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September 4, 2018

Kim West
Director, Western Region
Pipeline and Hazardous Materials Safety Administration
12300 W. Dakota Ave., Suite 110
Lakewood, CO 80288

Email: kim.west@dot.gov

Re: CPF 5-2018-0008 (Transmission System)

Dear Ms. West:

The following is City of Vernon's response to Notice of Probable Violation and Proposed Compliance Order CPF 5-2018-0008, dated August 2, 2018. This proposed order relates specifically to Vernon's gas transmission system.

We have reviewed the Proposed Compliance Order and find the remedial requirements to be acceptable, but do formally request that the names of Vernon's employee and consultant be anonymized for the public record. Our consultant and gas superintendent are referred to by name on page 2, footnote 2. Due to the public nature of the audit findings, we believe it is appropriate for them to be referred to by job title.

Vernon Public Utilities values the feedback of PHMSA auditors. Most, if not all, of the remedial requirements have already been met in our response to PHMSA's "Post-Inspection Written Preliminary Findings." While not specified in the Proposed Compliance Order, we are taking steps to address the auditor's feedback by seeking outside expertise to perform a review and validation of Vernon's T-IMP program. We anticipate receiving PHMSA's Final Compliance Order and will respond in a timely manner.

Sincerely,

Kelly Nguyen
General Manager, Vernon Public Utilities

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