

Agenda Date: August 10, 2023
Item Number: E1

Docket: PG-230390
Company Name: Avista Corporation d/b/a Avista Utilities

Staff: Scott Rukke, Director, Pipeline Safety
Dennis Ritter, Chief Engineer, Pipeline Safety

Recommendation

Issue an order approving Avista Corporation’s d/b/a Avista Utilities (Avista or Company) 2023-2025 Two Year Plan filed on April 14, 2023. Avista’s Two Year Plan is consistent with the Commission Policy addressing all known elevated risk pipeline facilities in Washington.

Background

On December 31, 2012, the Washington Utilities and Transportation Commission (Commission) issued a Policy Statement entitled “Commission Policy on Accelerated Replacement of Pipeline Facilities with Elevated Risk”¹ (Policy Statement). Pursuant to the Policy Statement, each investor-owned gas pipeline utility company filed a Master Plan (Plan) in 2013 for replacing pipe that represents an elevated risk of failure. The Policy Statement also requires that Avista file a Two-Year Plan that specifically identifies the pipe replacement program goals for the upcoming two year period.

On April 14, 2023, Avista filed with the Commission, its Two-Year Plan for 2023-2025. Commission staff (Staff) finds that the Company’s 2023-2025 Two-Year Plan meets the requirements of the Policy Statement, with respect to pipeline safety.

I. Plan Requirements

Under the Policy Statement, the fourth Two-Year Plan was to be filed by June 1, 2023,² covering planned pipeline replacement through 2025. The plan has three parts: (1) a Master Plan (Plan) for replacing all facilities with an elevated risk of failure; (2) a Two-Year Plan that specifically

¹ “Commission Policy on Accelerated Replacement of Pipeline Facilities with Elevated Risk (December 31, 2012) (Policy Statement) (Docket UG-120715).

² Subsequent plan filings are to be filed by June 1 every two years thereafter (*i.e.*, June 1, 2015, 2017, 2019, etc.). “If the gas company makes no changes to its Master Plan, it need file only the Two-Year plan in each filing after June 1, 2013. If the company makes a material change either to its Master Plan, its Two-Year plan, or its Pipe Location Plan, it should file plan changes with the commission within 30 days.” Policy Statement at 11, ¶ 43.

identifies the pipe replacement program goals for the upcoming two year period; and if applicable, (3) a Pipe Location Plan for identifying the location of pipe or facilities that present an elevated risk of failure.³

Each plan must also:

- Target pipe or facilities that pose an elevated risk of failure.
- Be a measured and reasonable response in relation to the elevated risk, and the program must not unduly burden ratepayers.
- Be in the public interest.⁴

II. Commission Staff's Review of Avista's 2023-2025 Two Year Plan

A. Overview

Avista's plan indicates that the following types of gas pipe with an elevated risk of failure are present within its Washington service area: Vintage Aldyl-A polyethylene (PE) mains,⁵ PE service piping where it transitions to rigid steel service tees, and isolated steel, which historically may or may not have had adequate cathodic protection (the uncertainty is because this pipe was not electrically conductive with Avista's cathodic protection system(s)).

B. Evaluation of the Required Plan Elements

1. Whether the Company's Plan Targets Pipe that Poses an Elevated Risk of Failure

Avista's 2023-2025 Two-Year Plan is materially unchanged from its 2021-2023 Two-Year Plan so no new Master Plan is necessary at this time. Avista is on schedule to meet the requirements of its Master Plan and Two-Year Plan.

Avista initiated pipe replacement programs for each of the three types of identified elevated risk pipe prior to filing its initial Plan. As noted in previous Two-Year Plans.

Avista replaced 7,467 PE service tee to rigid steel transitions (an additional 96 were found and replaced in 2022). Avista's Isolated Steel Identification and

³ Policy Statement at 11, ¶ 42.

⁴ Policy Statement at 12-14, ¶¶ 45-56.

⁵ Pre 1984 manufacture and pre 1987 installation. (susceptible to slow crack growth (SCG)).

Replacement Program was completed in 2021. The program began in November, 2011 and Avista has replaced approximately 4,799 segments.

In 2022, Avista increased the total Adyl-A mileage replaced each year to remain on pace to complete the program within a 20-year timeframe. Subsequently, Avista replaced 17.67 miles in 2022 as compared with 12.98 miles in 2021. This included 1.02 miles in Clarkston, 5.63 miles in Kettle Falls/Colville and the remainder in greater Spokane. Avista is planning to replace 17.38 miles in 2023, 19.58 miles in 2024 and 20.34 miles in 2025.

Avista's Two-Year Plan is consistent with the Company's Distribution Integrity Management Plan which identified threats to its distribution system. Appendix B Table 6.1-1 "Threats Applicable to Avista's Gas Distribution System" identifies Adyl-A pipe in the Material section of the threats table.

2. Pipe Location Plan

Avista's Plan indicates that a Pipe Location Plan is not warranted because the Company knows where its elevated risk pipe is located. Because Avista classifies this pipe as higher risk pipe, this pipe is on a priority replacement schedule. As of the filing of the Two-Year Plan, Avista has three segments for a total of 21 feet remaining.

3. Whether the Company's Plan is a Measured and Reasonable Response in Relation to the Elevated Risk

Based on Staff's review, Avista's Plan is a measured and reasonable response to the elevated risks identified. The plan adequately addresses facilities with an elevated risk or failure. Adyl-A polyethylene pipe is the only elevated risk threat currently identified in the plan. As noted above, Avista has rectified the other high risk threats.

C. Impact on Rates

In accordance with Paragraph 64 of the commission's policy statement, Avista may submit information for a Cost Recovery Mechanism (CRM). Should this occur, Regulatory Services staff will present the CRM in a separate filing.

Avista submitted the expected level of capital investment each year for pipeline replacement, which was allocated by rate class to determine the level of rate impact for the customers in each class. Costs are already included in rates and will have no new incremental rate impact.

III. Conclusion

Avista is on schedule to remediate identified elevated risk pipeline facilities according to their master Plan filed on May 31, 2013. Having completed the service tee transitions and bare steel segment replacement in previous plans, Avista's 2023-2025 Two-Year Plan continues the Adyl- A high risk pipeline replacement program. The Two-Year Plan is consistent with the Commission policy and Avista's Distribution Integrity Management Plan (DIMP), and adequately addresses all known elevated risk pipeline facilities in Washington State.

Staff recommends approval of Avista's 2023-2025 Two-Year Plan filed on April 14, 2023.