



STATE OF WASHINGTON

UTILITIES AND TRANSPORTATION COMMISSION

1300 S. Evergreen Park Dr. S.W., P.O. Box 47250 • Olympia, Washington 98504-7250

(360) 664-1160 • TTY (360) 586-8203

CERTIFIED MAIL

December 30, 2014

Eric Martuscelli
Vice President – Operations
Cascade Natural Gas Corporation
8113 W. Grandridge Blvd
Kennewick, WA 99336

Dear Mr. Martuscelli:

RE: 2014 Natural Gas Standard Inspection – Cascade Natural Gas Corporation, Mt. Vernon District – (Insp. No. 5840)

Staff from the Washington Utilities and Transportation Commission (staff) conducted a standard inspection from October 28 - 30, 2014, of Cascade Natural Gas Corporation (CNGC) Mt. Vernon District. The inspection included a records review and inspection of the pipeline facilities.

Our inspection indicates one probable violation as noted in the enclosed report.

Your response needed

Please review the attached report and respond in writing by February 2, 2015. The response should include how and when you plan to bring the probable violations into full compliance.

What happens after you respond to this letter?

The attached report presents staff's decision on probable violations and does not constitute a finding of violation by the commission at this time.

After you respond in writing to this letter, there are several possible actions the commission, in its discretion, may take with respect to this matter. For example, the commission may:

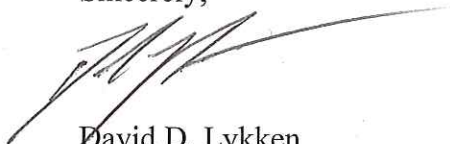
- Issue an administrative penalty under RCW 81.88.040, or;
- Institute a complaint, seeking monetary penalties, changes in the company's practices, or other relief authorized by law, and justified by the circumstances, or;
- Consider the matter resolved without further commission action.

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We have not yet decided whether to pursue a complaint or penalty in this matter. Should an administrative law judge decide to pursue a complaint or penalty, your company will have an opportunity to present its position directly to the commissioners.

If you have any questions or if we may be of any assistance, please contact Lex Vinsel at (360) 664-1319. Please refer to the subject matter described above in any future correspondence pertaining to this inspection.

Sincerely,



David D. Lykken
Pipeline Safety Director

Enclosure

cc: Steve Kessie, Director Operation Services, CNGC
Jeremy Ogden, Director Engineering Services, CNGC
Mike Eutsey, Manager Standards and Compliance, CNGC
Vicki Ganow, Pipeline Safety Specialist, CNGC

UTILITIES AND TRANSPORTATION COMMISSION
2014 Natural Gas Pipeline Safety Inspection
Cascade Natural Gas Corporation
Mount Vernon District

The following probable violation of WAC 480-93 was noted as a result of the 2014 inspection of the Cascade Natural Gas Corporation, Mount Vernon District. The inspection included a random selection of records, operation and maintenance (O&M), emergency response, inventory, and field inspection of the pipeline facilities.

PROBABLE VIOLATION

1. **WAC 480-93-178 Protection of plastic pipe**

(2) *The gas pipeline company must follow the manufacturer's recommendation for maximum cumulative ultraviolet light exposure limit for plastic pipe. If there is no such recommendation, the gas pipeline company must not expose plastic pipe to ultraviolet light for more than two years. Each gas pipeline company must include the applicable ultraviolet exposure time limit in its procedures manual.*

Finding(s):

Inspection of the CNGC Mount Vernon yard, staff found two spools of plastic pipe with manufacture date over 2 years. Additional research by CNGC found that the expired material had been used in a service line. CNGC was affecting repairs by removing the expired material from the ground and disposing of it. Staff noticed that the questionable material from the yard was placed in a recycle or trash container the next day (10/30/2014).