

EXECUTIVE OFFICES

INTERMOUNTAIN GAS COMPANY

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

March 30, 2021

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

Subject: Response to Notice of Probable Violation dated February 17, 2021 (Report # I202102)

Dear Mr. Ulmer,

This letter is intended to address one probable violation stemming from a February 8, 2021 training program inspection which included plastic pipe joining for Intermountain Gas Company (IGC) personnel in Twin Falls, Idaho. Specifically, we are addressing the details brought forth by the Idaho Public Utility Commission (IPUC) stated below.

PROBABLE VIOLATION

1. 49 CFR §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. 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.

Finding:

During the inspection it was noted that after the classroom training, the personnel went into the warehouse for the hands-on evaluation. It was observed that the pyrometer being used to test the heating element was out of calibration (1/31/2021) thus in violation of OPS 501. This topic has been a previous issue brought to your company's attention multiple times.

Intermountain Gas Response

IGC acknowledges that the pyrometer labeled with a calibration due date of January 31, 2021 (Pyrometer 1) was present during the February 8, 2021 Plastic Joining Qualification Training. Twin Falls District personnel reported that the calibration due date of Pyrometer 1 was checked prior to being used for a performance evaluation. As such, the MDU Utilities Group (MDUG) SMS/Quality Assurance department performed an investigation into the above finding.

The investigation included interviews with eight IGC employees directly or indirectly involved and validated that Pyrometer 1 was not used for performance evaluations. IGC personnel mitigated the issue by purchasing a new pyrometer (see Attachment A) to be utilized for performance evaluations; therefore, remaining compliant with MDUG procedure, *OPS 501 – Equipment Calibration, Maintenance and Testing*, and moreover, 49 CFR 192.605(a).

IGC is cognizant of IPUC concerns regarding equipment calibration and is working diligently to assess and improve calibration tracking processes for the company and its Contractors. As stated in IGC's response to the

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IPUC Area of Concern dated January 26, 2021 (Report No. I202101), IGC is performing a comprehensive review of current construction inspection practices, Quality Control inspection practices, and Contractor equipment calibration tracking practices. IGC will respond in writing by May 28, 2021 with the results of this review and a schedule of the required remedial action(s).

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

Respectfully Submitted,

A handwritten signature in black ink that reads "Pat Darras". The signature is written in a cursive, flowing style.

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

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Attachment A Proof of Purchase



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INVOICE DATE 2/09/21
031 Twin Falls (208) 734-5413 mgr31@platt.com

DATE ORDERED	DATE SHIPPED	SHIPPED VIA	BILL OF LADING	CUSTOMER PO#
2/08/21	2/08/21	Pickup		5300

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451 Alan Dr
Jerome, ID 83338

SHIP TO

Customer Pickup

ORDERED BY: BRACK

PAGE 1

CUSTOMER ACCT.#	JOB NAME	JOB#	SALES	PLATT SALESPERSON				
149716			A31	TWIN FALLS				
QTY. ORDERED	SHIPPED	BACK ORD.	EDP #/DESCRIPTION	UNIT PRICE	UNIT	DISC %	TOTAL	TAX TERM
1	1	0	PLU 62-MAX IP54 IR THERMOMETE 0914550	95.0000	EA		95.00	Y .0
1	1	0	STM 61700 BANDIT YELLOW 0217908	28.9350	EA		28.94	Y .0
Full phone support 7 days/week 4AM - 12AM PST, 5AM - 1AM MST Every single day Pay Online / Invoices & Statements 24/7 www.platt.com								
SUB TOTAL				123.94			SALES TAX	\$ 7.44
				OTHER CHARGES		INVOICE TOTAL		\$ 131.38

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