

EXECUTIVE OFFICES

INTERMOUNTAIN GAS COMPANY

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IDAHO PUBLIC
UTILITIES COMMISSION

October 9, 2020

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

Subject: Response to Letter of Concern dated September 14, 2020 (Report # 1202007)

Dear Mr. Ulmer,

This letter is intended to address one area of concern stemming from an onsite specialized field inspection in Intermountain Gas Company's (IGC) Idaho Falls District conducted August 31 – September 2, 2020. Specifically, we are addressing how we have brought the area of concern into full compliance.

AREA(S) OF CONCERN

1. Cascade Natural Gas Corporation-OPS 703 (Sec 8), 8.1.5-reads: *If a plug is not adequately lubricated, apply valve sealant. (Inability to operate without significant force is an indication of inadequate lubrication.) Refer to section 6.*

Emergency Valve 700 0226 is not able to be operated without significant force (takes 2 personnel to operate).

Intermountain Gas Response

IGC acknowledges the findings brought forth by the IPUC stated above. On September 25, 2020, Idaho Falls Valve 48747-VLV-29560 (Legacy ID 700-0226) was flushed, re-lubricated, and confirmed to be operational by IGC field personnel. (See Figure 1.)

Additionally, as the 2020 valve inspection and maintenance near a close, the Director of Operations Services will send a Compliance Message to MDU Utilities Group employees prior to the start of 2021 valve inspection and maintenance. The purpose of the Compliance Message will be to remind employees of the requirements of OPS 703 – *Valve Inspection and Maintenance* and the importance of proper documentation to ensure that the applicable follow-up orders are generated in Compliance Tracking Software when valves do not turn without significant force.

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

Respectfully Submitted,



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

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Figure 1

PCAD Job ID: MDUG-20200925-21603
FA ID: 8023281495

MDUG-20200925-21603	8023281495	G-VALVE	Virtual Premise	UCON	09-25-2020 00:00 US/Mountain	Inst: ATTN: MATT SAXTON - MAINTENANCE ON VALVE #700-0226 - INST N 25/EVERON	SAXTON	CLEARED
Cmts: flushed valve and GREASED. worked valve. valve is easier to turn and is OPERATIONAL								

FIELD AUTOMATION

Home Compliance Construction FCS Mobile Up PCAD

Order Summary

PCAD Job ID: FA ID: Service Code:

Customer:

Address: [Attachments: 0](#)

Action Taken

Completed Meter Action: CGI: CGI Reason: Material or Billable Work?:

Existing Meter/ERT Information

Meter Number	Correct Mtr No?	Corrected Mtr No.	Disconnect Location	Drive Rate	Index Read
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
ERT Number	Correct ERT No.?	Corrected ERT No.	Delivery Pressure	Drive Rate Found	ERT Read
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

Additional Order Information

Date Work Performed: Bypassable Meter Set: Pipe Condition: Odorant Perceptible: Company Relight?: Lock Up-Found: Lock Up-Left:

Comments

Flushed valve and GREASED. worked valve. valve is easier to turn and is OPERATIONAL

Office Review?: Review Reason:

Reviewer: