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Date: September 14, 2021

Subject: Completion of Revised Compliance Program Item V. B. 5

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Identification of Proceeding: PG-150120

Identification of Documents: 150120-CNG-CMPL V B 5-09-14-21



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September 14, 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. 5.

Dear Mr. Mayo,

This letter is intended to serve as a notification of completion of Revised Compliance Program Item V.B.5 of the Amended Settlement Agreement, Docket PG- 150120, between the Washington Utilities and Transportation Commission (WUTC) and Cascade Natural Gas Corporation (CNGC).

5. **ONGOING:** Line segments preliminarily calculated at greater than 20% SMYS will be incorporated into CNGC's transmission integrity management program (TIMP). Baseline assessments for said pipe will be completed by December 31, 2020. Upon completion of MAOP validation, CNGC's TIMP and distribution integrity management program (DIMP) will be re-evaluated and updated as required.¹

By the completion of Item V.B.5, CNGC has completed the baseline assessment requirements for line segments which were calculated at greater than or equal to 20% SMYS due to maximum allowable operating pressure (MAOP) validation activities. The work required to address the remaining three high consequence areas (HCA's) outlined in the March 26, 2021 Six-Month Status Report, has been completed, fulfilling the requirements of Item V.B.5. CNGC continues to evaluate and update TIMP and DIMP as required as MAOP validation activities are completed.

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

Respectfully Submitted,

A handwritten signature in black ink that reads "Pat Darras".

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

¹ Order 06, December 10, 2020, approval for the extension of deadline established in Amended Settlement Agreement Docket PG-150120. Extended the completion date of Revised Compliance Program Item V.B.5 to September 30, 2021.