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July 31, 2025

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 Records and Field Inspection (Insp. No. 8999).

Dear Mr. Rukke,

This letter is intended to address one area of concern stemming from a Standard Records and Field Inspection of Cascade Natural Gas Corporation's (CNGC) Yakima District from May 6, 2025, to June 11, 2025.

**AREAS OF CONCERN**

**1. WAC 480-93-110 Corrosion Control**

*(2) Each gas pipeline company must complete remedial action within ninety days to correct any cathodic protection deficiencies known and indicated by any test, survey, or inspection. An additional thirty days may be allowed for remedial action if due to circumstances beyond the gas pipeline company's control the company cannot complete remedial action within ninety days. Each gas pipeline company must be able to provide documentation to the commission indicating that remedial action was started in a timely manner and that all efforts were made to complete remedial action within ninety days. (Examples of circumstances allowing each gas pipeline company to exceed the ninety-day time frame include right of way permitting issues, availability of repair materials, or unusually long investigation or repair requirements.)*

**49 CFR §192.463 External corrosion control: Cathodic protection.**

*(a) Each cathodic protection system required by this subpart must provide a level of cathodic protection that complies with one or more of the applicable criteria contained in appendix D of this part. If none of these criteria is applicable, the cathodic protection system must provide a level of cathodic protection at least equal to that provided by compliance with one or more of these criteria.*

**Finding(s):**

The rectifier at: S. 30TH & BONNIE DOON, YAKIMA (47968-RE-1115435) is not functioning properly and is scheduled to be replaced in July. Confirmation that this will be remedied and notice of when the work is completed is requested.

**Cascade Response**

CNGC acknowledges the findings brought forth by the WUTC stated above. A new rectifier was installed and put into operation on July 16, 2025.

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

Respectfully Submitted,

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