

Avista Utilities
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August 15, 2007

STATE OF WASHINGTON
UTIL. AND TRANSP.
COM. HEARING

Alan E. Rathbun
Pipeline Safety Director
UTC
P.O. Box 47250
Olympia, Washington 98504-7250

Dear Mr. Rathbun:

Subject: Docket PG-070013, 2007 Standard Natural Gas Inspection – Spokane/Ritzville

Avista agrees with the commission staff's recommended course of action and provides the following response in regards to the draft agreement conditions for each of the four probable violations found during the natural gas inspection conducted in Spokane/Ritzville in May of 2007:

1. Avista has already implemented a system wide remediation program to identify and correct regulator vent installations over a three-year period to coincide with other existing programs, which will conclude by July 1, 2010.
2. Avista will begin tracking plastic pipe joints performed between annual plastic pipe joining re-qualifications of employees/contractors.
3. Avista will make combustible gas indicators available to contractors for use on the purging of mains. Further, Avista has chosen to revise their procedure in regard to purging of services to utilizing a table indicating necessary purge times that has been developed based on engineering calculations.
4. Avista has created a sticker which is adhered to as-built records to record pressure test information. This sticker has been revised to include the required information. An instruction sheet on the requirements of pressure testing was sent to all districts with a supply of the stickers which included examples of when multiple pressure test records are required. Avista will also go over this information in more detail during their next regularly scheduled companywide training sessions.

If you have any questions in regard to the agreement conditions outlined above, please contact me or Linda Burger at (509) 495-4423.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael J. Faukenberry".

Michael J. Faukenberry
Chief Gas Engineer

:lb

C: File/Jody Morehouse/A! Fisher/Linda Gervais