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July 11, 2023

Scott Rukke – Pipeline Safety Director
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Subject: CNGC response to Areas of Concern RE: Standard inspection on May 17, 2023, through May 19, 2023 (Insp. No. 8584).

Dear Mr. Rukke,

This letter is intended to address one area of concern stemming from a field inspection of Cascade Natural Gas Corporation's (CNGC) Kennewick's unit assets on May 17, 2023, through May 19, 2023.

AREAS OF CONCERN

1. WAC 480-93-180 Plans and procedures/

(a) Each gas pipeline company must have and follow a gas pipeline plan and procedure manual (manual) for operation, maintenance, inspection, and emergency response activities that is specific to the gas pipeline company's system. The manual must include plans and procedures for meeting all applicable requirements of 49 C.F.R. §§ 191, 192 and chapter 490-93 WAC, and any plans or procedures used by a gas pipeline company's associated contractors.

CNGC Procedures OPS 500 – Regulator Station Inspection and Maintenance

3. General Inspection and Maintenance

3.10 – Inspection station signage

6. Post Inspection Maintenance

6.6. Required corrective maintenance

General Inspection and Maintenance Deficiencies; the following timeframes:

Sign Condition Unacceptable – 45 Days

Summary of Finding(s):

Staff noted three regulator stations without proper signage or complete signage:

R-142 (formerly R-6)- Burbank

R-115 47116-RS-60677 – Burbank

R-136 47288-RS-1557212 – Finley

After further review staff also noted that CNGC personnel conducted routine maintenance at these facilities without acknowledging that the proper signage or complete signage was missing and without generating a work order to resolve the situation according to procedures. Staff understand that since two of the three regulator stations identified were newly constructed, at times equipment supply can be delayed, however, R-136 was installed for more than 45 days without a signage correction.

Cascade Response

CNGC acknowledges the findings brought forth by the WUTC stated above. Signage was installed at the following regulator stations:

R-142 in Burbank – Installed May 19, 2023 (Exhibit A)

R-115 in Burbank - Installed May 26, 2023 (Exhibit B)

R-136 in Finley – Installed May 19, 2023 (Exhibit C)

Additionally, an MOC has been initiated to revise *OPS 500 – Regulator Station Inspection and Maintenance* to inspect for signage when commissioning a new regulator station. If signage is not installed at the time of commission, a deficiency work order shall be created. Training will be provided to Company personnel responsible for installing and inspecting regulator station signage.

Please contact Josh Sanders at (701) 222-7773 with questions or comments.

Respectfully Submitted,

A handwritten signature in black ink that reads "Pat Darras". The signature is written in a cursive, flowing style.

Pat Darras
Vice President, Engineering & Operations Services
Cascade Natural Gas Corporation

Exhibit A: R-142



Exhibit B: R-115



Exhibit C: R-136

