



11/18/2022

Mr. Jeff Brooks
Pipeline Safety, Program Manager
Idaho Division of Public Utilities
11331 W Chinden Blvd
Boise, ID 83714

Dear Mr. Brooks,

Dominion Energy Idaho (DEI) has received your Letter of Concern dated October 26, 2022, regarding the joint Public Awareness Plan audit and appreciates the opportunity to respond. Your letter stated that the following items of concern were found and noted along with DEI's response:

1. § 192.616 Public awareness.

(c) The operator must follow the general program recommendations, including baseline and supplemental requirements of API RP 1162, unless the operator provides justification in its program or procedural manual as to why compliance with all or certain provisions of the recommended practice is not practicable and not necessary for safety.

API 1162, First Edition, December 2003

8.4.4 Measure 4-Achieving Bottom-Line Results

One measure of the "bottom-line results" is the damage prevention effectiveness of an operator's Public Awareness Program and the change in the number and consequences of third-party incidents. As a baseline, the operator should track the number of incidents and consequences caused by third party excavators. This should include reported near misses; reported pipeline damage occurrences that did not result in a release; and third-party excavation damage events that resulted in pipeline failures. The tracking of leaks caused by third-party excavation damage should be compared to statistics of pipelines in the same sector (e.g. gathering, transmission, local distribution). While third-party excavation damage is a major cause of pipeline incidents, data regarding such incidents should be evaluated over a relatively long period of time to determine any meaningful trends relative to the operator's Public Awareness Program. This is due to the low frequency of such incidents on a specific pipeline system. The operator should also look for other types of bottom-line measures. One other measure that operators may consider is the affected public's perception of the safety of pipelines.

Finding(s):

Dominion Energy has not implemented a way of receiving, reviewing, and tracking any reported near miss events.

DEI Response:

DEI will initiate tracking of near-miss events in Q1 of 2023, that will include any outside force damage that does not result in a leak. This information will be extracted from DEI's Core data base consisting of plastic damages, details of any exposed intermediate high-pressure steel, and DEI's Field Activity Report data, reflecting any work being performed in and around DEI's high-pressure distribution/transmission piping e.g., Excavation/Crossings, Pipeline Uncovered, Repairs etc.

This information will be gathered monthly, reviewed, and retained by DEI's Damage Prevention group for any near miss events and readily available upon your request.

Should you have any additional questions regarding our response and corrective actions, please contact Steve Bursett, Supervisor, Pipeline Compliance, 801-324-3697.

Respectfully,

A handwritten signature in black ink, appearing to read 'SR', with a long horizontal flourish extending to the right.

Steven Ridge
VP & General Manager, Western Distribution
Dominion Energy Idaho

cc:

State of Idaho (OPS):

Matt Galli

Bruce Perkins

DEUWI:

Matt Bartol

Steve Bursett

Jeff Hansen

Reid Hess