



1015 6th St. NW
Winter Haven, FL 33881

November 4, 2011

Wayne T. Lemoi
Director, Office of Pipeline Safety
PHMSA Southern Region

RE: CPF 2-2011-0007M

Dear Mr. Lemoi:

This correspondence is in response to the Notice of Amendment, **CPF 2-2011-0007M**, dated October 12, 2011, that Florida Public Utilities (FPU) received. The notice identifies apparent inadequacies found within FPU's written plans and procedures on the basis of an inspection by representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA) on September 12-15, 2011.

There were six items listed where plans and procedures had apparent inadequacies:

1. **191.3 Definitions**
2. **191.5 Immediate Notice of Certain Incidents**
3. **192.11 Petroleum Gas Systems**
4. **192.227 Qualification of Welders**
5. **192.383 Excess Flow Valve Installation**
6. **192.747 Valve Maintenance: Distribution Systems**

Florida Public Utilities has reviewed its plans and procedures and made the corresponding changes to its Operating and Maintenance plan. An electronic copy of the revised O&M plan has been sent to Donald Murphy, General Engineer and Inspector of the Office of Pipeline Safety for review.

Sincerely

Mike McCarty
Safety and Training Manager
Florida Public Utilities

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cc: Kevin Webber, Vice President, Business Development and Operations, Florida Public Utilities
Barry Kennedy, Director of Gas Operations, Florida Public Utilities
Donald Murphy, General Engineer and Inspector, Office of Pipeline Safety