

**Avista Utilities**  
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September 19, 2005

Mr. Alan Rathbun  
Pipeline Safety Director  
Washington Utilities and Transportation Commission  
PO Box 47250  
Olympia, WA 98504-7250

**RECEIVED**

SEP 26 2005

**WUTC  
Pipeline Safety Division**

Attn: Mr. Scott Rukke

Dear Mr. Rukke,

Per the requirements of WAC 480-93-020, we are submitting a request to operate high-pressure gas distribution facilities at greater than 250 psig although they are within 100 feet of existing buildings. Specifically, these facilities include Avista's South Hill Feeder from the Mica City Gate to the 65<sup>th</sup> and Freya Station #61, and the Mica Feeder from our Mica City Gate to 32<sup>nd</sup> and Blake Rd. (SR27) Station #46. Due to system growth on the south side of Spokane, it has become necessary to begin operating these facilities at pressures above 250 psig. Enclosed please find several supporting documents, including aerial maps, leak survey records, regulator station and valve maintenance records, cathodic protection reports and patrolling summaries for each pipeline.

The South Hill Feeder is approximately 11 miles of 6.625" O.D., 0.219" W.T., API 5L GR. X-42 steel pipe, constructed in 1992. There are an estimated 24 buildings along this pipeline that runs through a rural agricultural area of Spokane County. The documentation for this pipeline includes the original construction drawings.

The Mica Feeder is approximately 6 miles of 6.625" O.D., 0.188" W.T., API 5L GR. X-42 steel pipe, constructed in 1957. There are an estimated 30 buildings along this pipeline that runs through a rural area of Spokane County. The documentation includes the detailed written procedure and pressure recording charts from the 1975 uprate of that pipeline.

Should you have further questions regarding this request, please contact Ms. Kris Busko of my staff at (509) 495-8767.

Respectfully yours,

Michael J. Faulkenberry, P.E.  
Chief Gas Engineer

**Posted**

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RMS  
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