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September 28, 2026

Oregon Public Utility Commission
Filing Center
201 High St SE Suite 100
PO Box 1088
Salem, OR 97301

RE: Avista Utilities 2026 Natural Gas Safety Project Plan

Avista Corporation, dba Avista Utilities ("Avista" or "Company"), submits its 2026 Natural Gas Safety Project Plan in compliance with Commission Order 17 084. Among other matters the Order requires natural gas companies to submit an annual "Safety Project Plan" (Plan) report to the Commission by September 30th of each year. The Order lays out the requirements of the Plan, which is to be provided to the Commission as an informational report only. The Company's attached report satisfies these requirements, demonstrates Avista's priority commitment to natural gas safety, and meets the objective of being informational and easy to understand for the public, customers, and other regulatory stakeholders. If you have any questions regarding this filing, please contact Amanda Ghering at (509) 495-7950 or amanda.ghering@avistacorp.com.

Sincerely,

/s/ Amanda Ghering

Regulatory Affairs Manager

Avista Utilities

Natural Gas Safety Project Plan - Oregon



September 2026

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I. INTRODUCTION

On March 6, 2017, the Oregon Public Utilities Commission (Commission) issued Order 17-084, which in part required each of the natural gas distribution companies serving customers in Oregon to file with the Commission by September 30th each year an annual "Safety Project Plan" (Plan).[1] The purpose of the Plan is to increase transparency into the investments made by each utility, based predominantly on achieving important safety objectives. More specifically, the Plan intends to achieve the following objectives:

1. Explain capital and operating expenses needed to mitigate safety issues identified by risk analysis or to comply with federal and state rules.
2. Demonstrate the utility's commitment to safety and priority to its customers.
3. Provide a non-technical explanation of primary safety reports each utility is required to file with the Commission's pipeline safety staff.
4. Identify major state and federal regulatory changes that impact the utility's safety programs and investments.

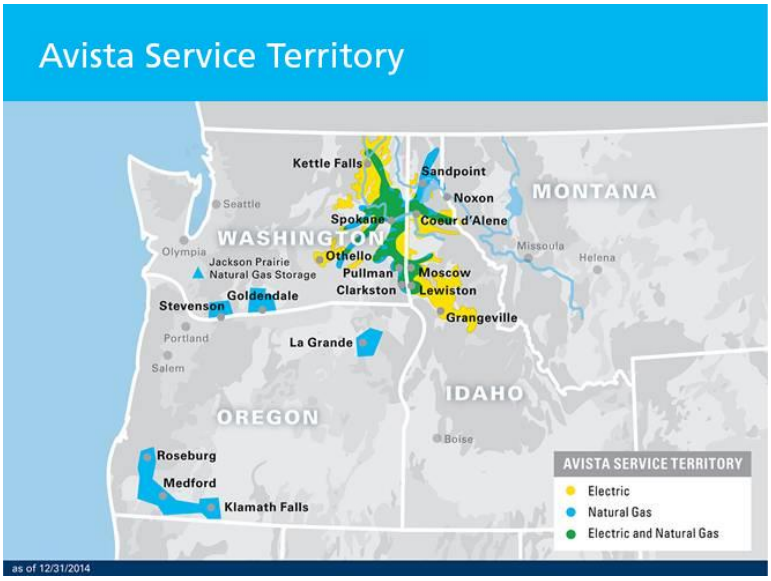
In meeting these objectives, the Plan provides an annual "snapshot" of the utility's expected investments in its identified safety programs along with the activities planned for each program over a period of 12 months. The Plan also includes a brief description of each safety program or initiative, the risks being addressed, a description of any supporting analysis, the costs and benefits, and an explanation of any program changes from the prior reporting year.

Importantly, the annual Plan is not intended to replicate the analysis performed to satisfy the utility's Distribution and Transmission Integrity Management Plans (DIMP and TIMP, respectively). Neither will the Plan provide in-depth descriptions of the analytical methods used to evaluate safety risks or replicate filings each utility already makes with the Commission's pipeline safety staff. In this respect, the annual Safety Project Plan has been deemed by the Commission to be an "informational report" to help the Commission better understand upcoming safety investments planned by each company, and as such, the Commission will not take any action on these informal plans. As detailed in Order No. 17-084, "the inclusion of a safety-related project in the Safety Project Plan (SPP) is not a prerequisite to recovery of the costs associated with that project in a GRC. Further, the SPP process does not change the standard for a prudence review in

[1] Order of the Public Utility Commission of Oregon in Docket UM 1722, Investigation into Recovery of Safety Costs by Natural Gas Utilities. March 6, 2017.

a GRC, with respect to either the costs of the project or the determination to proceed with the project."[2]

Avista serves approximately 386,000 natural gas customers in the states of Oregon, Washington and Idaho over an extensive service territory highlighted on the map to the left. The Company has served natural gas in Oregon since 1991 when it acquired the natural gas properties of Alltel/CP National in and around the communities of La Grande, Roseburg, Medford, and Klamath Falls.



II. AVISTA'S PERSPECTIVE ON SAFETY INVESTMENTS

Providing service to its customers, Avista relies on complex infrastructure systems designed, built, operated, and maintained to achieve a range of important objectives. Nearly every infrastructure investment the Company makes has at least some relationship to providing "safe" and "reliable" service, though very few of them are made exclusively to achieve a safety or reliability objective.[3] For the purposes of this Plan the Company distinguishes between:

1. **Recognized Safety Programs** – Those investments made to comply with federal and state-mandated programs, and other programs that have a primary safety emphasis.
2. **Safety as a Key Factor** – Investments intended to achieve other objectives than safety but that have a strong emphasis on public, customer, and employee safety.
3. **Safety as a Minor Factor** – Programs with primary objectives other than safety.

[2] UM 1722, Order No. 17-084 at ¶24.

[3] For example, when Avista replaces worn equipment at the end of its useful life the new equipment is more safe and more reliable than the old, but the investments are made to meet the predominant objective of replacing plant based on asset condition. The word predominant is used because end of life asset replacements will generally be made as planned *regardless* of whether there is an attendant safety or reliability benefit. On the other hand, true safety and reliability investments are those that would likely *not be made* absent the safety or reliability objectives they are intended to achieve.

Consideration of safety is either not a factor or is only one of many considerations guiding the investment. Avista has included Recognized Safety Programs and programs where Safety is a Key Factor in this Plan.

III. OVERARCHING FEDERAL SAFETY REGULATIONS

Avista, like all other natural gas distribution utilities, is subject to a range of federal and state safety regulations, industry standards and practices, as well as its own operating requirements. While these regulations, rules, and standards are designed to achieve multiple objectives (e.g. environmental protection, security, and reliability), the safety of citizens, customers, and employees is a primary focus. The overarching rules governing pipeline safety are developed and implemented by the Pipeline and Hazardous Materials Safety Administration (PHMSA) of the U.S. Department of Transportation and are contained in the Code of Federal Regulations (CFR), Title 49, Parts 190-199. These federal regulations continuously evolve to address existing issues more effectively as well as new threats that continue to emerge over time. In addition to developing the rules, the agency also administers and enforces them. States such as Oregon are also engaged in the business of ensuring the safe operation of natural gas systems and play a companion role in the implementation and administration of these federal regulations.

IV. PIPELINE SAFETY MANAGEMENT SYSTEM

In line with industry best practice, Avista is implementing a Pipeline Safety Management System (PSMS) based on guidance provided in the American Petroleum Institute (API) Recommended Practice 1173 (RP 1173) "Pipeline Safety Management Systems."

A PSMS is a structured method to continually assess and identify risks to Avista's gas system, measure progress and learn from its performance so the Company may employ appropriate defenses and controls to keep the risks from evolving into a catastrophic safety incident.

RP 1173 details the components of a PSMS using 10 Elements and the Plan, Do, Check, Act model (PDCA). Avista has modified the model to replace the "Act" step with "Adjust" and included the 5 principles of Human and Organizational Performance (HOP) to align with its enterprise Safety Management System. Figure 1, modified from RP 1173, illustrates each of the 10 PSMS Elements and 5 HOP Principles embedded with the PDCA circle showing the cyclical nature of PDCA and the continuous improvement philosophy of the PSMS. Each iteration through

PDCA produces opportunities for improvement of Avista defenses and controls, making its system safer over time.

Programs discussed in subsequent sections of this report are components of Avista's PSMS.

Figure 1: Plan–Do–Check–Adjust (PDCA) Cycle



V. RECOGNIZED SAFETY PROGRAMS

Distribution and Transmission Integrity Management Plans

In recent years, PHMSA has moved beyond the enforcement of individual rules to require natural gas utilities to conduct a standardized assessment of risks threatening the integrity of their pipeline systems. Known as the DIMP and TIMP, these requirements were enabled by amendments to the Federal Pipeline Safety Regulations on December 4, 2009, and December 15, 2003, respectively.

Distribution Integrity Management – The purpose of these plans is to enhance pipeline safety by identifying and reducing potential integrity risks on an operator's natural gas distribution system. Operators must base their analysis on reasonably available information about their pipelines as the basis of informing their risk decisions. The rule, symbolized in the PDCA Cycle diagram in Figure 1 above, requires operators to prioritize the risks identified in their planning process and to focus remediation activities on those that could result in an incident(s) that could cause serious

consequences. Finally, the rule also requires that operators implement a program to provide greater assurance of the integrity of their pipeline systems. This requirement is designed to promote continuous improvement in pipeline safety by requiring operators to identify and invest in risk control measures that go beyond previously established regulatory requirements.

Avista's DIMP - Managing the integrity, safety, and reliability of gas distribution pipelines has always been a primary goal for Avista, ensuring design, construction, operations, and maintenance activities are compliant with state and federal requirements. Meeting these requirements is a key part of Avista's goal to protect the health and safety of its customers, employees, and the communities it serves. Avista's DIMP establishes the requirements for compliance with the regulations and addresses the following key elements:

- Knowledge
- Identify Threats
- Evaluate and Rank Risks
- Identify and Implement Measures to Address Risks
- Measure Performance, Monitor Results, and Evaluate Effectiveness
- Periodic Evaluation and Improvement
- Report Results

The results of Avista's DIMP for its Oregon natural gas operations (including Transmission risks) have identified the following five priority risks (referred to as "sub-threats") to Avista's system.

Oregon Risk Ranking of Sub-Threats (Transmission & Distribution Combined)

1. Excavation Damage
2. Other Outside Force – Damage to Aboveground Facilities
3. Material Failure- Slow Crack Growth
4. Material Failure – Steel Welds
5. Incorrect Operations – Sewer Cross-bore

Transmission Integrity Management – As noted above, and as directed by the Pipeline Safety Act of 2002, PHMSA amended the Federal Pipeline Safety Regulations on December 15, 2003 by adding Subpart O – Gas Transmission Pipeline Integrity Management. The addition required

operators of natural gas transmission pipelines to create a Transmission Integrity Management Program. The purpose of the program is to ensure the safe, reliable, and cost-effective transportation of natural gas for customers without adverse effects on the public, customers, employees, and the environment. This program provides for the comprehensive, integrated, and systematic management of pipeline integrity as a means to improve the safety of applicable pipeline systems.

As with Distribution Integrity Management, the Transmission Integrity Management Program provides the necessary framework for Avista to assess and mitigate risks in order to reduce both the likelihood and consequences of pipeline failures. This process enables the Company to effectively allocate resources to appropriate prevention, detection, and mitigation activities that will result in improved integrity and safety. The TIMP requires primary Company documents for the management of its natural gas system to be referenced and incorporated into the Plan, and as part of the Plan, procedures and standards are reviewed and modified as necessary. These primary documents include:

- Avista Utilities Gas Emergency and Service Handbook (GESH);
- Avista Utilities Gas Standards Manual (GSM);
- Avista Utilities Public Awareness Program; and
- Avista Utilities Operator Qualification Program.

In the development and implementation of the TIMP, Avista has adopted a set of principles that guide the intent and specific details of the plan. These principles are summarized below:

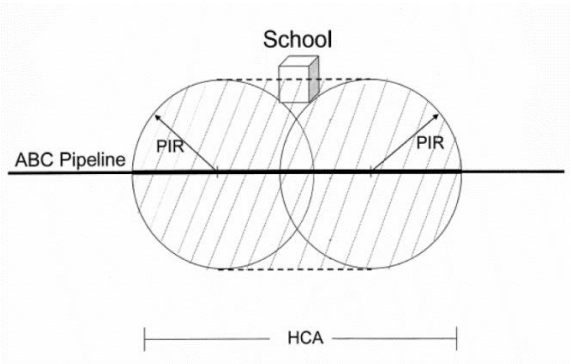
- Functional requirements for integrity management shall be engineered into new pipeline systems from initial planning, design, material selection, installation and initial inspection and testing.
- System integrity requires commitment by all operating personnel using systematic, comprehensive, and integrated processes in order to safely operate and maintain the pipeline systems.
- The TIMP will continuously evolve and improve which is intended to be flexible. Periodic evaluations are conducted to ensure the program takes appropriate advantage of improvements in technologies, and that the program utilizes appropriate prevention, detection, and mitigation activities.

- The integration of information is recognized as a key component for managing system integrity. Avista is committed to analyzing all pertinent information in order to effectively manage pipeline integrity.
- Avista has developed a relative risk assessment methodology and uses that methodology to determine the types of adverse events or conditions that may impact pipeline integrity. The process is also used to rank the pipeline segments for further assessment by considering the likelihood and consequence of an adverse event.
- Avista is committed to staying abreast of new knowledge and technologies affecting pipeline integrity, evaluating those technologies, and implementing them where appropriate. Avista personnel attend meetings and conferences and perform literature searches in order to investigate and then evaluate the use of new technologies for specific application in the integrity management program.
- Avista has determined the set of performance measures that best serve the need for monitoring and evaluating the effectiveness of the integrity management program.
- Avista is committed to communicating the results of its integrity management activities to its stakeholders.
- Non-mandatory requirements from industry standards or other documents invoked by Subpart O (i.e., ASME B31.8S and NACE SP0502) are incorporated into the TIMP and implemented as recommended in the standard.

Avista's DIMP and TIMP are submitted to the Oregon Commission's pipeline safety staff each year.

Planned Activities for 2026 – Avista will continue its regular leak data gathering, review, and analyses for both distribution and transmission integrity management planning. For distribution, Avista will complete its annual review and revisions to its accelerated actions in relation to the current leak data analysis and the new risk model and will publish these results in its annual distribution integrity management manual. For transmission, Avista will continue to monitor class location changes, high consequence areas (HCA), and Moderate Consequence Areas (MCA). An example of a high consequence area analysis is depicted in the following diagram.

Figure 2: Determining High Consequence Area



Planned or Anticipated Changes to the Program for 2027 – Avista's probabilistic risk model provides greater analysis into the risk associated with each gas asset and help in recommending future projects that will reduce the overall risk in Avista's gas system and ideally prevent future leaks before they occur.

Expenses for preparing Avista's DIMP and TIMP, as allocated to Oregon, are approximately $300,000 for 2027. These expenditures fund the processing and preparation of the plans and producing the annual reports. Implementation of measures to address key threats are funded under the respective programs responsible for their implementation.

Avista's Excavation Damage Prevention Program

As noted above, the number one safety and integrity threat to Avista's natural gas system results from accidental damage to underground facilities, referred to as "dig-ins," caused by third parties excavating in the vicinity of Avista's underground pipelines. Avista and the natural gas industry are actively combatting this threat through a comprehensive public communication campaign known as the "811" or "Call Before You Dig" program. The purpose of Avista's Damage Prevention Program and customer awareness activities is to increase public and employee safety by reducing the number of hazardous excavation damages



to Avista's natural gas (and electric) facilities. Avista communicates, cooperates, and coordinates with government agencies, utilities, contractors, engineers, customers, and the general public through a membership in the "811 One-Call" centers and through other communication, education, and awareness initiatives. In addition to reducing the overall damage to Avista's system, the Company also strives to meet the following objectives:

- Ensure adherence to federal and state regulations;
- Ensure adherence to Avista's standards, policies, and procedures;
- Provide standby oversight during excavation near transmission, higher-pressure pipelines, and critical large diameter pipelines;
- Identify areas in Avista's standards for damage prevention, such as locating, tracking of damages, and training that needs to be updated or clarified;
- Manage quality control of Avista's contract locating services and monitor contract requirements for locators;
- Develop and provide training to increase awareness of the potential hazards to appropriate personnel and third-party contractors working near and around Avista facilities;
- Provide program data and updates to appropriate key stakeholders; and,
- Develop, analyze, and track performance metrics related to the program.

Overview of Communications and Outreach

- 'Safe Excavation in Our Neighborhood' postcard – This informative postcard is provided to commercial excavators and contractors within Avista's service territory. A QR Code has been added to the postcard to provide additional information on our website. Based on recommendations from the 2017 Public Awareness Program Effectiveness Survey, Avista increased its outreach to excavators. This postcard is physically mailed in the spring to avoid the busy construction season and gain more attention. A copy of the *Safe Excavation* postcard is provided in Appendix A. In addition, excavators receive a quarterly '*Tips of the Trade*' email, which provides information on various industry topics and an Excavator Safety Guide. The email campaign and safety guide are provided via a third-party vendor, Culver Co. and Pipeline Association for Public Awareness (PAPA), respectively.
- 'Landscapers! Don't dig into buried utilities' postcard – Avista created a specific postcard for landscapers who often are the ones installing sprinkler lines and plants who may not consider

themselves excavators. This postcard draws their attention to make sure they call 811. A copy of the postcard is provided in Appendix B.

- 'Tips of the Trade' digital campaign – This email is sent quarterly to excavators in an attempt to reach the stakeholders who want easily accessible information on their phone. Avista contracts this service through a third-party vendor, Culver Company. The Company's Public Safety Program Manager coordinate the content used in these emails. A copy of the campaign is included as Appendix C.
- 'Safe Excavation Tips' checklist - When a dig-in occurs within the Company's system, Avista personnel responding to the emergency call typically give the excavator on site a copy of the Safe Excavation Tips sheet, included as Appendix D.
- 'Fence builders! Watch out for buried utility lines' postcard - Avista created a postcard for fence builders so they are not overlooking the importance of utilizing 811 by not considering themselves excavators (dirt movers). A copy of the postcard is included in Appendix E.
- 'Avista Pipeline Damage Tips' card – A business card size document was created to cover 811 and steps to take in the event of a damaged gas pipeline. A copy of the card is included in Appendix F.
- 'Excavator Safety Guide' publication – This magazine is published by PAPA and is provided once each year to commercial excavators and contractors in the counties in which Avista operates. A copy of the front cover of the magazine is provided in Appendix G. This publication is mailed in the spring to avoid the busy construction season.
- 'Natural Gas Safety' – Spanish translation brochure – Avista translated its Natural Gas Safety brochure to Spanish for Spanish speaking customers. The brochure explains basic safety measures for natural gas, natural gas operations procedures, and the responsibilities of customers regarding equipment and the use of 811 when excavating. The *Natural Gas Safety* brochure -Spanish translation can be found in Appendix H.
- 'One Call Center' brochure – A brochure was created to highlight the 811 process, common misconceptions, and the potential ramifications of violating dig laws. The *One Call Center* brochure can be found in Appendix I.

Avista Damage Prevention General Communications – The Company distributes a range of other education and outreach materials each year to the following groups:

- Avista Customers – Affected Public;
- Public in the Vicinity of Projects;
- Emergency Responders;
- Excavators/Contractors/Farmers/Fence Builders and Landscapers;
- Public Officials;
- Railroads; and,
- Schools – targeting the third through sixth grades, providing instruction materials to teachers and students.

Avista offers a Natural Gas Safety brochure written in Spanish, which is included as Appendix H.

Digital Outreach - Starting in 2019, Avista contracted with a third-party to do digital outreach with 811 to provide public safety messaging every quarter (Safe Digging Tips Newsletter). This email targets key issues found based on excavation damage trending data. Avista also shares this digital outreach with its employees.

Media Outreach – Advertising and outreach materials are distributed broadly through a range of media outlets each year in Washington, Idaho, and Oregon, including online banners (also called online marketing), radio, YouTube and promotional projects such as the 811 partnership with Papa Murphy's. Avista also partners with different organizations to advertise the 811 Call Before You Dig program, such as local and state Utility Coordinating Councils, PAPA, Pipeline Association of the Northwest (PANW), and special features like JJ the Rodeo Clown (pictured at left) who educates attendees at rodeos held across the state of Oregon.



Figure 3 below shows Avista's trend with pipeline damages in Oregon for the last ten years of the Company's Excavation and Damage Prevention Program. Figure 4 shows a year over year view of these damages by excavation cause category.

Figure 3: 10 Year Trend of Damage/Locate Ratios - Oregon

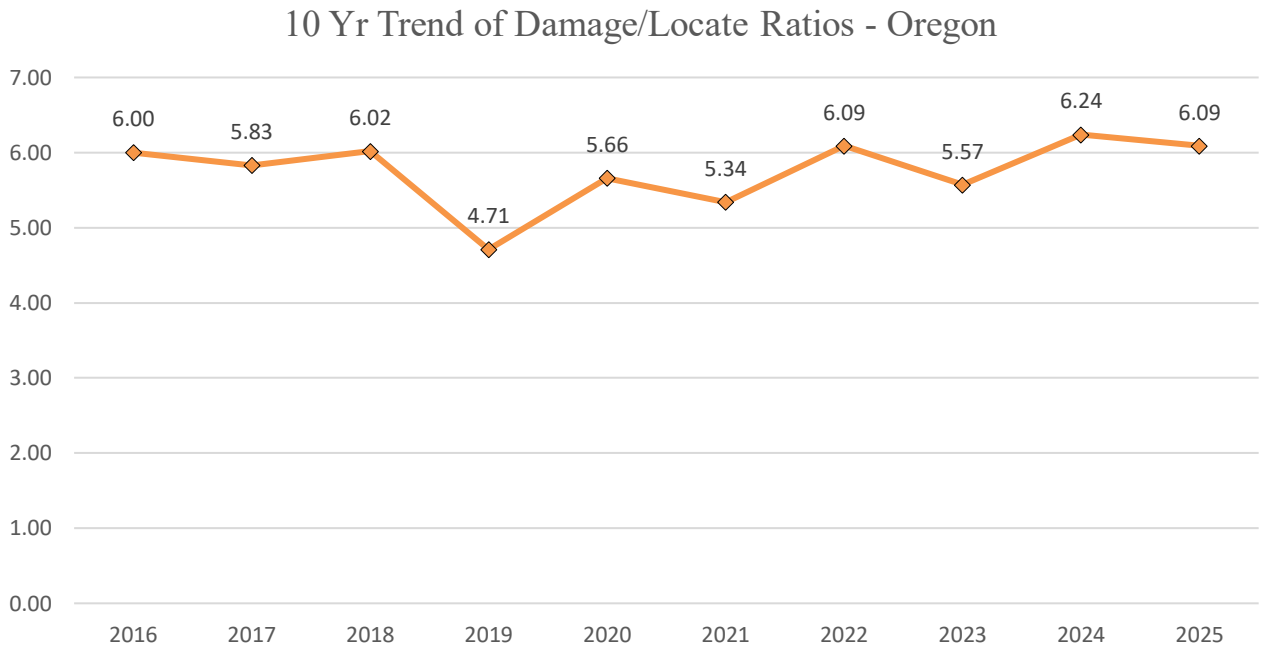
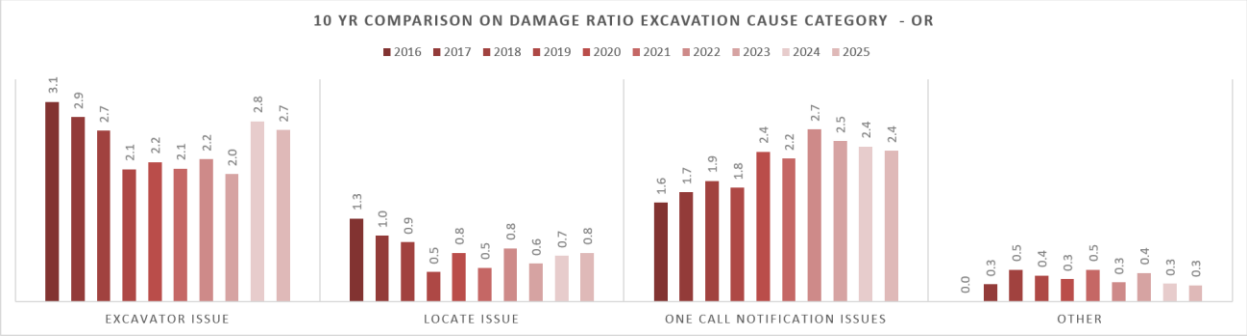


Figure 4: 10 Year Comparison on DAMAGE Ratio Excavation Caused – Oregon



Planned Activities in 2026 – Avista continues to collaborate with other organizations to spread the public safety message through outreach mailings, media, in-person events and other activities. Avista, in collaboration with Williams Pipeline, again held a Damage Prevention Summit to discuss and collaborate on damage prevention efforts amongst northwest natural gas operators (NW Natural, Cascade Natural Gas, MDU, TC Energy, Marathon, and others). "No Locates Requested" continues to be a large root cause for third-party excavation damage. To further inform the excavation community, Avista will be distributing a brochure outlining data and information pertinent to requesting locates as well as potential consequences of not doing so. Avista continues

its targeted focus on auditing the performance of contract locators through the Quality Assurance Department. These audits help identify program gaps, enhancements to locating processes, and aids in the accuracy of locates. Additionally, the Company continues to benchmark KPI metrics for Avista's locating contractor. Avista identified missed locates which did not result in any damages, as a result, the Company created a process to document these incidents for review and trending analysis. Avista also focused on repeat offenders by utilizing the Oregon complaint process. Avista continues to utilize internal 811 locate ticket risk ranking software and new Risk Mitigation Suite form throughout Avista service territories. This software identifies high risk locate tickets based on certain criteria such as location, population density and facility type. Once high-risk tickets are identified, field personnel, as available, contact the excavator to determine if the Company's facilities will be affected and if so, Avista personnel work to be onsite while excavating near its facilities. This also provides an opportunity for education of the Oregon dig laws. Avista created a Damage Prevention Specialist position in 2025, based in Medford, who is responsible for providing education and outreach to excavators through Risk Tool use and 811 events & campaigns. The effects of this position appear to have contributed to the reduction of Avista's overall damage total as well as the damage ratio in Oregon in 2026. Avista acquired a ticket management system (TMS), and it is being configured to better track internal and external locating efforts, data production, generate reports, and dashboard tracking.

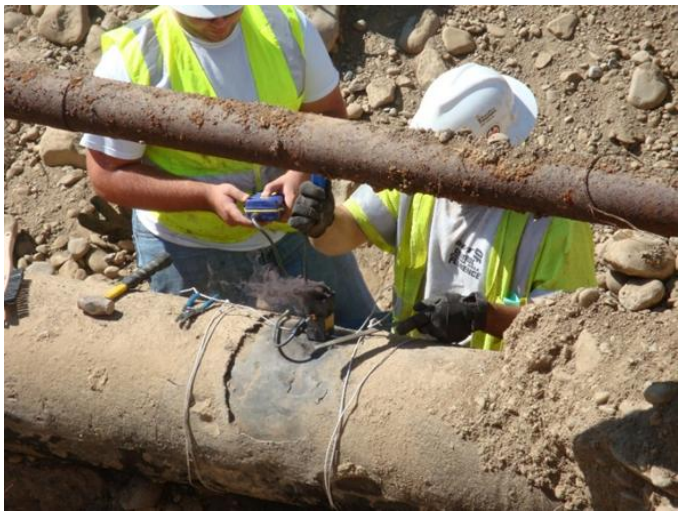
Planned or Anticipated Changes to the Program for 2027 – Avista is participating in the third annual Damage Prevention Summit in Boise, ID. Hosted by Intermountain Gas, the summit brings together Avista, Williams Pipeline, and other industry peers to collaborate on damage prevention. Avista will continue to collaborate with other organizations to spread the public safety messaging and continue providing outreach mailings, media, in-person events, locating audits, filing complaints on repeat offenders, and activities similar to 2026. The program will continue to utilize the Damage Prevention Specialist to liaise with excavators and contract locators as well as look for more ways to be effective in preventing damage.

Avista's expected 2027 expenses for its Damage Prevention Program and customer awareness communications in Oregon are approximately $99,000 in capital and $1,580,000 in O&M expenses.

The expected investments are proposed budgets for the time horizon presented; actual investments may change throughout each year and from year-to-year. The Company will seek recovery of the actual investments associated with this program through the General Rate Case process.

Cathodic Protection Program

Overview of Cathodic Protection Program - The purpose of the Cathodic Protection (CP) program is to provide additional protection to Avista's buried steel pipe from the effects of natural corrosion. Cathodic protection works by utilizing a low voltage DC current source, providing an excess number of electrons on the surface of the steel pipeline. By providing this excess amount of electrons on the surface of the pipeline, an electrical attraction is created with the chemicals in the soil resulting in an electro-chemical reaction creating a neutral PH level (7) at the surface of the pipeline, which results in a corrosion free zone at the surface of the pipeline. This forced electrochemical process directs the corrosion process to a sacrificial metal, which protects the pipeline from corroding as long as the circuit and power source are properly maintained. Even though steel pipelines coated with protective materials are effective in preventing corrosion, the cathodic protection system provides a safety net in the event this protective coating system is compromised. Cathodic protection systems are mandatory as required by the Code of Federal Regulations (CFR) 192.463, and this program is an important element of Avista's focus on reducing the second priority threat to the integrity of its system from external corrosion.



The Company's cathodic protection technicians are responsible for ensuring Avista's pipelines comply with these regulations, and that these systems are performing properly. Cathodic protection technicians take the lead in implementing corrective actions when problems arise. These technicians, shown in the photograph above, are continuously striving to upgrade and improve the efficiency of Avista's cathodic protection systems.

Alternating Current (AC) Voltage Mitigation – In areas where Avista's steel pipelines are located in proximity to high-voltage electric transmission lines, hazardous levels of induced AC voltage can develop on the pipelines through resistive, capacitive, and inductive coupling. Elevated AC voltages can accelerate corrosion and pose a safety risk to personnel working on or near the pipeline. To better understand and mitigate these hazards, Avista is installing monitoring equipment and conducting studies to quantify the effects of AC voltage on its pipeline system. This work will help ensure that transient and steady-state AC voltages are mitigated efficiently and effectively while maintaining pipeline integrity and worker safety.

Zone Isolation Points and Zone Management - Avista manages multiple cathodic protection zones across its three-state service territory. "Isolation Fittings" are utilized to electrically isolate each zone (i.e., electric current is prevented from flowing between any adjacent zones). The size of these zones is monitored and managed each year, resulting in zone boundaries being maintained in their current state, or alternatively, divided or consolidated as appropriate.

Other Program Elements - In addition to zone management, the Company's cathodic protection technicians are responsible for the following activities:

- Pipe Casings Monitoring;
- Bi-Monthly Rectifier Maintenance and Operation;
- Anode Bed Replacements;
- Annual Surveys; and,
- Isolated Steel < / > 100'in Length Monitoring

Inspection and Other Requirements - Under federal and state regulatory rules, cathodic protection programs are subject to mandated inspection activities, initiation of inspection, and frequency of inspection requirements.

Planned Activities for 2026 – Avista will continue to monitor its cathodic protection systems and perform testing throughout the year. On average, one or two anode beds must be replaced each year due to anode consumption. These replacement projects are typically scheduled for construction during the summer.

Planned or Anticipated Changes to the Program for 2027 – Avista is installing AC voltage monitoring equipment and performing an AC Voltage Impact study on a system between

Jacksonville, OR and Shady Cove, OR in 2027. Based on the results of the study, equipment may need to be installed to mitigate the effects of induced AC voltage.

Expected 2027 expenses for this program in Oregon are approximately $150,000 in capital and $250,000 in O&M expenses. The expected investments are proposed budgets for the time horizon presented; actual investments may change throughout each year and from year-to-year. The Company will seek recovery of the actual investments associated with this program through the General Rate Case process.

Atmospheric Corrosion Program

A companion part of the Company's response to the potential for external corrosion is the Atmospheric Corrosion Inspection Program (Atmospheric Corrosion). Similar to cathodic protection, this program is a requirement of federal regulation 49 CFR 192.481, which directs the pipeline operator to inspect its natural gas infrastructure exposed to the atmosphere for evidence of corrosion at least once every five years, and at intervals not exceeding 63 months. The Company previously conducted the Atmospheric Corrosion Program systematically, by state, and by operations district, in a three-year cycle. Avista shifted from the historic three-year cycle to a five-year cycle, meeting minimum federal regulations. Avista's Atmospheric Corrosion Program is managed by the Natural Gas Programs Manager and the Atmospheric Corrosion Program Administrator. Field inspections are completed by contractors specializing in this activity.

At some service locations, the inspections identify "abnormal operating conditions," which are those that exceed standard requirements and require mitigation to correct. Avista field personnel remediate these abnormal conditions on a pre-determined compliance timeline. The local construction office schedules and manages these remediation efforts. Some examples of abnormal conditions include buried meters and service valves, corroded risers, and risers in need of protective wrap (protecting the riser from soil). In addition, Avista also monitors, identifies, and mitigates several "continuing surveillance" items under the Atmospheric Corrosion Program. Examples of the continuing surveillance items include settled meter sets, overbuilt meters, and meters in need of barrier protection from vehicle damage.

Planned Activities for 2026 – Avista will continue its practice of inspecting facilities in at least one fifth of its Oregon service territory annually on a rotating schedule, which ensures inspections

of each meter and riser at least once every five years. Remediation work is completed in accordance with the specified compliance timeline.

Planned or Anticipated Changes to the Program for 2027 –

Avista's does not anticipate any capital expenses for 2027 and expects approximately $200,000 in O&M expenses for this program in Oregon. The expected investments are proposed budgets for the time horizon presented; actual investments may change throughout each year and from year-to-year. The Company will seek recovery of the actual investments associated with this program through the General Rate Case process.

Leak Survey Program

The Company's Leak Survey Program is mandated by federal regulation 49 CFR 192.723 and requires the utility to survey its system for potential leaks using specialized equipment that can detect trace amounts of natural gas. These surveys must be performed in business districts at least once each calendar year, but at intervals not exceeding 15 months. Surveys include tests of the atmosphere in natural gas, electric, telephone, sewer, and water system manholes, at cracks in pavement and sidewalks, and at other locations that provide an opportunity for finding gas leaks. Outside business districts, leak surveys must be conducted as frequently as necessary, but at least once every five calendar years, and at intervals not exceeding 63 months. The utility may also survey natural gas facilities on a more frequent basis, such as Avista's Priority Aldyl-A piping and high-pressure mains, where Avista leak surveys the facilities annually. Overall, Avista surveys its natural gas facilities in business districts, high occupancy structures and high occupancy areas, and 20 percent (one fifth) of its residential services each year. All of Avista's residential natural gas facilities are surveyed at least once every five calendar years. Avista's Leak Survey Program is managed by the Natural Gas Programs Manager and the Leak Survey Program Administrator. Field survey is completed by contractors specializing in this activity.

Avista field personnel remediate the detected leaks based on the grade of the leak and its required compliance timeline. The local construction office schedules and manages the remediation efforts. In general, Grade 1 leaks are repaired immediately, Grade 2 leaks are typically repaired within six months of discovery, and Grade 3 leaks are typically repaired within one year of discovery.

Planned Activities for 2026 – Avista will continue the Leak Survey Program in the state of Oregon at the above-listed intervals and will remediate all leaks within their respective compliance timeframes.

Planned or Anticipated Changes to the Program for 2027 – There are no significant program changes anticipated for 2027. Avista does not anticipate any capital expenses in 2027 pertaining to this program and expects approximately $700,000 in O&M expenses in Oregon. The expected investments are proposed budgets for the time horizon presented; actual investments may change throughout each year and from year-to-year. The Company will seek recovery of the actual investments associated with this program through the General Rate Case process.

Natural Gas Pipe Overbuild Program

Among the safety standards contained in Title 49, Part 192 of the Federal Code of Regulations is the requirement to remove customer-installed encroachments or "overbuilds" that interfere with or prohibit the Company's ability to safely operate the gas system. Typically, an overbuild situation occurs when a structure is erected over the top of Avista's preexisting natural gas facilities. These structures or barriers prevent the Company from performing mandatory maintenance such as leak survey (as described above), which is typically performed by walking directly above the gas facilities while operating the leak detection equipment. Overbuild of piping not originally designed for that condition is also a violation of the federal code. This is because the construction does not meet the code requirement for installation of the pipeline within a sealed conduit that is vented outside the overlying structure.



Overbuilds present an increased risk to customers as well as operational risks to Avista employees because of the potential of leaking gas to migrate into or become entrapped within structures built over the line. Overbuilds also increase the Company's operating costs due to the

need to return to the overbuild location multiple times in an attempt to complete leak survey and other maintenance tasks.

Avista's program is focused primarily on overbuilt pipe in mobile home parks. Due to the dynamic nature of this housing, it represents an area of great risk because the dwellings can be easily sited over buried facilities. Because of their incidence, they also represent the greatest opportunity to cost effectively resolve these problems. However, because overbuilds are not isolated to mobile home parks, the Company conducts the program over its entire natural gas service area.

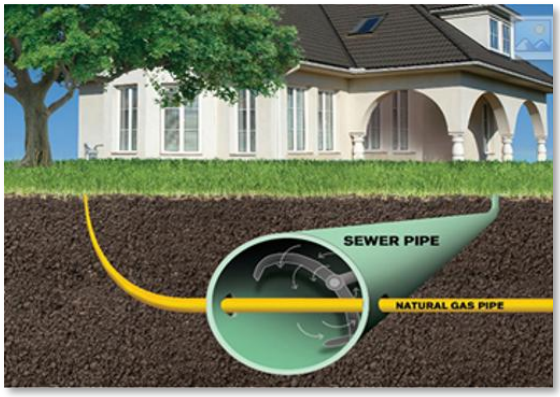
Planned Activities for 2026 – Avista will continue to mitigate known overbuilt conditions in each district to address the high-risk projects first, as prioritized by the Company's DIMP.

Planned or Anticipated Changes to the Program for 2027 – By the end of 2027, the Company anticipates completing the replacement of all known overbuilt pipe within mobile home parks.

Avista's expected 2027 expenses for this program in Oregon are approximately $656,000 in capital and $201,000 in O&M expenses. The expected investments are proposed budgets for the time horizon presented; actual investments may change throughout each year and from year-to-year. The Company will seek recovery of the actual investments associated with this program through the General Rate Case process.

Gas Cross bore Post-Construction Inspection Program

In 2019, Avista began a Company-wide cross bore inspection program targeted specifically at finding instances where a gas line has been installed through a sewer line. In rare cases, when natural gas lines are installed by boring horizontally, they can cross or penetrate an undetected sewer line. This can happen if a sewer line wasn't mapped and couldn't be located on the property prior to the installation of the gas line. The safety risk created by a cross bore comes when the gas line causes the sewer to back up and the homeowner or a plumber uses a rooter device to clean out the sewer line without checking for a cross bore first. The rooter equipment is designed not only to cut



roots that have encroached within the sewer line but also is capable of cutting plastic gas lines as well, causing blowing gas to enter into the sewer line and potentially into the home and neighboring homes.

The sewer inspections are completed using camera technology that travels through the inside of the sewer lines which minimizes the disruption to the customer. At times, the contractor will need access to a customer's home to access the sewer lateral with their camera equipment. Contractors will set up an appointment with the customer to complete their inspection. If a cross bore is identified the contractor will notify Avista immediately and Avista personnel will be dispatched to the location to organize a reroute of the gas line and repairs to the sewer line.

Avista's cross bore inspection contractor inspects sewer mains and laterals in proximity to new construction projects and Aldyl-A replacement projects where some form of trenchless technology was used to install the gas facilities. In addition, the program inspects legacy work, targeting areas of the system where trenchless methods were employed in past installations. The team utilizes a "risk heat map" which incorporates facility data such as pipe type and year of installation alongside industry benchmarks to assess risk. Avista's gas cross bore inspection program is managed by the Natural Gas Programs Manager and Cross Bore Project Coordinator. Field inspections are completed by contractors specializing in this activity.

Planned Activities for 2026 – Avista will continue gas cross bore inspections of new construction projects and Aldyl-A replacement projects when trenchless forms of technology are used during installation. The Legacy Program also remains active, with an allocated $50,000 in O&M expense (Company wide), and will leverage the established risk assessment tool, or "risk heat map" to inform the work.

In the Fall of 2026 Avista will solicit bids from qualified contractors for the Cross Bore project through the Request for Proposal (RFP) process. This will allow Avista to review proposals from several contractors to find the best fit in terms of quality, cost, and alignment with organizational goals.

Planned or Anticipated Changes to the Program for 2027 – Avista's expected 2027 expenses for this program in Oregon are approximately $1,500,000 in capital and $50,000 in O&M expenses. The expected investments are proposed budgets for the time horizon presented; actual investments

may change throughout each year and from year-to-year. The Company will seek recovery of the actual investments associated with this program through the General Rate Case process.

VI. PROGRAMS WHERE SAFETY IS A KEY FACTOR

As noted above, the Company makes a range of investments in its systems each year to replace assets that are at or are nearing the end of their useful life (i.e., based on asset condition). While there is some element of safety and reliability in nearly every investment of this type, the predominant reason for the investment is to replace worn-out equipment that has provided a lifetime of useful service for customers. While the next two programs represent the replacement of assets based on condition, the safety of customers and employees is a priority consideration in determining how the programs are implemented and over what period of time.

Aldyl-A Pipe Replacement Program

Avista is continuing its planned program to systematically replace select portions of DuPont Aldyl-A medium density polyethylene pipe in its natural gas distribution system. This work is accomplished by the Gas Facilities Replacement Program (GFRP), which is responsible for developing and managing projects in Oregon, Washington, and Idaho. Avista's Master Plan for this program, titled "Protocol for Managing Select Aldyl-A Pipe in Avista's Natural Gas System," provides the background on this pipe, the vintages and types of pipe slated for replacement. In 2022 a study was completed by Avista's Asset Management group which is titled "Study of Aldyl-A Pipe Leaks 2022" which describes the rationale and analysis for the proposed 25-year replacement program. None of the subject pipe is "high pressure main pipe", but rather, consists of distribution mains at maximum operating pressures of 60 psi and pipe diameters ranging from 1¼ to 4 inches. As part of this program, Avista has rebuilt or eliminated thousands of transition fittings used to connect Aldyl-A service piping (1/2 and 3/4-inch diameter) to steel tees that are welded to steel main pipe (service tee transitions). As of August 2026, there are 51 Service Tee Transition Rebuilds (STTRs) remaining in Oregon being actively worked by Avista's local district offices.

Nature of the Safety Risk – Early vintages of Aldyl-A pipe produced for natural gas service from the 1960s through the early 1980s are subject to "premature brittle-like cracking". This failure

process results from a loss of 'ductility' or flexibility in the pipe material. Ductility is a fundamentally important property of polyethylene piping. Its loss allows small cracks to form on the inner wall of the pipe, which eventually propagate through the pipe wall, resulting in failure. This tendency for brittle-like cracking renders the pipe more susceptible to failure over time than newer-generation polyethylene pipe, and this tendency to fail increases as the piping continues to age.

Completed Replacement Activities – Under guidance of the Master Plan, Avista began replacing 253 miles of select Aldyl-A piping in its Oregon service territory in 2012. While the GFRP's plan was to replace 125.9 miles (50%) of pipe via construction projects from 2012 through 2025, the actual amount of pipe replaced during this 14-year period totaled 89.0 miles (35%), a shortfall variance of 36.9 miles. Despite the shortfall via construction activities, Avista's system of record indicates that 158 miles (63%) in total has been replaced by the GFRP or otherwise removed during the same period by way of local district road projects, system repairs, and mapping corrections.

Construction Approach – Avista continues to complete the majority of its Aldyl-A replacement using contract crews and equipment. This approach is more efficient since this effort is focused, intensive, specialized, subject to seasonal constraints, and is adaptive to Avista's normal workload and staffing levels required for ongoing natural gas operations. In April 2026, Canyon Pipeline Construction, Inc..[4] became Avista's primary contractor for performing its Aldyl-A main pipe replacement and rebuilding service tee transitions. Canyon's expertise of specialized natural gas construction techniques has been a valuable asset in Avista's efforts to complete work on time and manage costs effectively. Avista will partner with Canyon to refine their construction technologies allowing the Company to improve efficiency and cost effectiveness over time. Avista continues to employ keyhole technology in support of main pipe replacement work when installing new main pipe by the use of directional drilling. More specifically, in effort to avoid cross-boring or otherwise damaging adjacent utilities along the bore path, each utility is exposed, or windowed to visually ensure that the drill head clears each respective utility without conflict. From 2012 to the time of this report, this environmentally friendly approach has yielded approximately $8.31 million

[4] Canyon Pipeline began natural gas infrastructure construction operations in Utah as NPL Construction Co. in 2007. To enhance local focus and better serve our customers, Canyon Pipeline Construction, Inc. was established in 2015. Website: https://canyonpipeline.com/about/

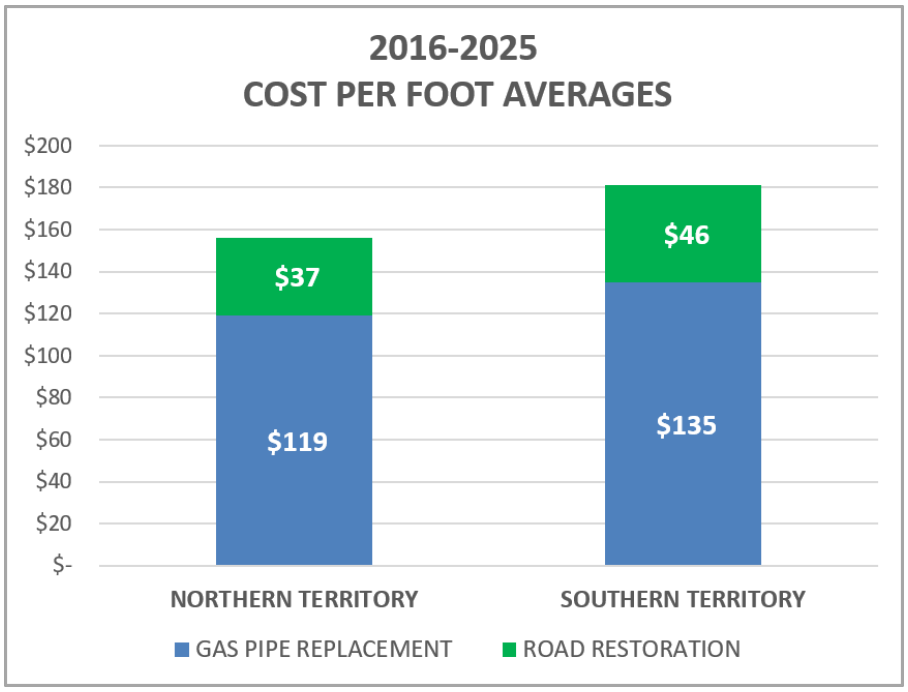
in road restoration cost avoidances as compared to the cost of conventional construction and road restoration.

Managing the Unit Costs of Replacement – Prior to initiating Avista's Aldyl-A pipe replacement program, Avista'a experience with pipe installation and the associated cost was almost exculsively with new construction. Since new construction most often involves installation of main pipe and service lines in new residential or commercial developments, the activities are generally limited to trenching in open soil, installing piping and padding, backfilling and compacting the open ditch. The 2011-2012 construction costs for new construction averaged about $45 per linear foot.

Replacing natural gas facilities decades after the initial installation, and after the subsequent development of these areas, turns out to be another matter entirely. Replacement pipe must now be installed in fully developed and occupied areas that consist of numerous below ground facilities, paved streets, sidewalks and arterials, landscaped residential neighborhoods, and hard-surfaced commercial developments teeming with daily traffic and other activity. New main pipe is most often installed by either horizontal directional drilling or open trenching. While horizontal drilling is far less invasive, both methods require cutting into existing pavement or other hard surfaces. Care must be taken to plan and locate the existing underground facilities to avoid damaging them, new service lines must be ditched into landscaped yards, etc., and all of these features must be restored to unblemished service once the installation is complete. As a result, pipe replacement costs have increased throughout the length of this program. In 2025, the average cost of main pipe replacement was $233 /LF (per linear foot), with a low of $146/LF in Central Point and a high of $319 /LF in the City of Ashland

In addition to the added cost of installing the pipe, the pavement cutting and remediation policies of local jurisdictions have had a significant impact on the scheduling, logistics, operational methods, extent of the area to be repaved, and the ultimate cost of pipe replacement. In Avista's experience, there appears to be a continuing trend among jurisdictions to enforce restrictive moratoria on cutting in newer arterials and streets, to require more expansive requirements for control density backfill and compaction, and for patching or repaving of streets cut for pipe replacement. These requirements include rules on the export and import of trench backfill materials, significant soil compaction, and the width of pavement restoration, which averages 4 feet and can range from 2 feet up to 8 feet along segments of the project.

Figure 5: 2016-2025 Cost Per Foot Averages



In an effort to understand, control, and document project costs, the program has been tracking system-wide cost data including cost per foot averages since its inception in 2012. The cost of completing this work in Oregon is significantly higher than other state jurisdictions. As an example, Figure 5 to the left shows the average cost per foot from 2016-2025 for the Company's northern territory, which includes Washington and Idaho's service area. Though actual pipe replacement costs are higher in Oregon,[5] a major element of the total cost disparity between the two territories is related to road restoration requirements in Oregon jurisdictions. These costs are largely a direct result of municipally-driven traffic control, road restoration, and permit requirements, which are beyond Avista's direct control.

Optimizing Trenchless Technology – Given the high costs associated with open trenching and roadway restoration, Avista partners with Canyon to optimize the use of trenchless technologies. Not all projects, however, are suitable for using these technologies due to safety issues associated with the presence of multiple underground utilites, or when the affected area has only one source of supply. For example, utilizing split and pull or pipe bursting technology requires the

[5] Some of the reasons for the higher construction costs include 100% import/export of trench materials, slurry backfill, material handling requirements, native soil conditions, traffic control requirements such as traffic plate locks, and installation methods used.

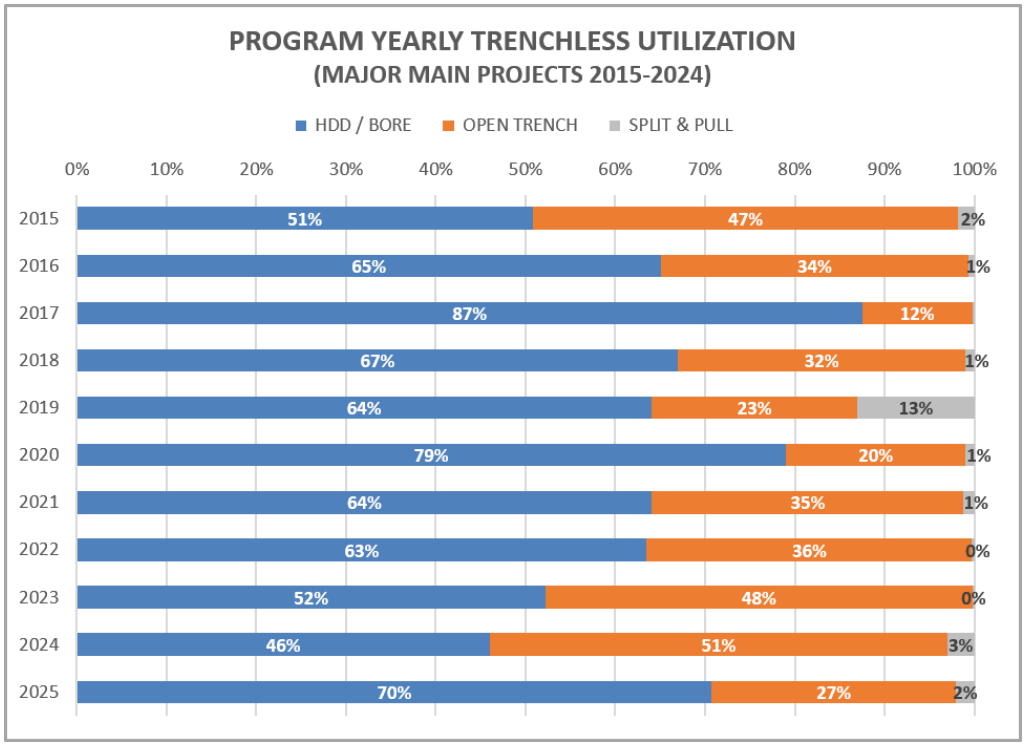
coordination and logistics of an all-day customer outage and the ability to perform the procedure to allow for restoration of customers' service the same day. Other prohibitive conditions include the presence of subsurface rock (solid rock or heavy cobble) and the lack of sufficient clearance along the pipe path to provide for adequate separation of utilites. However, where conditions are favorable, horizontal drilling and split and pull can provide a cost-effective alternative to open trench construction because the restoration footprint is significantly reduced.

Figure 6 and Table 1 below, show the utilization of horizontal directional drilling as a percent of main pipe installed by year.

Table 1: Program Utilization of Horizontal Drilling Installation for Main Pipe

Year	Percent Utilized
2015	51%
2016	65%
2017	87%
2018	67%
2019	64%
2020	79%
2021	64%
2022	63%
2023	52%
2024	46%
2025	70%

Figure 6: Program Yearly Trenchless Utilization



Continuing Annual Leak Survey – Avista has continued to conduct annual leak surveys on Priority Aldyl-A main pipe since 2011, even though it is more costly than the conventional frequency of surveying every five years. This frequency, however, provides customers and others a prudent margin of added safety while these facilities are being replaced and rebuilt.

Heightened Risk Prioritization within High-Consequence Areas (HCA) – A key tool developed by Avista for better managing the risks associated with its priority Aldyl-A piping, is its risk consequence model. The model predicts areas in the system where leaks are most likely to occur and then incorporates information on the density of development (high-consequence areas) to assess relative priorities for pipe replacement. In 2014, Avista updated its model to distinguish schools and daycare facilities from other types of developments. These were identified as sites that would be difficult to evacuate in a natural gas emergency. Though these sites were already included in designated high-consequence areas, this designation provides an additional layer of priority. The model highlights instances where Aldyl-A facilities are close to facilities that can sometimes encompass outdoor play areas or other congregation areas. Avista continues to list and map potential sites to determine whether they might warrant this higher-level prioritization. As of

August 2023, all known schools and daycare facilities with large diameter Aldyl-A services listed as high consequence areas have been remediated.

Activity Summary for 2025 – Of the 8.70 miles planned for pipe replacement, 6.89 miles were remediated via construction with the addition of 0.44 miles through pipe verification. In addition to Aldyl-A main replacement, 73 STTR's were mitigated via construction or map corrections.

Current Activities for 2026 – As shown in Table 2 below, Avista and Canyon are working to complete 7.33 miles of Aldyl-A main pipe replacement in the cities of Ashland, Central Point, Phoenix and Klamath Falls Oregon.

Table 2: Current 2026 Oregon Major Main Projects

Location	Miles	Start	End
Ashland	1.40	January	April
Central Point	2.08	July	September
Klamath Falls	1.27	May	July
Eagle Point	0.33	September	September
Phoenix	2.25	October	December
Total Miles	**7.33**		

Planned Activities for 2027 – As provided in Table 3 below, Avista and Canyon are scheduled to address 6.93 miles of main pipe replacement in Oregon in 2027.

Table 3: Planned 2027 Oregon Major Main Projects

Location	Miles	Start	End
Medford North	1.80	January	April
Roseburg	3.10	May	September
Grants Pass	1.60	October	December
La Grande	0.43	October	December
Total Miles	**6.93**		

Avista's expected 2027 expenses for this program in Oregon are approximately $9,066,081 in capital and $146,000 O&M expenses. The expected investments are proposed budgets for the time horizon presented; actual investments may change throughout each year and from year to

year. Avista will seek recovery of the actual investments associated with this program through the General Rate Case process.

Isolated Steel Pipe Replacement Program

Steel pipe that is not cathodically protected is subject to varying degrees of corrosion depending on pipe coating, the type and condition of the pipe, soil type and acidity, ground moisture, the presence of foreign utilities, and other factors. Corrosion causes the loss of metal from the pipe wall, which over time can result in a failure of the pipe and a gas leak. A safety issue can arise because in many cases these pipes are installed next to the businesses and homes of customers.

Avista proactively performs cathodic inspections on steel pipe and service risers to try and identify isolated steel within its distribution system. As mandated by Federal and State regulation, Avista monitors isolated steel sections of pipeline main less than 100 feet in length, and isolated services and risers at a frequency of 10 percent per year. This preemptive effort helps reduce the potential for corrosion and a subsequent leak, thereby increasing the safety and reliability of Avista's natural gas system.

Current Activities for 2026 – During 2026, the Company is planning to continue proactively identify and replace isolated steel pipeline and services/risers as part of our active mitigation program.

Avista is considering an RFP process in the Fall of 2026 to solicit bids from qualified contractors for the Isolated Steel project. If pursued, the RFP would allow Avista to evaluate multiple proposals based on quality, cost, and alignment with organizational goals.

Planned or Anticipated Changes to the Program for 2027 – There are no anticipated changes to the overall program for 2027.

Avista's expected 2027 expenses for this program in Oregon are approximately $1,900,000 in capital and $130,000 O&M expenses. The expected investments are proposed budgets for the time horizon presented; actual investments may change throughout each year and from year-to-year. The Company will seek recovery of the actual investments associated with this program through the General Rate Case process.

VII. APPENDICES

Appendix A: Safe Excavation in Our Neighborhoods

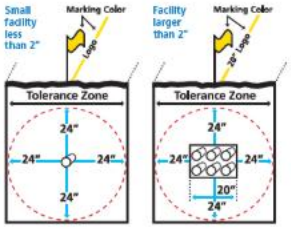


Safe excavation in our neighborhoods.

It takes a system of underground pipelines to bring natural gas service to our communities. Federal and state codes regulate natural gas pipelines for public safety. Avista regularly maintains its natural gas facilities to ensure safe and reliable service. To protect pipelines from excavation damage, have utilities marked before you break ground. Click or call 811 at least two business days before you dig—it's the law.

Before disturbing the ground

1. Mark/outline your dig zone with white paint.
2. Call 811 (or visit **call811.com**) and wait until utility lines are marked. Privately owned lines beyond the meter can be located for a fee.
3. Maintain and respect all location marks/flags.
4. Hand dig gently to expose the utility line, which can be up to 24 inches from the locate mark (reasonable accuracy zone). Do not use mechanized equipment within a 24-inch radius of the line until it has been visually located (see right).
5. Properly support and protect exposed pipeline from rupture/other damage.
6. Stop excavating immediately if you find unmarked gas or electric lines, and click or call 811 to have them marked.
7. Cover the exposed line afterward with acceptable backfill (rock-free dirt or sand) and proper compaction to avoid damage.



Ground-markings colors

- Colors indicate buried utility types.
- Validity periods vary by state and can change.
- Visit call811.com for current digging timeframes.

ELECTRIC: RED | SEWER: GREEN
GAS-OIL: YELLOW | TEMPORARY SURVEY: PINK
COMMUNICATIONS: ORANGE | IRRIGATION: PURPLE
WATER: BLUE | PROPOSED EXCAVATION: WHITE

Signs of a natural gas leak

Smell — Smell rotten eggs?
Hear — Hear hissing or roaring?
See — See bubbles or blowing dirt?

AVISTA

Hazards of a natural gas leak

- Natural gas mixed with air (4% gas to 15% air ratio) easily ignites near heat or sparks.
- Gas can migrate to enclosed spaces and displace oxygen, causing dizziness or asphyxiation.
- Gas fires may produce irritating or toxic fumes.

Responding to a gas leak emergency

- Never try to fix a gas line or restrict the gas flow, including bending over a pipe (causes static spark).
- Do not use phones, flip switches, start cars or do anything to cause a spark.
- Do not shut off any pipeline valves.
- Evacuate on foot, heading upwind and uphill.
- Alert others to evacuate the area and keep people away.
- Call 911 and Avista from a safe distance to report the emergency.
- Wait for emergency responders and Avista to arrive.

For safety instruction videos, go to myavista.com/safetyvideos



General Pipeline Markers do not show precise utility locations and are no substitute for contacting 811. You are still required to click or call 811 before you dig.

Если Вы хотели бы получить информацию о правилах безопасности на русском языке, пожалуйста звоните по телефону (800) 227-9187.

Si desea recibir información en Español acerca de la seguridad, por favor llamar a: (800) 227-9187.

For assistance in alternative languages, please call (800) 227-9187.

(800) 227-9187
For additional information
myavista.com/contractorsafety
publicsafety@avistacorp.com

811 SAFETY IS IN YOUR HANDS. EVERY DIG. EVERY TIME.

2/26

AVISTA
1411 East Mission MSC 20
P.O. Box 3727
Spokane, WA 99220-3727

Appendix B: Landscaper Brochure

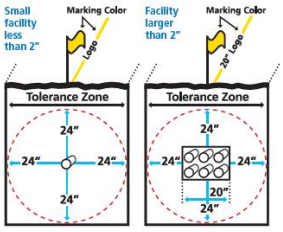


Landscapers, don't dig into buried utilities.

Before you break ground with a shovel, auger or other equipment, click or call 811 at least two business days before you dig—it's the law. A utility representative will mark buried utility lines in your dig zone (free for Avista residential customers).

Before disturbing the ground

1. Mark/outline your dig zone with white paint.
2. Call 811 (or visit **call811.com**) and wait until utility lines are marked. Privately owned lines beyond the meter can be located for a fee.
3. Maintain and respect all location marks/flags.
4. Hand dig gently to expose the utility line, which can be up to 24 inches from the locate mark (reasonable accuracy zone). Do not use mechanized equipment within a 24-inch radius of the line until it has been visually located (see right).



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- Validity periods vary by state and can change.
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COMMUNICATION: ORANGE	IRRIGATION: PURPLE
WATER: BLUE	PROPOSED EXCAVATION: WHITE

Signs of a natural gas leak

- **Smell** rotten eggs?
- **Hear** hissing or roaring?
- **See** bubbles or blowing dirt?

Planting and construction near gas utilities

- Do not build structures overtop buried utilities or block meter access.
- Never plant trees or vegetation too close to utilities. Spreading roots and branches can become an issue later.

If you damage a buried gas line

- Get a safe distance away, then immediately call 911 and Avista.
- DO NOT FOLD OVER A GAS PIPELINE to stop a leak. Static could ignite the gas.
- Avoid causing a spark. Do NOT start vehicles, use cell phones, etc.
- Evacuate the area on foot in an upwind and uphill direction.
- Alert others to evacuate the area.
- If you witness someone tampering with a pipeline, call 911 right away, then call Avista.

Hazards of a natural gas leak

- Natural gas mixed with air (4% gas to 15% air ratio) easily ignites near heat or sparks.
- Gas can migrate to enclosed spaces and displace oxygen, causing dizziness or asphyxiation.
- Gas fires may produce irritating or toxic fumes.

For safety instruction videos, go to myavista.com/safetyvideos



General Pipeline Markers do not show precise utility locations and are no substitute for contacting 811. You are still required to click or call 811 before you dig.

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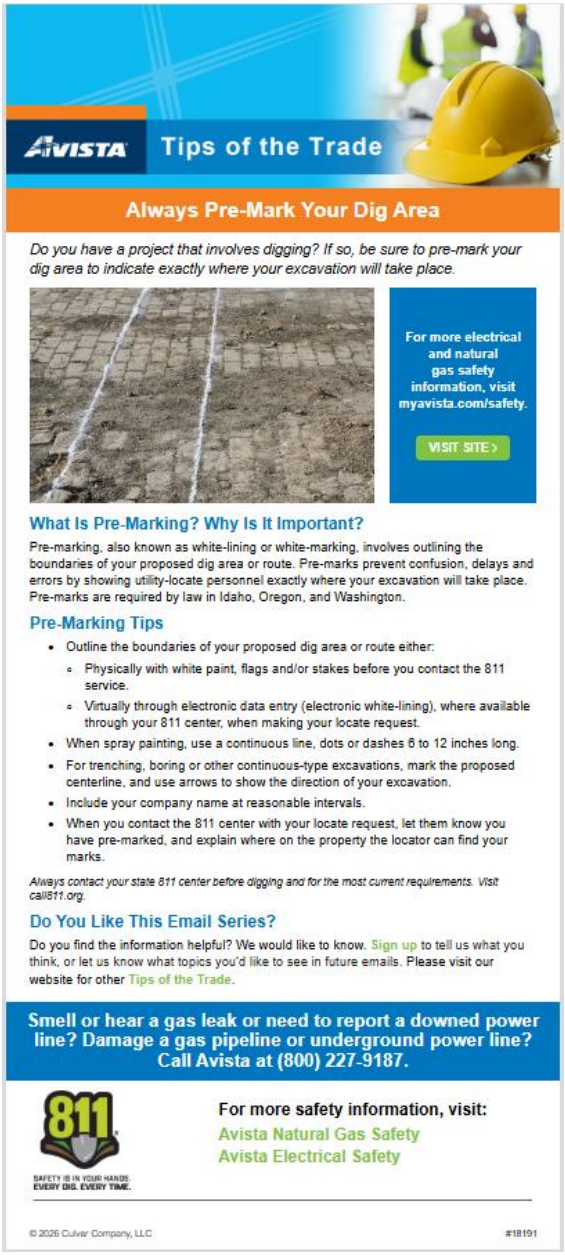
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For additional information
myavista.com/contractorsafety
publicsafety@avistacorp.com

811 SAFETY IS IN YOUR HANDS. EVERY DIG. EVERY TIME.

2/26

1411 East Mission MSC 20
P.O. Box 3727
Spokane, WA 99220-3727

Appendix C: Digital Tips of the Trade



Appendix D: Safe Excavation Tips Card

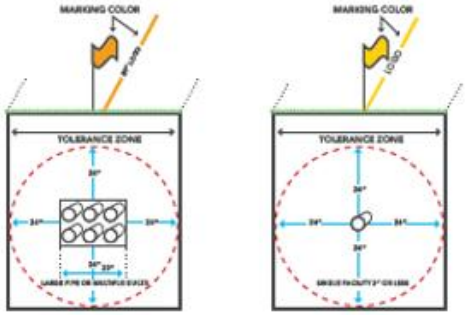
AVISTA

Safe Excavation Tips

What is excavation definition?

… Means any operation, including the installation of signs, in which earth, rock, or other materials on or below the ground is moved or displaced.

TOLERANCE ZONE



RED	Electric Power Lines, Cables, Conduit & Lighting Cables
YELLOW	Gas, Oil, Steam, Petroleum or Gaseous Materials
ORANGE	Communication, Alarm or Signal Lines, Cables or Conduit
BLUE	Potable Water
GREEN	Sewers and Drain Lines
PURPLE	Non-Potable Water: Reclaimed Water, Irrigation and Slurry Lines
PINK	Temporary Survey Markings
WHITE	Proposed Excavation

Safe Excavation

We want everyone to be safe



1 ☐ Pre mark your dig area in white.

2 ☐ Call 811 for a locate ticket. Make sure the company who is doing the digging is on the locate.

3 ☐ Have you waited two full business days for the locates?

4 ☐ Verify the locate description matches the excavation project. Keep locate ticket on hand as verification all utilities have responded.

5 ☐ Reasonable Accuracy means location, within 24 inches, of the outside lateral dimensions.

6 ☐ Use of hand tools or other non-invasive methods in the accuracy zone.

7 ☐ Are you maintaining the locate marks? Means 45 calendar day period after notice.

8 ☐ Call 911 and the utility owner if a gas line is damaged and gas is escaping. If nicked call the utility owner.

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Appendix E: Fence builders! Watch out for buried utility lines

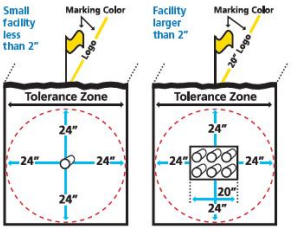


Fence builders, watch out for buried gas lines.

Before you break ground with a shovel, auger or other equipment, click or call 811 at least two business days before you dig—it's the law. A utility representative will come and mark buried natural gas pipelines in your dig zone (free for Avista residential customers).

Before disturbing the ground

1. Mark/outline your dig zone with white paint.
2. Call 811 (or visit **call811.com**) and wait until utility lines are marked. Privately owned lines beyond the meter can be located for a fee.
3. Maintain and respect all location marks/flags.
4. Hand dig gently to expose the utility line, which can be up to 24 inches from the locate mark (reasonable accuracy zone). Do not use mechanized equipment within a 24-inch radius of the line until it has been visually located (see right).



Ground-markings colors

- Colors indicate buried utility types.
- Validity periods vary by state and can change.
- Visit **call811.com** for current digging timeframes.

ELECTRIC: RED	SEWER: GREEN
GAS-OIL: YELLOW	TEMPORARY SURVEY: PINK
COMMUNICATION: ORANGE	IRRIGATION: PURPLE
WATER: BLUE	PROPOSED EXCAVATION: WHITE

Signs of a natural gas leak

- **Smell** rotten eggs?
- **Hear** hissing or roaring?
- **See** bubbles or blowing dirt?

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Hazards of a natural gas leak

- Natural gas mixed with air (4% gas to 15% air ratio) easily ignites near heat or sparks.
- Gas can migrate to enclosed spaces and displace oxygen, causing dizziness or asphyxiation.
- Gas fires may produce irritating or toxic fumes.

If you damage a buried gas line

- Get a safe distance away, then immediately call 911 and Avista.
- DO NOT FOLD OVER A GAS PIPELINE to stop a leak. Static could ignite the gas.
- Avoid causing a spark. Do NOT start vehicles, use cell phones, etc.
- Evacuate the area on foot in an upwind and uphill direction.
- Alert others to evacuate the area.
- If you witness someone tampering with a pipeline, call 911 right away, then call Avista.

For safety instruction videos, go to myavista.com/safetyvideos



General Pipeline Markers do not show precise utility locations and are no substitute for contacting 811. You are still required to click or call 811 before you dig.

Если Вы хотели бы получить информацию о правилах безопасности на русском языке, пожалуйста звоните по телефону (800) 227-9187.

Si desea recibir información en Español acerca de la seguridad, por favor llamar a: (800) 227-9187.

For assistance in alternative languages, please call (800) 227-9187.

(800) 227-9187
For additional information
myavista.com/contractorsafety
publicsafety@avistacorp.com

811 SAFETY IS IN YOUR HANDS. EVERY DIG. EVERY TIME.

2/26

AVISTA
1411 East Mission MSC 20
P.O. Box 3727
Spokane, WA 99220-3727

Appendix F: Pipeline Damage Tips

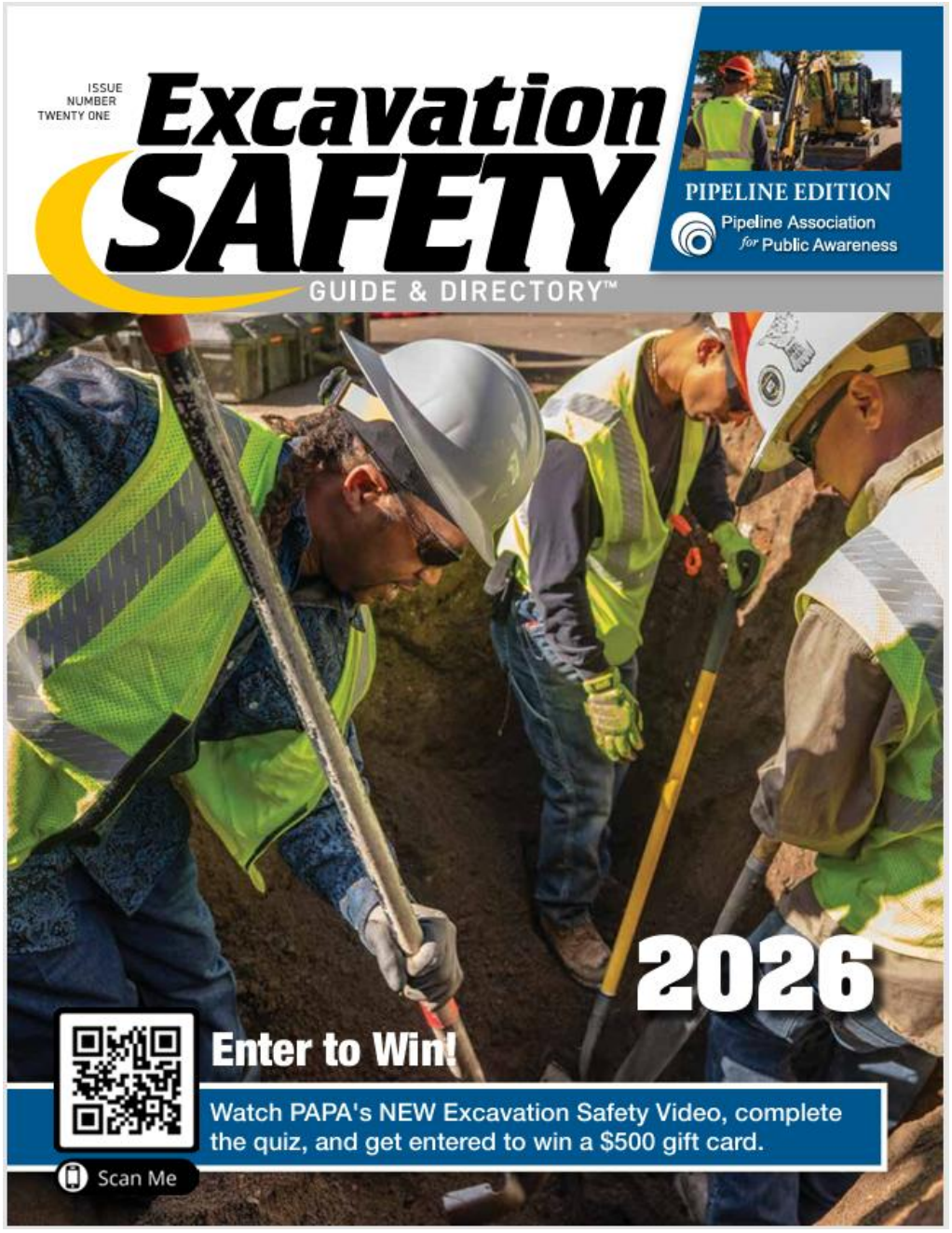


In the event of gas pipeline damage:

- Turn off and abandon your vehicle
- Leave the area immediately
- Call from a safe distance, 911 and Avista
- Evacuate people to an upwind location
- DO NOT bend the pipe over
- DO NOT turn valves
- DO NOT drive over manholes
- DO NOT attempt to extinguish flames of burning gas



Appendix G: Front Cover of the Excavation Magazine by PAPA



Appendix H: Natural Gas Safety Brochure – Spanish Translation



Guía de seguridad del gas natural

Queremos que estés seguro.

Atención al cliente (800) 227-9187

La seguridad importa

Solo queremos que esté seguro. Si tu vivienda tiene ocupantes o inquilinos, pídenos más folletos para mantenerlos informados. Para información adicional, visita **myavista.com** o llama al **(800) 227-9187**.

Mira videos útiles de seguridad en: **myavista.com/safetyvideos**.

Если Вы хотели бы получить информацию о правилах безопасности на русском языке, пожалуйста звоните по телефону (800) 227-9187.

Si desea recibir información en español acerca de la seguridad, llama a: (800) 227-9187.

Para asistencia en idiomas alternativos, llama al (800) 227-9187.

Translation available.
English, Espanol, Русский

Avista
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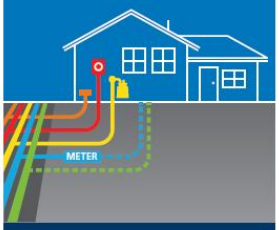
Appendix I: One Call Center Brochure

One call is all it takes

When you dig or do any other type of excavation work, it is important to be aware of underground utilities. Buried utilities could be hidden anywhere on a property or right-of-way—and at any depth. Damaging them not only entails hefty fines and repair costs but could risk the personal safety of you and others.

Get underground utilities marked ahead of time—it's the law in Washington, Idaho and Oregon. Call **811** (or visit **call811.com**) at least two business days before you dig.

811 SAFETY IS IN YOUR HANDS. EVERY DIG. EVERY TIME.



Phone/Cable Gas Water
Electric Sewer

Dashed lines are privately owned lines
Solid lines are utility owned lines

For additional information
(800) 227-9187
myavista.com/811
myavista.com/safetyvideos
damageprevention@avistacorp.com

Email publicsafety@avistacorp.com to request free safety materials.

- Pipeline marker wallet card
- Gas leak response wallet card
- Safe excavation checklist

Если Вы хотели бы получить информацию о правилах безопасности на русском языке, пожалуйста звоните по телефону 1-800-227-9187.

Si desea recibir información en español acerca de la seguridad, llama a: 1-800-227-9187.

For assistance with alternative languages, please call Avista customer service at 1-800-227-9187.

Avista
Damage Prevention
1411 East Mission MSC 6
Spokane, WA 99220-3727

AVISTA

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Click or call 811 before digging



The cost of skipping utility locates

- In 2022, 1 in 4 utility damages nationwide was due to excavation without a locate request.
- Professional excavators caused 60% of those incidents.
- Nearly one-third involved natural gas lines.
- Avista reports that 40% of excavation damage to its gas lines occurred when 811 was not called before digging.
- Most gas line hits occurred during water, sewer, or telecom work.

Utility Commission fines and damage costs

An excavator found liable for damaging underground utilities is subject to repair costs and to the following penalties:

- WA, ID, and OR allow for fines ranging from $1,000 to $25,000 for each violation.
- Any intentional violation of Oregon Utility Notification Center rules, the excavator can be fined up to $10,000 on subsequent violations.

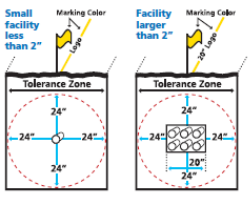
Before You Dig

1. Request locates at least 2 business days in advance. (**Call 811** or visit **call811.com**)
2. Mark your dig area with white paint.
3. Wait for utility marks—don't move or alter them.
4. Hand dig to expose lines before using equipment.
5. Stay within 2 feet of either side of the marks.
6. Support exposed gas lines and use proper backfill (sand or rock-free dirt) to prevent damage.
7. Stop immediately if you find unmarked lines—call 811.
8. Never try to fix or bend a damaged gas line.

Reasonable accuracy zone

Utilities are typically within 24" of either side of the mark. If line marks indicate the buried utility is greater than 2" in width, increase the accuracy zone by that amount.

Hand dig within 24"



Learn from other's mistakes

Common quotes from people who damaged utility lines:

"I thought 811 was just for pros."
"I didn't think I was digging deep enough."
"I didn't think anything was buried here."
"I thought I remembered where the lines were."
"I've dug here before without a problem."

Common excavation projects

Including but not limited to:

- Sidewalks, curbs, and fencing
- Landscaping, gardening, and tree work
- Grading and site development
- Irrigation and sprinkler systems
- Utility installation (gas, water, sewer, storm drain)
- Pole and sign work (street lights, traffic signals)

Common excavation equipment

Including but not limited to:

- Hand tools and probing devices
- Augers, drills, and boring machines
- Backhoes, bulldozers, and trenchers
- Graders, scrapers, and farm equipment
- Horizontal directional drilling
- Vacuum and explosive methods