



Idaho Public Utilities Commission

P.O. Box 83720, Boise, ID 83720-0074

Brad Little, Governor

Eric Anderson, President
John Chatburn, Commissioner
John R. Hammond, Jr., Commissioner

Letter of Concern

October 26, 2022

Report # D202201

Mr. Steven Ridge
VP & General Manager, Western Distribution
Dominion Energy
PO Box 45360
Salt Lake City, UT 84145-0360

Dear Mr. Ridge:

On Oct 17-18, 2022, the Idaho Public Utilities Commission, Pipeline Safety Division, pursuant to Chapter 601 of Title 49, United States Code, conducted a Public Awareness Plan Audit of Dominion Energy.

Area(s) of concern were identified that do not fully meet the intent of the pipeline safety regulations Title 49, Code of Federal Regulations, Part 192. The item(s) listed below are of concern:

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.

The above-mentioned item(s) were brought to the attention of Dominion Energy compliance representatives during the inspection. We would request that you review these matter(s) and respond in writing within 30 days regarding the above issue(s) including any planned corrective actions.

If you have any questions concerning this notice, please contact me at (208) 334-0333. All written responses should be addressed to me at: 11331 W Chinden Blvd, Ste 201-A, Boise, ID 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,



Jeff Brooks
Pipeline Safety, Program Manager
Idaho Public Utility Commission