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July 21, 2015

Docket Management System
U.S. Department of Transportation
1200 New Jersey Avenue SE, Room W12-140
Washington, DC 20590

Re: Docket PHMSA-2014-0098

Dear Sir or Madam:

Avista Utilities (NYSE: AVA) is an energy company involved in the transmission and distribution of natural gas as well as other energy-related businesses. Since 1889, Avista Utilities has provided reliable and safe energy services to customers in eastern Washington, northern Idaho, and parts of southern and eastern Oregon. Avista's natural gas company is comprised of 124 miles of intrastate transmission pipe and 12,600 miles of distribution pipe. Avista delivers natural gas to approximately 320,000 customers.

Avista commends PHMSA's continuing commitment to pipeline safety and appreciates the opportunity to comment on the topic of Plastic Pipe. We are committed to promoting a positive safety culture among our employees and in the communities we serve. Avista employees and contractors are expected to place the highest priority on employee, customer, public, and pipeline safety.

Avista expresses full support of the American Gas Association's (AGA) comments to PHMSA with special emphasis on these 3 items:

- §192.204 Risers - Avista fully supports AGA's comments in regards to having the design flexibility for the 3-ft structural support and to not be retroactive. Avista believes the utilization of risers is beneficial as it eliminates a piece of steel below ground that must be cathodically protected. A requirement for a non-standard, specially designed riser will negate the purpose for the petition. It would not be practical to special order risers.
- §92.376 Installation of plastic service lines by trenchless excavation - Avista recommends a Weak Link to be used on trenchless installations on mains and services. Avista also recommends the discretion of the type of Weak Link would be up to the

operator to define (i.e. pull head with sheer pins, smaller diameter size, etc) based on the project conditions and sound engineering practices.

- §192.756 Joining plastic pipe by heat fusion; equipment maintenance and calibration - Avista fully supports AGA's recommendation in regards to maintenance records. PHMSA's suggested requirements would be overly burdensome for the operators. Allow the operator to have ownership and determine appropriate internal programs to maintain necessary equipment maintenance records. Each operator should have an equipment maintenance program that meets equipment manufacturer's recommended practices or written standards.

Avista looks forward to working in concert with PHMSA and state regulators to enhance the nation's natural gas infrastructure.

Respectfully submitted by:



Michael Faulkenberry, PE
Director, Natural Gas Delivery

cc: Gas Compliance Correspondence File

