CASCADE NATURAL GAS CORPORATION
A Subsidiary of MDU Resources Group, Inc.

222 FAIRVIEW AVENUE N., SEATTLE WASHINGTON 98109-5312 206-624-3900
FACSIMILE 206-654-4039
www.cngc.com

VIA CERTIFIED MAIL

December 29, 2010

David Lykken
Pipeline Safety Director
Washington Utilities and Transportation Commission
P.O. Box 47250
1300 S. Evergreen Park Dr. SW
Olympia, WA 98504

Subject: Docket PG-091879 Response to Request for Information Related to the 12-2-2009 System Overpressure Event – Sedro Woolley, Skagit County, WA

Dear Mr. Lykken:

This letter with attachments is our response to the subject request dated December 29, 2009, regarding the R-15 system overpressure event we experienced on December 2, 2009.

Data Request Item 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 are attached behind Tab 1.

Data Request Item 2:
The actual normal operating pressures of all pipelines operating above 60 psig are listed in the table behind Tab 2. These pressures are cross referenced to the maps discussed above by line number.

Data Request Item 3:
A list of all pressure regulator stations and relief devices maintained by CNG is included behind Tab 3.

Data Request Item 4:
The maps included behind Tab 1 show all pressure regulator stations. The list behind Tab 3 is cross referenced to the maps by regulator number.

Data Request Item 5:
The list included behind Tab 3 includes regulator set points.

Data Request Item 6:
The 2008 and 2009 regulator maintenance records for each pressure regulator station listed behind Tab 3 are included behind Tab 6. As a separate project, CNG is currently in the process of a company-wide audit of regulator and valve maintenance records. That audit has revealed some maintenance tasks which were not completed within the code time frames. R-93 in Anacortes is one of these stations. R-93 is a little joe style regulator that serves three customers. Due to an error at the time of installation, R-93 was set up as a service line regulator rather than a numbered regulator station requiring annual maintenance. As a result, CNG completed maintenance of this station in January of 2010 for the first time. R-93 maintenance records are therefore not included behind Tab 6; all remaining regulators listed behind Tab 3 are included. CNG will provide WUTC with a complete company-wide summary of our regulator and valve maintenance audit when complete.

Data Request Item 7:
The MAOP for systems operating above 60 psig is shown in the table behind Tab 2 along with actual normal operating pressures. The MAOP for systems operating at or below 60 psig is shown in the table behind Tab 7.

Data Request Item 8:
Electronic pressure monitoring records for CNG HP and distribution systems from 11-15-09 through 12-3-09 are included behind Tab 8.

Data Request Item 9:
Mechanical pressure recording charts for HP and distribution systems from 11-15-09 through 12-3-09 are included behind Tab 9.

Data Request Item 10:
Copies of CNG form 347 for each pressure recording pen are included behind Tab 10. The forms correspond with the charts behind Tab 9. P-001 records pressure on a 45 MAOP system in Anacortes, WA. The CNG form 347 for P-001 shows that a pressure of 46 psig was recorded on 12-13-08. P-013 records pressure on a 42 MAOP system in Burlington, WA. The CNG form 347 for P-013 shows that a pressure of 43 psig was recorded on 12-5-07 and 12-19-07.. We have record that WUTC was notified of the P-013 incident.

Data Request Item 11:
The narrative requested is included behind Tab 11.

Data Request Item 12:
Weather data from 11-30-09 through 12-4-09 including temperature, precipitation, wind direction and wind speed is included behind Tab 12. CNG informed you via email that we could not locate wind chill information and you responded that the above information was adequate on 1-12-09. The weather information is for Burlington, WA and was acquired from www.wunderground.com.

Data Request Item 13:
As-built drawings and materials for R-15 and associated relief in effect prior to 12-2-09 are included behind Tab 13.
Data Request Item 14:
As-built drawings and materials for R-15 and associated relief after recent modification are included behind Tab 14.

Data Request Item 15:
As-built drawings, materials list, and pressure test records for downstream distribution mains served by R-15 are included behind Tab 15.

Data Request Item 16:
Records noting any modifications to R-15 since 2006 including modifications to overpressure protection and associated appurtenances are included behind Tab 16.

Data Request Item 17:
The last time a CNG employee was at R-15 prior to 12-2-09 was in March of 2009 for regulator maintenance. The maintenance form is included behind Tab 17.

Data Request Item 18:
When the service mechanic arrived on site at R-15 on 12-2-09 he found that the condition of the regulator vents was as follows. Both regulator vents were oriented downward. The standby regulator had ice around it and it appeared that ice may have been partially blocking the vent.

Data Request Item 19:
Engineering evaluations for R-15 are included behind Tab 19.

Data Request Item 20:
The regulator soft parts were removed and replaced as a precaution. Visual examination did not reveal any corroded, damaged or unsatisfactory features. The parts were discarded and are no longer available.

Data Request Item 21:
The closest available pressure records on the high pressure side of R-15 are included behind Tab 21. No pressure records exist for the low pressure side of R-15.

Data Request Item 22:
A copy of the manufacturer's recommendation's on regulator/relief vent orientation and design for regulator and relief systems for cold weather operations is attached behind Tab 22.

Data Request Item 23:
When the service mechanic arrived at R-15 on 12-2-2009, the relief valve was fully venting. The cap was fully open, and the flag was tripped.

Data Request Item 24:
No water accumulation or ice was evident during the event. The relief appeared to be fully open and unrestricted by water or ice.

Data Request Item 25:
The relief cap installed on R-15 at the time of the incident matches the current CNG standard for relief caps. In other words, it meets the standard that we intended all relief stacks to meet by our response to PG-060217. We cannot find records that indicate if or when this cap was replaced.

Data Request Item 26:
A list of addresses for each residential and commercial customer served by R-15 on 12-1-09 is included behind Tab 27.

Data Request Item 27:
The list behind Tab 27 also includes the manufacturer, type, body size, maximum operating inlet pressure, capacity, and orifice size for each pressure reducing regulator as requested.

Data Request Item 28:
Operation and Maintenance Requests and Work Orders for work performed on facilities downstream of R-15 between 11-1-09 and 12-4-09 is included behind Tab 28.

Data Request Item 29:
A timeline of events and response to R-15 overpressure event beginning on 12-2-09 through 12-4-09 is included behind Tab 29.

Data Request Item 30:
No additional investigation reports or failure analysis reports other than the PHMSA Safety Related Condition Report and the WUTC 30 day report were prepared or received by CNG in relation to this incident. Both the reports mentioned above were previously submitted to WUTC.

If you have any questions regarding this response, please contact Chanda Marek at (206) 381-6777. Thank you.

Sincerely,
CASCADE NATURAL GAS CORP.

FOR
Eldon N. Book
Executive Vice President and Chief Operating Officer

c: Tim Clark
Chanda Marek
Keith Meissner

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.