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

April 23, 2021

Mr. Darrin Ulmer
Program Manager
Idaho Public Utilities Commission
11331 Chinden Blvd., Building 8, Suite 201-A
Boise, ID 83714

Re: IPUC Records Audit (Report # A202102) – Avista Response

Dear Mr. Ulmer:

In your letter of March 18, 2021, you listed two probable violations discovered during the 2021 Natural Gas Standard Inspection that was conducted March 16, 2021. In this letter we have provided restatements of the probable violations and Avista's responses.

Notice of Probable Violation (NOPV) #1 Reference:

49 CFR §192.605

Description of NOPV #1:

(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.

*Avista Utilities 2021 Gas Standards Manual
2.2 Metering & Regulation, Design Requirements, 3 Foot Rule.*

Finding(s):

Avista's contract crew (NPL) failed to follow procedure 2.2 Metering & Regulation, Design Requirements, 3-Foot Rule which states:

For outside meter set locations, at the time of installation of the meter, the vent of the service regulator should not be located within a 3-foot radius of the following (refer to Drawing A-36275, Item 1. "Electrical components, devices & equipment including switches, receptacles, light fixtures, disconnects, circuit breakers, pad mounted air conditioners or heat pumps that do not supply ventilation air, generators, & transformers should be at least 36" away from the regulator vent."

Avista Response to NOPV#1:

Avista concurs that a regulator vent was found to be less than 36" from an electrical panel on a new installation (17 September 2020) at 433 Shoshone Blvd in Osburn, Idaho. It was determined, however, by the Kellogg Gas Local Representative that the electric panel was installed subsequent to the gas meter being installed and as a result, Avista's gas contractor, NPL, was not at fault.

To remedy these types of situations in the future, the Kellogg Gas Local Representative has now established a process whereby the gas meter is not set until after the electric meter and applicable associated appurtenances are in place and can be evaluated to be in compliance with Drawing A-36275.

Avista respectfully requests that this NOPV be rescinded since the problem occurred after Avista's contractor completed their install work and consequently they were not at fault.



Notice of Probable Violation #2 Reference:

49 CFR §192.605

Description of NOPV #2:

(b) 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.

Avista Utilities 2021 Gas Standards Manual

4.61 Quality Assurance/Quality Control (QA/QC) Program, Objectives of the QA/QC Program.

Findings:

Avista's QA/QC program personnel failed to accurately follow their procedures which state:

(1.) Ensuring adherence to federal, state and Company requirements, standards, policies and procedures.

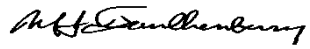
Avista Response to NOPV #2:

Avista concurs that a regulator vent was found to be less than 36" from an electrical panel on a new installation (17 September 2020) at 433 Shoshone Blvd in Osburn, Idaho and this item should have been identified in the audit per Avista standards.

On March 11, 2021, Avista's QA/QC Manager had a meeting with department personnel to review Audit 20-ID-JWW-162 (The QA/QC audit of work done at 433 Shoshone Blvd). The audit had found that procedures were satisfactorily followed, but in fact it was noticed by commission staff that the regulator vent distance to the electric panel did not meet company standards in Spec. 2.22, page 22 of 22. In a memorandum documenting the review of the audit (enclosed), QA Manager Matt Mullineaux documented his review of this NOPV with his team.



Respectfully Submitted,



Michael J. Faulkenberry
Director, Natural Gas
MJF/rkb

Enclosure

Cc: Jesse Butler, Kellogg Operations Manager
Matt Mullineaux, Manager Gas Quality Assurance
Vern Malensky, Manager of Pipeline Integrity and Compliance - DO

