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Date: September 9, 2021

Subject: Completion of Revised Compliance Program Item V. B. 8

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Cascade Natural Gas Corporation

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September 9, 2021

Sean C. Mayo
Pipeline Safety Director, Pipeline Safety Program
State of Washington Utilities and Transportation Commission
P.O. Box 47250
Olympia, WA 98504-7250

Subject: Docket PG-150120, Completion of Revised Compliance Program Item V. B. 8.

Dear Mr. Mayo,

This letter is intended to serve as a notification of completion of Revised Compliance Program Item V. B. 8 of the Amended Settlement Agreement, Docket PG- 150120, between the Washington Utilities and Transportation Commission (WUTC) and Cascade Natural Gas Corporation (CNGC).

8. **ONGOING:** CNGC will commence a program to align its operations with the standards of API Recommended Practice 1173. Commission Staff will review CNGC's progress in implementing these operational changes. API 1173 is a recommended practice and, as such, compliance with API 1173 may be subject to audit but shall not be the basis for penalties.

By the completion of Item V. B. 8, CNGC has taken the steps and implemented a Safety Management System (SMS) as an ongoing continuous improvement program. The program has reached our two-year objective of a Level 3 maturity. This maturity level is based on the maturity model¹ established by the Pipeline SMS Collaborative.² A Level 3 maturity is considered an implemented SMS program. The SMS processes are developed, documented and in use at CNGC.

If you have any questions or comments, please contact Ryan Privratsky at (509) 734-4599.

Respectfully Submitted,

Pat Darras

Pat Darras
Vice President, Engineering & Operations Services
Cascade Natural Gas Corporation

¹ <http://pipelinesms.org/pipeline-sms-maturity-model/>

² <http://pipelinesms.org/>