



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 procedures 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. 49 CFR § 192.619 Maximum allowable operating pressure: Steel or plastic pipelines.**

*(a) No person may operate a segment of steel or plastic pipeline at a pressure that exceeds a maximum allowable operating pressure (MAOP) determined under paragraph (c), (d), or (e) of this section, or the lowest of the following:*

**Finding(s):** *Unable to locate this code requirement in DEUWI procedures where it covers plastic pipelines.*

**DEI Response:**

DEI has incorporated the following language in DEUWI Standard Practice 1-97-04; "Determining Maximum Allowable Operating Pressure (MAOP) for Plastic or Steel Pipelines", section 4.1. Please find attached an updated copy for your records.

- 4.1. No person may operate a segment of steel or plastic pipeline at a pressure that exceeds an established maximum allowable operating pressure (MAOP) or the lowest of the following contained in 6.5.2. (a) and (b).

**2. 49 CFR § 192.747 Valve maintenance: Distribution systems.**

*(b) Each operator must take prompt remedial action to correct any valve found inoperable, unless the operator designates an alternative valve.*

**Finding(s):** *DEUWI Standard Operating Procedure (SOP) 8.5 states. "Should any emergency valve be found inoperable document on DOT Valve Inspection Report that remedial action (RA) is required and return DOT Valve Inspection Report to Central DOT File where a RA report shall be generated and assigned to the appropriate individual". This procedure does not require that the operator must take prompt remedial action.*

**DEI Response:**

In DEUWI Standard Practice 3-25-01; "Valve Inspection and Maintenance", subsequent to section 8.5., entitled Note, it states:

**"High Pressure Engineering or Operations Engineering shall identify a temporary isolation valve if valve cannot be repaired in a timely manner."**

The word “timely” as defined in the Free Dictionary depicts “done or occurring sufficiently early; prompt”. DEI believes the language currently depicted, captures the intent of the code requirement as stated.

**3. 49 CFR § 192.605 Procedural manual for operations, maintenance, and emergencies.**

*(b) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations. (3) Making construction records, maps, and operating history available to appropriate operating personnel.*

**Finding(s):** 49 CFR § 192.605 (c) states “Making construction records, maps, and operating history available to appropriate operating personnel”. Unable to locate this code requirement in DEUWI procedures.

**DEI Response:**

Please reference the following language located in Appendix G section 1.1. of DEUWI’s Emergency Plan:

“1.1. Make construction records, maps and operating history available to appropriate operating personnel....”

**4. 49 CFR § 192.16 Customer notification.**

*(c) Each operator shall notify each customer not later than August 14, 1996, or 90 days after the customer first receives gas at a particular location, whichever is later. However, operators of master meter systems may continuously post a general notice in a prominent location frequented by customers.*

**Finding(s):** Unable to locate this code requirement in DEUWI procedures.

**DEI Response:**

Although DEI has a process that ensures new customers receive the required notification within 90 days, generally during the first billing cycle, DEI agrees it is not readily identifiable in DEUWI procedures. DEI will draft a new, dedicated standard practice that will include the overall process regarding customer notification, encompassing the language noted above. DEI will provide the standard in Q1 of 2023 for your records.

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

Respectfully,



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

Attachment: Standard Practice 1-97-04 (updated)

cc:

State of Idaho (OPS):

Matt Galli

Bruce Perkins

DEUWI:

Matt Bartol

Steve Bursett

Jeff Hansen

Reid Hess