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January 29, 2016

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State of Washington
UTC
Pipeline Safety Program

Alan Rathbun- Director of Pipeline Safety Program
State of Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. SW
P.O. Box 47250
Olympia, WA 98504-7250

Re: MAOP Determination & Validation Plan
Docket PG-150120

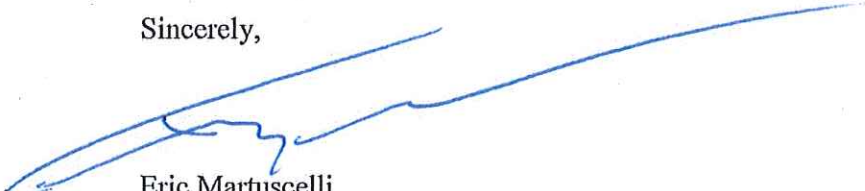
Dear Mr. Rathbun:

Sincerely,

In accordance with the Stipulated Agreement in Docket PG-150120 Cascade Natural Gas Corporation (CNGC) hereby submits its Maximum Allowable Operating Pressure (MAOP) Determination & Validation Plan. This plan outlines how CNGC will collect information, prioritize, and execute steps to confirm the MAOP for high pressure pipelines in Washington.

If there are any questions regarding this update please contact Jeremy Ogden at (509) 734-4509.

Sincerely,



Eric Martuscelli
Vice President, Operations
Cascade Natural Gas Corporation

Cascade Natural Gas Corporation
MAOP Determination & Validation Plan

in accordance with

Stipulated Agreement in Docket No. PG-150120

Cascade Natural Gas Corporation (Cascade) has prepared a Maximum Allowable Operating Pressure (MAOP) Determination & Validation Plan for all high pressure (HP) pipelines in the State of Washington. The purpose of this plan is to determine and verify the MAOP of all HP pipelines for which there is insufficient documentation to confirm the current MAOP. This MAOP Validation Plan consists of the following elements:

1. Summary of all HP pipelines with data currently insufficient to demonstrate and confirm MAOP
2. Determination of MAOP for each segment of pipeline
3. Process that Cascade will use to validate data to calculate hoop stress for unknown pipe
4. Action plan for each pipeline segment
5. Rationale describing prioritization of each action plan
6. Process for corrective actions and updates to plan
7. Schedule listing time frames for completion of action plan for each pipeline segment

Beginning in 2013, Cascade performed a comprehensive search of records to locate information that can be used to validate MAOP on HP pipelines in the state of Washington. Critical information that can validate MAOP includes, but is not limited to, pipeline diameter, wall thickness, pipe grade (i.e. X52), pressure rating of fitting, longitudinal seam type, pressure test records, and as-built records. Records searched included those in storage facilities, Cascade's District Offices and Kennewick General Office, and electronic records. This plan is based on the results of that search.

Summary of HP Systems

Table 1 lists the HP pipeline segments with data currently insufficient to demonstrate and confirm MAOP. This table also includes the MAOP, pipeline segment description, installation year, pipe diameter, pipe wall thickness, pipe grade, test pressure, % Specified Minimum Yield Strength (SMYS), critical missing information, and action plan. Information for this table was gathered through a comprehensive review of all of Cascade's available records. Critical missing information (wall thickness, pipe grade, pressure test) is highlighted in this table. Values shown in yellow highlighted fields indicate that Cascade has assumed the most stringent criteria for missing values.

If assuming the most stringent criteria resulted in a pipeline segment operating with a hoop stress of 20% SMYS or greater, that pipeline segment was reclassified as transmission and incorporated into Cascade's Transmission Integrity Management Program (TIMP). Additionally, these pipeline segments will have baseline assessments completed by February 2, 2018 and will be leak surveyed two (2) times per calendar year. Table 2 lists the pipeline segments that were reclassified as transmission. The entirety of some pipelines were classified as transmission even though only segments are operating at 20% SMYS or above.

In some instances, assuming the most stringent criteria for missing information resulted in a pre-1970 pipeline segment operating at greater than 30% SMYS. Those pipeline segments, and the justification for the corresponding action plan, are described below.

1. 8" Bellingham HP Line #1 – Testing up to this point indicates that this pipeline has a yield strength of 46,000 psi. This results in the pipeline operating at 18.9% SMYS, rather than 36.3% SMYS. Additionally, lowering the pressure to 20% below MAOP (288 psig) will result in Cascade likely not being able to supply gas to all customers. For these reasons, Cascade does not feel that it is prudent to lower the operating pressure and has made this pipeline one of the top priorities.
2. 8" Central Whatcom HP Line #3 – Pipeline is operating at greater than 20% below MAOP. Cascade does not plan to lower pressure further and has made this pipeline one of the top priorities.
3. 8" Lake Terrell Road Transmission Line #9 – Pipeline is connected to 8" Central Whatcom HP Line, is operating at greater than 20% below MAOP. Additionally, Cascade's as-built documents for this pipeline call this pipe out as Grade B, which will result in the pipeline operating at 24.91% SMYS. This pipeline is currently operating as transmission and will continue to remain so. Cascade does not plan to lower pressure further and has made this pipeline one of the top priorities.
4. 8" & 12" Bremerton Line #2 – Testing up to this point indicates that this pipeline has a yield strength of 46,000 psi and was manufactured with a high-frequency weld process. This results in the pipeline operating at 24.9% SMYS. Additionally, lowering the operating pressure to 20% below MAOP will result in Cascade likely not being able to supply gas to all customers in the Bremerton District. For these reasons Cascade does not feel that it is prudent to lower the operating pressure and has made this pipeline one of the top priorities.
5. 8" Anacortes HP Line #1 – Testing up to this point indicates that this pipeline has a yield strength of at least 42,000 psi and was manufactured with a high frequency weld process. This results in the pipeline operating at 19.7% SMYS or below. For these reasons Cascade does not feel that it is prudent to lower the operating pressure and has made this pipeline one of the top priorities.
6. 8" March Point HP Line #2 – Cascade will fabricate a regulator station and modify set points on the existing regulator station feeding this pipeline to lower the operating pressure to 20% below MAOP and meet customer demands. The lower operating pressure will result in the pipeline operating at 27.53% SMYS. In situ testing on this pipeline is Cascade's highest priority and will be performed in 2016.

Determination of MAOP

Tables 3-7 list the basis of determination for Cascade's pipeline segments which are missing critical information. Table 3 lists the pipelines that Cascade considers low-risk due to knowing wall thickness and pipe grade, operating below 20% SMYS, with the pressure test as the only missing information. Cascade has been safely operating these pipelines for approximately 50 years and requests an allowance to continue operating these pipelines at the currently established operating pressure and MAOP.

Table 4 lists the pipelines that Cascade considers low-risk due to operating below 20% SMYS with the most stringent criteria for missing critical information applied. These pipelines do not have pressure test records. Cascade has been safely operating these pipelines for approximately 50 years and requests an

allowance to accept the most stringent criteria as final and continue operating these pipelines at the currently established operating pressure and MAOP.

Table 5 lists the pre-code pipelines for which Cascade has a pressure test, but the pressure test is not sufficient for the current MAOP. The wall thickness and pipe grade are known for these pipelines. Cascade has been safely operating these pipelines for approximately 50 years and requests an allowance to continue operating these pipelines at the currently established operating pressure and MAOP until an uprate can be completed.

Table 6 lists the pipelines which will undergo pressure testing, in situ testing, replacement, or other verification method. Cascade requests an allowance to continue operating all but one of these pipelines at the currently established operating pressure and MAOP until validation efforts are complete. The lone exception is the previously-mentioned 8" March Point HP Line #2, which will undergo a pressure reduction.

Table 7 lists the pipelines which have the MAOP determined by pressure testing. Validation efforts will be performed on some of these pipelines, and on some pipelines the most stringent criteria will be applied as final.

In all but three instances where Cascade requests an allowance to operate at the currently established operating pressure and MAOP, the MAOP is less than the most conservative design pressure calculated as prescribed in 49 CFR 192.105. In the three exceptions, the assumed yield strength results in a design pressure lower than the MAOP. However, all three pipelines have pressure test records and test results or as-built records giving a preliminary indication that the yield strength is greater than the most stringent criteria.

Processes to Validate Data

In addition to gathering information through a comprehensive review of all available records, Cascade's plan will include gathering and verifying data from pipelines in service. Methods that will be employed include:

1. Measuring pipe wall thickness with Ultrasonic Thickness (UT) gauge
2. Verifying pipe grade and/or longitudinal seam type through mechanical testing of samples at an accredited materials testing laboratory in accordance with 49 CFR 192.107
3. Verifying pipe grade by non-destructive in situ testing as described in a letter to the Washington Utilities and Transportation Commission (UTC) on June 2, 2015
4. Confirming pipe diameter through field measurements
5. Pressure testing
6. Exposing rated fittings to verify pressure rating

As information is collected the records will be stored on Cascade's SharePoint site. Any process used to validate data not listed above will be submitted to the UTC for review.

Cascade has contracted Parametrix, Inc. (Parametrix) to perform a statistical analysis of all pipeline segments with missing pipe grade and to determine the number of sampling points that will be required to validate pipe grade. This analysis will be conducted in accordance with 49 CFR 192 Appendix B – Qualification of Pipe. Parametrix will also work with Cascade’s Engineering Services and local districts to identify the testing locations. Parametrix has completed the analysis for pipelines in Cascade’s Bellingham and Mt. Vernon districts, and those results have been used to estimate the number of sampling points that will be required on pipelines in other districts until the analysis is completed in 2016.

Cascade has also contacted ABI Services, LLC (ABI), located in Oak Ridge, Tennessee, to perform in situ testing at the determined locations. Information describing their testing process was sent to the UTC on June 2, 2015, and approval of this testing method was received on January 12, 2016. Das-Co of Idaho, Inc. will be the excavation contractor used for the in situ testing.

Action Plan

Cascade has reviewed each segment of HP pipeline and identified those segments with missing critical information. Table 1 contains the pipelines by district and the overall action plans for each. The time frames for completion of each action plan are shown in Table 8. Plans of action include replacement, pressure testing, lowering pressure, mechanical testing of samples, statistical analysis and in situ testing, uprating, and operating pipeline with assumptions.

Prioritization

Cascade has prepared a matrix to individually evaluate each segment of HP pipeline with missing critical information. Components of the priority matrix, in descending order of weighting, are: urgent need, % SMYS of pipe and fittings, pressure rating of fittings, population density near pipeline, length of pipeline segment, and presence of as-built and pressure test records. The matrix produced a total prioritization score for each segment of pipeline and a prioritization score per length of pipeline. These scores were then combined with Subject Matter Expert (SME) knowledge of pipelines to finalize priorities. In general, pipeline segments operating at greater than 30% SMYS which were constructed prior to 1970 were the highest priorities, with subsequent priorities following the descending order of % SMYS.

Process for Corrective Actions and Update to Plan

Cascade will continue to evaluate all current and future HP pipelines on an ongoing basis to verify that critical information used to validate MAOP is known and to identify when immediate corrective actions are required. Existing pipelines will be evaluated annually by Cascade’s Engineering Services group. Documentation for new pipelines will be audited by Cascade’s Standards & Compliance group or Engineering Services group as construction of new pipelines is completed. If any critical information necessary to validate MAOP is discovered to be insufficient, corrective actions will be taken. Corrective actions include, but are not limited to, review of records as well as the processes used to validate data listed above.

Until a pipeline's characteristics can be verified, Cascade will assume the most stringent criteria for unknown pipe characteristics, as described in 49 CFR 192.107 & 109. If these assumptions result in a pipeline operating at 20% SMYS or greater, the pipeline will be leak surveyed two (2) times per calendar year and incorporated into Cascade's TIMP. For these pipelines, Cascade will perform a threat evaluation, and incorporate the pipe into risk and pipe assessments. Baseline assessments for all pipelines reclassified as transmission status shall be completed within three (3) years of reclassification.

When information is verified that results in a pipeline operating at a higher or lower % SMYS, changing classification from transmission to HP, or other similar actions, this plan will be amended and updated. If an amendment to the plan is necessary, Cascade will submit the proposed amended plan to Commission Staff for review at least ninety (90) days prior to the time Cascade submits the amended plan to the Commission for formal approval.

Cascade will also submit to Commission Staff an annual status report on the progress in implementing this plan. The annual status report will be submitted by March 15 of each year. As part of the annual status report every aspect of the plan will be reviewed and the tables and schedule will be revised as required. Test results will be updated, as well as any resulting changes in priorities and schedule. If Cascade decides to accept the most stringent criteria as the final resolution for a particular line segment, that will be included in an amended plan or annual status report and submitted to the Commission for approval.

Schedule

Table 8 below provides the schedule for the action plans for each HP pipeline segment with missing critical information. In situ testing, replacement, pressure testing, and fitting exposure have been scheduled commensurate with the availability of resources. The number of in situ tests that are scheduled to be completed each year are based on Cascade's prior experience with ECDA and ICDA digs as part of Cascade's TIMP.

TABLES

Table 1

| HP Line # | HP Line Name | MAQP (psig) | HP Line Segment/WO Number | Year Installed | Diameter (in.) | Wall Thickness (in.) | Yield Strength (psi) | Test Pressure (psig) | % SMYS | Action Plan |
|------------------------------|---------------------------------------|-------------|-----------------------------|----------------|----------------|----------------------|---|----------------------|--------|---|
| Bellingham District | | | | | | | | | | |
| 1 | 8" Bellingham H.P. Line | 380 | Line 1-1 | 1956 | 8.625 | 0.188 | 24,000 | | 36.3% | Request allowance to continue operating pipeline at pressure currently established, preliminary testing to be performed on available samples, third party to perform statistical analysis to determine the number of test points and identify their locations, in situ testing to verify pipe grade and wall thickness, request allowance to continue operating pipeline at pressure currently established. |
| 2 | Bellingham H.P. Distribution System | 155 | Fish-1 | 1956 | 8.625 | 0.188 | 24,000 | | 14.8% | Request allowance to continue operating low-risk pipeline at pressure currently established, accept most stringent criteria as final pipe grade, test samples as they become available. |
| | | | Fish-2 | 1956 | 10.75 | 0.188 | 24,000 | | 18.5% | Request allowance to continue operating low-risk pipeline at pressure currently established, accept most stringent criteria as final pipe grade, test samples as they become available. |
| | | | 10C3298 | 1960 | 4.5 | 0.156 | 24,000 | | 9.3% | Request allowance to continue operating low-risk pipeline at pressure currently established, accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available. |
| | | | 10C8241 | 1964 | 4.5 | 0.188 | 35,000 | | 5.3% | Request allowance to continue operating low-risk pipeline at pressure currently established. |
| | | | 10C9683 | 1965 | 6.625 | 0.188 | 35,000 | | 7.8% | Request allowance to continue operating low-risk pipeline at pressure currently established. |
| | | | 11480-1 | 1966 | 6.625 | 0.188 | 35,000 | | 7.8% | Request allowance to continue operating low-risk pipeline at pressure currently established. |
| | | | 11480-2 | 1966 | 8.625 | 0.188 | 35,000 | | 10.2% | Request allowance to continue operating low-risk pipeline at pressure currently established. |
| | | | 13150 | 1967 | 2.375 | 0.154 | 35,000 | 100 | 3.4% | Converted to Intermediate Pressure. |
| 20564 | 1972 | 4.5 | 0.156 | 24,000 | 225 | 9.3% | Accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available. | | | |
| 3 | 8" Central Whatcom H.P. Line | 380 | Line 3-1 | 1957 | 8.625 | 0.188 | 24,000 | | 36.3% | Preliminary testing to be performed on available samples, third party to perform statistical analysis to determine the number of test points and identify their locations, in situ testing to verify pipe grade and wall thickness, request allowance to continue operating pipeline at pressure currently established (20% below MAQP). |
| | | | 40855 (Transition fittings) | 1993 | 8.625 | 0.188 | 24,000 | 680 | 36.3% | Third party to perform statistical analysis to determine the number of test points and identify their locations, in situ testing to verify pipe grade and wall thickness, request allowance to continue operating pipeline at pressure currently established (20% below MAQP). |
| 4 | 4" South Lynden H.P. Line | 250 | Line 4-1 | 1961 | 4.5 | 0.156 | 24,000 | | 15.0% | Request allowance to continue operating low-risk pipeline at pressure currently established, accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available. |
| 8 | 2" Nooksack H.P. Distribution System | 250 | 16C7000 | 1963 | 2.375 | 0.154 | 24,000 | | 8.0% | Request allowance to continue operating low-risk pipeline at pressure currently established, accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available. |
| 9 | 8" Lake Terrell Rd Transmission Line | 380 | 18734-1 | 1965 | 8.625 | 0.188 | 24,000 | 569 | 36.3% | Third party to perform statistical analysis to determine the number of test points and identify their locations, in situ testing to verify pipe grade and wall thickness, request allowance to continue operating pipeline at pressure currently established (20% below MAQP). |
| 10 | 16" N. Whatcom Transmission Line | 600 | 18794 | 1971 | 16 | 0.25 | 52000 | 900 | N/A | Expose and verify part # for elbow at V-175 and 4 plugs at V-38. |
| 12 | 4" North Lynden H.P. Line | 400 | 25773 | 1978 | 4.5 | 0.188 | 35000 | 600 | N/A | Verify that Sav-A-Valve has sufficient pressure rating or is located on IP section. |
| 21 | 12", 16" & 4" Squalicum H.P. Line | 250 | 41508 | 1993 | 16 | 0.281 | 24,000 | 620 | 29.7% | Third party to perform statistical analysis to determine the number of test points and identify their locations, in situ testing to verify pipe grade and wall thickness. |
| Aberdeen District | | | | | | | | | | |
| 1* | 8" Kitsap Line | 366 | 19261 | 1972 | 8.625 | 0.188 | 42000 | 750 | N/A | Expose Sav-A-Valves and verify pressure rating. |
| 3 | 4" McCleary H.P. Line | 150 | 79C6323 | 1963 | 4.5 | 0.154 | 24,000 | | 9.1% | Request allowance to continue operating low-risk pipeline at pressure currently established, accept most stringent criteria as final pipe grade, test samples as they become available. |
| 8 | 4" Montesano H.P. Distribution System | 135 | 77C6321 | 1964 | 4.5 | 0.188 | 35000 | | 4.6% | Request allowance to continue operating low-risk pipeline at pressure currently established. |
| 9 | 2" Elma Rendering Plant H.P. Line | 150 | 78C7902-1 | 1964 | 2.375 | 0.156 | 35000 | | 3.3% | Request allowance to continue operating low-risk pipeline at pressure currently established. |
| | | | 78C7902-2 | 1964 | 4.5 | 0.154 | 24000 | | 9.1% | Request allowance to continue operating low-risk pipeline at pressure currently established, accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available. |
| 15* | 12" Kitsap H.P. Line | 499 | 44000 | 1995 | 12.75 | 0.312 | 52000 | 1080 | N/A | Expose Sav-A-Valves and verify pressure rating. |
| Bremerton District | | | | | | | | | | |
| 2 | 8" & 12" Bremerton Transmission Line | 499 | BremertonL2-1 | 1963 | 8.625 | 0.188 | 24,000 | 750 | 47.7% | Preliminary testing to be performed on available samples, third party to perform statistical analysis to determine the number of test points and identify their locations, in situ testing to verify pipe grade. |
| 6 | 4" Olympic View H.P. Line | 499 | 20387 | 1973 | 4.5 | 0.188 | 42000 | 500 | N/A | Verify that plugs have sufficient pressure rating. |
| 11 | 8" Bremerton H.P. Line | 144 | 29C6316 | 1964 | 8.625 | 0.188 | 46000 | | 7.2% | Request allowance to continue operating low-risk pipeline at pressure currently established. |
| | | | 18522 | 1971 | 8.625 | 0.188 | 35000 | | 9.4% | Pressure test or replace, request allowance to continue operating pipeline at pressure currently established. |
| Mount Vernon District | | | | | | | | | | |
| 1 | 8" Anacortes H.P. Line | 360 | MTVL1-1 | 1957 | 8.625 | 0.188 | 24,000 | | 34.4% | Preliminary testing to be performed on available samples, third party to perform statistical analysis to determine the number of test points and identify their locations, in situ testing to verify pipe grade and wall thickness, request allowance to continue operating pipeline at pressure currently established, validate pressure rating of line stopper fittings at V-3/V-4. |
| | | | 18191 | 1972 | 8.625 | 0.188 | 35,000 | | 23.6% | Replace, request allowance to continue operating pipeline at pressure currently established. |
| 2 | 8" March Point H.P. Line | 360 | 11C1144 | 1957 | 8.625 | 0.188 | 24,000 | | 34.4% | Lower pressure to 20% below MAQP, third party to perform statistical analysis to determine the number of test points and identify their locations, in situ testing to verify pipe grade and wall thickness, upon completion of testing request allowance to continue operating pipeline at pressure currently established. |
| | | | 11C1144 | 1957 | 8.625 | 0.25 | 24,000 | | 25.9% | Lower pressure to 20% below MAQP, third party to perform statistical analysis to determine the number of test points and identify their locations, in situ testing to verify pipe grade and wall thickness, upon completion of testing request allowance to continue operating pipeline at pressure currently established. |
| | | | 11C5628 | 1963 | 8.625 | 0.188 | 24,000 | | 34.4% | Lower pressure by 20% and replace, request allowance to continue operating pipeline at pressure currently established until replacement. |
| 3 | Anacortes H.P. Distribution System | 105 | MTVL3-1 | 1956 | 6.625 | 0.188 | 24,000 | | 7.7% | Request allowance to continue operating low-risk pipeline at pressure currently established, accept most stringent criteria as final pipe grade, test samples as they become available. |
| | | | MTVL3-2 | 1956 | 8.625 | 0.188 | 24,000 | | 10.0% | Request allowance to continue operating low-risk pipeline at pressure currently established, accept most stringent criteria as final pipe grade, test samples as they become available. |
| 4 | 4" Mount Vernon H.P. Line | 250 | MTVL4-1 | 1957 | 4.5 | 0.156 | 24,000 | 400 | 15.0% | Accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available. |
| 5 | 3" Burlington H.P. Line | 249 | 211220 | 1957 | 3.5 | 0.156 | 24,000 | | 11.6% | Request allowance to continue operating low-risk pipeline at pressure currently established until replacement in 2015. |
| 7 | 4" North Texas Rd H.P. Line | 250 | 11C2775 | 1960 | 2.375 | 0.154 | 24,000 | | 8.0% | Request allowance to continue operating low-risk pipeline at pressure currently established, accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available. |
| 8 | 4" Arlington H.P. Line | 249 | Fish 18C4272 | 1961 | 4.5 | 0.156 | 24,000 | | 15.0% | Request allowance to continue operating low-risk pipeline at pressure currently established, accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available. |
| 10 | 4" Sedro-Woolley H.P. Line | 100 | 14788 | 1968 | 4.5 | 0.188 | 35000 | 100 | 3.4% | Conduct urazole to validate MAQP. |
| 12 | 6" North Oak Harbor H.P. Line | 400 | 17206 | 1972 | 6.625 | 0.188 | 42000 | 675 | N/A | Validate pressure rating of line stopper fitting, elbow at V-193, and Sav-A-Valve and service tee at V-104. |
| 14 | 16" Fredonia Transmission Line | 500 | 30636 (Transition fittings) | 1983 | 16 | 0.281 | 24,000 | 750 | 59.3% | Third party to perform statistical analysis to determine the number of test points and identify their locations. In situ testing to verify pipe grade and wall thickness. |
| | | | 30636 (Elbows) | 1983 | 16 | 0.375 | 35,000 | 750 | 30.5% | Third party to perform statistical analysis to determine the number of test points and identify their locations. In situ testing to verify pipe grade and wall thickness. |
| 16 | 16" March Point Transmission Line | 500 | 40000 (Transition fittings) | 1992 | 16 | 0.281 | 24,000 | 750 | 59.3% | Third party to perform statistical analysis to determine the number of test points and identify their locations. In situ testing to verify pipe grade and wall thickness. |
| | | | 40000 (Elbows) | 1992 | 16 | 0.375 | 35,000 | 750 | 30.5% | Third party to perform statistical analysis to determine the number of test points and identify their locations. In situ testing to verify pipe grade and wall thickness. |

| HP Line # | HP Line Name | MAOP (psig) | HP Line Segment/WO Number | Year Installed | Diameter (in.) | Wall Thickness (in.) | Yield Strength (psi) | Test Pressure (psig) | % SMYS | Action Plan |
|------------------------------------|---------------------------------------|-------------|-----------------------------|----------------|----------------|----------------------|----------------------|----------------------|--------|--|
| Longview District | | | | | | | | | | |
| 1 | Longview-Kelso H.P. Distribution Line | 250 | Pre-CNGC-L1-1 | 1957 | 12.75 | 0.25 | 24,000 | 400 | 26.6% | Conduct study to determine replacement options and projects, test existing samples. |
| | | | Pre-CNGC-L1-2 | 1957 | 4.5 | 0.156 | 24,000 | | 15.0% | Request allowance to continue operating low-risk pipeline at pressure currently established, accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available. |
| 2 | 4" Kalama H.P. Line | 300 | 28621 | 1980 | 12.75 | 0.25 | 52,000 | | 12.3% | Pressure test or replace, request allowance to continue operating pipeline at pressure currently established. |
| | | | 24676 | 1976 | 4.5 | 0.188 | 35,000 | | 10.3% | Pressure test or replace, request allowance to continue operating pipeline at pressure currently established. |
| 3 | 4" Dike Road H.P. Line (Longview) | 80 | 82CB335 | 1965 | 4.5 | 0.156 | 24,000 | | 4.8% | Request allowance to continue operating low-risk pipeline at pressure currently established, accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available. |
| | | | 51820 (1) | 1996 | 8.625 | 0.332 | 46,000 | | 8.5% | Pressure test and request allowance to continue operating pipeline at pressure currently established or replace. |
| 8 | 8" Kalama H.P. Line | 300 | 51820 (2) | 1997 | 8.625 | 0.188 | 24,000 | | 28.7% | Pressure test and request allowance to continue operating pipeline at pressure currently established or replace. |
| | | | 51820 (3) | 1997 | 8.625 | 0.25 | 24,000 | | 21.6% | Pressure test and request allowance to continue operating pipeline at pressure currently established or replace. |
| | | | 51820 (4) | 1997 | 8.625 | 0.25 | 46,000 | | 11.3% | Pressure test and request allowance to continue operating pipeline at pressure currently established or replace. |
| | | | 43600 (Transition fittings) | 1995 | 12.75 | 0.312 | 24,000 | 1080 | 42.5% | Third party to perform statistical analysis to determine the number of test points and identify their locations, in situ testing to verify pipe grade and wall thickness. |
| Yakima District (Sunnyside) | | | | | | | | | | |
| 1 | 3" Sunnyside H.P. Line | 200 | Fish-L1-1 | 1956 | 3.5 | 0.156 | 24,000 | | 9.3% | Request allowance to continue operating low-risk pipeline at pressure currently established, accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available. |
| 2 | 2" South Sunnyside H.P. Line | 200 | 42C2530 | 1959 | 2.375 | 0.154 | 24,000 | | 6.4% | Request allowance to continue operating low-risk pipeline at pressure currently established, accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available. |
| 3 | 4" Grandview H.P. Line | 250 | Fish-L2-1 | 1956 | 4.5 | 0.156 | 24,000 | | 15.0% | Request allowance to continue operating low-risk pipeline at pressure currently established, accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available. |
| 4 | 3" Prosser H.P. Line | 250 | YakimaL4-1 | 1956 | 3.5 | 0.156 | 24,000 | | 11.7% | Request allowance to continue operating low-risk pipeline at pressure currently established, accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available. |
| 5 | 6" Toppenish-Zillah H.P. Line | 400 | YakimaL5-1 | 1956 | 6.625 | 0.188 | 24,000 | | 29.4% | Preliminary testing to be performed on available samples, third party to perform statistical analysis to determine the number of test points and identify their locations, in situ testing to verify pipe grade and wall thickness, request allowance to operate pipeline at pressure currently established. |
| 6 | 3" Zillah H.P. Line | 400 | fish-L6-1 | 1956 | 3.5 | 0.156 | 24,000 | | 18.7% | Request allowance to continue operating low-risk pipeline at pressure currently established, accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available. |
| 7 | 4" Wapato H.P. Line | 152 | fish-L7-1 | 1956 | 4.5 | 0.156 | 24,000 | | 9.1% | Request allowance to continue operating low-risk pipeline at pressure currently established, accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available. |
| 8 | 3" South Toppenish H.P. Line | 175 | fish-L8-1 | 1956 | 3.5 | 0.156 | 24,000 | | 8.2% | Request allowance to continue operating low-risk pipeline at pressure currently established, accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available. |
| 9 | 3" Granger H.P. Line | 175 | fish-L9-1 | 1956 | 3.5 | 0.156 | 24,000 | | 8.2% | Request allowance to continue operating low-risk pipeline at pressure currently established, accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available. |
| Yakima District | | | | | | | | | | |
| 1 | 8" Yakima H.P. Line | 200 | Fish_968 | 1956 | 8.625 | 0.188 | 24,000 | | 19.1% | Request allowance to continue operating low-risk pipeline at pressure currently established, accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available. |
| | | | FISH_968_Lat_26 | 1956 | 8.625 | 0.5 | 24,000 | | 7.2% | Request allowance to continue operating low-risk pipeline at pressure currently established, accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available. |
| | | | 40C4357 | 1961 | 8.625 | 0.188 | 24,000 | 352 | 19.1% | Accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available. |
| | | | 203375 | 1978 | 8.625 | 0.25 | 46,000 | | 7.5% | Pressure test or replace, request allowance to continue operating pipeline at pressure currently established. |
| Wenatchee District | | | | | | | | | | |
| 1 | 6" & 8" Moses Lake H.P. Line | 250 | WenL1-1 | 1957 | 6.625 | 0.188 | 24,000 | | 18.4% | Request allowance to continue operating low-risk pipeline at pressure currently established, accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available. |
| | | | WenL1-2 | 1957 | 8.625 | 0.188 | 24,000 | | 23.9% | Preliminary testing to be performed on available samples, third party to perform statistical analysis to determine the number of test points and identify their locations, in situ testing to verify pipe grade and wall thickness, request allowance to continue operating pipeline at pressure currently established. |
| 2 | 2" Wheeler H.P. Line | 250 | 60390 | 1981 | 4.5 | 0.156 | 24,000 | 375 | 15.0% | Accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available. |
| | | | WenL2-2 | 1962 | 2.375 | 0.154 | 24,000 | | 8.0% | Request allowance to continue operating low-risk pipeline at pressure currently established, accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available, verify pressure rating of block valve at R-53. |
| 3 | 4" Othello Transmission Line | 400 | 18998 | 1971 | 6.625 | 0.188 | 35,000 | 531 | 20.1% | Request allowance to continue operating pipeline at pressure currently established until replacement. |
| 6 | 4" South Moses Lake H.P. Line | 250 | 14455 | 1968 | 4.5 | 0.188 | 35,000 | | 8.5% | Request allowance to continue operating low-risk pipeline at pressure currently established. |
| 10 | 6" West Wheeler H.P. Line | 250 | 54006 | 1997 | 6.625 | 0.188 | 24,000 | 740 | 18.4% | Accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available. |
| 12 | 6" Wenatchee H.P. Line | 225 | 2912 fish | 1956 | 6.625 | 0.188 | 24,000 | | 16.5% | Request allowance to continue operating low-risk pipeline at pressure currently established, accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available, validate pressure rating of stopper at odorizer. |
| Kennewick | | | | | | | | | | |
| 1 | 8" Attalla H.P. Line | 300 | 01C4776 | 1958 | 8.625 | 0.188 | 24,000 | | 28.7% | Request allowance to continue operating pipeline at pressure currently established, preliminary testing to be performed on available samples, conduct study to determine replacement options and projects, third party to perform statistical analysis to determine number of test points, operate with assumptions until replacement or in situ testing is performed. |
| | | | 14375 (1) | 1968 | 8.625 | 0.188 | 35,000 | | 19.7% | Request allowance to continue operating pipeline at pressure currently established, conduct study to determine replacement and testing options, verify pressure rating of Saw-A-Valve. |
| | | | 14375 (2) | 1968 | 12.75 | 0.25 | 35,000 | | 21.9% | Request allowance to continue operating pipeline at pressure currently established, conduct study to determine replacement and testing options, verify pressure rating of 1" bypass valve. |
| | | | 14375 (3) | 1968 | 12.75 | 0.375 | 35,000 | | 14.6% | Request allowance to continue operating pipeline at pressure currently established, conduct study to determine replacement and testing options. |
| | | | 14375 (4) | 1968 | 12.75 | 0.33 | 35,000 | | 16.6% | Request allowance to continue operating pipeline at pressure currently established, conduct study to determine replacement and testing options. |
| | | | 14375 (5) | 1968 | 12.75 | 0.25 | 52,000 | | 14.7% | Request allowance to continue operating pipeline at pressure currently established, conduct study to determine replacement and testing options. |
| 3 | 4" East Finley H.P. Line | 250 | 12614 | 1967 | 4.5 | 0.188 | 35,000 | 120 | 8.5% | Conduct uprate to validate MAOP. |
| 4 | Pasco H.P. Distribution System | 300 | KennL4-1 | 1960 | 4.5 | 0.156 | 24,000 | 450 | 18.0% | Accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available. |
| 5 | 4" Northwest Pasco H.P. Line | 300 | 11097 (1) | 1966 | 4.5 | 0.188 | 35,000 | | 10.3% | Request allowance to continue operating low-risk pipeline at pressure currently established. |
| 6 | 4" Glade Road H.P. Line | 150 | 11097 (2) | 1966 | 4.5 | 0.188 | 35,000 | | 5.1% | Request allowance to continue operating low-risk pipeline at pressure currently established. |
| 7 | 2" Burbank H.P. Line | 158 | 12301 | 1967 | 2.375 | 0.154 | 35,000 | 100 | 3.5% | Conduct uprate to validate MAOP. |
| 8 | 4" Finley H.P. Line | 200 | 93C2527 | 1999 | 4.5 | 0.156 | 24,000 | | 12.0% | Request allowance to continue operating low-risk pipeline at pressure currently established, accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available. |
| Walla Walla | | | | | | | | | | |
| 1 | 8" Walla Walla H.P. Line | 150 | WWL1-1 | 1956 | 8.625 | 0.188 | 24,000 | | 14.3% | Request allowance to continue operating low-risk pipeline at pressure currently established, accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available. |
| 2 | 3" College Place H.P. Line | 150 | WWL2-1 | 1956 | 3.5 | 0.156 | 24,000 | | 7.0% | Request allowance to continue operating low-risk pipeline at pressure currently established, accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available. |

Critical Missing Information

Post-Code Missing Pressure Test

Table 2

| HP Line # | HP Line Name | MAOP (psig) | HP Line Segment/WO Number | Year Installed | Diameter (in.) | Wall Thickness (in.) | Yield Strength (psi) | % SMYS |
|------------------------------------|---------------------------------------|-------------|-----------------------------|----------------|----------------|----------------------|----------------------|--------|
| Bellingham District | | | | | | | | |
| 1 | 8" Bellingham H.P. Line | 380 | Line 1-1 | 1956 | 8.625 | 0.188 | 24000 | 36.3% |
| 3 | 8" Central Whatcom H.P. Line | 380 | Line 3-1 | 1957 | 8.625 | 0.188 | 24000 | 36.3% |
| | | | 40855 (Transition fittings) | 1993 | 8.625 | 0.188 | 24000 | 36.3% |
| 21 | 12",16" & 4" Squalicum H.P. Line | 250 | 41508 | 1993 | 16 | 0.281 | 24000 | 29.7% |
| Mount Vernon District | | | | | | | | |
| 1 | 8" Anacortes H.P. Line | 360 | MTVL1-1 | 1957 | 8.625 | 0.188 | 24000 | 34.4% |
| | | | 18191 | 1972 | 8.625 | 0.188 | 35000 | 23.6% |
| 2 | 8" March Point H.P. Line | 360 | 11C1144 | 1957 | 8.625 | 0.188 | 24000 | 34.4% |
| | | | 11C1144 | 1957 | 8.625 | 0.25 | 24000 | 25.9% |
| | | | 11C5628 | 1963 | 8.625 | 0.188 | 24000 | 34.4% |
| Longview District | | | | | | | | |
| 1 | Longview-Kelso H.P. Distribution Line | 250 | Pre-CNGC-L1-1 | 1957 | 12.75 | 0.25 | 24000 | 26.6% |
| 8 | 8" Kalama H.P. Line | 300 | 51820 (1) | 1996 | 8.625 | 0.332 | 46000 | 8.5% |
| | | | 51820 (2) | 1997 | 8.625 | 0.188 | 24000 | 28.7% |
| | | | 51820 (3) | 1997 | 8.625 | 0.25 | 24000 | 21.6% |
| | | | 51820 (4) | 1997 | 8.625 | 0.25 | 46000 | 11.3% |
| Yakima District (Sunnyside) | | | | | | | | |
| 5 | 6" Toppenish-Zillah H.P. Line | 400 | YakimaL5-1 | 1956 | 6.625 | 0.188 | 24000 | 29.4% |
| Wenatchee District | | | | | | | | |
| 1 | | 0 | WenL1-1 | 1957 | 6.625 | 0.188 | 24000 | 18.4% |
| | | | WenL1-2 | 1957 | 8.625 | 0.188 | 24000 | 23.9% |
| | | | 60390 | 1981 | 4.5 | 0.156 | 24000 | 15.0% |
| 3 | 4" Othello Transmission Line | 400 | 18998 | 1971 | 6.625 | 0.188 | 35000 | 20.1% |
| Kennewick | | | | | | | | |
| 0 | | 0 | 01C4776 | 1958 | 8.625 | 0.188 | 24000 | 28.7% |
| | | | 14375 (1) | 1968 | 8.625 | 0.188 | 35000 | 19.7% |
| | | | 14375 (2) | 1968 | 12.75 | 0.25 | 35000 | 21.9% |
| | | | 14375 (3) | 1968 | 12.75 | 0.375 | 35000 | 14.6% |
| | | | 14375 (4) | 1968 | 12.75 | 0.33 | 35000 | 16.6% |
| | | | 14375 (5) | 1968 | 12.75 | 0.25 | 52000 | 14.7% |

Table 3

| HP Line # | HP Line Name | MAOP (psig) | HP Line Segment/WO Number | Year Installed | Diameter (in.) | Wall Thickness (in.) | Yield Strength (psi) | % SMYS | Design Pressure (psig) |
|----------------------------|---------------------------------------|-------------|---------------------------|----------------|----------------|----------------------|----------------------|--------|------------------------|
| Bellingham District | | | | | | | | | |
| 2 | Bellingham H.P. Distribution System | 155 | 10c8241 | 1964 | 4.5 | 0.188 | 35,000 | 5.3% | 877 |
| | | | 10c9683 | 1965 | 6.625 | 0.188 | 35,000 | 7.8% | 795 |
| | | | 11480-1 | 1966 | 6.625 | 0.188 | 35,000 | 7.8% | 795 |
| | | | 11480-2 | 1966 | 8.625 | 0.188 | 35,000 | 10.2% | 610 |
| | | | 13150 | 1967 | 2.375 | 0.154 | 35,000 | 3.4% | 1,362 |
| Aberdeen District | | | | | | | | | |
| 8 | 4" Montesano H.P. Distribution System | 135 | 77C6321 | 1964 | 4.5 | 0.188 | 35000 | 4.6% | 877 |
| 9 | 2" Elma Rendering Plant H.P. Line | 150 | 78C7902-1 | 1964 | 2.375 | 0.156 | 35000 | 3.3% | 1,379 |
| Bremerton District | | | | | | | | | |
| 11 | 8" Bremerton H.P. Line | 144 | 20C6316 | 1964 | 8.625 | 0.188 | 46000 | 7.2% | 802 |
| Wenatchee District | | | | | | | | | |
| 6 | 4" South Moses Lake H.P. Line | 250 | 14455 | 1968 | 4.5 | 0.188 | 35000 | 8.5% | 877 |
| Kennewick | | | | | | | | | |
| 1 | 8"Attalia H.P. Line | 300 | 14375 (1) | 1968 | 8.625 | 0.188 | 35,000 | 19.7% | 610 |
| | | | 14375 (3) | 1968 | 12.75 | 0.375 | 35,000 | 14.6% | 824 |
| | | | 14375 (4) | 1968 | 12.75 | 0.33 | 35,000 | 16.6% | 725 |
| | | | 14375 (5) | 1968 | 12.75 | 0.25 | 52,000 | 14.7% | 816 |
| 5 | 4" Northwest Pasco H.P. Line | 300 | 11097 (1) | 1966 | 4.5 | 0.188 | 35000 | 10.3% | 877 |
| 6 | 4" Glade Road H.P. Line | 150 | 11097 (2) | 1966 | 4.5 | 0.188 | 35000 | 5.1% | 877 |

Table 4

| HP Line # | HP Line Name | MAOP (psig) | HP Line Segment/WO Number | Year Installed | Diameter (in.) | Wall Thickness (in.) | Yield Strength (psi) | % SMYS | Design Pressure (psig) |
|------------------------------------|---------------------------------------|-------------|---------------------------|----------------|----------------|----------------------|----------------------|--------|------------------------|
| Bellingham District | | | | | | | | | |
| 2 | Bellingham H.P. Distribution System | 155 | fish-1 | 1956 | 8.625 | 0.188 | 24,000 | 14.8% | 419 |
| | | | fish-2 | 1956 | 10.75 | 0.188 | 24,000 | 18.5% | 336 |
| | | | 10c3298 | 1960 | 4.5 | 0.156 | 24,000 | 9.3% | 499 |
| 4 | 4" South Lynden H.P. Line | 250 | Line 4-1 | 1961 | 4.5 | 0.156 | 24,000 | 15.0% | 499 |
| 8 | 2" Nooksack H.P. Distribution System | 250 | 16C7000 | 1963 | 2.375 | 0.154 | 24,000 | 8.0% | 934 |
| Aberdeen District | | | | | | | | | |
| 3 | 4" McCleary H.P. Line | 150 | 79C6323 | 1963 | 4.5 | 0.154 | 24,000 | 9.1% | 493 |
| 9 | 2" Elma Rendering Plant H.P. Line | 150 | 78C7902-2 | 1964 | 4.5 | 0.154 | 24000 | 9.1% | 493 |
| Mount Vernon District | | | | | | | | | |
| 3 | Anacortes H.P. Distribution System | 105 | MTVL3-1 | 1956 | 6.625 | 0.188 | 24,000 | 7.7% | 545 |
| | | | MTVL3-2 | 1956 | 8.625 | 0.188 | 24,000 | 10.0% | 419 |
| 5 | 3" Burlington H.P. Line | 249 | 211220 | 1957 | 3.5 | 0.156 | 24,000 | 11.6% | 642 |
| 7 | 4" North Texas Rd H.P. Line | 250 | 11C2775 | 1960 | 2.375 | 0.154 | 24,000 | 8.0% | 934 |
| 8 | 4" Arlington H.P. Line | 249 | Fish 18C4272 | 1961 | 4.5 | 0.156 | 24,000 | 15.0% | 499 |
| Longview District | | | | | | | | | |
| 1 | Longview-Kelso H.P. Distribution Line | 250 | Pre-CNGC-L1-2 | 1957 | 4.5 | 0.156 | 24,000 | 15.0% | 499 |
| 3 | 4" Dike Road H.P. Line (Longview) | 80 | 82C8335 | 1965 | 4.5 | 0.156 | 24,000 | 4.8% | 499 |
| Yakima District (Sunnyside) | | | | | | | | | |
| 1 | 3" Sunnyside H.P. Line | 200 | Fish-L1-1 | 1956 | 3.5 | 0.156 | 24,000 | 9.3% | 642 |
| 2 | 2" South Sunnyside H.P. Line | 200 | 42C2530 | 1959 | 2.375 | 0.154 | 24,000 | 6.4% | 934 |
| 3 | 4" Grandview H.P. Line | 250 | Fish-L2-1 | 1956 | 4.5 | 0.156 | 24,000 | 15.0% | 499 |
| 4 | 3" Prosser H.P. Line | 250 | YakimaL4-1 | 1956 | 3.5 | 0.156 | 24,000 | 11.7% | 642 |
| 6 | 3" Zillah H.P. Line | 400 | fish-L6-1 | 1956 | 3.5 | 0.156 | 24,000 | 18.7% | 642 |
| 7 | 4" Wapato H.P. Line | 152 | fish-L7-1 | 1956 | 4.5 | 0.156 | 24,000 | 9.1% | 499 |
| 8 | 3" South Toppenish H.P. Line | 175 | fish-L8-1 | 1956 | 3.5 | 0.156 | 24,000 | 8.2% | 642 |
| 9 | 3" Granger H.P. Line | 175 | fish-L9-1 | 1956 | 3.5 | 0.156 | 24,000 | 8.2% | 642 |
| Yakima District | | | | | | | | | |
| 1 | 8" Yakima H.P. Line | 200 | Fish_968 | 1956 | 8.625 | 0.188 | 24,000 | 19.1% | 419 |
| | | | FISH_968_Lat_26 | 1956 | 8.625 | 0.5 | 24,000 | 7.2% | 1,113 |
| Wenatchee District | | | | | | | | | |
| 1 | 6" & 8" Moses Lake H.P. Line | 250 | WenL1-1 | 1957 | 6.625 | 0.188 | 24,000 | 18.4% | 545 |
| 2 | 2" Wheeler H.P. Line | 250 | WenL2-2 | 1962 | 2.375 | 0.154 | 24,000 | 8.0% | 934 |
| 10 | 6" West Wheeler H.P. Line | 250 | 54006 | 1997 | 6.625 | 0.188 | 24,000 | 18.4% | 545 |
| 12 | 6" Wenatchee H.P. Line | 225 | 2912 fish | 1956 | 6.625 | 0.188 | 24,000 | 16.5% | 545 |
| Kennewick | | | | | | | | | |
| 8 | 4" Finley H.P. Line | 200 | 53C2527 | 1959 | 4.5 | 0.156 | 24,000 | 12.0% | 499 |
| Walla Walla | | | | | | | | | |
| 1 | 8" Walla Walla H.P. Line | 150 | WWL1-1 | 1956 | 8.625 | 0.188 | 24,000 | 14.3% | 419 |
| 2 | 3" College Place H.P. Line | 150 | WWL2-1 | 1956 | 3.5 | 0.156 | 24,000 | 7.0% | 642 |

Table 5

| HP Line # | HP Line Name | MAOP (psig) | HP Line Segment/WO Number | Year Installed | Diameter (in.) | Wall Thickness (in.) | Yield Strength (psi) | Test Pressure (psig) | % SMYS | Design Pressure (psig) |
|------------------------------|----------------------------|-------------|---------------------------|----------------|----------------|----------------------|----------------------|----------------------|--------|------------------------|
| Mount Vernon District | | | | | | | | | | |
| 10 | 4" Sedro-Woolley H.P. Line | 100 | 14788 | 1968 | 4.5 | 0.188 | 35000 | 100 | 3.4% | 877 |
| Kennewick | | | | | | | | | | |
| 3 | 4" East Finley H.P. Line | 250 | 12614 | 1967 | 4.5 | 0.188 | 35000 | 120 | 8.5% | 877 |
| 7 | 2" Burbank H.P. Line | 158 | 12301 | 1967 | 2.375 | 0.154 | 35000 | 100 | 3.5% | 1,362 |

Table 6

| HP Line # | HP Line Name | MAOP (psig) | HP Line Segment/WO Number | Year Installed | Diameter (in.) | Wall Thickness (in.) | Yield Strength (psi) | % SMYS | Design Pressure (psig) |
|------------------------------------|---------------------------------------|-------------|---------------------------|----------------|----------------|----------------------|----------------------|--------|------------------------|
| Bellingham District | | | | | | | | | |
| 1 | 8" Bellingham H.P. Line | 380 | Line 1-1 | 1956 | 8.625 | 0.188 | 24,000 | 36.3% | 419 |
| 3 | 8" Central Whatcom H.P. Line | 380 | Line 3-1 | 1957 | 8.625 | 0.188 | 24,000 | 36.3% | 419 |
| Bremerton District | | | | | | | | | |
| 2 | 8" & 12" Bremerton Transmission Line | 499 | BremertonL2-1 | 1963 | 8.625 | 0.188 | 24,000 | 47.7% | 419 |
| 11 | 8" Bremerton H.P. Line | 144 | 18522 | 1971 | 8.625 | 0.188 | 35000 | 9.4% | 610 |
| Mount Vernon District | | | | | | | | | |
| 1 | 8" Anacortes H.P. Line | 360 | MTVL1-1 | 1957 | 8.625 | 0.188 | 24,000 | 34.4% | 419 |
| | | | 18191 | 1972 | 8.625 | 0.188 | 35,000 | 23.6% | 610 |
| 2 | 8" March Point H.P. Line | 360 | 11C1144 | 1957 | 8.625 | 0.188 | 24,000 | 34.4% | 419 |
| | | | 11C1144 | 1957 | 8.625 | 0.25 | 24,000 | 25.9% | 557 |
| | | | 11C5628 | 1963 | 8.625 | 0.188 | 24,000 | 34.4% | 419 |
| Longview District | | | | | | | | | |
| 1 | Longview-Kelso H.P. Distribution Line | 250 | 28621 | 1980 | 12.75 | 0.25 | 52,000 | 12.3% | 816 |
| 2 | 4" Kalama H.P. Line | 300 | 24676 | 1976 | 4.5 | 0.188 | 35,000 | 10.3% | 877 |
| 8 | 8" Kalama H.P. Line | 300 | 51820 (1) | 1996 | 8.625 | 0.332 | 46,000 | 8.5% | 1,417 |
| | | | 51820 (2) | 1997 | 8.625 | 0.188 | 24,000 | 28.7% | 419 |
| | | | 51820 (3) | 1997 | 8.625 | 0.25 | 24,000 | 21.6% | 557 |
| | | | 51820 (4) | 1997 | 8.625 | 0.25 | 46,000 | 11.3% | 1,067 |
| Yakima District (Sunnyside) | | | | | | | | | |
| 5 | 6" Toppenish-Zillah H.P. Line | 400 | YakimaL5-1 | 1956 | 6.625 | 0.188 | 24,000 | 29.4% | 545 |
| Yakima District | | | | | | | | | |
| 1 | 8" Yakima H.P. Line | 200 | 20375 | 1978 | 8.625 | 0.25 | 46,000 | 7.5% | 1,067 |
| Wenatchee District | | | | | | | | | |
| 1 | 6" & 8" Moses Lake H.P. Line | 250 | WenL1-2 | 1957 | 8.625 | 0.188 | 24,000 | 23.9% | 419 |
| 3 | 4" Othello Transmission Line | 400 | 18998 | 1971 | 6.625 | 0.188 | 35,000 | 20.1% | 795 |
| Kennewick | | | | | | | | | |
| 1 | 8"Attalia H.P. Line | 300 | 01C4776 | 1958 | 8.625 | 0.188 | 24,000 | 28.7% | 419 |
| | | | 14375 (2) | 1968 | 12.75 | 0.25 | 35,000 | 21.9% | 549 |

| Table 7 | | | | | | | | | | |
|------------------------------|---------------------------------------|-------------|-----------------------------|----------------|----------------|----------------------|----------------------|----------------------|--------|------------------------|
| HP Line # | HP Line Name | MAOP (psig) | HP Line Segment/WO Number | Year Installed | Diameter (in.) | Wall Thickness (in.) | Yield Strength (psi) | Test Pressure (psig) | % SMYS | Design Pressure (psig) |
| Bellingham District | | | | | | | | | | |
| 2 | Bellingham H.P. Distribution System | 155 | 20564 | 1972 | 4.5 | 0.156 | 24,000 | 225 | 9.3% | 499 |
| 3 | 8" Central Whatcom H.P. Line | 380 | 40855 (Transition fittings) | 1993 | 8.625 | 0.188 | 24,000 | 680 | 36.3% | 419 |
| 9 | 8" Lake Terrell Rd Transmission Line | 380 | 18734-1 | 1965 | 8.625 | 0.188 | 24,000 | 569 | 36.3% | 419 |
| 10 | 16" N. Whatcom Transmission Line | 600 | 18794 | 1971 | 16 | 0.25 | 52000 | 900 | N/A | 650 |
| 12 | 4" North Lynden H.P. Line | 400 | 25773 | 1978 | 4.5 | 0.188 | 35000 | 600 | N/A | 877 |
| 21 | 12",16" & 4" Squalicum H.P. Line | 250 | 41508 | 1993 | 16 | 0.281 | 24,000 | 620 | 29.7% | 337 |
| Aberdeen District | | | | | | | | | | |
| 1* | 8" Kitsap Line | 366 | 19261 | 1972 | 8.625 | 0.188 | 42000 | 750 | N/A | 732 |
| 15* | 12" Kitsap H.P. Line | 499 | 44000 | 1995 | 12.75 | 0.312 | 52000 | 1080 | N/A | 1,018 |
| Bremerton District | | | | | | | | | | |
| 6 | 4" Olympic View H.P. Line | 499 | 20387 | 1973 | 4.5 | 0.188 | 42000 | 500 | N/A | 1,053 |
| Mount Vernon District | | | | | | | | | | |
| 4 | 4" Mount Vernon H.P. Line | 250 | MTVL4-1 | 1957 | 4.5 | 0.156 | 24,000 | 400 | 15.0% | 499 |
| 12 | 6" North Oak Harbor H.P. Line | 400 | 17206 | 1972 | 6.625 | 0.188 | 42000 | 675 | N/A | 953 |
| 14 | 16" Fredonia Transmission Line | 500 | 30636 (Transition fittings) | 1983 | 16 | 0.281 | 24,000 | 750 | 59.3% | 337 |
| | | | 30636 (Elbows) | 1983 | 16 | 0.375 | 35,000 | 750 | 30.5% | 656 |
| 16 | 16" March Point Transmission Line | 500 | 40000 (Transition fittings) | 1992 | 16 | 0.281 | 24,000 | 750 | 59.3% | 337 |
| | | | 40000 (Elbows) | 1992 | 16 | 0.375 | 35,000 | 750 | 30.5% | 656 |
| Longview District | | | | | | | | | | |
| 1 | Longview-Kelso H.P. Distribution Line | 250 | Pre-CNGC-L1-1 | 1957 | 12.75 | 0.25 | 24,000 | 400 | 26.6% | 376 |
| 7 | 12" South Longview H.P. Line | 499 | 43600 (Transition fittings) | 1995 | 12.75 | 0.312 | 24,000 | 1080 | 42.5% | 470 |
| Yakima District | | | | | | | | | | |
| 1 | 8" Yakima H.P. Line | 200 | 40C4357 | 1961 | 8.625 | 0.188 | 24,000 | 352 | 19.1% | 419 |
| Wenatchee District | | | | | | | | | | |
| 1 | 6" & 8" Moses Lake H.P. Line | 250 | 60390 | 1981 | 4.5 | 0.156 | 24,000 | 375 | 15.0% | 499 |
| Kennewick | | | | | | | | | | |
| 4 | Pasco H.P. Distribution System | 300 | KennL4-1 | 1960 | 4.5 | 0.156 | 24,000 | 450 | 18.0% | 499 |

Table 8

| HP Line # | HP Line Name | HP Line Segment/WO Number | 2016 Action | 2017 Action | 2018 Action | 2019 Action | 2020 Action | 2021 Action | 2022 Action |
|----------------------------|---|---|--|--|---------------------------------|---------------------------------|-------------|-------------|-------------|
| Bellingham District | | | | | | | | | |
| 1 | 8" Bellingham H.P. Line | Line 1-1 | Request allowance to continue operating pipeline at pressure currently established, perform statistical analysis, replace section at Squalicum Creek crossing and test samples from that project | In situ testing at 35 locations | | | | | |
| 2 | Bellingham H.P. Distribution System | fish-1 | Request allowance to continue operating low-risk pipeline at pressure currently established, accept most stringent criteria as final pipe grade, test samples as they become available. | | | | | | |
| | | fish-2 | Request allowance to continue operating low-risk pipeline at pressure currently established, accept most stringent criteria as final pipe grade, test samples as they become available. | | | | | | |
| | | 10c3298 | Request allowance to continue operating low-risk pipeline at pressure currently established, accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available. | | | | | | |
| | | 10c8241 | Request allowance to continue operating low-risk pipeline at pressure currently established. | | | | | | |
| | | 10c9683 | Request allowance to continue operating low-risk pipeline at pressure currently established. | | | | | | |
| | | 11480-1 | Request allowance to continue operating low-risk pipeline at pressure currently established. | | | | | | |
| | | 11480-2 | Request allowance to continue operating low-risk pipeline at pressure currently established. | | | | | | |
| | | 13150 | Converted to Intermediate Pressure. | | | | | | |
| 20564 | Accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available. | | | | | | | | |
| 3 | 8" Central Whatcom H.P. Line | Line 3-1 40855 (Transition fittings) | Operate at 20% below MAOP, perform statistical analysis Operate at 20% below MAOP, perform statistical analysis | In situ testing at 70 locations In situ testing at 10 locations | In situ testing at 65 locations | | | | |
| 4 | 4" South Lynden H.P. Line | Line 4-1 | Request allowance to continue operating low-risk pipeline at pressure currently established, accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available. | | | | | | |
| 8 | 2" Nooksack H.P. Distribution System | 16C7000 | Request allowance to continue operating low-risk pipeline at pressure currently established, accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available. | | | | | | |
| 9 | 8" Lake Terrell Rd Transmission Line | 18734-1 | Request allowance to operate at 20% below MAOP, perform statistical analysis | | | In situ testing at 26 locations | | | |
| 10 | 16" N. Whatcom Transmission Line | 18794 | Expose and verify part # for elbow at V-175 and 4 plugs at V-38. | | | | | | |
| 12 | 4" North Lynden H.P. Line | 25773 | Verify that Sav-A-Valve has sufficient pressure rating or is located on IP section. | | | | | | |
| 21 | 12", 16" & 4" Squalicum H.P. Line | 41508 | Perform statistical analysis | | In situ testing at 13 locations | | | | |
| Aberdeen District | | | | | | | | | |
| 1* | 8" Kitsap Line | 19261 | Expose Sav-A-Valves and verify pressure rating. | | | | | | |
| 3 | 4" McCleary H.P. Line | 79C6323 | Request allowance to continue operating low-risk pipeline at pressure currently established, accept most stringent criteria as final pipe grade, test samples as they become available. | | | | | | |
| 8 | 4" Montesano H.P. Distribution System | 77C6321 | Request allowance to continue operating low-risk pipeline at pressure currently established. | | | | | | |
| 9 | 2" Elma Rendering Plant H.P. Line | 78C7902-1 | Request allowance to continue operating low-risk pipeline at pressure currently established. | | | | | | |
| | | 78C7902-2 | Request allowance to continue operating low-risk pipeline at pressure currently established, accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available. | | | | | | |
| 15* | 12" Kitsap H.P. Line | 44000 | Expose Sav-A-Valves and verify pressure rating. | | | | | | |
| Bremerton District | | | | | | | | | |
| 2 | 8" & 12" Bremerton Transmission Line | Bremerton12-1 | Request allowance to continue operating pipeline at pressure currently established, perform statistical analysis | In situ testing at approximately 15 locations | | | | | |
| 6 | 4" Olympic View H.P. Line | 20387 | Verify that plugs have sufficient pressure rating. | | | | | | |

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| 11 | 8" Bremerton H.P. Line | 20C6316 | Request allowance to continue operating low-risk pipeline at pressure currently established. | | | | | | |
| | | 18S22 | Request allowance to continue operating pipeline at pressure currently established. | | Pressure test or replace. | | | | |
| Mount Vernon District | | | | | | | | | |
| 1 | 8" Anacortes H.P. Line | MTVL1-1 | Request allowance to continue operating pipeline at pressure currently established, perform statistical analysis | Approximately 9 miles to be retired and replaced | In situ testing at approximately 65 locations | In situ testing at approximately 65 locations | | | |
| | | 18191 | Request allowance to continue operating pipeline at pressure currently established until replacement | Replace | | | | | |
| 2 | 8" March Point H.P. Line | 11C1144 | Lower operating pressure to be 20% below MAOP, perform statistical analysis, and in situ testing at 21 locations | | | | | | |
| | | 11C1144 | Lower operating pressure by 20%, perform statistical analysis | In situ testing at 10 locations | | | | | |
| | | 11C5628 | Lower operating pressure by 20% | Replacement | | | | | |
| 3 | Anacortes H.P. Distribution System | MTVL3-1 | Request allowance to continue operating low-risk pipeline at pressure currently established, accept most stringent criteria as final pipe grade, test samples as they become available. | | | | | | |
| | | MTVL3-2 | Request allowance to continue operating low-risk pipeline at pressure currently established, accept most stringent criteria as final pipe grade, test samples as they become available. | | | | | | |
| 4 | 4" Mount Vernon H.P. Line | MTVL4-1 | Accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available. | | | | | | |
| 5 | 3" Burlington H.P. Line | 211220 | Request allowance to continue operating low-risk pipeline at pressure currently established until replacement in 2016. | | | | | | |
| 7 | 4" North Texas Rd H.P. Line | 11C2775 | Request allowance to continue operating low-risk pipeline at pressure currently established, accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available. | | | | | | |
| 8 | 4" Arlington H.P. Line | Fish 18C4272 | Request allowance to continue operating low-risk pipeline at pressure currently established, accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available. | | | | | | |
| 10 | 4" Sedro-Woolley H.P. Line | 14788 | Request allowance to continue operating low-risk pipeline at pressure currently established until uprate is completed | Conduct uprate to validate MAOP | | | | | |
| 12 | 6" North Oak Harbor H.P. Line | 17206 | Validate pressure rating of line stopper fitting, elbow at V-193, and Sav-A-Valve and service tee at V-104 | | | | | | |
| 14 | 18" Fredonia Transmission Line | 30636 (Transition fittings) | Perform statistical analysis | | | In situ testing at 15 locations | | | |
| | | 30636 (Elbows) | Perform statistical analysis | | | In situ testing at 10 locations | | | |
| 16 | 16" March Point Transmission Line | 40000 (Transition fittings) | Perform statistical analysis | | | In situ testing at 2 locations | | | |
| | | 40000 (Elbows) | Perform statistical analysis | | | In situ testing at 10 locations | | | |
| Longview District | | | | | | | | | |
| 1 | Longview-Kelso H.P. Distribution Line | Pre-CNGC-L1-1 | Conduct study to determine replacement options and projects, test existing samples | Replace Phase I | Replace Phase II | Prepace Phase III | Prepace Phase IV | | |
| | | Pre-CNGC-L1-2 | Request allowance to continue operating low-risk pipeline at pressure currently established, accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available. | | | | | | |
| | | 28621 | Request allowance to continue operating pipeline at pressure currently established until pressure test or replacement is complete. | | | | | Pressure test or replace | |
| 2 | 4" Kalama H.P. Line | 24676 | Request allowance to continue operating pipeline at pressure currently established until pressure test or replacement is complete. | | | | | Pressure test or replace | Pressure test or replace |
| 3 | 4" Dike Road H.P. Line (Longview) | 82C8335 | Request allowance to continue operating low-risk pipeline at pressure currently established, accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available. | | | | | | |
| | | 51820 (1) | Request allowance to continue operating pipeline at pressure currently established until pressure test or replacement is complete. | | | | | Pressure test or replace | Pressure test or replace |

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| 8 | 8" Kalama H.P. Line | 51820 (2) | Request allowance to continue operating pipeline at pressure currently established until pressure test or replacement is complete. | | | | | Pressure test or replace | Pressure test or replace |
| | | 51820 (3) | Request allowance to continue operating pipeline at pressure currently established until pressure test or replacement is complete. | | | | | Pressure test or replace | Pressure test or replace |
| | | 51820 (4) | Request allowance to continue operating pipeline at pressure currently established until pressure test or replacement is complete. | | | | | Pressure test or replace | Pressure test or replace |
| 7 | 12" South Longview H.P. Line | 43600 (Transition fittings) | Perform statistical analysis | | | | | In situ testing at approximately 10 locations | |
| Yakima District (Sunnyside) | | | | | | | | | |
| 1 | 3" Sunnyside H.P. Line | Fish-L1-1 | Request allowance to continue operating low-risk pipeline at pressure currently established, accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available. | | | | | | |
| 2 | 2" South Sunnyside H.P. Line | 42C2530 | Request allowance to continue operating low-risk pipeline at pressure currently established, accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available. | | | | | | |
| 3 | 4" Grandview H.P. Line | Fish-L2-1 | Request allowance to continue operating low-risk pipeline at pressure currently established, accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available. | | | | | | |
| 4 | 3" Prosser H.P. Line | YakimaL4-1 | Request allowance to continue operating low-risk pipeline at pressure currently established, accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available. | | | | | | |
| 5 | 6" Toppensish-Zillah H.P. Line | YakimaL5-1 | Request allowance to continue operating pipeline at pressure currently established, perform statistical analysis and test available samples | Replace section on Fraley Road and test samples | | | | | In situ testing at approximately 82 locations |
| 6 | 3" Zillah H.P. Line | fish-L6-1 | Request allowance to continue operating low-risk pipeline at pressure currently established, accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available. | | | | | | |
| 7 | 4" Wapato H.P. Line | fish-L7-1 | Request allowance to continue operating low-risk pipeline at pressure currently established, accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available. | | | | | | |
| 8 | 3" South Toppenish H.P. Line | fish-L8-1 | Request allowance to continue operating low-risk pipeline at pressure currently established, accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available. | | | | | | |
| 9 | 3" Granger H.P. Line | fish-L9-1 | Request allowance to continue operating low-risk pipeline at pressure currently established, accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available. | | | | | | |
| Yakima District | | | | | | | | | |
| 1 | 8" Yakima H.P. Line | Fish_968 | Request allowance to continue operating low-risk pipeline at pressure currently established, accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available. | | | | | | |
| | | FISH_968_Lat_26 | Request allowance to continue operating low-risk pipeline at pressure currently established, accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available. | | | | | | |
| | | 40C4357 | Accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available. | | | | | | |
| | | 20375 | Request allowance to continue operating pipeline at pressure currently established until pressure test or replacement is complete. | | | | | Pressure test or replace | |

| Wenatchee District | | | | | | | | | |
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| 1 | 6" & 8" Moses Lake H.P. Line | WenL1-1 | Request allowance to continue operating low-risk pipeline at pressure currently established, accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available. | | | | | | |
| | | WenL1-2 | Request allowance to continue operating pipeline at pressure currently established, perform statistical analysis | | | | | In situ testing at approximately 33 locations | |
| | | 60390 | Accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available. | | | | | | |
| 2 | 2" Wheeler H.P. Line | WenL2-2 | Request allowance to continue operating low-risk pipeline at pressure currently established, accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available, verify pressure rating of block valve at R-53 | | | | | | |
| 3 | 4" Othello Transmission Line | 18998 | Request allowance to continue operating pipeline at pressure currently established until replacement is complete. | Replace 191 ft section at Booker Road Bridge | | | | | |
| 6 | 4" South Moses Lake H.P. Line | 14455 | Request allowance to continue operating low-risk pipeline at pressure currently established. | | | | | | |
| 10 | 6" West Wheeler H.P. Line | 54006 | Accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available. | | | | | | |
| 12 | 6" Wenatchee H.P. Line | 2912 fish | Request allowance to continue operating low-risk pipeline at pressure currently established, accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available. | Validate pressure rating of stopper at odorizer. | | | | | |
| Kemenick District | | | | | | | | | |
| 1 | 8" Attalia H.P. Line | 01C4776 | Request allowance to continue operating pipeline at pressure currently established, perform statistical analysis and replacement study | | | | | In situ testing at approximately 40 locations | In situ testing at approximately 156 locations |
| | | 14375 (1) | Request allowance to continue operating pipeline at pressure currently established, conduct study to determine replacement and testing options, verify pressure rating of Saw-A-Valve. | | | | | | |
| | | 14375 (2) | Request allowance to continue operating pipeline at pressure currently established, conduct study to determine replacement and testing options | | | | | | |
| | | 14375 (3) | Request allowance to continue operating pipeline at pressure currently established, conduct study to determine replacement and testing options | | | | | | |
| | | 14375 (4) | Request allowance to continue operating pipeline at pressure currently established, conduct study to determine replacement and testing options | | | | | | |
| | | 14375 (5) | Request allowance to continue operating pipeline at pressure currently established, conduct study to determine replacement and testing options | | | | | | |
| 3 | 4" East Finley H.P. Line | 12614 | Request allowance to continue operating low-risk pipeline at pressure currently established until uprate is completed | Conduct uprate to validate MAQP | | | | | |
| 4 | Pasco H.P. Distribution System | KennL4-1 | Accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available. | | | | | | |
| 5 | 4" Northwest Pasco H.P. Line | 11097 (1) | Request allowance to continue operating low-risk pipeline at pressure currently established. | | | | | | |
| 6 | 4" Glade Road H.P. Line | 11097 (2) | Request allowance to continue operating low-risk pipeline at pressure currently established. | | | | | | |
| 7 | 2" Burbank H.P. Line | 12301 | Request allowance to continue operating low-risk pipeline at pressure currently established until uprate is completed | Conduct uprate to validate MAQP | | | | | |
| 8 | 4" Finley H.P. Line | 53C2527 | Request allowance to continue operating low-risk pipeline at pressure currently established, accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available. | | | | | | |
| Walla Walla District | | | | | | | | | |
| 1 | 8" Walla Walla H.P. Line | WWL1-1 | Request allowance to continue operating low-risk pipeline at pressure currently established, accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available. | | | | | | |
| 2 | 3" College Place H.P. Line | WWL2-1 | Request allowance to continue operating low-risk pipeline at pressure currently established, accept most stringent criteria as final wall thickness and pipe grade, test samples as they become available. | | | | | | |