

December 1, 2014

Docket Management Facility
US Department of Transportation
1200 New Jersey Ave SE, West Building
Washington, DC 205090

Re: Pipeline Safety: Request for Revision of a Previously Approved Information Collection
National Pipeline Mapping System (PHMSA-2014-0092)

Avista Utilities (AVA) is a natural gas LDC serving Washington, Oregon and Idaho with approximately 325,000 customers. AVA operates approximately 125 miles of natural gas transmission pipelines, based on the 20% or more of SMYS criteria from Part 192.3, and over 12,000 miles of distribution main and service piping.

Avista currently submits data to NPMS electronically by extracting geospatial information and attributes from the Company's GIS system. Some of the new information requested by the NPMS is currently available in the GIS system, while other information is kept through paper records or other separate databases and is not available in a spatial format.

Positional Accuracy:

PHMSA proposes that for pipeline segments location within Class 3, Class 4, High Consequence Areas (HCA), or "could-affect" HCAs, operators submit data to the NPMS with a positional accuracy of five feet. PHMSA further proposes that for all pipeline segments located within Class 1 or Class 2 locations, operators submit data to the NPMS with a positional accuracy of 50 feet.

Comments:

AVA does not have GIS spatial data for Class 3 locations within the suggested five feet of accuracy. In order to do so, the Company would have to complete a GPS survey of these locations using GPS technology capable of providing the five foot accuracy. In order for AVA to maintain map continuity, the Company would likely need to GPS survey all 125 miles of transmission pipeline. This would also require mapping corrections where transmission piping connects to non-GPS distribution piping.

Throughput:

Throughput is used to denote a pipeline's capacity by stating the pipelines ability to flow a measured amount of product per unit of time. PHMSA proposes operators submit average daily

throughput to States can better identify shortages and implement contingency plans for potential widespread pipeline service outages to maintain an uninterrupted flow of energy supplies.

Comments:

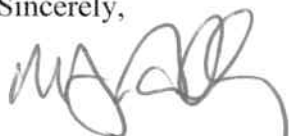
This information is not available through AVA's GIS system. AVA's distribution system is used in conjunction with transmission piping and volume measurement locations are limited making it difficult to obtain an average daily throughput through each segment of transmission pipe.

New requested attributes that are not currently available in a spatial format and that would have to have resources allocated for transferring the information into a geospatial format:

- Percent of SMYS
- Leak Detection
- Pipe Coating and Type
- Pipe Joining Method
- Class Location
- High Consequence "Could Affect" Areas
- Seam Type
- Installation Method
- Type of Valve Operators
- Year and Pressure of Original and Last Hydrostatic Test
- Ability to Inline Inspect
- Year of Last Inline Inspection and Year of Last Direct Assessment

We appreciate the opportunity to provide comments and we are committed to improving pipeline safety and the reliability of natural gas transmission pipelines.

Sincerely,



Michael J. Faulkenberry
Director, Natural Gas