



Idaho Public Utilities Commission

PO Box 83720, Boise, ID 83720-0074

Brad Little, Governor

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

March 18, 2021

Report # A202102

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

Dear Mr. Faulkenberry:

On March 16, 2021 representatives of the Idaho Public Utility Commission, Pipeline Safety Division, conducted a compliance inspection of Avista's Records for the Idaho natural gas distribution system. This inspection was conducted virtually using a MS Teams platform. During this inspection we reviewed several Quality Assurance Audit Forms and discovered possible violations in reference to service installation (1013394718) at 433 Shoshone Blvd, Osburn, ID that occurred on 17 September 2020.

The inspection indicates two area(s) of concern that do not fully meet the intent of the pipeline safety regulations Title 49, Code of Federal Regulations for calendar year 2020. The probable violation(s) will be discussed below.

PROBABLE VIOLATIONS

1. **49 C.F.R. § 192.605 Procedural manual for operations, maintenance, and emergencies.**
 - 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 2020 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 Utilities 2020 Gas Standards Manual

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

Finding(s):

Avista's QA/QC program personnel failed to accurately follow its procedures which states:

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

The above mentioned items were brought to the attention of your representatives during the inspection. We would request that you review this matter and respond in writing within 45 days regarding the above issue including any planned corrective action.

REQUESTED ACTION

A reply to this letter, as outlined below, is required no later than 45 days from the date of this letter. Please send all documents to our office at P.O. Box 83720, Boise, Idaho 83720-0074. Be advised that all material you submit in response to this enforcement action may be a public record, subject to disclosure under Idaho's Public Records Law. See Idaho Code § 74-101-126.

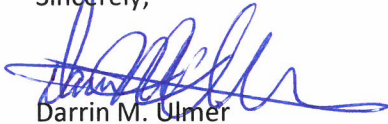
You have a right to appear before the Pipeline Safety Division in an informal conference before April 29, 2021, at the Commission's offices at 11331 W. Chinden Blvd, Boise, Idaho 83714. You have the right to present relevant documents to the Commission at that conference. The Commission will make available to you any evidence which indicates that you may have violated the law, and you will have the opportunity to rebut this evidence. See IDAPA 31.01.01.21-26. If you intend to request an informal conference, please contact the Pipeline Safety Division no later than April 15, 2021.

If you wish to dispute the allegations in this notice, but do not want an informal conference, you may send the Pipeline Safety Division a written reply to this notice. This written reply must be filed with the Commission on or before April 29, 2021 and must be signed by a Company Official. The reply must include a complete statement of all relevant facts including a complete description of the corrective action(s) taken and any and all actions to be taken to prevent future failures in these areas of concern.

If you do not respond to this notice, as specified above, by April 29, 2021, you may be subject to statutory civil penalties and further enforcement, as allowed by law. Idaho Code § 61-712A states that "[a]ny person who violates or fails to comply with, or who procures, aids or abets any violation of title 61, Idaho Code, governing safety of pipeline facilities and the transportation of gas, or of any order, decision, rule or regulation duly issued by the Idaho public utilities commission governing the safety of pipeline facilities and the transportation of gas, shall be subject to a civil penalty of not to exceed two thousand dollars (\$2,000) for each violation for each day that the violation persists. However, the maximum civil penalty shall not exceed two hundred thousand dollars (\$200,000) for any related series of violation."

If you have any questions concerning this notice, please contact me at (208) 334-0321. Also, all written responses should be addressed to me at the above address or you may fax your response to (208) 334-3762. We appreciate your attention to this matter and your effort to promote pipeline safety.

Sincerely,



Darrin M. Ulmer

Pipeline Safety, Program Manager
Idaho Public Utility Commission