

EXECUTIVE OFFICES

INTERMOUNTAIN GAS COMPANY

555 SOUTH COLE ROAD • P.O. BOX 7608 • BOISE, IDAHO 83707 • (208) 377-6000 • FAX: 377-6097

June 2, 2022

Mr. Jeff Brooks, Programs Manager
Idaho Public Utility Commission
PO Box 83720
Boise, ID 83720-0074

Subject: Response to Notice of Probable Violation dated April 26, 2022 (Report # I202203)

Dear Mr. Brooks,

This letter is intended to address one probable violation stemming from a construction inspection conducted by the Idaho Public Utilities Commission (IPUC) on April 25, 2022, at 68 E Fairview Ave in Meridian, Idaho in Intermountain Gas Company's (IGC) Boise District.

PROBABLE VIOLATIONS

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

(a) General.

Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year. This manual must be prepared before operations of a pipeline system commence.

Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.

Finding(s):

During the inspection it was noted that:

- Procedure as required by OPS 501 Section 2.4 was not followed.
- Heat plate temperatures were checked with a digital pyrometer that was out of calibration during plastic fusing.
- Calibration on digital pyrometer ID# 50733740MV was due 10/26/21.

Intermountain Gas Response

IGC acknowledges the findings brought forth by the IPUC. In response to this occurrence, IGC's Quality Management Systems (QMS) department will revise the inspection protocol to ensure inspection of equipment calibration due dates are included when butt fusions are being performed. If unable to provide record of calibration onsite during a field inspection, QMS inspectors will issue a nonconformity report against the contractor. Forty-eight (48) hours will be provided to the contractor to verify record of calibration. If unable to provide record of calibration, further action will be taken with the contractor.

Additionally, IGC has initiated an MOC to revise *OPS 501 – Equipment Calibration, Maintenance, and Testing* adding guidance for contractors to have equipment calibration records on the jobsite. Notification will be provided to contractors of this change.

The revised protocol and revised *OPS 501* are expected to implement before July 1, 2022.

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Please contact Josh Sanders at (701) 222-7773 with questions or comments.

Respectfully Submitted,

A handwritten signature in black ink that reads "Pat Darras". The signature is written in a cursive, flowing style.

Pat Darras
Vice President, Engineering & Operations Services
Intermountain Gas Company