PG-150120
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September 13, 2024

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

Subject: Docket PG-150120, V.B.4 – Return to Previous Operating Pressure

Dear Mr. Rukke,

This letter serves as Cascade Natural Gas Corporation's (CNGC) notification as required per Item 4 of the Revised Compliance Program (Section V.B.) of the Settlement Agreement, Docket PG-150120 between the Staff of the Washington Utilities and Transportation Commission (WUTC) and CNGC. Section V.B.4 requires CNGC to notify Commission Staff when a pipeline segment returns to a previous operating pressure.

CNGC has completed MAOP validation work required on the remaining pipeline segments with low frequency seam weld or unknown seam types, that had preliminary % SMYS calculations over 30%. These pipeline segments and a summary of the work that has taken place is described below:

Pipeline Segment	**Work Order #**	
8" Anacortes Line	MTVL1-1	In-situ testing was completed in 2017, which used a statistical approach to randomly sample multiple locations per the requirements of 49 CPR 192.107. From in-situ testing, the yield strength was determined to be 35,500 psig, this value represents the lowest yield strength determined by testing. The wall thickness values determined by testing support an overall wall thickness value of 0.188". Based on these results, at the maximum allowable operating pressure (MAOP) of 360 psig, will produce a hoop stress equivalent to 23.26% of the specified minimum yield strength (SMYS). In addition to in-situ testing, MAOP validation has been completed to document the basis for validation of the pipeline segment's MAOP. MAOP validation included pressure testing of 90,549' and replacement of 1,921'. Once this pipeline segment returns to previous operating pressure, the last 11,381' of this pipeline segment will have its MAOP lowered to 200 psig.
8" March Point Line	11C1144 11C1144-T	In-situ testing was completed in 2016, which used a statistical approach to randomly sample multiple locations per the requirements of 49 CPR 192.107. This pipeline segment was broken into two testing groups, one group for pipe identified as

Pipeline Segment	Work Order #	
		having a wall thickness of 0.188" and second group for pipe identified with a wall thickness of 0.250". From in-situ testing the yield strength was determined to be 42,300 psig and 40,700 psig respectively. Both of these values represent 80% of the average of the yield strength values determined by testing. The wall thickness values determined by testing supported the pipeline segments 0.188" and 0.250" wall thickness values. Based on these results, at the MAOP of 360 psig, will produce a hoop stress equivalent to 19.52% SMYS for the 0.188" pipe and 15.26% SMYS for the 0.250" pipe. In addition to in-situ testing, MAOP validation was completed to document the basis for validation of the pipeline segment's MAOP. MAOP validation included pressure testing of 3,813' and replacement of 5,013'.
8" March Point Line	11C7157	Pipeline segment was replaced in its entirety in 2021.
8" March Point Line	1880	Pipeline segment was replaced in its entirety in 2023.
8" March Point Line	11C5628	Pipeline segment was replaced in its entirety in 2021.

The maximum operating pressure on these pipeline segments was reduced from 360 psig to 288 psig on July 21, 2016. This pressure reduction, in accordance with the requirements of Docket PG-150120, was necessary since it was determined that the preliminary calculated % SMYS for these pipeline segments was over 30% SMYS. The preliminary % SMYS was calculated to be 34.41% SMYS, for these pipeline segments. This pressure lowering was not considered a change in MAOP, but a temporary pressure reduction until information became available to identify seam type was not low frequency ERW or to substantiate % SMYS below 30%. Now that in-situ testing results are available showing the % SMYS is less than 30% and MAOP validation has been completed, CNGC intends to increase the operating pressure in October.

This change in operating pressure will not be considered an uprate because the MAOP of the pipeline was not changed and these pipeline segments will be returning to original operating pressures.

With the operating pressure being restored back to previous operating pressures for these pipeline segments, there are no pipeline segments that are currently under a 20% pressure reduction, as required per Section V.B.4 of the Revised Compliance Program of the Settlement Agreement, Docket PG-150120.

If you have any questions or would like to review any of the documentation pertaining to these pipeline segments, please do not hesitate to contact me directly at ryan.privratsky@mdu.com, or 509-734-4599.

Respectfully Submitted,

Ryan Privratsky
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Date: September 13, 2024

Subject: V.B.4 Pressure Notification

Sender: Ryan Privratsky, Director, System Integrity
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Identification of Proceeding: PG-150120

Identification of Documents: 150120-CNG-NOTIFY-LTR-9-13-24