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October 27, 2016

Alan Rathbun
Director of Pipeline Safety Program
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive S.W.
P.O. Box 47250
Olympia, WA 98504-7250

RECEIVED
OCT 27 2016
State of Washington
UTC
Pipeline Safety Program

Subject: 8" & 12" Bremerton Transmission Line #2 – Return to Original Pressure

Mr. Rathbun:

This letter is to notify the Washington Utilities and Transportation Commission (WUTC) that Cascade Natural Gas Corporation (Cascade) has completed in situ testing on the 8" & 12" Bremerton Transmission Line #2 and, based on the results, intends to return it to its original operating pressure. The operating pressure was reduced from 499 psig to 399 psig on July 20, 2016. Testing locations were selected in accordance with the process outlined in the Technical Memorandum prepared by Parametrix on January 8, 2016 and sent to the WUTC on April 15, 2016. This process follows the requirements of 49 CFR 192 Appendix B – Qualification of Pipe. Testing was performed in accordance with the process created by ABI Services and approved for use by the WUTC on January 12, 2016.

Fifteen locations were tested and, based on the requirements of 49 CFR 192.107, the yield strength was determined to be 40,400 psi. This value represents 80% of the average yield strength determined by testing. The wall thickness was measured to be 0.188 inches. The final report containing the results of this testing is attached. Based on these results, the maximum allowable operating pressure (MAOP) of 499 psig will produce a hoop stress equivalent to 28.33% of the specified minimum yield strength (SMYS) of the pipeline.

Because this is a pre-code pipeline with unknown seam type and yield strength, it was assumed to be operating at 47.69% SMYS. For that reason the pressure was lowered by 20%, in accordance with the requirements of the Stipulated Agreement in Docket PG-150120. This pressure lowering was not considered a change in MAOP. Now that testing results are available showing the yield strength to be 40,400 psi, rather than the assumed 24,000 psi, the pipeline operating at 499 psig will result in a hoop stress equivalent to 28.33% SMYS.

Because operating this pipeline at 499 psig is critical to providing gas to Bremerton, WA and the surrounding area, Cascade intends to change the operating pressure on November 10, 2016.

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Re: 8" & 12" Bremerton Transmission Line #2 – Return to Original Pressure

Page 2

This change in operating pressure will not be considered an uprate because the MAOP of the pipeline was not changed.

If you have any questions about this pressure increase, please feel free to contact me at jeremy.ogden@cngc.com or 509-734-4509.

Sincerely,



Jeremy Ogden, P.E.

Director, Engineering Services

Cascade Natural Gas Corporation

Attachments

cc: Joe Subsits
Dennis Ritter