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Rob Berntsen  
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January 22, 2020

Iowa Utilities Board  
Customer Service  
1375 E. Court Avenue, Room 69  
Des Moines, IA 50319-0069

Re: Inspection of MidAmerican Energy Company's Bettendorf Transmission and Distribution Units for Compliance with Natural Gas Pipeline Safety Standards  
Docket Nos: RG-0156, P-0148, P-0451, P-0729, P-0831

Iowa Utilities Board:

MidAmerican Energy Company (MidAmerican) provides the following response to the December 24, 2019, notification letter from Mr. Magid Yousif.

**Probable Violation 192.147(a)**

Flanges and flange accessories: One meter setting was found with short bolts that did not fully engage the connecting nut at Hoover Elementary School - inside school gymnasium.

**MidAmerican Response:**

*MidAmerican replaced bolts that were not fully engaged.*



**Probable Violation 192.353(a)**

The field inspection found a three locations where a bollard is needed to protect the setting from vehicular damage, and also found a meter contacting the soil would need to be protected from corrosion of the meter casing.

Bollard Protection needed:

- 1) 120 W 4th Street, Wilton
- 2) Public Works, 105 E Le Claire, Eldridge
- 3) 108 East 4th Street, Wilton

Meter partially buried :

- 1) 231 East Genesee, Blue Grass

**MidAmerican Response:**

*MidAmerican installed bollards at the following locations:*

- 1) 120 (actual 118) W 4<sup>th</sup> St, Wilton    2) 105 E LeClaire, Eldridge



3) 108 (actual 110) East 4<sup>th</sup> St, Wilton – *After further review, MidAmerican determined bollards are not needed at this location as this is an area where vehicles do not normally travel.*

*MidAmerican rebuilt the meter set to eliminate meter contact with soil at the following location:*

- 1) 231 E Gennessee (actual Mayne) St, Blue Grass



**Probable Violation 192.355(b)(2)**

The field inspection found four instances where a regulator vent was located near an opening into a building.

1. 12160 South Utah Avenue, Buffalo
2. 1162 6th Street, Moscow
3. 210 North 2nd Street, Eldridge
4. 2950 Learning Campus Drive, Bettendorf

**MidAmerican Response:**

*MidAmerican installed IMN (internal monitor) regulators or vent lines at the following locations:*

- 1) 12160 S Utah Ave, Buffalo



- 2) 1162 6<sup>th</sup> St, Moscow



3) 210 (actual 212) N 2<sup>nd</sup> St, Eldridge



4) 2950 Learning Campus Dr,  
Bettendorf



**Probable Violation 192.357(a)**

The field inspection found one instance of inadequate installation placing stress on a meter:  
2600 Shoreline Dr., Bettendorf

**MidAmerican Response:**

*MidAmerican removed the meter bar, plugged and pinned the shut off valve in the closed position at the following location:*

1) 2600 Shoreline Dr., Bettendorf





**Probable Violation 192.481(b) and 192.479(b)**

The field inspection found twelve instances of above-ground pipe which needed wrap or coating repair to maintain protection from atmospheric corrosion: 192.481(b)

1. TRS #303 Riverdale, Riser 3061
2. 3210 East Kimberly Road, Davenport
3. DRS #112 State Street, Bettendorf
4. DRS #122 at Locust Street No Pic
5. Grace Fellowship Church Davenport
6. Multiple Risers, QCIA16 Blackhawk TBS
7. 3618 Parkdale Drive, Bettendorf
8. 3624 Parkdale Drive, Bettendorf
9. Lee Lohman Arena, Saint Ambrose University, West Lombard Street
10. 108 East 4th Street, Wilton
11. 408 6th Avenue, Durant
12. 313 North Mississippi Street, Blue Grass

Field Inspection also found five above-ground pipes with active atmospheric corrosion: 192.479(b)

1. Linwood TRS 0069 on the 20 inch pipe on Linwood
2. Station #107 on Kimberly Ave in Bettendorf
3. DRS #0034 on W 59th St
4. DRS #154 North Brady Street
5. DRS #0043, South Stark Street and John Fell Drive, Davenport

**MidAmerican Response:**

1) TRS #303 Riverdale, Riser 3061  
*MidAmerican rewrapped the riser.*



2) 3210 East Kimberly Road, Davenport  
*MidAmerican rewrapped the riser.*



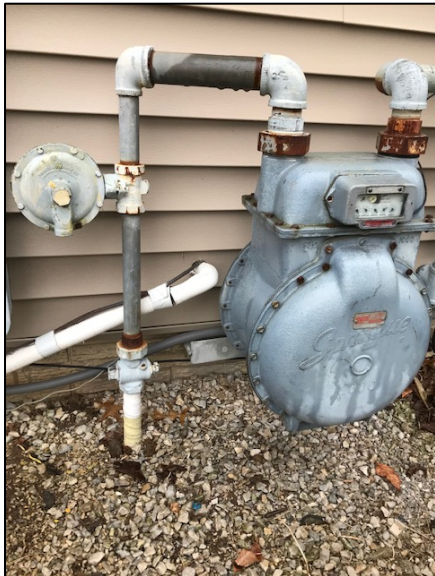
3) DRS #112 State Street, Bettendorf  
*MidAmerican rewrapped the riser.*



4) DRS #122 at Locust Street  
*MidAmerican rewrapped the riser.*



5) Grace Fellowship Church Davenport  
*MidAmerican rewrapped the riser.*



6) Multiple Risers, QCIA16 Blackhawk TBS  
*MidAmerican rewrapped the risers.*



7) 3618 Parkdale Drive, Bettendorf  
*MidAmerican rewrapped the riser.*



8) 3624 Parkdale Drive, Bettendorf  
*MidAmerican rewrapped the riser.*



9) Lee Lohman Arena, Saint Ambrose University, West Lombard Street  
*MidAmerican rewrapped the riser.*





10) 108 (actual 110) East 4th Street, Wilton  
*MidAmerican rewrapped the riser.*



11) 408 6th Avenue, Durant  
*MidAmerican rewrapped the riser.*



12) 313 (actual 319) North Mississippi Street, Blue Grass  
*MidAmerican rewrapped the riser.*



Field Inspection also found five above-ground pipes with active atmospheric corrosion:  
192.479(b)

1. Linwood TRS 0069 on the 20 inch pipe on Linwood
2. Station #107 on Kimberly Ave in Bettendorf
3. DRS #0034 on W 59th St
4. DRS #154 North Brady Street
5. DRS #0043, South Stark Street and John Fell Drive, Davenport



**MidAmerican Response:**

1) Linwood TRS 0069

*MidAmerican cleaned and painted the pipe.*



2) Station #107 on Kimberly Ave (actual Rd) in Davenport – *MidAmerican identified this during a station inspection in July 2018 and determined the corrosion does not affect the integrity of the pipe and should be monitored during annual station inspections until remediation is completed. Remediation is scheduled to be completed under work request 2709990 by July 2021.*

3) DRS #0034 on W 59th St

*MidAmerican cleaned and painted the pipe.*



4) DRS #154 North Brady Street

*MidAmerican cleaned and painted the pipe.*



5) DRS #0043, South Stark Street and John Fell Drive, Davenport  
*MidAmerican cleaned and painted the station.*



**Probable Violation 192.740(b)(4)**

The field inspection identified three instances of regulator stations improperly protected from conditions that could prevent proper access or operation:

1. DRS #0286 Hickory Grove Rd, Davenport
2. DRS #003 Hwy 61, Muscatine (un-pictured)
3. DRS #0242 On South Utah Ave. Buffalo

**MidAmerican Response:**

- 1) DRS #0286 Hickory Grove Rd  
*MidAmerican removed the vegetation.*



2) DRS #003 Hwy 61, Muscatine

*This was determined to be station 258. MidAmerican reviewed and determined the station is accessible.*



3) DRS #0242 On South Utah Ave, Buffalo

*MidAmerican reviewed and determined the station is accessible.*



**Probable Violation 192.455(a)**

Inspected steel pipes are cathodically protected from corrosion with the exception of four locations where the crimp on the anodeless riser was found buried below the surface, leaving a short, unprotected section of pipe:

1. Admissions Center, St Ambrose
2. Bank, 101 Main Street, Walcott
3. Rogalski Ctr, St Ambrose
4. 3000 N Fairmount, Library, Bettendorf

**MidAmerican Response:**

1) Admissions Center, St Ambrose

*MidAmerican installed corrugated tubing to eliminate contact between gas carrying metallic pipe and the soil.*



2) Bank, 101 Main Street, Walcott

*MidAmerican installed corrugated tubing to eliminate contact between gas carrying metallic pipe and the soil.*





3) Rogalski Ctr, St Ambrose

*MidAmerican installed a Beyer box to eliminate contact between gas carrying pipe and the soil.*



4) 3000 N Fairmount, Library, Bettendorf

*MidAmerican installed a Beyer box to eliminate contact between gas carrying metallic pipe and the soil.*



**Probable Violation 192.727(d)1**

The field inspection identified one instance of an open facility which requires a locking device.

Book Store Saint Ambrose University, 330 West Pleasant Street

**MidAmerican Response:**

*MidAmerican installed a plug and lock.*



**Probable Violation 192.161(c)3**

The field inspection identified four instances of movement of the pipeline causing disengagement of the support equipment:

1. TBS #0122, West Locust Street, Davenport
2. QCIA 0016 Blackhawk TBS
3. Gaines Fine Arts Center, Saint Ambrose University, 1928 North Gaines Street
4. 3000 N Fairmount, Library – Davenport

**MidAmerican Response:**

- 1) TBS#0122 West Locust St, Davenport

*MidAmerican adjusted the pipeline supports.*



2) QCIA0016 Blackhawk TBS

*MidAmerican adjusted the pipeline supports.*



3) Gaines Fine Arts Center, Saint Ambrose University, 1928 North Gaines Street

*MidAmerican adjusted the pipeline supports.*





4) 3000 N Fairmount, Library – Davenport

*MidAmerican determined the pipe supports were not needed and removed them.*



**Probable Violation 192.707(d)(1)**

The field inspection found four markers which were either missing information or illegible:

1. East of DRS 214, 230th St, DeWitt
2. Intersection of 280th Ave & 175th St
3. West of 280th Ave and 175th St
4. At TBS 38, Muscatine

**MidAmerican Response:**

*MidAmerican replaced the pipeline markers at the following locations:*

- 1) East of DRS 214, 230<sup>th</sup> St  
DeWitt
- 2) Intersection of 280<sup>th</sup> Ave & 175<sup>th</sup> St





3) West of 280<sup>th</sup> Ave and 175<sup>th</sup> St



4) At TBS 38, Muscatine



**Advisory 192.705(b)**

The overgrowth and foliage within pipeline ROWs on the 14 transmission lines in the Quad Cities Unit are cleared on a seven year cycle by company choice. Some specific areas were found to contain some extra heavy foliage with small trees and shrubs blocking the sightline. Patrolling records do not reflect ROW foliage as found in the inspection. The four locations having examples of inadequate access to observe surface conditions are:

1. Line 602 Scott College near Culinary School building
2. Line 602 Goose Creek crossing
3. Line 611 ROW along 39th St & South to Central Ave
4. Line 608 from DRS 3 south two miles.

**MidAmerican Response:**

*The intent of MidAmerican's gas transmission right of way clearing program is to maintain an accessible pipeline right of way, which may not equate to a clear sightline for the entire pipeline. As recommended by staff, MidAmerican will review the vegetation concerns at the locations noted and address vegetation determined to make gas facilities inadequately accessible by March 31, 2020.*

Please feel free to contact Darwin Hook at (515) 242-3959 if you have any questions.

Sincerely,

/s/ Rob Berntsen

Sr. Vice President & General Counsel

cc: Alicia Knapp, Vice President, Gas Delivery, MidAmerican Energy Company