



Avista Utilities
1411 East Mission
PO Box 3727
Spokane, WA 99220-3727

Submitted via electronic email to Marina Woodard, mwoodard@utc.wa.gov

January 12th, 2012

Mr. David Lykken
Director, Pipeline Safety
Washington Utilities and Transportation Commission
P.O. Box 47250
Olympia, WA 98504-7250

RECEIVED

JAN 12 2012

State of Washington
UTC
Pipeline Safety Program

Re: WA Isolated Steel Settlement Agreement Report (Docket PG-100049)

Pursuant to Docket PG-100049 (WA Isolated Steel Settlement Agreement Report – "Stipulated Agreement to Close Docket"), Avista Utilities (Avista) is providing the quarterly status report for progress through December 31, 2011.

In 2011, Avista conducted a pilot Isolated Steel Inspection Program prior to the signed "Stipulated Agreement to Close Docket" (Agreement). During the pilot program, Avista surveyed 17,856 of the 143,536 risers in Washington (approx. 12.5%). The attached table provides details on the progress of the riser survey as well as the replacement activities related to this program through 12/31/2011. Refer to Table 1.

The inspection work and report were completed both in accordance with the agreement and include the following elements:

Survey Areas – The field survey was completed by established cathodic protection zones and by areas outside of the established cathodic zones with pipe installed prior to 1992. Refer to the enclosed maps for a description of areas surveyed.

Survey Points – Each riser within Avista's Natural Gas system is considered a survey point. Risers that serve multiple customers are considered a single service point for the survey.

QA/QC Process – The QA/QC process included both a validation of all field inspections and random post field inspections. Validation of all field inspections was completed by the Program Manager.

The inspection validation included a confirmation of the meter number recorded by the field inspector during the field inspection with the known meter number. Meter numbers recorded in the field that did not match known meter numbers were re-evaluated by the Program Manager. An inspection was considered failed if information pertinent to an inspection point was missing (such as an unresolved meter number), riser identified as plastic but had a pipe to soil read, or a pipe to soil read was recorded but the riser type was incorrect or missing. Unresolved inspections resulted in a re-inspection by the inspector to obtain the correct information.

Random post field inspections were completed to validate that the riser inspection completed by the field inspector properly identified the riser type and that the cathodic potential was properly



recorded. A representative sample, by area and field inspector, for approximately 1% of all risers surveyed were post field inspected.

Avista is committed to resolving this agreement in an expeditious manner and anticipates re-initiating field surveys during Q2, 2012.

Respectfully yours,

David R. Howell 1/12/11

David Howell
Gas Compliance Manager
DRH/kb

Enclosures: Survey Maps

cc: WA Compliance Documentation File



Table 1

	Q4 – 2011 (Period End)		Totals YTD
	Summary	Inspections	
ISOLATED STEEL PROGRAM:			
WA Survey Points ⁽⁴⁾	-	-	143,536
Points surveyed	17,856	-	17,856
QA/QC:			
Field Inspections Completed	17,856	-	17,856
Field Inspections Validated – Initially acceptable ⁽⁵⁾	-	17,826	-
Failed Inspection Validations	-	30	-
Failed Inspection Validations Resolved	-	30	-
Random Post Field Inspections	-	150	-
Random Post Field Inspections Failed	-	-	-
Random Post Field Inspections Resolved	-	-	-
Unprotected Isolated Segments < 100 ft⁽¹⁾:			
Found in Survey	176	-	176
Resolved (Replaced)	-	174	-
Unresolved (Temporarily Protected)	-	2	-
Protected Isolated Segments < 100 ft⁽²⁾:			
Replacement Jobs Created	1,671	-	1,671
Found in Survey	-	220	-
Known Before Survey	-	1,451	-
Resolved (Replaced)	665	-	665
Unresolved ⁽²⁾	1,006	-	1,006
Protected Isolated Segments > 100 ft			
Found in Survey	-	-	-
Known Before Survey	72	-	72
Unprotected Isolated Segments > 100 ft⁽³⁾:			
Found in Survey	-	-	-
Unprotected Isolated Segments > 100 ft Replaced	-	-	-
Unprotected Isolated Segments > 100 ft Protected	-	-	-
Leak Surveys Completed	-	-	-

⁽¹⁾ Replaced within 90 days per WAC 480-93-110(2) or protected and replaced within 1 year of discovery. Protection typically includes installation of an anode to protect the isolated riser or service. Other mitigative actions are possible.

⁽²⁾ Mitigation required by November, 2021 - (WA-PG-100049-Par 12).

⁽³⁾ Replace within the time allowed per WAC 480-93-110(2), or cathodically protect within the time allowed per WAC 480-93-110(2), leak survey one time within 30 days of discovery and check for past corrosion leaks over the previous 5 years. If past corrosion leaks are found (within the previous 5 years), the segment will either (a) be replaced within one year of discovery, or (b) be evaluated as to the need for replacement.

⁽⁴⁾ Known survey locations as of March 2011

⁽⁵⁾ Meter number and field data validated by Program Manager.