



Avista Corp.

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September 18, 2018

Diane Hanian, Secretary
Idaho Public Utilities Commission
Statehouse Mail
W. 472 Washington Street
Boise, Idaho 83720

AVU-G-18-07

RECEIVED
2018 SEP 19 AM 8:48
IDAHO PUBLIC
UTILITIES COMMISSION

Re: Avista Corporation Tariff Schedule 170 Revision – Natural Gas Rules and Regulations

Dear Ms. Hanian:

Enclosed for filing with the Commission is an original and seven (7) copies of Avista Corporation's dba Avista Utilities ("Avista or the Company") request for approval of proposed revisions to its natural gas tariffs in compliance with Order No. 33953 in Case Nos. AVU-E-17-01 and AVU-G-17-02.

If you have any questions regarding this filing, please contact Jaime Majure at (509) 495-7839 or jaime.majure@avistacorp.com.

Sincerely,

A handwritten signature in blue ink, reading "Linda Gervais", is positioned above the typed name.

Linda Gervais
Senior Manager, Regulatory Policy
Avista Utilities
509-495-4975
linda.gervais@avistacorp.com

Enclosure

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3 REGULATORY AND GOVERNMENTAL AFFAIRS
4 AVISTA CORPORATION
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7 SPOKANE, WASHINGTON 99220
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10

11 **BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

12

13 IN THE MATTER OF THE APPLICATION OF) CASE NO. AVU-G-18-07
14 AVISTA CORPORATION FOR AN ORDER)
15 AUTHORIZING APPROVAL OF PROPOSED) APPLICATION OF
16 REVISIONS TO ITS NATURAL GAS) AVISTA CORPORATION
17 TARIFFS)

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I. INTRODUCTION

22 In accordance with Idaho Code §61-502 and RP 052, Avista
23 Corporation, doing business as Avista Utilities (hereinafter
24 "Avista" or "Company"), at 1411 East Mission Avenue,
25 Spokane, Washington, respectfully makes application to the
26 Idaho Public Utilities Commission ("IPUC" or the
27 "Commission") for an Order authorizing the approval of
28 proposed revisions to natural gas tariff Schedule 170,
29 "Rules and Regulations" ("Gas Service Rules"), to
30 incorporate additional regulations to the Commission's

1 Service Rules for Gas Utilities (IDAPA 31.31.01), effective
2 November 1, 2018.

3

4 The Company requests that this filing be processed
5 under the Commission's Modified Procedure rules.

6 Communications in reference to this Application
7 should be addressed to:

8 David J. Meyer, Esq.
9 Vice President and Chief Counsel for
10 Regulatory & Governmental Affairs
11 Avista Corporation
12 P.O. Box 3727
13 MSC-27
14 1411 E. Mission Ave
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26 Phone: (509) 495-4975
27 Linda.Gervais@avistacorp.com

28

29

30 **II. SUMMARY OF APPLICATION**

31 Avista requests approval of the following revisions to
32 the Company's natural gas Tariff I.P.U.C No. 27.

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1 and 203.02, which were most recently amended in 2008. These
2 two rules are nearly identical and read in pertinent part:

3 02. *Utility Compliance.* All gas corporations subject to
4 the jurisdiction of this Commission are required to
5 abide by applicable provisions of the International
6 Mechanical Code [or International Fuel Gas Code] and to
7 connect for service and light only those installations
8 that:

9 a. Have been inspected and approved by authorized
10 agencies; or

11 b. When inspecting agencies do not exist, to require
12 their customers to abide by applicable provisions of
13 the International Mechanical Code [or Fuel Gas Code] as
14 a condition of receiving service or continuing to
15 receive service. (Safety Rules 202.02 and 203.02, IDAPA
16 31.11.01.202.02 and 203.02 (emphasis added))

17
18 Safety Rule 202 adopts the International Fuel Gas Code
19 of 2006 and Safety Rule 203 adopts the International
20 Mechanical Code of 2006. The International Codes are updated
21 and published every three years by the International Code
22 Council.

1 After Staff's investigation and Commission review of
2 the rules in question, it was found that Gas Service Rule
3 102 was incompatible with the Commission's Safety Rules
4 202.02 and 203.02. In particular, the safety codes
5 referenced in Gas Rule 102 had been superseded and the Rule
6 itself compelled utilities to perform actions that were no
7 longer required under the International Codes adopted by
8 Idaho Legislature in Idaho Code §54-5001. Therefore, on
9 August 19, 2018, the Commission suspended Gas Service Rule
10 102, IDAPA 31.31.01.102, in Order No. 30625 of Case No. GNR-
11 G-08-01. In this Order, the Commission also required that
12 Commission Staff undertake an informal review of its Gas
13 Service Rules with gas utilities and other interested
14 parties.

15 After collaborative discussions with Commission Staff
16 and other natural gas utilities, Avista provided Staff with
17 proposed changes to IDAPA 31.31.01 in November 2016, to
18 incorporate revisions consistent with current best practices
19 implemented in both Avista and Intermountain Gas Company's
20 respective Gas Meter Test programs. Further work and
21 discussion surrounding this issue, however, led to a
22 consensus that the integration of these revisions into each
23 individual Company's tariffs would prove more beneficial in

1 addressing the Gas Service Rules and also allow the
2 Commission to propose to repeal the entire rule set in the
3 future. As such, the matter of incorporating pertinent
4 provisions from IDAPA 31.31.01 into Avista's tariffs was
5 addressed in the Company's 2017 general rate case¹.

6 On December 28, 2017, the Commission issued Order No.
7 33953 in Avista's general rate case, approving the
8 Settlement Stipulation ("Settlement") filed by the Parties²
9 and requiring the Company to make additional compliance
10 filings to meet the terms and conditions of the Settlement.
11 With respect to Avista's Gas Service Rules, the Parties
12 agreed that:

13 *The Company and interested parties will meet and confer*
14 *to review the Commission's Service Rules for Gas*
15 *Utilities (IDAPA 31.31.01) to determine which*
16 *provisions should be retained and/or modified, and, if*
17 *the participants agree, incorporate those changes into*
18 *the Company's tariff. Any changes requiring Commission*
19 *approval, e.g., tariff revisions, will be submitted by*
20 *the Company on or before July 1, 2018. (Stipulation and*
21 *Settlement Para. 19)*
22

23 In compliance with this Order, Avista drafted revisions
24 to its Schedule 170 Gas Service Rules to reflect applicable

¹ Case Nos. AVU-E-17-01/AVU-G-17-02

² Stipulation "Parties" include Avista, IPUC Commission Staff, Clearwater Paper Corporation, Idaho Forest Group, LLC, and the Community Action Partnership Association of Idaho ("CAPAI").

1 requirements found in IDAPA 31.31.01. These draft Rules were
2 subsequently shared with Commission Staff, and a conference
3 call was held on June 13, 2018 between the Company and Staff
4 for a collaborative review of these Rules. On June 25, 2018,
5 Avista filed a Motion for Procedural Relief under Rule 256,
6 requesting to extend the filing deadline from July 1, 2018
7 to October 1, 2018 to allow sufficient time to complete the
8 work on the proposed Rules. With no parties in this case
9 objecting to the motion, the Commission granted the request
10 for extension on July 3, 2018 in Order No. 34102. An
11 additional conference call was held between Commission Staff
12 and Avista on July 28, 2018, and final consensus between
13 Commission Staff and Avista regarding the Gas Service Rules
14 was reached on September 10, 2018.

15 **V. CONCLUSION**

16 The purpose of this filing is to revise Avista's
17 Gas Service Rules to incorporate pertinent provisions of
18 the Commission's Service Rules for Gas Utilities (IDAPA
19 31.31.01), including rules for meter testing and accuracy
20 as well as maintaining system maps and records. Moving
21 these relevant requirements into the Company's tariff then
22 allows the Commission to propose to repeal the entire rule

1 set if desired, and is in compliance with Order No. 33953
2 in Case Nos. AVU-E-17-01 and AVU-G-17-01. Accordingly,
3 Avista requests that the Commission issue an Order
4 approving the proposed revisions to natural gas tariff
5 Schedule 170.

6 WHEREFORE, Avista respectfully requests the
7 Commission issue its Order finding the proposed Application
8 to be fair, just, reasonable and nondiscriminatory, and
9 effective for natural gas service rendered on and after
10 November 1, 2018, with this Application being processed
11 under Modified Procedure.

12

Dated at Spokane, Washington this 18th day of Sept
2018.

AVISTA CORPORATION

By: [Signature]

David J. Meyer

Vice President and Chief Counsel for
Regulatory and Governmental Affairs

AVISTA CORPORATION
d/b/a Avista Utilities

IDAHO
RULES AND REGULATIONS - continued

23. METER READING AND BILLING PRACTICE: - continued

3. When other than normal billing periods are caused by the Customer; i.e., opening an account, services for six days or less will be treated as an addition to the next normal billing period, and the total billed on the basis of a normal billing period; consumptions for seven days or more will be billed as a normal billing period, i.e., closing an account, services for 27 to 35 days will be billed as a normal billing period. The billings for services less than 27 and more than 35 days will be prorated.

4. When other than normal billing periods are caused by the Company, due to modification of meter reading schedules as required by changing conditions, services will be billed on a normal billing period basis, or prorated, whichever produces the smaller bill.

5. The Company may estimate meter readings for fractional month's use and render bills based on these estimated readings.

6. Where the Company's meter reader is unable to gain access to the premises to read the meter on his regular meter trip, the Company may estimate meter readings or request the Customer to send in the meter reading on a post card furnished by the Company.

7. See Utility Customer Relations Rule 204.

24. METER ACCURACY

The Company shall ensure that customers receive service with adequate pressure, heat content, and accurate measurement of gas consumption. No meter that is mechanically defective shall be placed in service or allowed to remain in service after a defect has been discovered.

A new gas meter installed for the use of any customer shall not be more than one (1) percent slow and not more than one (1) percent fast. Any meter removed from service for testing or repair shall be adjusted to the tolerance prescribed by the Avista Utilities Gas Standards Manual prior to being reinstalled.

Issued September 18, 2018

Effective November 1, 2018

Issued by Avista Utilities
By

Patrick Ehrbar, Director of Regulatory Affairs



AVISTA CORPORATION
d/b/a Avista Utilities

IDAHO
RULES AND REGULATIONS - continued

25. METER TESTING

A. Reporting.

After December 31st of each year, results of the installed meter testing program will be summarized, analyzed, and made available at the request of the Commission.

B. Meter Records.

Meter history records shall be maintained until superseded by a later test, but not less than two years. These records shall give:

1. sufficient information to identify the meter,
2. the reason for the test,
3. the date of the test and reading of the meter,
4. the name of the person making the test, and
5. the accuracy as found and as left, together with enough of the data taken at the time of the test to permit the convenient checking of the methods employed and the calculations.

C. Testing of Meters.

All tests to determine the accuracy of registrations of gas service meters shall be made with a suitable meter prover or testing equipment.

1. New Meter Testing Program.

- a. New meters shall be factory tested and certified to meet accuracy criteria as specified herein.
- b. Acceptance testing shall be performed by the Company prior to installation of new meters per the Avista Utilities Gas Standards Manual.

2. Installed Meters Testing Program.

- a. Installed meters shall be inspected and tested against metering tolerance prescribed herein and per the Avista Utilities Gas Standards Manual.
- b. Meters found to be outside the prescribed tolerances shall be immediately adjusted or replaced. No meter shall be reinstalled if found to be more than two (2) percent slow or fast when tested at the prescribed rate(s) of flow.

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IDAHO
RULES AND REGULATIONS - continued

- c. The methodology for sample sizes and analysis for the installed meter testing program is derived from the American National Standards Institute (ANSI) / American Society for Quality (ASQ) Standard Z1.9 (Standard Z1.9) and other generally accepted inspection standards.
- i. For diaphragm meters 1000 CFH and smaller, a random sample of meters shall be selected, tested within a prescribed sample size, and analysis conducted using Standard Z1.9. The random sampling program shall begin during the 10th year after meter installation, as established by last set date.
- ii. Larger capacity meters shall be tested per the Avista Utilities Gas Standards Manual.

D. Meter Tests Requested by Customers

The Company will, without charge, test the accuracy of registration of a meter upon request of a Customer, provided that the Customer does not request such a test more frequently than once in a 12-month period.

If a Customer requests more than one meter test within any 12-month period, the Company shall inform the Customer, prior to the test, that if the meter is found to register within the 2 percent accepted tolerance standard, under normal operating conditions, the Customer shall be required to pay the actual cost to perform the meter test.

No billing adjustment shall be required if the test results show an average registration error of less than 2 percent.

26. MAPS AND RECORDS OF FACILITIES

Maps and records shall be kept on file or available electronically in the principal office of each division or district. The maps shall show the size, character, and location of each street main, district regulator, street valve, and when practicable, each service connection in the corresponding territory served. In lieu of showing the date of installation and service location on maps, a separate record may be maintained.

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AVISTA CORPORATION
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Each division or district office shall maintain records of the gas distribution system that will enable the Company to furnish information regarding the provision of service to Applicants and Customers.

The Commission may inspect facilities and records as necessary as provided in section 61-521, Idaho Code.

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