

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Request of

CASCADE NATURAL GAS  
CORPORATION

Pursuant to WAC 480-93-020 for  
Approval to Operate a Proposed Pipeline  
at a Pressure of 330 psig with a Maximum  
Allowable Operating Pressure of 340  
Pounds per Square Inch Gauge within 100  
Feet of Existing Structures or those that  
are under construction.

DOCKET PG-240538

ORDER 01

APPROVING REQUEST

**BACKGROUND**

- 1 On July 3, 2024, Cascade Natural Gas Corporation (Cascade or Company) filed with the Washington Utilities and Transportation Commission (Commission) a request for approval to operate the proposed pipeline at a pressure of 330 psig with a maximum allowable operating pressure (MAOP) of 340 pounds per square inch gauge (psig) within 100 feet of existing buildings or those that are under construction. Cascade is performing this work to maintain core customer needs & large volume industrial needs and to have the ability to supply necessary capacities for future growth in Longview, WA.
- 2 The Commission has adopted the Code of Federal Regulations (C.F.R.) Title 49, Part 192, and promulgated Washington Administrative Code (WAC) Chapter 480-93 as the minimum standards for gas pipeline construction. WAC 480-93-020 requires a gas pipeline company to obtain approval from the Commission to operate a gas pipeline at greater than 250 psig within 100 hundred feet of any existing buildings not owned by the gas pipeline company.
- 3 Cascade is proposing the uprating of approximately 22,325 feet of 12-inch steel, 47 feet of 8-inch steel, 437 feet of 6-inch steel, 2,542 feet of 4-inch steel, 23 feet of 2-inch steel and 5 regulator stations. Cascade is asking for approval to operate the existing pipeline at 340 MAOP.
- 4 No new pipeline or regulator stations will be installed as part of this uprate. This project begins at regulator station 54 (R-54) located near 300 Fiber Way, other stations along the route are as follows: R-127, R-38, R-8, R-36 and R-14. The minimum design pressure of

these regulator stations are ANSI Class 300 components with a maximum working pressure rating of 720 psig. All existing regulator stations have already been pressure tested to a minimum certification pressure of 400 psig.

5 At the proposed MAOP of 340 psig, the stress level of the regulator stations, pipe and pipeline fittings will be a maximum of 19.85 percent of the specified minimum yield strength. The Longview-Kelso HP Distribution section will be classified as high-pressure distribution main, not Transmission.

6 The Longview-Kelso HP Distribution pipeline will be within 100 feet of 95 structures, route analysis and protective measures were not taken into consideration of the pipeline route and proximity to public and associated facilities due to it being a previously installed gas main with no new pipeline installed.

7 Commission staff (Staff) reviewed the Company's proposed proximity request, calculations, and existing records. Staff notes the following facts:

- (a) The proposed MAOP of the pipeline will be 340 psig.
- (b) The proposed piping and all fittings are commensurate with the proposed MAOP.
- (c) The approximate distance from the pipeline to existing structures will be within 100 feet. All other buildings are greater than 100 feet from the pipeline.
- (d) At the proposed MAOP of 340 psig, the maximum stress level of the new pipe would be 19.85 percent of the specified minimum yield strength (SMYS). Pipelines that operate under 20 percent of SMYS are considered low-stress lines and pose a lower risk than pipelines operating above 20 percent of SMYS.

8 Staff finds that Cascade's proposed uprating meets all the pertinent requirements of Title 49 C.F.R. Part 192 and WAC Chapter 480-93.

9 Staff recommends that the Commission approve the request subject to the following conditions, designed to minimize the risks to public safety from the proposed pipeline:

- (a) Cascade must provide notification to the Commission via email to [pipelineprogram@utc.wa.gov](mailto:pipelineprogram@utc.wa.gov) at least two business days prior to the beginning of the uprating project.
- (b) Cascade must contact building owners within 100 feet of the new pipeline prior to the Commission's open meeting and inform them of the uprating project and any additional information consistent with the public awareness requirements in Title 49 CFR Part 192.616.

### DISCUSSION

10 The Commission agrees with the Staff's analysis and adopts its recommendations. The Commission's primary objective in regulating natural gas pipelines is to protect public safety. The rules the Commission has promulgated to govern pipelines incorporate and exceed federal requirements and provide flexibility to establish safety standards tailored to individual projects. The Commission's proximity rule, WAC 480-93-020, allows pipeline Staff the opportunity to review construction plans of high-pressure pipelines in close proximity to inhabited structures to address safety considerations, however in this case no new pipeline or regulator stations will be installed as part of this uprate. Staff's recommended conditions described in paragraph 7 appropriately minimize the public safety risk associated with the proposed uprating of the pipeline. Accordingly, we approve the Company's request.

### FINDINGS AND CONCLUSIONS

- 11 (1) The Commission is an agency of the State of Washington vested by statute with the authority to adopt and enforce rules for gas pipeline safety.
- 12 (2) Cascade is a gas pipeline company and subject to Commission jurisdiction.
- 13 (3) In WAC 480-93, the Commission has adopted minimum standards for gas pipeline construction. Pursuant to these standards, gas pipelines are designed to withstand higher pressure than the maximum allowable operating pressure (MAOP) prescribed by these rules. The most restrictive gas pipeline safety rules specify that pipelines in a highly populated area must be operated at pressures producing a hoop stress of no greater than 40 percent of the specified minimum yield strength (SMYS) of the pipe.

- 14 (4) Cascade's uprating plan indicates that the proposed pipeline will meet or exceed all the pertinent requirements of Title 49 C.F.R. Part 192 and WAC Chapter 480-93. The conditions recommended by Staff add requirements to this installation that minimize the risk of proximity of the pipeline to habitable structures.
- 15 (5) This matter came before the Commission at its regularly scheduled meeting on December 19, 2024.
- 16 (6) The Commission should approve Cascade's request to operate the existing Longview-Kelso HP Distribution main with a 340 psig MAOP & 330 psig because the Company's proposal, with the conditions Staff recommends, is consistent with the public interest.

**ORDER**

**THE COMMISSION ORDERS:**

- 17 (1) The Commission approves Cascade Natural Gas Corporation's request to Operate a Proposed Pipeline at a Pressure of 330 psig with a Maximum Allowable Operating Pressure of 340 Pounds per Square Inch Gauge within 100 Feet of Existing Structures or those that are under construction.
- 18 (2) The Commission retains jurisdiction over the subject matter and Cascade Natural Gas Corporation to effectuate the provisions of this Order.

DATED at Lacey, Washington, and effective December 19, 2024.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**JEFF KILLIP**  
Executive Director and Secretary