



Idaho Public Utilities Commission

PO Box 83720, Boise, ID 83720-0074

Brad Little, Governor

Paul Kjellander, Commissioner

Kristine Raper, Commissioner

Eric Anderson, Commissioner

Letter of Concern

July 6, 2021

Report # DE202101

Craig Wagstaff
Dominion Energy
333 S State St.
Salt Lake City, UT 84111

Dear Mr. Wagstaff:

On June 30, 2021 representatives of the Idaho Public Utilities Commission, Pipeline Safety, pursuant to Chapter 601 of Title 49, United States Code, conducted an onsite inspection of the Integrity Management verification dig located at mile marker 2 of North Highway 91, in Franklin, Idaho.

As a result of the inspection, it appears there are area(s) 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 2021.

The item(s) listed below are of concern:

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.*

During the inspection it was noted that the Whitaker Construction crew employed by DEUWI, did not have a calibrated holiday detection device (jeep) to check for coating defects as required by DEUWI Specification 9-11-01 12.5.1 Coating Inspection "... Contractor shall ensure holiday detector is properly calibrated. " There was no reference to calibration in SP 4-13-01 Portable Electrical Holiday Detector Operating Procedures.

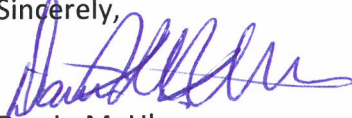
The above mentioned item was brought to the attention of your representatives during the onsite inspections. We would request that you review this matter and respond in writing within 30 days regarding the above issue including any planned corrective actions.

If you have any questions concerning this notice, please contact me at (208) 334-0321. All written responses should be addressed to me at: 11311 W Chinden Blvd, Ste 201-A, Boise, Idaho 83714 or you can 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 take action 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 M. Ulmer
Pipeline Safety, Program Manager
Idaho Public Utility Commission