Dasco crew install a new branch service to residential homes in Kuna, ID. During the inspection it was noted that the crew was not following the general installation process of an EFV for a residential service. The employee did not purge the new service lines with air or inert gas to clear lines of debris before installing the EFV. The employee also failed to perform a short purge of the in-service stub to remove possible debris before tying it into the EFV.

Intermountain Gas Response

Intermountain Gas Company (IGC) acknowledges the findings brought forth by the IPUC stated above. On March 12, 2020, the Das-Co of Idaho crew did not adequately adhere to the requirements of the general process for installation of an EFV for residential services as stated in *Standard Operating Procedure (SOP) 4308 – Excess Flow Valves*. In response to this occurrence, IGC will provide additional training to the Das-Co of Idaho crewmen involved in the 20JUS-26 project.

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The intent of the verbiage in section 3.6 of SOP 4308 was to clear lines of debris with air or inert gas only when necessary. IGC is currently creating an integrated procedure for the sizing and installation of excess flow valves to be used across its service territories. The development of *OPS 301 – Excess Flow Valves* is being facilitated in OPSMOC-249 and will further address this probable violation by clarifying cleaning and purging requirements.

Following an internal review, an Immediate MOC has been initiated to make the following change to *OPS 603 – Pipeline Purging and Cleaning*:

1.1.1. Service lines one inch (1") or less in diameter do not require cleaning prior to purging into service provided dirt and other debris is kept from entering the open ends during installation.

This revision is being tracked in OPSMOC-612. IGC will provide the revised OPS 603 to the IPUC following implementation.

Please contact Josh Sanders at (701) 222-7773 with questions or comments.

Respectfully Submitted,



Pat Darras
Vice President, Engineering & Operations Services
Intermountain Gas Company