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PG-150120

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March 28, 2024

Scott Rukke, Director
Washington Utilities and Transportation Commission
Pipeline Safety Division
621 Woodland Square Loop SE
Lacey, WA 98503

Subject: Docket PG-150120, Amended Settlement Agreement, Six-Month Status Report

Dear Mr. Rukke,

This letter serves as Cascade Natural Gas Corporation's (CNGC) six-month status report as outlined in the Amended Settlement Agreement, Docket PG-150120, between the Staff of the Washington Utilities and Transportation Commission (WUTC) and CNGC.

V. TERMS OF AMENDED AGREEMENT

B. Revised Compliance Program

1. CNGC will document the basis for validation of the MAOP of every pipeline segment and facility operating above 60 psig. Such documentation will be completed in accordance with the provisions of 49 C.F.R. § 192.619 as it currently, or as it may be amended by PHMSA. CNGC will meet the following timelines:
 - a. For all segments and facilities identified as missing critical information necessary for documenting the basis for validation of MAOP:
 - i. CNGC will document the basis for validation of the MAOP on 100% of the segments and facilities having a risk score of greater than or equal to 75, as set forth in the MAOP Determination & Validation Plan dated March 2018, by December 31, 2023.
 - ii. CNGC will document the basis for validation of the MAOP on 100% of the segments and facilities having a risk score of less than 75, as set forth in the MAOP Determination & Validation Plan dated March 2018, by December 31, 2028.
 - iii. CNGC has identified eight additional segments currently operating at 30% SMYS or above that are missing critical information needed to document the basis for validation of MAOP. CNGC will complete validation of the eight additional segments by December 31, 2018, unless the percent SMYS of a pipeline segment is reduced below 30% through testing or other approved validation methods, in which case CNGC will schedule the segment for validation based on the total risk score of the segment.

Cascade Response

CNGC continues to make progress completing work to document the basis for validation of the maximum allowable operation pressure (MAOP) of pipeline segments and facilities operating above 60 psig. A request was submitted on October 13, 2023, and an extension was approved on December 21, 2023, extending the completion of Revised Compliance Program Item V.B.1.a.i. to December 31, 2024.

The current unvalidated segment and facility count by risk score is shown in the table below.

Total Risk Score \geq 75	Total Risk Score $<$ 75
16 Pipeline Segments – 13.62 Miles	1,772 Pipeline Segments – 25.66 Miles
7 Facilities	116 Facilities

Notable projects completed since the last update include:

Replacement

- 3" Sunnyside H.P. Line (Fish-L1-1, 21440 - 4,552')
- 2" South Sunnyside H.P. Line (42C2530 - 4,018')
- 2" Wheeler H.P. Line (58C5745, WenL2-2 - 2,554')
- 4" Wheeler H.P. Line (15768 - 2,240')
- 6" Toppenish-Zillah H.P. Line (YakimaL5-1 - 2,400')

Notable projects currently in construction include:

Replacement

- 4" Wapato H.P. Line (Fish-L7-1 - 33,284')

Notable projects currently in planning and design or pre-construction stages include:

Replacement

- 8" Yakima H.P. Line, 032-R-007 (160, 20375, Fish_968, FISH_968_Lat_26, 13033 - 3,997')
- 3" Prosser H.P. Line, 032-R-050 (47C8259, 18687, 47C8256, YakimaL4-1 - 6,255')
- 3" Burlington H.P. Line (211220 - 420')
- 8" Anacortes Transmission Line (MTVL1-1 - 2,946')
- 4" Montesano H.P. Distribution System (77C6321 - 1,645')
- 4" East Finley H.P. Line (12614 - 2,498')
- 8" Bremerton H.P. Line (18522 - 2,863')

Retire

- 4" Arlington H.P. Line (Fish 18C4272 - 5,630')

Pressure Testing

- 6" Toppenish-Zillah H.P. Line, 032-O-008 (YakimaL5-1, 4230112, 4230120, 4230100, 4230105, 25856 - 17,105')
- 4" Sedro-Woolley H.P. Line (14788 - 1,880')

Facilities – Pressure Test/Replace

- 029-R-002 (33C9624)
- 017-R-002 (UNKV (017-R-002))
- 017-R-050 (G0084854)
- 009-R-067 (16160)

Along with the projects highlighted above, various smaller pipeline segments and facilities have also been validated or are in the process of being validated.

b. **COMPLETED:** Validation of highest risk pipeline segments: CNGC has identified five segments currently operating at 30% specified minimum yield strength (SMYS) or above that are missing critical information necessary to document the basis for validation of MAOP. CNGC will complete validation of all five segments by December 31, 2017.

c. **COMPLETED:** CNGC has retained TRC Pipelines Service LLC (TRC) to complete a records review of all remaining pipelines operating above 60 psig. The TRC MAOP records review will be completed by the end of first quarter 2017.

d. **COMPLETED:** CNGC will incorporate any additional pipeline segments operating above 60 psig that have been identified by TRC's review as missing critical information necessary to document the basis for validation of MAOP into the risk matrix to identify mitigation prioritization.

i. **COMPLETED:** CNGC will submit an updated timeline/plan that includes the additional segments to Commission Staff by December 31, 2017.

ii. **COMPLETED:** CNGC and Commission Staff will file an Amended Settlement Agreement with the Commission by March 31, 2018, that reflects a completion date by which CNGC will document the basis for validation of all the high pressure (greater than 60 psig) MAOP for the additional segments identified by TRC. **The Amended Settlement Agreement will include a \$500,000 suspended penalty, imposed in full if CNGC fails to comply with the completion date associated with any new high pressure segments identified by TRC.**

If CNGC and Staff disagree on a completion date, they commit to discuss the nature of the disagreement and to work cooperatively to resolve it. If agreement on the timeline cannot be reached in this way, either Staff or CNGC (or both) may bring the matter to the Commission for decision in a petition to enforce this Agreement.

2. **COMPLETED:** CNGC will prioritize the work set forth in No. 1 above, with priorities established for pipeline segments based on risk to public safety. Risk considerations will include but are not limited to:

- a. Segment class location;
- b. Location of high consequence areas;
- c. Segment SMYS percentage based on the most stringent criteria for missing pipe characteristics;
- d. Pipe vintage with special consideration for pre-code pipe with unknown characteristics;
- e. Pipe material, installation characteristics, or maintenance records that indicate increased risk; and
- f. Low frequency electric resistance welded (ERW) and unknown seam types when SMYS >25%.

3. **ONGOING:** All unvalidated pipeline segments with preliminary SMYS calculations of 20% or greater will be leak surveyed a minimum of four (4) times annually. Once information is available to substantiate SMYS below 20% or to validate the MAOP of a pipeline segment, that pipeline segment will return to leak survey intervals prescribed by code. CNGC will notify Commission Staff when a pipeline segment returns to code-based survey intervals and will make available for Commission Staff inspection documentation of the basis for the action.

Cascade Response

Leak survey of unvalidated pipeline segments at SMYS 20% or greater is ongoing. Currently only one pipeline segment remains on the list, that is being leak surveyed a minimum of four times annually.

4. **ONGOING:** All unvalidated pipeline segments with low frequency seam welds or unknown seam types, with preliminary SMYS calculations of over 30%, shall be maintained at a 20% pressure reduction. Once information becomes available to identify seam type as not low frequency ERW or to substantiate SMYS below 30%, pipeline segments will return to previous operating pressure. CNGC will notify Commission Staff when a pipeline segment returns to a previous operating pressure and will make available for Commission Staff inspection documentation of the basis for the action.

Cascade Response

CNGC continues to complete MAOP validation work required on the remaining pipeline segments with low frequency seam weld or unknown seam types, with preliminary SMYS calculations over 30%. CNGC continues to work on plans and design to complete the remaining work required to return these pipeline segments to previous operating pressures. The status of each unvalidated pipeline segment currently at a 20% pressure reduction is described below:

Pipeline Segment	Work Order #	
8" Anacortes Line	MTVL1-1	Validation work has been completed on 99,119' of the total 102,065' of this pipeline segment. The remaining 2,946' was pressure tested in May 2023. During the pressure test the pressure was held above the minimum test pressure for the duration of the test, but during the test the segment sustained a constant pressure drop that didn't appear to be consistent with temperature change. The segment was placed back into service and has been leak surveyed quarterly since May. On March 22, 2024, a leak was discovered while performing a leak survey. CNGC is currently putting a plan together to repair the leak. Based on the nature of the leak, CNGC will reevaluate retesting the pipeline segment to complete validation work. Planning and design has been under way to replace this pipeline segment in 2024, if the pipeline segment can be retested, replacement will be put on hold. Pipeline segment will remain at a pressure reduction until all validation work is completed.
8" March Point Line	11C1144	All required validation work on this pipeline segment has been completed. Pipeline segment will remain at a pressure reduction until remaining validation work is completed and remaining validation work is completed on connected pipeline segment, MTVL1-1.

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

Cascade Response

Notification letter was submitted through the WUTC Records Center on September 14, 2021, outlining the completion of this compliance item.

¹ Order 06, December 10, 2020, approval for the extension of deadline established in Amended Settlement Agreement Docket PG-150120

7. **COMPLETED:** CNGC will submit to a third party audit to determine baseline variance from the standards set forth in American Petroleum Institute (API) Recommended Practice 1173, Pipeline Safety Management Systems (PSMS). Commission Staff will provide input on the selection of the consultant. At a minimum, the audit will review the following company elements:

- a. Leadership and management commitment
- b. Stakeholder engagement
- c. Risk management
- d. Operational controls
- e. Incident investigation, evaluation and lessons learned
- f. Safety assurance
- g. Management review and continuous improvement
- h. Emergency preparedness and response
- i. Competence, awareness, and training
- j. Documentation and record keeping

Upon completion of the audit, CNGC will submit the consultant's report to the Commission. The third-party audit and written report will be completed by December 31, 2017. **The Commission will impose a \$500,000 suspended penalty if CNGC fails to submit the consultant's report by December 31, 2017.** The results of the third-party audit shall not be the basis for Staff recommendations of additional penalties against CNGC and if the third-party audit identifies violations of code, CNGC shall have a reasonable opportunity to correct such violations.

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.

Cascade Response

Notification letter was submitted through the WUTC Records Center on September 9, 2021, outlining the completion of this compliance item.

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

Respectfully Submitted,



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