

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

v.

CASCADE NATURAL GAS  
CORPORATION,

Respondent.

DOCKET PG-150120

AMENDED DECLARATION OF  
DENNIS RITTER

- 1 I, DENNIS RITTER, under penalty of perjury under the laws of the state of Washington,  
declare as follows:
- 2 I am over 18 years of age, a citizen of the United States, a resident of the state of Washington,  
and competent to be a witness.
- 3 I am employed by the Washington Utilities and Transportation Commission (Commission) as  
an Energy/Utilities Engineer 4. I have been employed in this position for 1.5 years. My  
responsibilities in this position include supervising a statewide program of the Pipeline Safety  
inspection and investigation program and related tasks. Establish annual work plans consistent  
with federal regulations, risk assessment of pipeline facilities and in coordination with direction  
from the US DOT Pipeline and Hazardous Materials Safety Administration (PHMSA). As part  
of this role I am made aware of and conduct investigations on pipelines and incidents such as  
leaks.
- 4 Cascade Natural Gas Corporation (Cascade or Company) is the owner and operator of the 8-  
inch Anacortes transmission line segment MTVL1-1 (Pipeline or MTVL1-1). This pipeline is  
located in Skagit County near the Swinomish Slough. This pipeline is also subject to the  
Maximum Allowable Operating Pressure settlement that was approved by the Commission in  
Order 03 of this docket (Agreement).
- 5 Term three of the Agreement requires that Cascade conduct a minimum of four leak surveys  
annually for all pipeline segments without a validated pressure with a Specified Minimum Yield  
Strength (SMYS) of 20 percent or greater.
- 6 Under the federal code, any pipeline operating over 20 percent of the SMYS is a transmission  
pipeline. Pipelines in Washington are classified under the federal code.
- 7 The MTVL1-1 is an unvalidated pipeline with a SMYS of 20 percent or greater, making it a  
transmission pipeline under federal law.
- 8 On June 1, 2023, Infrasource, a contractor hired by Cascade, performed a pressure test of the

MTVL1-1. The pressure test was being supervised by Mistras, another contractor hired by Cascade.

- 9 The pipeline failed the June 1, 2023, pressure test. After the failure of the pressure test, Cascade suspected there was a leak on the line and began looking for the leak. Over the proceeding nine months, Cascade attempted to find the source of the leak by conducting six different leak surveys on June 2, 2023, June 6, 2023, July 13, 2023, September 29, 2023, December 4, 2023 and February 27, 2024. Cascade found the leak—it was not over the location previously leak surveyed. Cascade notified the Commission that the location of the leak was discovered on March 22, 2024.
- 10 Cascade informed Staff that the nine month delay in locating the leak was the result of inaccurate GIS mapping data for this pipeline. Mapping data for this pipeline was inaccurate, being off by 100-200 feet in some locations. In the location of the leak in this instance, the GIS mapping was off by 120-130 feet. Because of the inaccurate mapping data of this line, it is unknown the last time this pipeline was properly leak surveyed or in fact, how long the leak had been occurring.
- 11 Staff does not believe this pipeline has been accurately leak surveyed since before the settlement in this matter. Staff bases this opinion on the fact that Cascade leaked surveyed the same line on 6 different dates following the failed pressure test and didn't find the known leak location. This is because Cascade was not surveying for the leak over the actual physical location of the pipeline. The only reason the leak was found was due to a large flooded area over the suspected location of the line, causing the technician to have to "go around" and in so doing, came across the leak purely by accident.
- 12 Staff is unsure if this mapping issue impacts other lines in Cascade's system. Cascade does have a history of issues with its GIS system. In 2011, Cascade was required to perform extensive improvements to its GIS system in 9 different inspection districts in WA. Part of this effort was to properly map Transmission lines in GIS for the Mt. Vernon district. According to Staff records, Cascade completed 100% of the lines in Mt. Vernon. This investigation was under docket PG-110443. Cascade does not have a compliance program in place to deal with issues pertaining to the accuracy of its GIS system.

DATED at Olympia, Washington, and effective this 13 day of February, 2025.

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DENNIS RITTER