

Huynh, Rhonda (UTC)

From: Beach, Tina <Tina.Beach@cngc.com>
Sent: Tuesday, March 04, 2014 12:57 PM
To: Huynh, Rhonda (UTC)
Cc: Kessie, Steve; Ogden, Jeremy; Subsits, Joe (UTC)
Subject: Response to Yakima Letter
Attachments: Yakima Response to 2 6 14 Letter from Staff (3).pdf

RECEIVED
MAR 04 2014
State of Washington
UTC
Pipeline Safety Program

Dear Rhonda;

Please forward the attached letter to Mr. David Lykken. Let this serve as a formal response to the letter received on February 10th, regarding the Yakima inspection dated February 6th, 2014. This was signed yesterday by Mr. Martuscelli; however I was out of the office and not able to send until today. I look forward to getting the follow up visitation by Mr. Ritter scheduled as soon as possible.

Sincerely,

Tina R. Beach

Manager of Standards and Compliance



8113 Grandridge Blvd.
Kennewick, WA 99336
(509) 734-4576 Kennewick office
(206) 445-4121 Work cell
(509) 737-9803 Fax
(406) 939-2240 Home cell
tina.beach@cngc.com



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

March 3, 2014

David Lykken- Director of Pipeline Safety Program
State of Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. SW
P.O. Box 47250
Olympia, WA 98504-7250

RECEIVED
MAR 04 2014
State of Washington
UTC
Pipeline Safety Program

Subject: 2013 Natural Gas Standard Inspection--Yakima/Sunnyside District

Dear Mr. Lykken,

This letter responds to your letter dated February 6, 2014 addressing the Washington Utilities and Transportation Commission Staff ("Staff") inspection referenced above. In your letter you report that Staff generally accepts Cascade Natural Gas Corporation's ("CNGC") response dated December 18, 2013. We appreciate your review and general acceptance of CNGC's response. However, there are two points addressed in your February 6, 2014 letter to which we are providing further clarification and response.

First and foremost, we disagree with the statement in your letter that leak documentation deficiencies were "allowed to happen and propagate until commission pipeline safety staff's (staff) audit." As we stated in the December 18 response letter, "[t]he vast majority of documents identified by Staff had been previously identified through internal auditing processes." Based on our records, all but one of the documentation deficiencies identified by Staff was identified by CNGC's QA program. When leak record documentation deficiencies were identified in the internal QA/QC process, the responsible parties were alerted and further training was provided to prevent re-occurrence. Further, as a result of the internal QA/QC program, CNGC has seen a significant decrease in the number of documentation errors since 2011. We respectfully disagree with the statement that "Staff is finding the same results--in numbers and by different employees." For example, in 2012 there were less than half the leak documentation deficiencies identified as compared to 2011, when viewing the results of Staff's audit.

Second, we wish to clarify that CNGC did not provide the internal QA/QC reports with its December 18 response because Ms. Beach and Mr. Kessie were instructed not to do so. At a meeting with Mr. Subits and yourself on November 8, 2013, Staff expressed a preference to review these records on site. We agree this approach is appropriate. We appreciate your time in reviewing this response as well as look forward to scheduling the on-site visit with Staff.

We appreciate your consideration of this additional information. Please contact Tina Beach at (509)-734-4576 with questions or comments.

Respectfully Submitted,

Eric Martuscelli,
Vice President, Operations
Cascade Natural Gas Corporation