



September 16, 2021

By Electronic Mail

Ms. Mary McDaniel, P.E.
Director, Southwest Region
Pipeline and Hazardous Materials Safety Administration
US Department of Transportation
8701 South Gessner, Suite 630
Houston, Texas 77074

Re: CPF 4-2021-041-NOA

Dear Ms. McDaniel:

Florida Gas Transmission Company (FGT or Company) is submitting the attached procedures in response to a Notice of Amendment (NOA) issued on August 17, 2021, by the Pipeline and Hazardous Materials Safety Administration (PHMSA). FGT is a subsidiary of Energy Transfer (ET). PHMSA's NOA identified four (4) alleged inadequacies within ET's Natural Gas Standard Operating Procedures (SOPs).

By way of background, this NOA was issued following an inspection of the Company's procedures for operations & maintenance via video conference on multiple dates between March 16, 2020 to October 2, 2020. The apparent inadequacies described in the NOA concern requirements for procedural manuals for operations, maintenance and emergencies found in 49 C.F.R. § 192.605.

Attached hereto are the updated applicable SOP's that address the alleged inadequacies related to NOA Items 1 and 4. Updates are highlighted in yellow.

With respect to Item 2 of the NOA, FGT is requesting an extension of time until October 15, 2021 to complete revisions to the associated SOP and submit such to PHMSA. Additionally, with respect to Item 3, PHMSA noted in the NOA that the item had been addressed sufficiently during the course of the inspection and that no further action was required by the Company.

Please note that this submission contains confidential business information and confidential security information that is protected from public disclosure under the Freedom of Information Act (FOIA), 5 U.S.C. § 552. Should PHMSA receive a FOIA request for this information, the Agency is required to notify ET and provide the Company with an adequate opportunity to substantiate its claim, prepare redactions, and/or object, if warranted.

FGT shares PHMSA's commitment to pipeline safety, public safety, and pipeline integrity. Should you have any questions or concerns please contact me at (713) 989-7126 or via email at todd.nardozzi@energytransfer.com.

Sincerely,

Todd Nardozzi
Sr. Manager – DOT Compliance

Attachments