

Form A - Annual Review 8758

UTC Standard Annual Review Inspection Report
Avista Corporation
2023 Annual Review

Inspector and Operator Information

Inspection ID 8758	Inspection Link 8758	Inspector -Lead Derek Norwood	Inspector -Asst Holt, Jason
Operator Avista	Unit HQ	Records Location - City & State Spokane, WA	
Inspection Start Date 03-26-2024	Inspection Exit Interview Date 04-16-2024	Engineer Submit Date 04-24-2024	

Inspection Summary

You must include the following in your inspection summary:

- *Inspection Scope and Summary
- *Facilities visited and Total AFOD
- *Summary of Significant Findings
- *Primary Operator contacts and/or participants

Inspection Scope and Summary

Annual review of Avista's annual report, changes to manuals and incidents from 2023. The inspection was conducted remotely via Microsoft Teams. There were no concerns or probable violations noted during the inspection.

Facilities visited and Total AFOD

No facilities visited, inspection completed remotely
 2 AFODs

Summary of Significant Findings

There were no concerns or probable violations noted during the inspection.

Primary Operator contacts and/or participants

Randy Bareither
 Principal Gas Engineer
 Randy.Bareither@avistacorp.com

Instructions and Ratings Definitions

INSPECTION RESULTS: Annual Review

Satisfactory Responses 29	Satisfactory List 1,3,4,5,6,8,10,12,13,14,15,18,21,22,23,24,25,26,27,28,29,30,31,32,35,37,39,40	Number of Unanswered Questions 0	Unanswered List
Unsatisfactory Responses 0	Unsatisfactory List		
Area of Concern Responses 0	Area of Concern List		
Not Applicable Responses 9	Not Applicable List 7,8,16,17,19,20,42,43,44		
Yes Responses 3	Yes List 34,36,38	No Responses 1	No List 41
Not Checked / Evaluated Responses 0	Not Checked / Evaluated List		

**If an item is marked Unsat., AOC, N/A, or N/C, an explanation must be included in the "Notes" block for that question and also summarized in the "SUMMARY OF REQUIRED COMMENTS" section at the end of this inspection form.

ANNUAL REPORT: ACCURACY/TRENDS

Question #1. Was the Annual Report reviewed for accuracy and trends? If any trends were discovered, please describe. **1. Result**
 Satisfactory

1. Notes

Number of leaks on main and services appears stable between 2022 and 2023, since 2015 Avista seems to be making an effort to repair leaks when found and get them out of the system ASAP. No other trends noted.

Current manuals submitted to UTC on 1/3/24

Contacts are current, update provided to UTC on 3/25/24

Access to Complete Distribution Annual Report

Year	Operator	SYSTEM TOTAL Miles of Main	Miles of Service	SYSTEM TOTAL Miles of Services	Average Service Length
No Report records found					

Access to Complete Transmission Annual Report

YEAR	Operator	Commodity Group	Total Total Miles
Avista Corporation (9 Report records)			
2015	Avista Corporation	Natural Gas	72.692
2016	Avista Corporation	Natural Gas	72.591
2017	Avista Corporation	Natural Gas	72.589
2018	Avista Corporation	Natural Gas	76.573
2019	Avista Corporation	Natural Gas	76.562
2020	Avista Corporation	Natural Gas	76.562
2021	Avista Corporation	Natural Gas	76.568
2022	Avista Corporation	Natural Gas	76.554
2023	Avista Corporation	Natural Gas	76.554

Access to Complete Hazardous Liquid Annual Report

YEAR	Operator	Commodity Group
No Report records found		

DAMAGE PREVENTION

Annual Report Damage Prevention data

Year	Operator	Number of Excavation Tickets	Total Number of Excavation Damages By Apparent Root Cause:	Locating Practices Not Sufficient:	One-Call Notification Practices Not Sufficient:	Excavation Practices Not Sufficient:	Other:	Number of Services	Total Leaks - Excavation Damage	Total Main Leaks	Miles of Service MAIN	Number of Leaks per Mile of MAIN	Total Leaks Per 1,000 Locates	Number of Hits Per 1,000 Ticket Requests	Number of Hits Per 10,000 Services	Number of Hits to Tickets
2023	Avista Corporation	42,686	198	29	78	76	15	170,426	170	67	3573.32	0.018750069962948	3.9825703977885	4.64	11.67945618626	0.46%
2022	Avista Corporation	44,346	203	30	93	69	11	169,245	30	71	3557	0.019960640989598	0.67649844405358	4.58	11.994445921593	0.46%
2021	Avista Corporation	49,034	248	37	95	100	16	126,810.48	41	138	44,211.79	0.0031213393531454	0.83615450503732	5.06	19.566743259705	0.51%
2020	Avista Corporation	46,242	185	14	93	66	12	165,333	134	45	3507.559	0.012829434943218	2.8977985381255	4.00	11.895386888586	0.40%
2019	Avista Corporation	47,232	211	17	90	89	15	163,662					0	4.47	12.892424631252	0.45%
2018	Avista Corporation	48,673	199	19	91	74	15	161,084					0	4.09	12.353802984778	0.41%
2017	Avista Corporation	44,325	213	31	79	88	15	158,092					0	4.81	13.473167522708	0.48%
2016	Avista Corporation	46,871	163	37	47	68	11	154,651					0	3.48	10.53968071865	0.35%

Year	Operator	Number of Excavation Tickets	Total Number of Excavation Damages By Apparent Root Cause:	Locating Practices Not Sufficient:	One-Call Notification Practices Not Sufficient:	Excavation Practices Not Sufficient:	Number of Services	Total Leaks - Total Main Leaks	Excavation Damage	Miles of Service MAIN	Number of Leaks per Mile of MAIN	Total Leaks Per 1,000 Locals	Number of Hits Per 1,000 Ticket Requests	Number of Hits Per 10,000 Services	Number of Hits Per 10,000 Tickets
2015	Avista Corporation	46,513	197	31	60	87	19	151,438				0	4.24	13.008623991336	0.42%

DIRT data on mismarks for prior year

Damage Cause	Number of Reports
No Report records found	

Question #2.

Review the following damage prevention items:

Q2. d. Is the damage prevention information in the annual report complete?

Satisfactory, data appears complete and consistent with prior years data

DIRT Timeliness- Prior Year Reports must be submitted within 45 days of the damage.

Submit/CompanyID - UTC/FileName	Number of Reports
No Report records found	

Q2. b. Is the annual report damages root cause information complete and accurate?

Yes, data appears complete and consistent with prior years data

Q2. c. Does the operator have a process to evaluate the cause of "One-call notification practices not sufficient" category?

Yes, the Damage Prevention Administrator and Damage Prevention Analyst determines the damage root cause associated with each one call issue and works with the Public Awareness Specialist on messaging based on the identified damage trends for One-Call Issues.

Yes, the Damage Prevention Administrator and Damage Prevention Analyst determines the damage root cause associated with each one call issue and works with the Public Awareness Specialist on messaging based on the identified damage trends for One-Call Issues.

Q2. d. Does the operator follow a process to evaluate the cause of "Locating practices not sufficient" category?

Yes, the Damage Prevention Administrator (Tyler Proszek) works with the locating contractor on locating issues to determine root causes and determine if additional training is necessary or if requalification is needed

Q2. e. Is the operator or its contractor qualified and following procedures for locating and marking facilities?

Yes, contractors and Avista personnel are qualified in accordance with GSA 4.31

Q2. f. Is the operator appropriately requiring locators to address performance deficiencies?

Yes, when locators have a performance issue they are brought out to the site and a supervisor goes over with them the issue. The Damage Prevention Administrator may also ask to have the Quality Assurance group do independent audits. If a locator has multiple performance issues in a short period of time, then they go through additional training before being requalified on tasks in question.

Q2. g. What is the number of damages resulting from mismarks?

23 (out of 42,686 locate tickets for a ratio of 0.54 damages per 1000 locales) damages as a result of mismarks. A total of 21 were "ELM At-Risk" (locating damages (1.49 per 1000 tickets). (INACCLO-ERROR,LOCERROR) The other two were "mapping/unlocatable" facilities (1 NOT FOUND, INACCTRACKERR)

Q2. h. What is the number of damages resulting from not locating within the time requirements?

0

Q2. i. Is the operator appropriately addressing discovered mapping errors resulting in excavation damage?

Yes, the Avista first responder turns in a mapping correction which mapping errors are discovered. The Damage Prevention Administrator routinely checks that maps have been corrected following a bad mapping damage in compliance with GSA Spec 4.11

Q2. j. Are mapping corrections timely and according to written procedures?

4 damages due to mapping errors in 2023, all mapping errors were corrected within 6 months

Q2. k. Does the operator follow a process to evaluate causes for damages listed "Excavation Practices Not Sufficient"?

Yes, the Damage Prevention Administrator and Damage Prevention Analyst works with the Public Awareness Specialist on messaging based on the damage trends for excavation practices.

Q2. l. Is the operator appropriately locating damage prevention education and training to address the causes of excavation damage?

2. Notes

NPMS SUBMISSIONS/CHANGES

Question #3.

For transmission operators, has the operator submitted information to the NPMS database, along with changes made after the original submission? Satisfactory

3. Result

3. Notes

Reviewed OSAE submital of "No Changes"
Submitted 2/15/24

INCIDENT/SRC/AOC REPORTS REVIEW

Question #4

Were there any federally reportable incidents during the previous year? Are there any discernable trends to these incidents?

4. Notes

1 federally reportable incident in 2023, no discernable trends

O4: Federally reportable incidents

NotificationID	Operator	Company	NRC#	Assigned Engineer	Date & Time of Incident	Street Address of event/incident	Incident Address: City	Closure Date	Reporting Level
4263	Avista Corporation	Avista Corporation	1383817 (initial), 1383977 (48H)	Thomas Green	11-08-2023 12:53 AM	Pullman Gate station	Pullman	01-10-2024	Federal

Question #5.

Review operator records of previous year's accidents and failures including reported third party damage and leak response. Is the operator ensuring appropriate evaluation and response as required in 192.617 (5a) or 195.402 (H) to determine cause of failure? Is the operator taking appropriate steps to minimize the possibility of recurrence?

5. Notes

Gas Materials Engineer keeps records & puts out Quarterly Materials One Pager emails to applicable company personnel. Field personnel are directed to fill out Form N-2614, Gas Material Failure Report, as necessary.

Avista follows GESH Section 17 for field investigations of gas related incidents

Question #6.

Review incident reports for the previous year for accuracy and identify any trends. If any trends discovered please describe. (Please see list of incident data at end of this report)

O4: Incident Reports

NotificationID	Inspector	Company	Street Address of event/incident	Date & Time of Incident	Is 30-Day Report Received?	Reporting Level
4437	Derek Norwood	Avista Corporation	5 Graham Rd & E Carrie Dr	11-13-2024 09:38 AM	<input type="checkbox"/>	State
4428	Scott Anderson	Avista Corporation	3133 N. Stuart St. Apt. B	10-09-2024 01:20 PM	<input checked="" type="checkbox"/>	State
4426	Scott Anderson	Avista Corporation	540 E. Main	10-09-2024 09:03 AM	<input checked="" type="checkbox"/>	State
4418	Jason Hout	Avista Corporation	214 W 25th Ave	09-28-2024 03:20 PM	<input checked="" type="checkbox"/>	State
4416	Jason Hout	Avista Corporation	3715 E Longfellow Ave	09-24-2024 09:01 AM	<input checked="" type="checkbox"/>	State
4406	Jason Hout	Avista Corporation	Intersection of E 2nd Ave and S 5erry St	09-04-2024 12:06 PM	<input checked="" type="checkbox"/>	State
4388	Thomas Green	Avista Corporation	605 E Bonnie Lynn	08-12-2024 11:30 AM	<input checked="" type="checkbox"/>	State
4350	Jason Hout	Avista Corporation	4237 S Cheney Spokane Rd	06-06-2024 12:40 PM	<input checked="" type="checkbox"/>	State
4338	Thomas Green	Avista Corporation	300 E Main st	05-16-2024 11:24 AM	<input checked="" type="checkbox"/>	State
4326	Derek Norwood	Avista Corporation	1205 N Country Club Dr	05-01-2024 10:49 AM	<input checked="" type="checkbox"/>	State
4323	Lex Vinsel	Avista Corporation	102 W Indiana Ave	04-24-2024 08:39 AM	<input type="checkbox"/>	State
4334	David Cullom	Avista Corporation	477 NW Chesser Rd	04-17-2024 03:00 PM	<input checked="" type="checkbox"/>	State
4319	Thomas Green	Avista Corporation	1328 N Robie LN	03-31-2024 04:06 PM	<input type="checkbox"/>	Non-Reportable
4315	Derek Norwood	Avista Corporation	7902 S Strawberry St	03-15-2024 04:34 PM	<input checked="" type="checkbox"/>	State
4310	Thomas Green	Avista Corporation	1412 N Lindsee St	02-22-2024 11:35 AM	<input checked="" type="checkbox"/>	State
4300	Anthony Dornough	Avista Corporation	1109 N Olson Hill Ct	01-29-2024 05:20 PM	<input checked="" type="checkbox"/>	State
4278	Anthony Dornough	Avista Corporation	5211 W Shawnee Ave	12-12-2023 02:08 PM	<input checked="" type="checkbox"/>	State
4274	Derek Norwood	Avista Corporation	1208 Serene Dr	12-06-2023 01:14 PM	<input checked="" type="checkbox"/>	State
4263	Thomas Green	Avista Corporation	Pullman Gate station	11-08-2023 12:53 AM	<input checked="" type="checkbox"/>	Federal
4245	Jason Hout	Avista Corporation	606 E Wellington Drive	09-25-2023 09:48 AM	<input checked="" type="checkbox"/>	State
4241	Thomas Green	Avista Corporation	2507 W Wellesley Ave	09-18-2023 02:25 PM	<input checked="" type="checkbox"/>	State
4237	Scott Anderson	Avista Corporation	131 S. Sullivan Road	09-11-2023 07:25 AM	<input checked="" type="checkbox"/>	State
4233	Anthony Dornough	Avista Corporation	3948 3rd Ave	08-27-2023 05:16 AM	<input checked="" type="checkbox"/>	State
4228	Scott Anderson	Avista Corporation	2002 E. Bridgeport Ave.	08-18-2023 06:18 PM	<input checked="" type="checkbox"/>	State
4229	Scott Anderson	Avista Corporation	407 S Prentis St	08-18-2023 02:19 PM	<input checked="" type="checkbox"/>	State
4226	David Cullom	Avista Corporation	4725 E Fredrick	08-12-2023 01:55 PM	<input checked="" type="checkbox"/>	State
4217	David Cullom	Avista Corporation	2110 N Duars Rd	08-07-2023 04:07 PM	<input checked="" type="checkbox"/>	State
4212	Derek Norwood	Avista Corporation	3511 I 36th Ave	07-30-2023 10:58 AM	<input checked="" type="checkbox"/>	State
4203	Derek Norwood	Avista Corporation	850 W Maple St	07-11-2023 02:15 PM	<input checked="" type="checkbox"/>	State
4171	Anthony Dornough	Avista Corporation	16210 N Green Bluff Road	04-11-2023 06:09 AM	<input checked="" type="checkbox"/>	State
4168	Scott Anderson	Avista Corporation	12111 Gibbs Rd	03-30-2023 11:53 AM	<input checked="" type="checkbox"/>	State
4147	Lex Vinsel	Avista Corporation	2320 S Sahnave Rd	02-09-2023 07:21 AM	<input checked="" type="checkbox"/>	State
4139	Derek Norwood	Avista Corporation	2500 N Substation Rd	01-31-2023 08:58 AM	<input checked="" type="checkbox"/>	State

6. Notes

There were 17 total incidents reported in 2023 (12 evacuations, 1 MAOP Exceedance, 3 gas release >2hrs and 3 customer outage >25) NOTE: Some events had multiple reporting reason so total does not add to 17

One MAOP exceedance was due to diethazine buildup but only a single occurrence so does not appear to be an ongoing issue

Release >2hrs: 2 incidents were due to unavailability of personnel in Spokane and Kettle Falls, and 2 were due to contractors exposing an abandoned line and mistakenly believing that was the located active gas line

Various incidents due to no locates

Question #7.

Were there reportable or unreportable safety related conditions during the previous year? If yes please describe.

O7: Report of SRCs

4. Results

Satisfactory

5. Result

Satisfactory

6. Result

Satisfactory

Notification ID	Company	Safety-Related Condition	Safety-Related/Condition/Choices	Reportable?	Date & Time of Incident	Company Notified	Report Date	Not Applicable
No Incident Notification records found								
7. Notes								
None in 2023								
Question #9.								
For transmission systems, were there any abnormal operating conditions (as described in 192.605 (c) or 195.402(d)) since the last annual review? If yes please describe.								
8. Notes								
49 CFR 192.606(c)(5) - The requirements of this paragraph (c) do not apply to natural gas distribution operators that are operating transmission lines in connection with their distribution system.								
O&M & EMERGENCY PROGRAMS								
Question #9.			Operator Manuals on Sharepoint		9. Result			
Is the O&M Manual up to date and were changes made in the previous year?					Satisfactory			
9. Notes								
The Gas Standards Manual (GSM) and Gas and Emergency Service Handbook (GESH) were updated in December 2023. The new revisions of these documents are good until 12/31/23 and changes are noted at the front of the documents. An electronic copy of the manuals was sent to WUTC on 1/3/24.								
Question #10.			10. Result		10. Result			
If changes to the O&M were made, are changes acceptable?					Satisfactory			
10. Notes								
Changes are acceptable, full O&M review also completed in 2024 (Inspection ID 8759)								
Question #11.								
Were emergency plans changed during the previous year?								
11. Result								
Satisfactory								
11. Notes								
Changes are acceptable, full O&M review also completed in 2024 (Inspection ID 8759)								
Question #12.								
Were any changes to emergency plans satisfactory?								
12. Result								
Satisfactory								
12. Notes								
Changes are acceptable, full O&M review also completed in 2024 (Inspection ID 8759)								
INTEGRITY MANAGEMENT PROGRAMS								
Question #13						13. Result		
Were there changes to the Integrity Management programs (TIMP, DIMP or both, as applicable)?						Satisfactory		
13. Notes								
Avista's DIMP Plan Revision 12 was completed December 2023. A copy was provided to the WUTC on 12/14/23. Avista TIMP Plan Revision 18 was completed December 2023. A copy was provided to the WUTC on 12/27/23.								
Question #14.						14. Result		
Is the DIMP/TIMP up to date? What are the results of the operator's program review (effectiveness evaluation) (DIMP every 5 years)?						Satisfactory		
14. Notes								
Avista conducts a complete review / effectiveness evaluation of its DIMP Program annually and updates the program document at that frequency and provides the updates to the WUTC. Appendix G of the DIMP Program Document has the year-by-year historical record of accelerated actions. Also, Appendix E notes the current accelerated actions.								
Question #15						15. Result		
Are IMP program changes acceptable?						Satisfactory		
15. Notes								
No concerns								
Question #16						16. Results		
Was appropriate assessment/ repair work conducted during the past year? (monitor progress of IMP activities)						Not Applicable		
16. Notes								
No assessment/repair work in 2023								
Question #17						17. Results		
Does the operator's HCA location data correspond to the positional data located in LTC GIS?						Not Applicable		
17. Notes								
Avista has no HCAs in Washington								
Question #18						18. Results		
What assessment work is planned for the upcoming year?						Satisfactory		
18. Notes								
No assessment work planned for 2024								
DIMP model is run every year with accelerated actions implemented throughout the year								
Question #19						19. Results		
Within the operator's DIMP, are low pressure systems evaluated for overpressure threats?						Not Applicable		
19. Notes								
No low pressure systems								
Question #20						20. Results		
Did the operator develop and follow specific procedures for low pressure system construction or maintenance projects? (Note: this question is revisited in greater detail in the ADR review section)						Not Applicable		
20. Notes								
No low pressure systems								
Question #21						21. Results		
Are electric pipe and components that have shown a record of defects/leaks being mitigated through the DIMP plans?						Satisfactory		
21. Notes								
Yes, all Aldyl-A main pipe, Aldyl A service tees, and Aldyl A services off steel service tees subject to bending stress are monitored, and risk ranked by DIMP. Use of Continental stab couplings was stopped and is being monitored by DIMP (Asset Management review showed infant mortality curve on the leak trends).								
Question #22						22. Results		
Has appropriate DIMP remediation work occurred during the past year? (monitor progress of DIMP activities)						Satisfactory		
22. Notes								
Ongoing GFRP - Gas Facility Replacement Program (Aldyl A Replacement Program) and the Deteriorated Pipe Replacement Program work continues. A Utility Cross Bore Post-Camera Inspection Program was started in 2019 and continues.								
Question #23						23. Results		
What DIMP remediation work is anticipated for upcoming year?						Satisfactory		
23. Notes								
GFRP (Aldyl A), Deteriorated Pipe and Utility Cross Bore Post-Camera Inspection will continue in 2024.								
OQ PROGRAM								

Question #24

Is the OQ program up to date? Were there changes to the Operator Qualification (OQ) program in the last year? If yes, please describe.

31. Results
Satisfactory

24. Notes

Yes. Avista's OQ Program is referenced in the Gas Standards Manual (GSM) Section 4.31. As noted, the formal OQ Program Document is a separate document, and the most recent edition (Revision 2) was forwarded to the WUTC on 10/20/23.

Question #25

Are the OQ plan updates satisfactory?

25. Results
Satisfactory

25. Notes

OQ inspection completed by WUTC in 2024 (Inspection ID 8757). No concerns or violations

Question #26

Are personnel performing covered tasks (including contractors) properly qualified and requalified at intervals determined in the operator's plan?

26. Results
Satisfactory

26. Notes

Reviewed all qualifications and re-qualifications during Avista OQ Inspection (Inspection ID 8757)

No concerns

PUBLIC AWARENESS PROGRAM

Question #27

Is the PA program up to date? And were there changes to the Public Awareness (PA) program within the last year?

27. Results
Satisfactory

27. Notes

Avista's current PA Program Document is Revision 13 dated 7/5/23. A copy was sent to the WUTC on 7/7/23.

Question #28

Are changes to the PA program satisfactory?

28. Results
Satisfactory

28. Notes

No concerns

CONTROL ROOM PROGRAM

Question #29

Is the CRM program up to date? And were there changes to the Control Room Management (CRM) program within the last year?

29. Results
Satisfactory

29. Notes

Avista's current Control Room Management Program Document is Revision 21 dated 12/11/23. A copy was sent to WUTC on 12/12/23

Question #30

Are the CRM program changes satisfactory?

30. Results
Satisfactory

30. Notes

No significant changes in 2023

SAFETY MANAGEMENT SYSTEM API 1173

Question #31

Is the operator developing and implementing an API 1173 Safety Management System?

31. Results
Satisfactory

31. Notes

Avista has been actively developing and implementing an API RP 1173 SMS since 2016. Avista provided staff a brief overview of their program. Avista has a good program in place and is making efforts to improve.

INSPECTOR ASSESSMENT OF INSPECTION UNITS

Question #32

Are inspection units broken down appropriately? Do you recommend any changes to inspection units?

32. Results
Satisfactory

32. Notes

Discussed with Avista options for breaking Spokane unit into multiple units but due to the way data and records are segmented, Avista said this would require significant effort on their part. Avista proposed keeping the unit intact and performing a records inspection every year for the whole county and completing a field inspection of one portion of the county every year so that the whole county would be inspected over a 4-5 year period.

Q32: List of current inspection units

Unit Name	Distribution/Transmission	Intrastate or Interstate?	GA5 or LIQUID	Operator - OPID	Unit ID	Date Created
No Unit records found						

OPERATOR'S PUBLIC WEB PAGE

Question #33

For informational purposes: Using the drop down selections available in the "Results" block, indicate whether the operator's web page contains the information listed by placing a check in the box adjacent to all items that are present.

33. Results

Q33.B Damage Prevention; Q33.C Pipe Location Information; Q33.D How to get additional information; Q33.E National Pipeline Mapping System; Q33.F On Call Requirements; Q33.G Potential Hazards; Q33.H Prevention Measures; Q33.I Leak/Damage Recognition; Q33.K Pipeline Location Information; Q33.M Emergency Preparedness

33. Notes

Natural gas safety page on Avista's website. Call before you dig, contact info available, NPMS info on the gas safety page, dangers of gas on the safety page, what to do if there is a leak, how to identify a leak, etc.

ADVISORY BULLETIN REVIEW

Question #34

Is there potential for damage to the operator's pipeline facilities caused by flooding, river scour, or channel migration?

34. Results
YES

ADB 2019-01

ADB 2019-01 Flood Mitigation

34. Notes

Yes. Avista has identified sites near Kettle Falls that may be prone to damage from river scour and migration. See note response to Q35

Question #35

If "YES" to Q34, did the operator take appropriate action in accordance with the guidance contained ADB 2019-01? Discuss ADB's guidance with operator's representative, and annotate any concerns.

35. Results
Satisfactory

ADB 2019-01

ADB 2019-01 Flood Mitigation

35. Notes

Avista responds to PHMSA when applicable advisory bulletins are published. Their response to this ADB is below. Their response and actions seem appropriate.

Avista has reviewed PHMSA's Advisory Bulletin on flooding, river scour, and river channel migration. Avista's Gas Standards take into account the threats concerned in this bulletin in its engineering, leak surveys and OQ qualifications (Sections 2.15, 2.13, 2.34, 2.15, 4.12, 5.11 and 4.31). Avista continues to improve our Emergency Response plans and has emergency valves in place for zoning off larger portions of the system strategically in case of natural disasters. Between 2016 and 2018, Avista's DIMP program hired outside geological firms to help develop a more detailed and robust natural forces risk model that takes into account waterway crossing, river scour, bank fires, landslides, erosion, liquefaction, and others for all three states we serve. The geological hazards survey performed includes all of Avista's service territory, but was focused in more detail on Avista's transmission pipelines.
Avista's response to the above mentioned "response to file" is the geological hazards survey did confirm waterway crossings of the Kettle Falls Transmission Line (NE Washington) require attention. The crossing of the Colville River at MP 47 was renoiced Summer 2021 due to it being exposed. Another crossing of the Colville River on the outskirts of the city of Kettle Falls, WA has been found to have reduced cover over the pipeline as well and a remediation plan is still being developed.

Question #36

Is there potential for the operator's system to be damaged by earth movement or other seismic/geological activities?

36. Results
YES

ADB 2019-02

ADB 2019-02 Earth Movement/Geological Hazards

36. Notes

Yes. Avista hired geological firms to develop a more robust natural forces risk model. See response to Q37

Question #37

If "YES" to Q36, did the operator take appropriate action according to ADB 2019-02? Discuss suggested actions from ADB with operator's representative and annotate any concerns.

37. Results
Satisfactory

ADB 2019-02

ADB 2019-02 Earth Movement/Geological Hazards

37. Notes

Avista has reviewed PHMSA's Advisory Bulletins on earth movement and other geologic hazards. Avista's Gas Standards take into account the threats concerned in this bulletin in its design, reporting, leak survey, and CO qualifications (Sections 2.12, 2.13, 2.14, 2.15, 2.17, 2.11 and 4.3). Avista continues to improve our Emergency Response plans and has emergency relief in place for zoning of larger portions of the system strategically in case of natural disasters. Between 2016 and 2018, Avista's DIMP program hired outside geological firms to help develop a more detailed and robust natural forces risk model that takes into account waterway connectivity, river scour, sea level, landslides, erosion, liquefaction, and others for all three sites we serve. The geological hazards survey performed includes all of Avista's service territory, but was focused in more detail on Avista's transmission pipelines.

Question #38

Does the operator have any indoor meter sets or regulators in their system?

ADB 2020-01
ADB 2020-01 Inside Meter Sets

38. Results
YES

38. Notes

Reviewed Avista's process and scheduling to remove indoor meter sets on a risk based and opportunistic approach

Question #39

If operator's system has indoor meter sets/regulators, did the operator review ADB 2020-0115? Discuss ADB guidance with operator's representative and annotate any concerns. Particular attention must be given to the operator's plan to conduct leak surveys, AC inspections, and other maintenance activities in locations that are difficult to access, as well as the inclusion of inside meters/regulators within the operator's DIMP plan, as applicable.

ADB 2020-01
ADB 2020-01 Inside Meter Sets

39. Results
Satisfactory

39. Notes

Avista responds to PHMSA's applicable advisory bulletins are published. Their response to this ADB is below. Their response and actions seem appropriate.

Avista has reviewed PHMSA's Advisory Bulletin on requirements for inside meters and regulators. Avista currently has approximately 500 inside meter sets in our gas system. Avista also has had a harden in place for several years for meter move-outs and continues to move out the higher risk inside meter sets each year. In response in the advisory bulletin, Avista made two updates to the Gas Standards in Specification 2.22 back in 2021. The updates to the Gas Standards included a new requirement for approval from Gas Engineering before any new meter or regulator can be installed inside a building and specifies: "Efforts should be made to move inside meter sets outside anytime work is required on the meter, regulator, or service line. If it is proposed to leave the meter set inside, contact Gas Engineering. Gas Engineering will review the existing installation and determine if it meets current installation requirements." Also, in response, Avista has made changes to the consequence scoring of the DIMP risk model to account for additional consequence risk where inside meter sets are currently located. Additionally, Avista continues to diligently work and move remaining inside meter sets that can/should be moved to outdoor locations.

Question #40

Is the operator's record of locations for all indoor meter sets/regulators within their system complete and sufficiently detailed??

ADB 2020-01
ADB 2020-01 Inside Meter Sets

40. Results
Satisfactory

40. Notes

Avista has records of all known locations of indoor meter sets. Reviewed a sample of the indoor meter set

Question #41

Does the operator have any low pressure systems?

ADB 2020-02
ADB 2020-02 Low Pressure Systems

41. Results
NO

41. Notes

Avista has no low pressure systems

Question #42

If "YES" to Q41, did the operator review ADB 2020-0025 for Overpressure Protection of Low Pressure Natural Gas Distribution Systems? Review ADB guidance with operator and annotate any concerns.

ADB 2020-02
ADB 2020-02 Low Pressure Systems

42. Results
Not Applicable

42. Notes

Avista has no low pressure systems

Question #43

For low pressure construction/maintenance projects, does the operator have a process for review of engineering plans and constructability reviews that are carried out through all applicable departments? Do all applicable departments review project plans for accuracy, completeness and correctness? How are control procedures developed that could identify system threats that could result in a common failure mode? How is the operator mitigating risk in their low pressure system?

ADB 2020-02
ADB 2020-02 Low Pressure Systems

43. Results
Not Applicable

43. Notes

Avista has no low pressure systems

Question #44

Does the operator include all low-pressure system risks in their DIMP program appropriately?

ADB 2020-02
ADB 2020-02 Low Pressure Systems

44. Results
Not Applicable

44. Notes

Avista has no low pressure systems

➤ **SUMMARY OF REQUIRED COMMENTS**

COMMENTS: Required for any ratings other than Satisfactory. Summarize/consolidate entries from the "Notes" blocks above. Ensure you annotate the question number for each comment.