



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 Notice of Probable Violation regarding the DOT field audit occurring on October 21, 2022, and appreciates the opportunity to respond. Your letter stated that the following item was found and noted along with DEI's response:

- 1.** *49 CFR § 192.739 Pressure limiting and regulation stations: Inspection and testing.*
 - (a) Each pressure limiting station, relief device (except rupture discs), and pressure regulating station and its equipment must be subjected at intervals not exceeding 15 months, but at least once each calendar year, to inspections and tests to determine that it is -*
 - (1) In good mechanical condition.*
 - (2) Adequate from the standpoint of capacity and reliability of operation for the service in which it is employed.*

49 CFR § 192.201 Required capacity of pressure relieving and limiting stations.

(c) Relief valves or other pressure limiting devices must be installed at or near each regulator station in a low-pressure distribution system, with a capacity to limit the maximum pressure in the main to a pressure that will not exceed the safe operating pressure for any connected and properly adjusted gas utilization equipment.

Finding(s): *During the inspection it was noted that regulator station (PS000I) failed to lock-up when tested, and 3 other regulator stations (FC0006, FC0005 and FC0004) were not plumbed for lock-up, thereby Measurement and Control Technicians were unable to demonstrate that the regulators were functioning properly and were able to lock-up when the necessity arises.*

DEI Response:

Under 49 CFR 192.739 (a)(3) it states "...except as provided in paragraph (b) of this section, set to control or relieve at the correct pressure consistent with the pressure limits of 192.201 (a)".

DEUWI Standard Practice (SP) 5-55-02, "Pressure Limiting and Regulation Station Inspection and Testing", documents two acceptable methods for the inspection of regulators:

- (1) disassembly and inspection of regulators or
- (2) performing a lock-up test.


It is further clarified in the same standard practice in a note following section 6.9. that:

“On one-way feed systems or regulator stations where there are not sufficient pressure taps, a lock-up test may not be feasible. In these instances, the operator may disassemble the regulating equipment as the sole means of inspection”.

During the annual inspection, DEI Technicians utilize method (1), consisting of the regulator(s) being disassembled and thoroughly inspected for any debris or other material that may cause the regulator to prematurely fail or cause the regulator to operate irregularly. Once placed back into service after disassembly, the regulator is carefully adjusted, while monitoring downstream pressure, to ensure it is regulating at the correct pressure consistent with 49 CFR 192.739.

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

Respectfully,



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