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*In the Community to Serve®*

June 2, 2015

Joe Subits  
Chief Engineer  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Drive S.W.  
P.O. Box 47250  
Olympia, WA 98504-7250

Subject: Cascade Natural Gas – Maximum Allowable Operating Pressure (MAOP)

Mr. Subits:

As part of Cascade Natural Gas's (Cascade's) effort to meet the terms of the Stipulated Agreement that is part of Docket PG-150120, Cascade will be sampling multiple high pressure pipelines to verify pipe grade and wall thickness. Each pipeline will be assessed individually, and a statistical analysis will be performed to determine how many sampling points will be needed. To verify the pipe grade Cascade plans to work with ABI Services, LLC (ABI), located in Oak Ridge, Tennessee. ABI has developed a non-destructive process that can test for pipe grade while keeping the pipe in service. This works by gathering data during compression loading that is used to create a stress strain curve, which is compared against destructive tensile tests on similarly graded steel.

In accordance with Section III.1.iii of the above-mentioned Stipulated Agreement, Cascade hereby submits for review this electric correspondence with included pdf files providing more technical details on the process that ABI has developed.

If you have any questions or would like additional information, please feel free to contact me at [jeremy.ogden@cngc.com](mailto:jeremy.ogden@cngc.com) or 509-734-4509.

Sincerely,

A handwritten signature in blue ink, appearing to read "J. Ogden", with a long horizontal flourish extending to the right.

Jeremy Ogden, P.E.  
Director, Engineering Services  
Cascade Natural Gas Corporation

cc: Steve Kessie  
Mike Eutsey