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September 14, 2012

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State of Washington Utilities and Transportation Commission
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Pipeline Safety Program

Subject: Response to 2012 Public Awareness Program Inspection

Dear Mr. Lykken,

This letter is intended to address all probable code violations and areas of concern. We want to take this opportunity to respond to your findings and update you on the steps that we have, or will be taking in the immediate future to bring the probable violations and areas of concern into full compliance. The inspection was conducted on May 30th through June 1st, 2012 in Kennewick, WA.

Since the inspection has occurred, Cascade Natural Gas Corporation (CNGC) has taken several aggressive steps in overhauling the Public Awareness Program (PAP) manual and our materials. CNGC personnel, with the assistance of an outside consultant, have been revising the PAP Manual. The purpose of the revision is to address issues identified as probable violations as well as incorporate general best practices. These revisions include reorganization of the information in the PAP consistent with your closing remarks. It will be more concise and organizes the information on a stakeholder by stakeholder basis.

CNGC has also initiated a review of each of its stakeholder outreach programs. Over the course of the next 18 months, as efforts are planned and implemented, CNGC will further review and update, if necessary, program materials, messaging and the methods by which public awareness messaging is conveyed and tracked. At this time, we anticipate this review will occur in the following order:

- Customers and general public – 4Q 2012
- Emergency responders - 1Q 2013
- Excavators- 2Q 2013
- School program- 3Q 2013
- Public officials- 4Q 2013

The following is in response to the nineteen probable violations and two areas of concern:

PROBABLE VIOLATIONS

1. 49 CFR §192.616 Public Awareness

(a) *Except for an operator of a master meter or petroleum gas system covered under paragraph (j) of this section, each pipeline operator must develop and implement a written continuing public education program that follows the guidance provided in the American Petroleum Institute's (API) Recommended Practice (RP) 1162(incorporated by reference, see§ 192. 7).*

Finding 1: PHMSA Form 21 question 1.02 Management Support

CNG's written PAP failed to specifically identify how management participates in the PAP.

Finding 2: PHMSA Form 21 question 1.02 Management Support

CNG's written PAP failed to identify all of the Program Administrator roles and responsibilities.

Finding 3: PHMSA Form 21 question 1.02 Management Support

CNG's written PAP failed to specifically identify how many employees are involved with the PAP, including senior management.

Finding 4: PHMSA Form 21 question 1.02 Management Support

CNG's written PAP failed to identify the titles of all the employees involved with the PAP, including senior management.

Finding 5: PHMSA Form 21 question 1.02 Management Support

CNG's written PAP failed to identify the roles of the employees involved with the PAP, including senior management.

Finding 6: PHMSA Form 21 question 1.02 Management Support

CNG's written PAP failed to identify the external support resources currently being used for the PAP implementation and evaluations. CNG did provide a list of all external support resources used.

Cascade Response:

Finding 1:

CNGC's written PAP (500-12) identifies in the Executive Support and the Program Administration sections the following roles and responsibilities for management.

- Allocate resources and funding for the Public Awareness Program
- Understanding of the Public Awareness Program
- Supports the efforts of employees in complying with the requirements of the PAP.
- District management is the primary liaison for Public Officials and Emergency Responders

CNGC's written PAP will be updated to specifically include management participation.

Finding 2:

CNGC's written PAP identifies in Program Administration (500.01) identifies the following roles and responsibilities for the Program Administrator:

- Implementation, delivery, on-going development of the PAP
- Determine supplemental activities
- Revisions to the PAP

- Maintain documentation for any identified supplemental activities

CNGC's written PAP will be updated to include all of the Program Administrator roles and responsibilities.

Finding 3:

CNGC's written PAP will be updated to include the number of employees involved in PAP.

Finding 4:

CNGC's written PAP will be updated to include the titles of all involved employees.

Finding 5:

CNGC's written PAP will be updated to include the roles of the employees identified in the program.

Finding 6:

CNGC's written PAP will be updated to specifically list the third party vendors utilized in the program.

2. 49 CFR §192.616 Public Awareness

(b) The operator's program must follow the general program recommendations of API RP 1162 and assess the unique attributes and characteristics of the operator's pipeline and facilities.

Finding 1: PHMSA Form 21 question 1.03 Unique attributes and Characteristics

CNG's written PAP failed to identify their unique attributes and characteristics of the pipeline and facilities, i.e. compressor station, odorizers.

Cascade Response:

CNGC's written PAP will be updated to identify unique attributes and characteristics.

3. 49 CFR §192.616 Public Awareness

(c) The operator must follow the general program recommendations, including baseline and supplemental requirements of API RP 1162, unless the operator provides justification in its program or procedural manual as to why compliance with all or certain provisions of the recommended practice is not practicable and not necessary for safety.

Finding 1: PHMSA Form 21 question 1.06 Written Evaluation Plan

Prior to the 2012 CNG PAP, CNG did not provide justification in the PAP for not using a statistical sample size when conducting evaluations.

Finding 2: PHMSA Form 21 question 1.06 Written Evaluation Plan

Prior to 2012, CNG did not follow its written PAP and conduct annual audits.

Finding 3: PHMSA Form 21 question 1.06 Written Evaluation Plan

Prior to 2012, CNG did not follow its written PAP and conduct a 4 year evaluations.

Cascade Response:

CNGC disagrees with Finding 1. CNGC did not need to provide justification in the PAP for not using a statistical sample size as all evaluations conducted used statistical sample sizes. Please refer to Probable Violation 10 for additional information.

CNGC concurs with Finding 2 that formalized annual audits were not performed between 2007 and 2011. Please refer to Probable Violation 6 for additional information.

CNGC concurs with Finding 3. CNGC has conducted individual evaluations for each of the stakeholder efforts throughout the four year cycle. These evaluations will be utilized by CNGC to establish the benchmark for future CNGC Public Awareness efforts. CNGC acknowledges that these evaluations were not summarized into a four year effectiveness report. CNGC will be taking the steps to complete the effectiveness report and will have it completed in Q1 2013.

4. 49 CFR §192.616 Public Awareness

(c) The operator must follow the general program recommendations, including baseline and supplemental requirements of API RP 1162, unless the operator provides justification in its program or procedural manual as to why compliance with all or certain provisions of the recommended practice is not practicable and not necessary for safety.

Finding 1: PHMSA Form 21 question 2.05 Considerations for Supplemental Program Enhancements

CNG's written PAP failed to identify how unique attributes and characteristics are considered for supplemental or enhanced program components.

Finding 2: PHMSA Form 21 question 2.05 Considerations for Supplemental Program Enhancements

CNG failed to provide supplemental enhanced program components for its unique attributes and characteristics of their pipeline system (an example is the compressor station in WA).

Finding 3: PHMSA Form 21 question 2.05 Considerations for Supplemental Program-Enhancements

CNG failed to provide justification documentation for its reasoning that supplemental enhanced program components for unique attributes and characteristics were not practicable and necessary for safety.

Finding 4: PHMSA Form 21 question 2.05 Considerations for Supplemental Program Enhancements

CNG failed to provide documentation that relevant factors were considered for supplemental program enhancements.

Finding 5: PHMSA Form 21 question 2.05 Considerations for Supplemental Program Enhancements

CNG failed to provide documentation that supplement program enhancements were not necessary.

Cascade Response:

CNGC's written PAP will be updated to include unique attributes and characteristics in the supplemental and/or enhanced program components. CNGC concurs that documentation was not provided for the supplemental and/or enhanced programs.

CNGC has initiated a review of each of its stakeholder outreach programs. CNGC will further review and update, if necessary, program materials, messaging and the methods by which public awareness messaging is conveyed and tracked.

5. 49 CFR §192.616 Public Awareness

(c) The operator must follow the general program recommendations, including baseline and supplemental requirements of API RP 1162, unless the operator provides justification in its program or procedural manual as to why compliance with all or certain provisions of the recommended practice is not practicable and not necessary for safety.

Finding 1: PHMSA Form 21 question 2.06 Maintaining Liaison with Emergency Response Officials

CNG's PAP failed to identify expectations related to emergency responders.

Finding 2: PHMSA Form 21 question 2.06 Maintaining Liaison with Emergency Response Officials

CNG's written PAP failed to identify if their expectations for emergency responders are the same for all areas.

Finding 3: PHMSA Form 21 question 2.06 Maintaining Liaison with Emergency Response Officials

CNG's PAP failed to determine if the affected emergency response organizations have adequate and proper resource to respond.

Finding 4: PHMSA Form 21 question 2.06 Maintaining Liaison with Emergency Response Officials

CNG's written PAP failed to specifically identify how emergency responders that did not attend training or information sections received the communicated information. CNG PAP Section .41 is specific to fire fighters and does not include all emergency responders, i.e. police

Finding 5: PHMSA Form 21 question 2.06 Maintaining Liaison with Emergency Response Officials

CNG's PAP failed to identify how CNG learns the responsibility and resources of each government organization and emergency responder.

Cascade Response:

CNGC disagrees with Finding 1. The expectations related to emergency responders was identified in the materials provided from PAPA (PERG – Pipeline Emergency Response Guidelines).

For Findings 2 through 5, CNGC's written PAP will be reviewed and updated to include additional information for emergency responders. Additionally, CNGC has initiated a review of each of its stakeholder outreach programs. CNGC will further review and update, if necessary, program materials, messaging and the methods by which public awareness messaging is conveyed and tracked.

6. 49 CFR §192.616 Public Awareness

(c) The operator must follow the general program recommendations, including baseline and supplemental requirements of API RP 1162, unless the operator provides justification in its program or procedural manual as to why compliance with all or certain provisions of the recommended practice is not practicable and not necessary for safety.

Finding 1: PHMSA Form 21 question 3.01 Program Evaluation and Continuous Improvement (Annual Implementation Audits)

CNG failed to conduct annual audits between 2007 and 2011.

Cascade Response:

CNGC concurs that formalized annual audits were not performed between 2007 and 2011. In 2012, CNGC identified that those audits had not been performed. Retrospective annual audits for those years were then conducted.

7. 49 CFR §192.616 Public Awareness

(c) The operator must follow the general program recommendations, including baseline and supplemental requirements of API RP 1162, unless the operator provides justification in its program or procedural manual as to why compliance with all or certain provisions of the recommended practice is not practicable and not necessary for safety.

Finding 1: PHMSA Form 21 question 3.02 Acceptable Methods for Program Implementation Audits

CNG's PAP failed to have procedures and documentation methods for completing CNG Exhibit 4 form titled Program Implementation Annual Audit.

Cascade Response:

CNGC's written PAP had instructions to complete the form. CNGC will initiate a review of the written PAP to determine if it requires additional instructions for completing the form.

8. 49 CFR §192.616 Public Awareness

(c) The operator must follow the general program recommendations, including baseline and supplemental requirements of API RP 1162, unless the operator provides justification in its program or procedural manual as to why compliance with all or certain provisions of the recommended practice is not practicable and not necessary for safety.

Finding 1: PHMSA Form 21 question 3.03 Program Changes and Improvements

CNG's PAP failed to have a procedure and documentation method for changes to the PAP.

Finding 2: PHMSA Form 21 question 3.03 Program Changes and Improvements

CNG's PAP failed to have a procedure and documentation methods for changes in individual PAP procedures and reasoning for change.

Cascade Response:

CNGC disagrees with the findings in this Probable Violation. CNGC written PAP Program Implementation Annual Audit (Exhibit 4) and Program Effectiveness Assessment (Exhibit 5) both require any identified PAP changes to be documented. PAP 500.063 and 500.067 include the

methods for changes. CNGC will initiate a review of the written PAP Program to determine if additional instructions for procedural and documentation method changes are needed.

9. 49 CFR §192.616 Public Awareness

(c) The operator must follow the general program recommendations, including baseline and supplemental requirements of API RP 1162, unless the operator provides justification in its program or procedural manual as to why compliance with all or certain provisions of the recommended practice is not practicable and not necessary for safety.

Finding 1: PHMSA Form 21 question 4.01 Evaluating Program Effectiveness

CNG failed to conduct a 4 year effectiveness evaluation in 2010.

Finding 2: PHMSA Form 21 question 4.01 Evaluating Program Effectiveness

CNG failed to provide justification for not completing a 4 year evaluation in its PAP.

Finding 3: PHMSA Form 21 question 4.01 Evaluating Program Effectiveness

CNG failed to follow its 2008 PAP .073 Program Effectiveness and prepare a 2010 effectiveness evaluation. The 2012 PAP was not in effect in 2008.

Cascade Response:

CNGC has conducted individual evaluations for each of the stakeholder efforts throughout the four year cycle. These evaluations will be utilized by CNGC to establish the benchmark for future CNGC Public Awareness efforts. CNGC acknowledges that these evaluations were not summarized into a four year effectiveness report. CNGC will be taking the steps to complete the effectiveness report and will have it completed in Q1 2013.

10. 49 CFR §192.616 Public Awareness

(c) The operator must follow the general program recommendations, including baseline and supplemental requirements of API RP 1162, unless the operator provides justification in its program or procedural manual as to why compliance with all or certain provisions of the recommended practice is not practicable and not necessary for safety.

Finding 1: PHMSA Form 21 question 4.02 Measure Program Outreach

Prior to 2012, CNG did not determine statistical sample size and margin of error for each of the four intended stakeholder audiences.

Cascade Response:

CNGC disagrees with the findings in Probable Violation 10. The Central Survey effectiveness evaluation included the statistical sample size and margin of error information of Affected Public reached for the 2010 survey. The Herbert Survey effectiveness evaluation was performed with a statistically based sample size and margin of error of Affected Public - CNGC customers reached for the 2007 survey. PAPA Public Officials, Emergency Responders, and Excavator effectiveness evaluations in 2010 also included statistical sample size and margin of error information but they were not CNGC specific.

11. 49 CFR §192.616 Public Awareness

(c) The operator must follow the general program recommendations, including baseline and supplemental requirements of API RP 1162, unless the operator provides justification in its program or procedural manual as to why compliance with all or certain provisions of the recommended practice is not practicable and not necessary for safety.

Finding 1: PHMSA Form 21 question 4.03 Measure Percentage Stakeholders Reached

Prior to 2012, CNG failed to estimate the percentage of individuals or entities actually reached within each stakeholder audience group.

Finding 2: PHMSA Form 21 question 4.03 Measure Percentage Stakeholders Reached

Prior to 2012, CNG failed to provide justification for not estimating the percentage of individuals or entities actually reached within each stakeholder audience group.

Cascade Response:

CNGC disagrees with the findings in Probable Violation 11. The Central Survey effectiveness evaluation included the percentage of Affected Public reached for the 2010 survey. The Herbert Survey effectiveness evaluation included the percentage of Affected Public - CNGC customers reached for the 2007 survey. PAPA Public Officials, Emergency Responders, and Excavator effectiveness evaluations in 2010 did provide percentages but they were not CNGC specific. As the percentages were calculated, a justification was not required.

12. 49 CFR §192.616 Public Awareness

(c) The operator must follow the general program recommendations, including baseline and supplemental requirements of API RP 1162, unless the operator provides justification in its program or procedural manual as to why compliance with all or certain provisions of the recommended practice is not practicable and not necessary for safety.

Finding 1: PHMSA Form 21 question 4.05 Measure Desired Stakeholder Behavior

Prior to 2012, CNG did not have procedures in place to determine if stakeholders demonstrated learned behaviors and if those behaviors were taking place.

Cascade Response:

CNGC disagrees with the finding in Probable Violation 12. PAPA Public Officials, Emergency Responders, and Excavator effectiveness evaluations in 2010 included learned behavior evaluations. CNGC's written PAP Program Effectiveness Measures section currently includes instructions to evaluate those behaviors.

CNGC has initiated a review of each of its stakeholder outreach programs. CNGC will further review and update, if necessary, program materials, messaging and the methods by which public awareness messaging is conveyed and tracked.

13. 49 CFR §192.616 Public Awareness

(c) The operator must follow the general program recommendations, including baseline and supplemental requirements of API RP 1162, unless the operator provides justification in its program or procedural manual as to why compliance with all or certain provisions of the recommended practice is not practicable and not necessary for safety.

Finding 1: PHMSA Form 21 question 4.06 Measure Bottom-Line results

CNG PAP failed to include damage prevention statistics (near misses, excavation damages resulting in pipeline failures, and excavation damages that do not result in pipeline failures).

Finding 2: PHMSA Form 21 question 4.06 Measure Bottom-Line results

CNG Substructure Damage Report had inaccurate information for 2009. The formula for the 2009 column had been deleted. This resulted in inaccurate conclusions.

Cascade Response:

CNGC disagrees with Finding 1. CNGC's written PAP includes instructions in the Program Effectiveness Measures for damage prevention statistics.

CNGC concurs with Finding 2. CNGC has corrected the 2009 Substructure Damage Report.

14. 49 CFR §192.616 Public Awareness

(c) The operator must follow the general program recommendations, including baseline and supplemental requirements of API RP 1162, unless the operator provides justification in its program or procedural manual as to why compliance with all or certain provisions of the recommended practice is not practicable and not necessary for safety.

Finding 1: PHMSA Form 21 question 4.07 Program Changes

CNG failed to include property owners along the pipeline that do not live on the pipelines in their Baseline messaging.

Cascade Response:

CNGC does not concur with Probable Violation 14. API RP1162 Section B.1.1 states that the program should address those people living on the property. Additionally, property owners not living on the property are not identified in the Affected Public stakeholder audience. CNGC disagrees with Staff's interpretation that the property owners not living on the property are required to be in the Baseline messaging. CNGC written PAP does include residents living near the pipeline in the Baseline messaging.

CNGC baseline messaging for residents living along pipelines is to help them identify pipeline facilities, prevent damage to pipelines, and recognize, respond and protect themselves in the event of a pipeline related emergency. This baseline messaging would not be applicable to property owners who are not physically living next to the pipelines.

15. 49 CFR §192.616 Public Awareness

(d) The operator's program must specifically include provisions to educate the public, appropriate government organizations, and persons engaged in excavation related activities on:
(1) Use of a one-call notification system prior to excavation and other damage prevention activities; (2) Possible hazards associated with unintended releases from a gas pipeline facility; (3) Physical indications that such a release may have occurred; (4) Steps that should be taken for public safety in the event of a gas pipeline release; and (5) Procedures for reporting such an event.

Finding 1: PHMSA Form 21 question 2.02 Message Type and Content

CNG's PAP failed to specifically include provisions to educate the affected public of using one-call notification system prior to excavation and other damage prevention activities;

Finding 2: PHMSA Form 21 question 2.02 Message Type and Content

CN G' s PAP failed to specifically include provisions to educate appropriate government organizations of using one-call notification system prior to excavation and other damage prevention activities;

Finding 3: PHMSA Form 21 question 2.02 Message Type and Content

CNG's PAP failed to specifically include provisions to educate the public of possible hazards associated with unintended releases from a gas pipeline facility.

Finding 4: PHMSA Form 21 question 2.02 Message Type and Content

CNG's PAP failed to specifically include provisions to educate the public of physical indications associated with an unintended release of gas.

Finding 5: PHMSA Form 21 question 2.02 Message Type and Content

CNG's PAP failed to specifically include provisions to educate the public of steps that should be taken for public safety in the event of a gas pipeline release.

Finding 6: PHMSA Form 21 question 2.02 Message Type and Content

CNG's PAP failed to specifically include provisions to educate the public of procedures for reporting a gas pipeline release.

Finding 7: PHMSA Form 21 question 2.02 Message Type and Content

CNG's PAP failed to specifically include provisions to educate appropriate government organizations of possible hazards associated with unintended releases from a gas pipeline facility.

Finding 8: PHMSA Form 21 question 2.02 Message Type and Content

CNG's PAP failed to specifically include provisions to educate appropriate government organizations of physical indications associated with an unintended release of gas.

Finding 9: PHMSA Form 21 question 2.02 Message Type and Content

CNG's PAP failed to specifically include provisions to educate appropriate government organizations of steps that should be taken for public safety in the event of a gas pipeline release

Finding 10: PHMSA Form 21 question 2.02 Message Type and Content

CNG's PAP failed to specifically include provisions to educate appropriate government organizations of procedures for reporting a gas pipeline release.

Finding 11: PHMSA Form 21 question 2.02 Message Type and Content

CNG's PAP failed to specifically include provisions to educate persons engaged in excavation related activities of possible hazards associated with unintended releases from a gas pipeline facility.

Finding 12: PHMSA Form 21 question 2.02 Message Type and Content

CNG's PAP failed to specifically include provisions to educate persons engaged in excavation related activities of physical indications associated with an unintended release of gas.

Finding 13: PHMSA Form 21 question 2.02 Message Type and Content

CNG's PAP failed to specifically include provisions to educate persons engaged in excavation related activities of steps that should be taken for public safety in the event of a gas pipeline release.

Finding 14: PHMSA Form 21 question 2.02 Message Type and Content

CNG's PAP failed to specifically include provisions to educate persons engaged in excavation related activities of procedures for reporting a gas pipeline release.

Cascade Response:

CNGC disagrees with Finding 1. This messaging was provided to CNGC customers in the December 2011 and June 2012 bill stuffer. Additionally, this message is provided to CNGC non-customers on the company website.

CNGC disagrees with Finding 2. This messaging was provided to Public Officials in the PAPA Public Officials Newsletter 2010 page 4.

CNGC disagrees with Findings 3, 4, 5, and 6. This messaging was provided to CNGC customers in the October 2011 and June 2012 bill stuffer. Additionally, this message is provided to CNGC non-customers on the company website.

CNGC disagrees with Finding 7. This messaging was provided to Public Officials in the PAPA Public Officials Newsletter 2010 page 7.

CNGC disagrees with Findings 8, 9, and 10. CNGC disagrees with Staff's interpretation that these are messaging requirements in API RP 1162 for Public Officials.

CNGC disagrees with Findings 11, 12, 13, and 14. This messaging was provided to Excavators in the PAPA Excavation Safety Guide – Pipeline Edition 2011 page 2.

CNGC has initiated a review of each of its stakeholder outreach programs. CNGC will further review and update, if necessary, program materials, messaging and the methods by which public awareness messaging is conveyed and tracked.

16. 49 CFR §192.616 Public Awareness

(e) The program must include activities to advise affected municipalities, school districts, businesses, and residents of pipeline facility locations.

Finding 1: PHMSA Form 21 question 1.04 Stakeholder Audience Identification

CNG's PAP does not address activities to advise municipalities and schools of pipeline facility locations.

Finding 2: PHMSA Form 21 question 1.04 Stakeholder Audience Identification

CNG did not have or did not provide a list of schools in their service area.

Finding 3: PHMSA Form 21 question 1.04 Stakeholder Audience Identification

CNG did not have or did not provide a list of municipalities in their service area.

Cascade Response:

CNGC concurs with the findings in Probable Violation 16. CNGC's written PAP will be updated to include additional information for municipalities and schools.

17. 49 CFR §192.616 Public Awareness

(f) The program and the media used must be as comprehensive as necessary to reach all areas in which the operator transports gas.

Finding 1: PHMSA Form 21 question 1.04 Stakeholder Audience Identification

CNG's PAP failed to provide exact notification areas and distance on either side of the pipeline. PAP .032 states "The potential impact buffer for those systems shall be 660 feet, approximately, on each side of the pipeline."

Finding 2: PHMSA Form 21 question 1.04 Stakeholder Audience Identification

CNG's PAP failed to include municipalities and school districts in their affected Public customer and non-customer definitions found in PAP .031 and .032.

Finding 3: PHMSA Form 21 question 1.04 Stakeholder Audience Identification

CNG's PAP failed to provide a data source for the non-customer affected public (this includes property owners).

Finding 4: PHMSA Form 21 question 1.04 Stakeholder Audience Identification

CNG failed to provide a list of non-customers on their distribution, high pressure and transmission pipelines.

Finding 5: PHMSA Form 21 question 1.04 Stakeholder Audience Identification

CNG failed to provide a data source for non-customer property owners on their distribution pipeline.

Finding 6: PHMSA Form 21 question 1.04 Stakeholder Audience Identification

CNG did not have or did not provide a list of non-customer property owners on their transmission pipelines.

Finding 7: PHMSA Form 21 question 1.04 Stakeholder Audience Identification

CNG did not have or did not provide a list non-customer property owners on their distribution pipelines.

Finding 8: PHMSA Form 21 question 1.04 Stakeholder Audience Identification

CNG did not have or did not provide a list of schools in their service area.

Finding 9: PHMSA Form 21 question 1.04 Stakeholder Audience Identification

CNG did not have or did not provide a list of municipalities in their service area.

Cascade Response:

CNGC concurs with the findings in Probable Violation 17. CNGC has initiated a review of each of its stakeholder outreach programs. CNGC will further review and update, if necessary, program materials, messaging and the methods by which public awareness messaging is conveyed and tracked.

18. 49 CFR §192.616 Public Awareness

(f) The program and the media used must be as comprehensive as necessary to reach all areas in which the operator transports gas.

Finding 1: PHMSA Form 21 question 2.02 Message Type and Content

CNG's Public Official mailing did not include an emergency phone number for CNG. CNG used a Public Association for Public Awareness (PAPA) brochure titled "Pipeline Awareness Safety Information for Public officials." CNG's name and informational phone number was found in the magazine in the list of 131 supporting member companies.

Cascade Response:

CNGC does not concur with Probable Violation 18. CNGC name and informational phone number was provided in the Public Officials mailing as stated above. CNGC's informational phone number and emergency phone number are one in the same, 1-888-522-1130. API RP1162 Section 4.4 states that the program should include Emergency Preparedness Communications with Public Officials that provides a summary of emergency preparedness information to local public officials and should indicate that detailed information has been provided to emergency response agencies in their jurisdictions. Additionally, Section 4.4.2 specifically states that the operator's emergency telephone line be shared with local and state emergency officials. CNGC Emergency Response Number was shared with local and state emergency officials in PERG-Pipeline Emergency Response Guidelines through the annual PAPA.

In 2012, PAPA included both the informational and the emergency phone numbers in the Public Officials mailing. This mailing is scheduled to be sent to Public Officials in September 2012.

19. 49 CFR §192.616 Public Awareness

(h) Operators in existence on June 20, 2005, must have completed their written programs no later than June 20, 2006. The operator of a master meter or petroleum gas system covered under paragraph OJ of this section must complete development of its written procedure by June 13, 2008. Upon request, operators must submit their completed programs to PHMSA or; in the case of an intrastate pipeline facility operator, the appropriate State agency.

Finding 1: PHMSA Form 21 question 1.01 Written Public Education Program

CNG failed to address one clearinghouse deficiency.

a. CNG did not include One-Call Requirements under Baseline Message Type for Affected Public.

Cascade Response:

CNGC concurs with the finding in this probable violation. CNGC's written PAP will be updated to include this requirement.

AREAS OF CONCERN

1. API RP 1162, Section 2.7 requires the name of the Program Administrator be stated in the PA plan. CNG C.P. 500 does not contain this information.

Cascade Response:

API RP 1162 Section 2.7 does not state that the name of the Program Administrator is a requirement in the written program.

2. CNG's PAP, Section .04, *Message Type, Frequency and DeliveLy* table, is confusing and disjointed. An example of this is under the Delivery Method column, the third delivery method under affected public states "Non-customers that live within a potential impact buffered direct mailing to non-customers living near high pressure and transmission line right of ways". It separates customers and non-customers, and then further breaks the non-customers into transmission and high pressure customers. This is unclear and resulted in probable violations when CNG was asked to provide lists of all the affected public and the respective delivery methods.

Cascade Response:

CNGC will update the written PAP to address Area of Concern 2.

Please contact Tina Beach at 509-734-4576 with questions or comments.

Respectfully Submitted,



Eric Martuscelli,
Vice President, Operations
Cascade Natural Gas Corporation