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December 11, 2013

Mr. Byron Coy, PE
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
Office of Pipeline Safety
820 Bear Tavern Road, Ste. 103
West Trenton, NJ 08628

CPF-1-2013-1024M

Dear Mr. Coy,

In response to your letter of November 13, 2013, Granite State Gas Transmission (Granite State) is not contesting the Notice of Amendment. This letter provides a summary of the inadequacies cited, followed with Granite State comments and actions:

1. *Granite State's written program was inadequate because it failed to follow general program recommendations in Section 2.7 and 5.1.4 of API RP 1162. Specifically, the program did not have a detailed procedure for the implementation and management of bounce back cards (BBCs)...Granite provides a form to those invited to the emergency responder, public official and excavator training sessions, conducted by a third party, to complete and return. However, the program did not have a written process for handling, reviewing or following up on these comment/feedback forms.*
 - Granite State is documenting the process it uses for handling, reviewing or following up on the comment/feedback forms in its January 2014 Public Awareness Plan.
2. *Granite State's written program was inadequate because it failed to follow general program recommendations in Section 3 of API RP 1162... Specifically, the program did not describe the criteria used to determine stakeholder notification areas...*

The program lacked the information on how Granite State determined that the communication coverage area (buffer) fit its particular pipeline, location and potential impact consequences for each stakeholders...

...Appendix C had a table that showed conditions that determined the need for supplemental activities and conclusions. Based on this table, Granite State determined that it would do "an annual mailing to all within a 660 feet radius of (its) pipeline" in relation to the "High Consequence Areas." However, there are no details on whether the information should be sent to the property owner or current resident of the property, whether the resident should receive notification if the property is within 660 feet but the home is located outside the 660 feet.

Thomas P. Meissner, Jr.
Senior Vice President
& Chief Operating Officer
meissner@unitil.com

6 Liberty Lane West
Hampton, NH 03842

T 603.773.6551 F 603.773.6751
www.unitil.com

- Granite updated its 2012 PAP to
 - Expand the description of the criteria used to determine stakeholder notification area for residents located adjacent to the transmission pipeline ROW.
 - Expand the particular criteria - its communication coverage area (buffer) from 660' to 1000' of the centerline of the pipeline. This ensures that properties partially within the 660' buffer would be included in communications to residents.
 - Update Appendix C to reflect the expansion of buffer size.
 - Granite is updating its January 2014 PAP to document that residents, not property owners within this buffer are mailed this information.
3. *Granite State's written program was inadequate because it failed to follow general program recommendations in Section 4 of API RP 1162... Specifically, Granite State did not have a detailed written process for providing programs in both English and in other languages commonly used a significant concentration of non-English speaking population along the pipeline... There was no information on what data should be evaluated to make a determination, the frequency of evaluation, and defining "significant number and concentration."*
- Granite State updated its 2012 PAP to document its process to make a determination and define a significant number and concentration of non-English speaking population along the pipeline.
 - Granite State is updating its January 2014 PAP to document that it performs these evaluations annually.
4. *Granite State's written program was inadequate because it failed to follow the guidance in Section 4.10 of RP 1162... "(p)ipeline maintenance-related construction activities should be communicated to the audience affected by the specific activity in a timely manner appropriate to the nature and extent of the activity." The program did not have a detailed written process for communicating to the audience affected by specific pipeline maintenance-related construction activities.*
- Granite presently notifies abutters by letter, phone call or personal visit, of maintenance or construction-related activities.
 - Granite State is documenting this process in its January 2014 PAP.
5. *Granite State's written program was inadequate because it failed to follow the general program recommendations in Sections 7.1(b) and (c) of API RP 1162... The written program should provide...*
- (b) a description of the roles and responsibilities of personnel administering the program and (c) identification of Key personnel and their titles (including senior management responsible for the implementation, delivery and ongoing development of the program.)*
- Granite State updated its 2012 PAP, Appendix B, to:
 - describe the roles and responsibilities of personnel administering the program

identify the key personnel and their titles, including senior management responsible for the implementation, delivery and ongoing development of the program.

6. *Granite State's written program was inadequate because it failed to follow the program recommendations in Section 7.1(g) of API RP1162...The written program should include the program evaluation process, including the methodology to be used to perform the evaluation and analysis of the results and criteria for program improvement based on the results of the evaluation...*

The program lacked a detailed written process on how to determine whether the program had been developed and implemented according to API RP 1162, as mentioned in Section 8.3 of AP RP 1162...

Also, the program lacked a detailed written process on how to determine whether the actions undertaken in the implementation of API RP 1162 are achieving the intended goals and objectives as mentioned in Section 8.4 of API RP 1162. Over all, the program lacked procedures for conducting the evaluations as outlined in Section 8 of API RP 1162. Moreover, the program had no information on what metrics/criteria/rational is used to determine if a modification to the baseline program and/or supplemental program enhancements are necessary. And the program did not mention who will participate in each evaluation.

- Granite State is updating its 2014 PAP to document a more detailed description of its program evaluation as described in RP 1162 Sections 7.1 (g), 8, 8.3, 8.4.

This will include:

- Program evaluation process including evaluation objectives, methodology used, analysis of results, and criteria for program improvement based on results
- Measuring program implementation
- Measuring program effectiveness

7. *Granite State's written program was inadequate because it failed to follow the general program recommendation in Section 8.4.2 of API RP 1162... (it) specifies that an operator should pre-test public awareness materials for their appeal and the messages for their clarity, understandability and retain-ability before they are widely used....The program did not have a detailed process or procedure for pre-testing public awareness materials in accordance with Section 8.4.2 of API RP 1162.*

- Granite updated its 2012 PAP to clarify its process for pre-testing new materials, which was applied in 2012 to its updated radio and print ad campaign.

By February 13, 2014, we will submit the above mentioned documentation addressing the inadequacies in the November 13, 2013 Notice of Amendment.

Sincerely,


Thomas Meissner, SVP & COO
Granite State Gas Transmission, Inc.