



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

10/26/2022

Report # D202202

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

Dear Mr. Ridge:

On October 18-19, 2022, the Idaho Public Utilities Commission, Pipeline Safety Division, pursuant to Chapter 601 of Title 49, United States Code, conducted a Procedures Audit of Dominion Energy (DEUWI).

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. 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.

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.

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.

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.

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 83714-1021 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