State of Utah
Department of Commerce
Division of Public Utilities

[redacted]
Executive Director

[redacted]
Director, Division of Public Utilities

[redacted]
Governor

[redacted]
Lieutenant Governor

CLOSE OUT LETTER with RECOMMENDATION

December 13, 2021

[redacted]e
VP & General Manager, Western Distribution
Dominion Energy
PO Box 45360
Salt Lake City, UT 84145-0360

[redacted],

This Close Out letter is issued as a result of an inspection, No. 20211115JB, of Dominion Energy Utah's Distribution Integrity Management Program (DIMP)[1] and DIMP Implementation[2]. The procedures and records inspection was conducted on November 15-16, 2021. The inspection revealed that the operator's procedures at the time of the inspection appeared to be in compliance with the code stated below:

The Utah Public Service Commission (Commission) is authorized by Title 54, Chapter 13 of the Utah State Code to make and enforce rules required by the Federal Natural Gas Pipeline Safety Act of 1968, as amended, and other applicable laws. The Commission, by orders issued in Docket No. 89-999-06, has adopted Title 49 CFR Parts 190, 191, 192, 193, 198, 199, and Part 40 along with certain subsequent amendments. Through delegation from the Commission, the Division of Public Utilities' Pipeline Safety Staff (UTPS) monitors compliance with intrastate natural gas pipeline safety requirements.

UTPS is making 2 recommendations as a result of this inspection, listed below:

RECOMMENDATIONS:

1. **192.1007(b) Did the operator consider the information that was reasonably available to identify existing and potential threats?** UTPS recommends DEU's detailed rationale should be available when risk-ranking models deviate from SME judgments, especially when determining risks associated with pre-1973 Aldyl A pipes exhibiting 'Low Density Inner Wall' characteristics associated with brittle cracking and numerous Advisory Bulletins issued in the federal register addressing the safety concerns associated with these pipeline materials (see ADB-99-01, ADB-99-02, and ADB-02-07; DIMP FAQ: C.4.b.6 192.1007(b); ADB-07-02(72FR51301))

2. **192.1007(c) Do the procedures to evaluate and rank risk consider each applicable current and potential threat?** UTPS recommends DEU clearly define what prioritization "Focus", "1",

[1] Five year Inspection Cycle for UTPS
[2] Annual Inspection Cycle for UTPS

"2", and "3" are, when making the final determination of the threat risk scores and accelerated actions based on Regional Engineers, High Pressure Engineers, TIMP Integrity Engineers or SME judgments to effectively reduce the total Risk to the system.

The inspection, 20211115JB, is closed with no further action required. Thank you for the cooperation and support of your staff during the inspection and for your continued interest in pipeline safety. If you have any questions concerning this inspection or the compliance process you may contact me at [redacted] or call our office at [redacted]

Sincerely,

[redacted]

Pipeline Safety Engineer

[redacted]

APPROVED:

[redacted]

Pipeline Safety Program Manager

[redacted]

cc: (via email)

[redacted]