



STATE OF 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

**CERTIFIED MAIL**

September 2, 2016

Eric Martuscelli  
Vice President-Operations  
Cascade Natural Gas Corporation  
8113 W. Grandridge Blvd.  
Kennewick, WA 99336

Dear Mr. Martuscelli:

**RE: PG 150120—MAOP Validation Plan (Insp. No. 2655)**

The Utilities and Transportation Commission (UTC) pipeline safety staff (staff) have reviewed your August 11, 2016, correspondence responding to our correspondence of July 7, 2016, concerning the MAOP Validation Plan submitted by Cascade Natural Gas Corporation (CNGC).

Relative to the timeframe for completion of your validation plan, staff agrees that the addition of nearly 400 pipeline branch segments with missing critical information places your original plan submission of April 29, 2016, incomplete. Until CNGC can give staff a completed inventory of these branch segments including location, length and missing information, it is impossible for staff to evaluate your plan.

Further, in your recent correspondence, CNGC voluntarily was adding leak surveys to all lines included in Tables 1 and 3 increasing each survey interval to one survey each quarter per line number. However, in a conversation on August 31, 2016, you informed me that because of resource limitations, this leak survey plan has not yet been fully implemented. Staff requests an update on when this leak survey enhancement will be accomplished. If CNGC plans to employ contractors to augment CNGC personnel, they must be qualified per subpart N of 49 CFR Part 192 and CNGC's procedures.

On page 3 of your August 11, 2016 letter, CNGC addresses MAOP for those segments operating above 30% SMYS using the provisions of 49 CFR 192.119 for unknown longitudinal joints. Please note that while this is accepted by code for establishment of MAOP, the fact that the joint type is still unknown must be taken into consideration in your Transmission Integrity

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Cascade Natural Gas Corporation  
PG-150120 – MAOP Validation Plan Review (Insp. No. 2655)  
September 2, 2016  
Page 2

Management Plan (TIMP). These unknown seem types add significant additional risk and must be vetted and mitigated as part of the TIMP.

In conclusion, the addition of substantial pipeline segments with significant missing critical information does not allow staff to fully evaluate your validation plan. We assume CNGC is working on providing this data as soon as possible. Please contact Dennis Ritter at (360) 664-1159 or me if you have questions concerning this communication.

Sincerely,



Alan E. Rathbun  
Pipeline Safety Director

cc: Steve Kessie, Director Operation Services, CNGC  
Jeremy Ogden, Director Engineering Services, CNGC  
Renie Sorenson, Supervisor Engineering Services, CNGC  
Mike Eutsey, Manager, Standards and Compliance, CNGC