

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Request of

CASCADE NATURAL GAS
CORPORATION,

Pursuant to WAC 480-93-020 for Approval
to Operate a Proposed New 6-Inch Pipeline
at a Maximum Allowable Operating
Pressure of 500 Pounds per Square Inch
Gauge within 100 Feet of Existing
Structures Not Owned by Cascade Natural
Gas Corporation

DOCKET PG-200087

ORDER 01

ORDER APPROVING REQUEST

BACKGROUND

- 1 On February 6, 2020, Cascade Natural Gas Corporation (Cascade or Company) filed with the Washington Utilities and Transportation Commission (Commission) a request for approval to construct and operate a new 6-inch natural gas pipeline at a maximum allowable operating pressure (MAOP) of 500 pounds per square inch gauge (psig) within 100 feet of nine existing structures not owned by Cascade.
- 2 The Commission has adopted the Code of Federal Regulations (CFR) Title 49, Part 192 and promulgated Washington Administrative Code (WAC) Chapter 480-93 as the minimum standards for gas pipeline construction. WAC 480-93-020 requires a gas pipeline company to obtain approval from the Commission to operate a gas pipeline at greater than 250 psig within 100 hundred feet of any existing buildings not owned by the gas pipeline company.
- 3 This project, identified as the Badger Road pipeline, will be a new 6-inch steel, 1.6 mile lateral pipeline, with an MAOP of 500 psig within 100 feet of nine existing structures in Kennewick, Washington. Included in the proposal is a new regulator station. Cascade explained in its request that it considered alternate routes for the pipeline, but it ultimately determined the alternate routes: 1) had higher installation difficulties; 2) would have required additional approvals from the city, private landowners, and other utilities; 3) and would have increased the number of structures within the 100 foot proximity limit. Cascade further stated that the pipeline will serve an area of future growth with very few future reinforcement options.

4 Commission staff (Staff) reviewed the Company's proposed proximity request and calculations. Because the facility is a lateral extension of existing pipeline, Staff reviewed historical records. Staff notes the following:

- (a) The proposed MAOP of the Badger Road high-pressure pipeline will be 500 psig.
- (b) The proposed piping and all fittings are commensurate with the proposed MAOP.
- (c) The proposed MAOP is commensurate with the current class location, which is Class 3.
- (d) The Badger Road high-pressure pipeline will be within 100 feet of 9 structures.
- (e) It is not feasible to increase the distance between the pipeline and the other buildings. Cascade considered alternate routes, all of which ultimately had higher installation difficulties and would have increased the number of structures within the 100 foot proximity limit.
- (f) At the proposed MAOP of 500 psig, the maximum stress level of the pipe would be 11.38 percent of the specified minimum yield strength (SMYS). Pipelines that operate under 20 percent of SMYS are considered low-stress lines and pose a lower risk than pipelines operating above 20 percent of SMYS.
- (g) The proposed pipeline and fittings will be pressure tested to a minimum of 750 psig in accordance with the company's procedures prior to operation. This test pressure is at least 1.5 times the MAOP of the pipeline as required for a Class 3 location.
- (h) Cascade will repair any leaks found on the system during the annual leak survey.

Staff finds that Cascade's proposed construction meets all of the pertinent requirements of Title 49 C.F.R. Part 192 and WAC Chapter 480-93. Staff agrees with the Company that the selected location of the new pipeline has the least impact on surrounding population densities.

5 Staff recommends that the Commission approve the request subject to the following conditions, which are designed to minimize the risks to public safety from the proposed pipeline:

- (a) For underground installations, Cascade must electrically inspect (jeep) the pipe coating and repair any coating defects in accordance with Cascade's operating standard prior to backfilling.
- (b) For underground installations, Cascade must apply backfill material around the pipe to protect the pipe and coating. The material around the pipe must be free of any sharp rocks or other objects with a maximum particle size of one-half inch and must contain a large percentage of fines, such as, sand, native soil, or soil-based select materials.
- (c) Cascade must non-destructively test 100 percent of all new construction welds on all newly installed pipe operating above 250 psig. Cascade must remedy defects in the welds in accordance with Cascade's operating standards and procedures. Cascade must non-destructively test all repaired welds on all newly installed pipe operating above 250 psig to ensure pipeline integrity and compliance with existing standards.
- (d) Cascade must install cathodic protection within 90 days after the pipeline is installed.
- (e) Cascade must provide notification via email to pipelineprogram@utc.wa.gov at least two business days prior to the beginning of project construction.
- (f) Cascade will submit ESRI Shapefiles and final construction specifications to the Commission within 90 days of project completion.
- (g) Cascade will conduct leak surveys on the Badger Road high-pressure pipeline in accordance with the Company's standards. The pipeline will be leak surveyed annually when it operates at 500 psig. Cascade will conduct leak surveys near high occupancy structures or areas – no less frequently than annually, not to exceed fifteen months between surveys unless additional surveys are required by Commission rules.
- (h) Cascade will notify the affected public no less than 14 days prior to the open meeting date to allow the public an opportunity to comment or have questions answered by Staff.

- (i) Cascade will bury the pipeline with a minimum of 48-inches of cover. Where 48-inches of cover cannot be achieved, a minimum of 36-inches of cover will be maintained.

DISCUSSION

6 The Commission agrees with Staff's analysis and adopts its recommendations. The Commission's primary objective in regulating natural gas pipelines is to protect public safety. The rules the Commission has promulgated to govern pipelines incorporate and exceed federal requirements, and provide flexibility to establish safety standards tailored to individual projects. The Commission's proximity rule, WAC 480-93-020, allows pipeline Staff the opportunity to review construction plans of high pressure pipelines in close proximity to inhabited structures to address safety considerations. Staff's recommended conditions described in paragraph 5 appropriately minimize the public safety risk associated with the proposed pipeline. Accordingly, we approve the Company's request.

FINDINGS AND CONCLUSIONS

- 7 (1) The Commission is an agency of the State of Washington vested by statute with the authority to adopt and enforce rules for gas pipeline safety.
- 8 (2) Cascade is a gas pipeline company subject to Commission jurisdiction.
- 9 (3) Cascade proposes to construct and maintain a new 6-inch steel, 1.6 mile lateral pipe, identified as the Badger Road pipeline, to increase the capacity and enhance the reliability of the Company's natural gas distribution system.
- 10 (4) The location Cascade has selected for the new pipeline has the least impact on surrounding population densities.
- 11 (5) Cascade's construction plans indicate that the proposed pipeline meets or exceeds all of the pertinent requirements of Title 49 C.F.R. Part 192 and WAC Chapter 480-93.
- 12 (6) The selected location of the proposed new pipe has the least impact on the surrounding community.
- 13 (7) The conditions recommended by Staff add requirements to this installation that minimize the added risk of the close proximity of the pipeline to a habitable structure.

- 14 (8) This matter came before the Commission at its regularly scheduled open meeting on April 10, 2020.
- 15 (9) The Commission should approve Cascade's request to operate a new 6-inch natural gas pipeline at a MAOP of 500 psig within 100 feet of existing structures not owned by Cascade in Kennewick, Washington, because the Company's proposal, with the conditions Staff recommends, is consistent with the public interest.

ORDER

THE COMMISSION ORDERS:

- 16 (1) The Commission approves Cascade Natural Gas Corporation's request to construct and operate a new 6-inch steel, 1.6 mile lateral natural gas pipeline, identified as the Badger Road pipeline, at a maximum allowable operating pressure of 500 pounds per square inch gauge within 100 feet of existing structures subject to the conditions set out in paragraph 5 of this Order.
- 17 (2) The Commission retains jurisdiction over the subject matter of this Docket and Cascade Natural Gas Corporation to effectuate the terms of this Order.
- 18 The Commissioners, having determined this Order to be consistent with the public interest, directed the Secretary to enter this Order.

DATED at Lacey, Washington, and effective April 10, 2020.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

MARK L. JOHNSON
Executive Director and Secretary