



8113 W. GRANDRIDGE BLVD., KENNEWICK, WASHINGTON 99336-7166
TELEPHONE 509-734-4500 FACSIMILE 509-737-9803
www.cngc.com

March 29, 2013

David D. Lykken – Pipeline Safety Director
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr.
Olympia WA, 98504

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Pipeline Safety Program

Dear Mr. Lykken,

This letter is in response to the 2012 Distribution Integrity Management Program (DIMP) inspection findings outlined in your letter to Cascade Natural Gas Corporation (CNGC) on October 10, 2012. As a result of the inspection, CNGC responded to the probable violations on November 19, 2012 specifying that all probable violations will be addressed by March 31, 2013.

CNGC has made the necessary revisions to the existing DIMP written plan and risk model to address all probable violations. In addition to plan revisions, CNGC has also updated CP 750: Leak Investigation and completed a leak classification review on all 2003-2011 leaks.

Cascade's approach to this plan revision is that the written plan provides the framework for the management of the program and the appendices provide the detail. Supplementary to this letter you will find a copy of the revised DIMP plan where Appendix I contains a summary of changes made to the previous plan version.

Please contact Jeremy Ogden, Director of Engineering Services with questions or comments at 509-734-4509.

Respectfully Submitted,

Eric Martuscelli,
Vice President, Operations
Cascade Natural Gas Corporation