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Spokane, WA 99220-3727

**Submitted via email to [pipelineprogram@utc.wa.gov](mailto:pipelineprogram@utc.wa.gov)**

February 3, 2021

Mr. Sean Mayo  
Director, Pipeline Safety  
Washington Utilities and Transportation Commission  
P.O. Box 47250  
Olympia, WA 98504-7250  
Re: Proximity Considerations Request - Airway Heights High Pressure New Construction

Dear Mr. Mayo:

Pursuant to WAC 480-93-020, Avista Utilities is requesting approval to operate a natural gas pipeline up to 500 PSIG within 100 ft of existing buildings in Airway Heights, WA. Avista is proposing to install 17,700 ft of 12" main from the intersection of S Russell St and W 21<sup>st</sup> Ave to near the intersection of S Spotted Rd and W Park Dr. Approximately 4,500 ft of this new 12" main will be located within 100 ft of existing buildings. This new 12" main is a necessary capacity reinforcement for Airway Heights, the Spokane Airport, and the SW area of Spokane. The new main will be installed in parallel to Avista's existing 8" main, which will remain in service, for the entire project length. The project will be split into two construction phases, the first to be completed in 2021 and the second in 2022.

The proposed pipeline project will increase capacity in the system to serve the strong commercial and residential growth in Airway Heights, the Spokane Airport, and the SW area of Spokane. This project will proactively address risk in Avista's system related to reliability and capacity constraints. Currently, we are unable to serve all customer loads on a design day condition. Should a gas outage occur during a cold weather event due to insufficient capacity, there would be a high level of risk associated with the health and safety of Avista's customers.

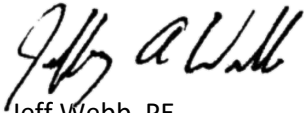
The number of buildings within the 100' proximity buffer of the proposed pipeline will be 9. These are the same 9 buildings that are within 100' of the existing 8" main. Refer to the enclosed pipeline drawing and summary of buildings located within 100 ft of the proposed route.

Avista's proposed route represents the best possible alternative based upon public exposure, terrain, road right-of-ways, and existing easements. The alternative of replacing the existing 8" main with larger diameter pipe was considered; however, the required pipe diameter to remedy the capacity constraint would be larger than 12" pipe, which Avista is not properly tooled to work on. Approximately 9,000 ft of the project will be located on Spokane Airport Board, City of Spokane, and County of Spokane Right of Way on Airport Property. This will minimize the number of potential future buildings that could be built within 100 ft of the proposed pipeline route. The remainder of the pipe will be installed within the City of Airway Heights Right of Way and private easements in accordance with their location restrictions and right of way conditions.

The pipe specification for the new main will be 12.75" O.D., 0.312" W.T., API-5L Gr. X-52, resulting in 19.7% SMYS at 500 PSIG. The new main will operate at a pressure of 350 PSIG. The high-pressure main will be installed in accordance with industry and Avista standards. To ensure a high level of integrity and confidence, Avista will have 100% of the welds non-destructively tested by a third party. Additionally, where terrain allows, the pipe will have 42" of cover, more than the 36" required by Federal Standards.

This project is scheduled to begin as early as April 1, 2021. I look forward to your approval of this project. Should you have further questions regarding this request I can be reached at 509-495-4424.

Sincerely,



Jeff Webb, PE  
Manager of Gas Design, Measurement, and Planning  
JW/rma

Attachments:

- Buildings within 100' of the proposed 12" HP Airway Heights Main – Spreadsheet
- Buildings within 100' of the proposed 12" HP Airway Heights Main – Map
- Draft Drawings E-38652, Airway Heights HP Reinforcement

cc: WUTC Correspondence File  
Randy Bareither, Pipeline Safety Engineer, Avista Utilities  
Rachael Anderson, Design Engineer, Avista Utilities

