



STATE OF WASHINGTON

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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(360) 664-1160 • TTY (360) 586-8203

Ref. No. Docket PG-090076

November 20, 2009

Don Kopczynski
Vice President – Operations
Avista Utilities Corporation
East 1411 mission, MSC 20
PO Box 3727
Spokane, WA 99220-3727

Dear Mr. Kopczynski:

Subject: 2009 Natural Gas Standard Inspection – Pullman/Clarkston, WA

Thank you for your letter dated October 13, 2009, responding to our findings related to the inspection of Avista Utilities Corporation (Avista) facilities in Pullman and Clarkston, Washington conducted in June 2009. We have reviewed your responses and offer the following comments.

Probable Violations:

Item 1: WAC 480-93-180 (1) Plans and procedures

We accept your response to Item 1. Discussions in the Colville Inspection indicated that Avista defines and identifies high occupancy structures in accordance with WAC 480-93-180.

Item 2: WAC 480-93-110 (9) Corrosion

We accept your response to Item 2. Avista has committed to add language to the O&M Manual to address “can’t gain access” situations.

Item 3 Finding a: CFR Part 192.481 Atmospheric corrosion

Your response will be accepted to Item 3, Finding a, after we receive the Pullman meter less riser atmospheric corrosion inspection documentation. Avista conducted meter less riser atmospheric corrosion inspections in Pullman after the standard inspection was completed, however, the inspection was in the required 3 year timeframe.



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Item 3 Finding b: CFR Part 192.481 Atmospheric corrosion

We do not accept your response to Item 3, Finding b. During atmospheric corrosion inspections, Avista must conduct a thorough investigation to determine there is no corrosion. For example, a thorough investigation would require, where necessary, an examination of pipe above and below the ground at soil-to-air interfaces where there is disbonded, loose, cracked or missing wrap and/or bare pipe. The conditions found must be documented regardless of whether or not remediation is required.

Item 4: CFR Part 192.739 Pressure limiting and regulating stations: Inspection and testing

We accept your response to Item 4.

Item 5: WAC 480-93-170 (7) Tests and reports for pipelines

We accept your response to Item 5. Avista has committed to modify their pressure test documentation to include those items as outlined in WAC 480-93-170 (7).

Areas of Concern:

We accept your response to Items 1 thru 4.

Your Response is needed

Please respond in writing by December 22, 2009. The response should include how and when the company intends to come into compliance with respect to Probable Violation 3, Finding b.

If you have any questions, or if we may be of any assistance, please contact Patti Johnson at (360) 664-1266.

Sincerely,



David D. Lykken
Acting Pipeline Safety Director

cc. Mike Faulkenberry, Avista Utilities
Jody Morehouse, Avista Utilities