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IDAHO PUBLIC  
UTILITIES COMMISSION

Attorney for Intermountain Gas Company

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE PETITION OF  
INTERMOUNTAIN GAS COMPANY  
FOR WAIVER TO MODIFY ATMOSPHERIC  
CORROSION CONTROL PATROL FREQUENCY

Case No. INT-G-05-03  
**PETITION FOR WAIVER**

Intermountain Gas Company (“Intermountain”), an Idaho corporation with general offices located at 555 South Cole Road, Boise, Idaho, hereby requests a waiver from IDAPA 31.11.01 – Safety and Accident Reporting Rules for Utilities, Rule 201 (SARR 201), compliance with the Code of Federal Regulations, Title 49, Section 192.481(a), as it pertains to exposed facilities associated with residential meters.

Communications in reference to this Petition should be addressed to:

Eldon Book  
Sr. Vice President, General Manager of Utility Operations  
Intermountain Gas Company  
Post Office Box 7608, Boise, ID 83707  
and  
Morgan W. Richards  
Attorney  
804 East Pennsylvania Lane, Boise, ID 83706

In support of this Petition, Intermountain does allege and state as follows:

**I.**

Intermountain is a gas utility, subject to the jurisdiction of the Idaho Public Utilities Commission, engaged in the sale of and distribution of natural gas within the State of Idaho

under authority of Commission Certificate No. 219 issued December 2, 1955, as amended and supplemented by Order No. 6564, dated October 3, 1962.

Intermountain provides natural gas service to the following Idaho communities and counties and adjoining areas:

Ada County – Boise, Eagle, Garden City, Kuna, Meridian, and Star;  
Bannock County – Chubbuck, Inkom, Lava Hot Springs, McCammon, and Pocatello;  
Bear Lake County – Georgetown, and Montpelier;  
Bingham County – Aberdeen, Basalt, Blackfoot, Firth, Fort Hall, Moreland/Riverside, and Shelly;  
Blaine County – Bellevue, Hailey, Ketchum, and Sun Valley;  
Bonneville County – Ammon, Idaho falls, Iona, and Ucon;  
Canyon County – Caldwell, Greenleaf, Middleton, Nampa, Parma, and Wilder;  
Caribou County – Bancroft, Conda, Grace, and Soda Springs;  
Cassia County – Burley, Declo, Malta, and Raft River;  
Elmore County – Glens Ferry, Hammett, and Mountain Home;  
Fremont County – Parker, and St. Anthony;  
Gem County – Emmett;  
Gooding County – Gooding, and Wendell;  
Jefferson County – Lewisville, Menan, Rigby, and Ririe;  
Jerome County – Jerome;  
Lincoln County – Shoshone;  
Madison County – Rexburg, and Sugar City;  
Minidoka County – Heyburn, Paul, and Rupert;  
Owyhee County – Bruneau, and Homedale;  
Payette County – Fruitland, New Plymouth, and Payette;  
Power County – American Falls;  
Twin Falls County – Buhl, Filer, Hansen, Kimberly, Murtaugh, and Twin Falls;  
Washington County – Weiser.

Intermountain's properties in these locations consist of transmission pipelines, a compressor station, a liquefied natural gas storage facility, distribution mains, services, meter and regulators, and general plant and equipment.

## II.

Intermountain seeks with this Petition for Waiver to obtain a waiver from compliance with the Code of Federal Regulations, Title 49, Section 192.481(a). This section of the code requires operators of natural gas pipelines to "inspect each pipeline or portion of a pipeline that is

exposed to the atmosphere for evidence of atmospheric corrosion...at least once every 3 years, but with intervals not exceeding 39 months.”

Currently, Intermountain inspects regulator stations, commercial and large volume meters for atmospheric corrosion on an annual basis which allows us to incorporate the atmospheric corrosion inspections with other routine maintenance that is required, by code, on an annual basis. By this waiver, Intermountain is requesting a change to the atmospheric corrosion inspection interval for residential meters from three (3) years to four (4) years.

### **III.**

In July of 2003, Intermountain implemented an automated meter reading (AMR) system for residential and commercial meters to improve customer service through more accurate meter reads and to continue improvement in operating efficiencies. Prior to July of 2003, Intermountain performed the atmospheric corrosion control monitoring on residential and commercial meters and associated exposed piping in conjunction with the monthly meter reading function. Meter readers, on foot, would perform a visual inspection of the above ground facilities associated with a residential or commercial customer meter as they performed their monthly meter reads. Intermountain does not have a regular maintenance need or requirement to visit each residential meter on an annual basis.

Intermountain has never experienced atmospheric corrosion or safety-related conditions resulting from atmospheric corrosion on our residential or commercial meters in the entire history of our operations, dating back to 1955. This is a direct result of the dry, arid, environment Intermountain operates in and the fact that the entire steel pipeline system is cathodically protected.

With the implementation of AMR, Meter Readers are no longer physically observing each residential and commercial meter during the course of routine meter reading to visually examine for atmospheric corrosion on residential and customer meters and associated exposed piping. The results from the years of monthly atmospheric corrosion inspections that were performed in conjunction with the monthly meter reading activity affirmed that atmospheric corrosion does not exist on Intermountain's residential and commercial meters.

#### IV.

In April of 1999, The Office of Pipeline Safety contemplated changing the onshore atmospheric corrosion inspection interval from three (3) to five (5) years due to "the generally low incidence of serious problems on protected pipelines", as stated in the Federal Register dated April 7, 1999, Volume 64, Number 66.

#### V.

Intermountain requests consideration for a waiver from Code of Federal Regulations, Title 49, Section 192.481(a):

"Each operator must inspect each pipeline or portion of pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion as follows:

If the pipeline is located onshore, then the frequency of the inspection is at least once every 3 calendar years, but with intervals not to exceed 39 months."

As a condition of the waiver, Intermountain proposes to perform the atmospheric corrosion inspection of residential meters and associated exposed piping in conjunction with the appropriate business district or non-business district leak survey schedule. Intermountain has already exceeded federal leak survey requirements by increasing the frequency of our non-business district leak survey from five (5) years to four (4) years. Additionally, our business district leak survey is performed annually.

Approval of this waiver will facilitate Intermountain's continued efforts to maximize operating efficiencies without jeopardizing atmospheric corrosion safety requirements by coupling atmospheric corrosion inspections with Intermountain's annual business district and four (4) year non-business district leak survey schedules.

**VI.**

This Petition is filed pursuant to the applicable statutes and the Rules and Regulations of the Commission.

**VII.**

Intermountain requests that this matter be handled under modified procedure pursuant to Rules 201-204 of the Commission's Rules of Procedure. Intermountain stands ready for immediate consideration of this matter.

WHEREFORE, Intermountain respectfully petitions the Idaho Public Utilities

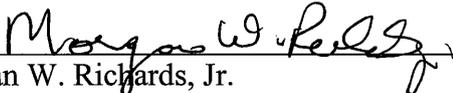
Commission as follows:

- a. That the proposed waiver herewith submitted be approved without suspension and made effective upon approval.
- b. That this Petition be heard and acted upon without hearing under modified procedure, and
- c. For such other relief as this Commission may determine proper herein.

DATED at Boise, Idaho, this 16<sup>th</sup> day of September, 2005.

INTERMOUNTAIN GAS COMPANY

By   
Eldon Book  
Senior Vice President,  
General Manager Utility Operations

By   
Morgan W. Richards, Jr.  
Attorney for Intermountain Gas Company