



STATE OF WASHINGTON

UTILITIES AND TRANSPORTATION COMMISSION

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January 12, 2016

Jeremy Ogden, P.E.
Director, Engineering Services
Cascade Natural Gas
8113 W. Grandridge Blvd
Kennewick, WA 99336

Dear Mr. Ogden:

RE: PG-150120 - Cascade Natural Gas Corporation - Maximum Allowable Operating Pressure (MAOP) (Insp. No. 2655)

We received your June 4, 2015 submittal regarding non-destructive methods (in-situ) to determine MAOP confirming information per Section III.1.iii of the Stipulated Agreement. Pipeline Safety staff (Staff) reviewed the following documents provided in the submittal:

- *Report of the Independent Review Panel San Bruno Explosion, California Public Utilities Commission, Revised June 24, 2011*
- *In-Situ Measurement of Pipeline Mechanical Properties Using Stress-Strain Microprobe-Validation of Data for Increased Confidence and Accuracy, Pipeline Research Council International, Inc. RCI, April 1, 2007*
- *Appendix A—USDOT/PHMSA December 13, 1999 Review Letter of ATC's SSM technology In-Situ Measurement of Pipeline Mechanical Properties Using Stress-Strain Microprobe-Validation of Data for Increased Confidence and Accuracy, Pipeline Research Council International, Inc. RCI, April 1, 2007*
- *Non-destructive measurements of Tensile and Fracture Toughness Presentation, ABI Services, 2014*

After reviewing these documents, it is staff's determination that the in-situ technology Cascade Natural Gas Corporation (CNGC) is proposing will yield accurate and valid results to confirm missing data required to establish MAOP of their high pressure pipelines. We will require CNGC to give notice when this technology is used in the field, so staff can observe implementation and results. This notice will be in the form of a special note on the daily construction crew schedule already being submitted to the UTC.

Respect. Professionalism. Integrity. Accountability.

Cascade Natural Gas Corporation
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If you have any questions or concerns, please call Dennis Ritter at (360) 664-1159.

Sincerely,

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

Alan E. Rathbun
Pipeline Safety Director

cc: Steve Kessie, Director Operation Services, CNGC
Mike Eutsey, Manager, Standards and Compliance, CNGC