



Pipeline Safety
Enable Midstream Partners
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January 12, 2021

Mary McDaniel
Director, Southwest Region
PHMSA Pipeline Safety
8701 S. Gessner Dr.
Suite 1110
Houston, TX 77074

Subject: Enable Gas Transmission, LLC - Response to PHMSA Notice of Amendment CPF 4-2020-001

Dear Ms. McDaniel,

This letter constitutes the response of Enable Gas Transmission, LLC (EGT) to the PHMSA Notice of Amendment, CPF 4-2020-001, issued by Pipeline and Hazardous Materials Safety Administration (PHMSA) on November 3, 2020, on the basis of PHMSA's Control Room Management inspection performed from March 2, 2020 through March 5, 2020. EGT hereby submits revised written plans and procedures addressing the alleged inadequacies seen below.

CPF 4-2020-002-NOPV

1. § 192.631 Control room management.

(a) General. (1) This section applies to each operator of a pipeline facility with a controller working in a control room who monitors and controls all or part of a pipeline facility through a SCADA system. Each operator must have and follow written control room management procedures that implement the requirements of this section, except that for each control room where an operator's activities are limited to either or both of: . . .

(b) Roles and responsibilities. Each operator must define the roles and responsibilities of a controller during normal, abnormal, and emergency operating conditions. To provide for a controller's prompt and appropriate response to operating conditions, an operator must define each of the following:

(1) A controller's authority and responsibility to make decisions and take actions during normal operations;

Enable's written Control Room Management Procedure, System Control: Roles and Responsibilities (CR-242) version 6.0 dated April 23, 2020, does not define the roles and responsibilities of the on-call controller monitoring its pipeline, and does not define the extreme circumstances in which the on-call controller may log in to its SCADA remotely until a replacement controller arrives at the control room.

Enable's written procedure, Section 4.1.1.18 Additional responsibilities during normal operations, allows its on-call controllers to "monitor the system remotely until a replacement can arrive."

However, Enable's written procedure neither defines the roles and responsibilities of the on-call remote controller nor defines what constitutes extreme circumstances.

Additionally, Section 4.2.1.13.b of CR-242 allows for its System Control Director, Manager and Supervisor of System Control (Manager) to "monitor" the system in "extreme circumstances" when a System Controller can no longer control Enable's pipeline on its assigned control room console until a replacement System Controller arrives in the Control room. However, Enable's procedures do not define the required qualifications of its Manager or whether the Manager must be qualified as a System Controller in order to monitor the pipelines.

Therefore, Enable must amend its written procedures to: (1) define the roles and responsibilities of the on-call controller and the extreme circumstances when the on-call controller may log in remotely to Enable's SCADA until a replacement controller arrives to the control room; and (2) define the required qualifications of its Manager or whether the Manager must be qualified as a System Controller.

2. § 192.631 Control room management.

(a) General. (1) This section applies to each operator of a pipeline facility with a controller working in a control room who monitors and controls all or part of a pipeline facility through a SCADA system. Each operator must have and follow written control room management procedures that implement the requirements of this section, except that for each control room where an operator's activities are limited to either or both of: . . .

(c) Provide adequate information. Each operator must provide its controllers with the information, tools, processes and procedures necessary for the controllers to carry out the roles and responsibilities the operator has defined by performing each of the following: . . .

(1) . . .

(2) Conduct a point-to-point verification between SCADA displays and related field equipment when field equipment is added or moved and when other changes that affect pipeline safety are made to field equipment or SCADA displays;

Enable's written Control Room Management Procedure, System Control: Point-to-Point Verification (CR-200) version 4, dated April 23, 2020, was inadequate because it did not require its personnel to verify alarm limits and set points as part of its point-to-point process if "System Control has operational concerns with doing so."

Section 192.631(c)(2) requires the verification of point-to-point between SCADA displays and related field equipment. However, CR-200 permits the temporary delay of a point-to-point verification due to operational concerns with no indication of when Enable personnel would eventually perform the required verification. Therefore, Enable must amend its procedures to ensure that Enable personnel verify alarm limits and set points as part of the point-to-point process.

Item 1 - Resolution:

In regard to Item Number 1 of the NOA pertaining to Enable's written Control Room Management Procedure, System Control: Roles and Responsibilities (CR-242), Enable submits revised CR-242 (attached).



Summary of Procedure CR-242 Revisions: Please note that Enable's System Control does not have "On-Call Controllers"; however, the Director, Managers, and Supervisors are "on-call" 24/7 so the System Controllers always have access to a subject matter expert. The definition of "On-Call" was added to Section 5 of the procedure. Section 4.2.1 was revised to define Roles of Supervisors, Managers, and the Director. Also, revisions were made to Section 4.2.1 for Normal Operations and 4.2.2 for Emergency and Abnormal Operations. The definition of Extreme Circumstances was added to Section 5 of the procedure.

Item 2 - Resolution:

In regard to Item Number 2 of the NOA pertaining to Enable's written Control Room Management Procedure, System Control: Point-to-Point Verification (CR-200) , Enable submits revised CR-200 (attached).

Summary of Procedure CR-200 Revisions: Sections 4.2.1 and 4.2.2. were revised to address Point-to-Point Verification and Section 4.1.2 was changed to define Point-to-Point Verification timing and approval authority.

Through the actions specified in this letter, we believe Enable has fulfilled the requirements of this Notice of Amendment. If you have any questions concerning the information contained in this response, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "Cary D. Watson", with a stylized flourish at the end.

Cary Watson
Vice President, Safety, Environmental and Technical Programs
Enable Midstream Partners, LP

Exhibits:

1. *System Control: Roles and Responsibilities (CR-242)*
2. *System Control: Point-to-Point Verification (CR-200)*