



STATE OF WASHINGTON

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

1300 S. Evergreen Park Dr. S.W., P.O. Box 47250 • Olympia, Washington 98504-7250
(360) 664-1160 • TTY (360) 586-8203

Ref. Docket PG-091879

VIA CERTIFIED MAIL

December 29, 2009

Eldon N. Book
Executive Vice President, COO
Cascade Natural Gas Corporation
555 South Cole Road
PO Box 7608
Boise, ID 83707

Dear Mr. Book:

**RE: Request for Information Related to the 12/2/2009 System Overpressure Event -
Sedro Woolley, Skagit County, Washington**

On December 2, 2009, Cascade Natural Gas (CNG) experienced an overpressure event on a portion of its gas distribution system. The pipeline segment affected was located downstream of CNG district regulator R-15 (R-15) located on Jones Road and east of Birch Lane. We are currently conducting an investigation into the cause of this event. To assist us in this investigation, we require additional information from CNG.

Please refer to the attachment enclosed with this letter. You should interpret the information requests to apply to CNG's facilities located in Skagit County only or to district regulator R-15 where specifically noted.

Your response needed

Please respond in writing to this request by February 1, 2010.

If you have any questions, please contact Patti Johnson at (360) 664-1266 or Joe Subsits at (360) 664-1322. Refer to docket number PG-091879 in any future correspondence regarding this investigation.

Sincerely,

David D. Lykken
Pipeline Safety Director

cc: Daniel E. Meredith, CNG
Chanda Marek, P.E., CNG



Washington Utilities and Transportation Commission
Request for Information
System Overpressure Event - Sedro Woolley, Skagit County
Docket PG-091879

1. Maps showing all pipelines that operate above 60 psig to the point where pressure is reduced to less than or equal to 60 psig.
2. The actual normal operating pressure of all pipelines operating above 60 psig. The pressures shall correspond with the maps provided under item 1.
3. A list of all pressure regulator stations and relief devices maintained by CNG under 49 CFR §192.739 and §192.743.
4. Maps with sufficient resolution to show all pressure regulator stations. The map should correspond with each regulator station provided under item 3.
5. Copies of Regulator Set Point Lists in effect on 12/1/ 2009 for each pressure regulator station. The lists should correspond with each regulator station provided under item 3.
6. Maintenance records for two years (2008-2009) for each pressure regulator station and relief device maintained by CNG under 49 CFR §192.739 and §192.743.
7. MAOP tables in effect on 12/2/ 2009 for each high pressure (HP) and distribution systems.
8. Electronic pressure monitoring records for CNG HP and distribution systems from 11/15/09 thru 12/3/2009.
9. Mechanical pressure recording charts for HP and distribution systems from 11/15/09 thru 12/3/2009.
10. Copies of CNG form 347 for each pressure recording pen. Forms should correspond with each recording chart provided under item 9.
11. Provide a narrative and policies in effect prior to 12/2/2009, detailing precautions CNG takes to minimize freezing problems. The narrative should address areas such as system design, equipment selection, water removal, and the application of heat where appropriate.
12. Weather data (closest in proximity to R-15) from 11/30/2009 thru 12/4/2009 including temperature, wind chill, precipitation, wind direction and wind speed.
13. As-Built drawings and materials list for R-15 and associated relief devices in effect prior to 12/2/2009.
14. As-Built drawings and materials list for R-15 and associated relief devices as a result of modification made since the overpressure event.
15. As-Built drawings, materials list, and pressure test records for downstream distribution mains served by R-15.
16. Records noting any modifications to R-15 since 2006 including modifications to overpressure protection and associated appurtenances.

17. When was the last time a CNG employee was at R-15 prior to 12/2/2009? Provide all documentation associated with the visit including work performed and any comments or observations noted.
18. What was the condition of the regulator vents when the service mechanic arrived on 12/2/2009?
19. Submit any engineering evaluations conducted for R-15.
20. Were any replaced regulator or relief parts corroded, damaged or unsatisfactory? Does CNG still have the parts? Where are they located and are they in a secure location?
21. Provide any available upstream and downstream of R-15 pressure readings from 11/15/2009 thru 12/4/2009. If there are multiple records for the day, then report daily max /min.
22. Provide a copy of the manufacturer's recommendation's on regulator/relief vent orientation and design for regulator and relief systems for cold weather operations.
23. What was the condition of the relief weather cap when the mechanic arrived on 12/2/2009?
24. Was the relief stack checked for water accumulation or ice? Was any found?
25. Was the weather cap installed on R-15 at the time of the overpressure event one of the 163 replaced as noted in the CNG letter dated 2/28/2008 under docket PG-060217?
26. Provide a list of addresses for each residential and commercial customer served by R-15 on 12/1/2009.
27. A list of pressure reducing regulators corresponding with the list provided under item 28 detailing the manufacturer, type and/or model, body size, maximum operating inlet pressure, capacities in standard cubic feet per hour (SCFH), and orifice size (in inches) for each.
28. Operation and Maintenance Request's (CNG Form 330A) and Work Order's (CNG Form 332) for all work performed on gas system facilities downstream of R-15 for the period beginning 11/1/2009 thru 12/4/2009.
29. Provide a timeline of events and response to R-15 overpressure event beginning on 12/2/2009 thru 12/4/2009.
30. Provide a copy of any investigation reports and failure analysis reports prepared or received by CNG in association with the R-15 overpressure event.