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October 24, 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 September 12, 2023, through September 21, 2023 (Insp. No. 8582).

Dear Mr. Rukke,

This letter is intended to address one area of concern stemming from a Drug and Alcohol Testing Program inspection of Cascade Natural Gas Corporation (CNGC) on September 12, 2023, through September 21, 2023.

AREAS OF CONCERN

1. **49 CFR §199.239(a)(2) Operator obligation to promulgate a policy on the misuse of alcohol.**
(a) *General requirements. Each operator shall provide educational materials that explain these alcohol misuse requirements and the operator's policies and procedures with respect to meeting those requirements.*
(1) *The operator shall ensure that a copy of these materials is distributed to each covered employee prior to start of alcohol testing under this subpart, and to each person subsequently hired for or transferred to a covered position.*
(2) *Each operator shall provide written notice to representatives of employee organizations of the availability of this information.*

Finding(s):

Through discussion with Oregon PUC, Cascade, and commission staff, it was determined that the operator provides educational materials to all covered employees which includes employee organization representatives. However, there is no formal notification to the employee organizations. Cascade should clarify their process to ensure employee organizations are aware of the resources available to covered employees.

Cascade Response

CNGC acknowledges the findings brought forth by the WUTC stated above. An MOC has been initiated to revise OPS 1 – Management of Change to include the Drug and Alcohol Misuse Prevention Plan. Upon implementation, changes made to the plan will follow the requirements outlined in OPS 1, including formal notification to employees and employee organization representatives.

Additionally, a copy of the plan was provided to employee organization representatives on October 3, 2023 (see Exhibit A).

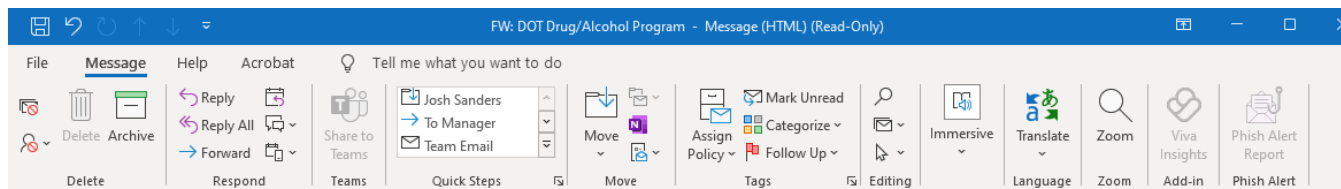
Please contact Josh Sanders at (701) 222-7773 with questions or comments.

Respectfully Submitted,

A handwritten signature in black ink that reads "Pat Darras".

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

Exhibit A

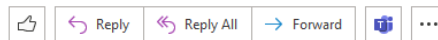


FW: DOT Drug/Alcohol Program



Berger, Angie

To Caldwell, Samantha; Sanders, Josh
Cc Hourigan, Kirsti



Fri 10/6/2023 8:42 AM



From: Roehrich, Brandon <Brandon.Roehrich@mdu.com>

Sent: Tuesday, October 3, 2023 11:21 AM

To: Berger, Angie <Angie.Berger@mdu.com>

Cc: DeRudder, Ian <Ian.DeRudder@mdu.com>

Subject: FW: DOT Drug/Alcohol Program

Hi Angie – here is the communication to the CNG Union Reps. Going forward, there is language in our Labor Agreement that we must communicate any changes to the Union 10 days in advance of a working rule change – refer to Article 7, Section 1(g). Ian regularly watches for any changes that need to be communicated and forwards them accordingly (including other policy changes, working rule changes, etc).

Thanks.
Brandon

From: Roehrich, Brandon

Sent: Tuesday, October 3, 2023 11:19 AM

To: Jackie Allen <jjallen@icwuc.org>; Carroll, Jeremy <Jeremy.Carroll@cngc.com>

Cc: DeRudder, Ian <Ian.DeRudder@mdu.com>

Subject: DOT Drug/Alcohol Program

Hi Jackie and Jeremy:

One of our HR team members was working with the states on our DOT drug/alcohol program. Without access to Janet or her predecessor's email, I was not able to locate the most recent email to Jonathan/Kevin and Vince at the time regarding our DOT Drug/Alcohol program. That being said, Jeremy, this is the same information you have access to on the company resources (but I recognize Jackie does not – therefore, I'm attaching them to this email).

No action is needed from you; however, if you have any questions, don't hesitate to let me know.

Thanks.
Brandon Roehrich