



Kiantone Pipeline Corporation

December 12, 2022

SENT BY EMAIL

Mr. Robert Burrough
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
840 Bear Tavern Road, Suite 300
West Trenton, NJ 08628
Robert.burrough@dot.gov

RE: Kiantone Pipeline Corporation
Notice of Amendment
CPF 1-2022-063-NOA
Submission of Revised Control Room
Management Procedures

Dear Mr. Burrough:

Kiantone Pipeline Corporation ("Kiantone") acknowledges receipt of Notice of Amendment ("NOA") issued by the US Department of Transportation, Pipeline and Hazardous Materials Safety Administration ("PHMSA") dated November 3, 2022. Pursuant to the request of the Company dated December 1, 2022, PHMSA extended the deadline for response to the NOA to December 17, 2022.

The NOA asserts an apparent inadequacy in Kiantone's Control Room Management Plan. Specifically, the NOA states that Kiantone's procedures are inadequate to ensure the safe operation of its pipeline facility due to a lack of procedures for the testing of back-up SCADA systems in accordance with §195.446(c)(4) requiring procedures for the testing of any back-up SCADA system at least once per calendar year, but not exceeding a 15-month interval.

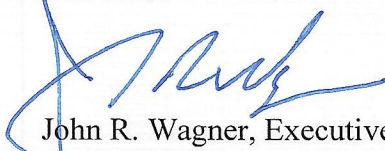
Kiantone notes that the regulations appear to lack any definition of the terms "back-up SCADA system" and "back-up control room." It appears these terms are discussed in PHMSA's Control Room Management Frequently Asked Questions (FAQ's) dated January 16, 2018, Section C.08. In the FAQs, a "back-up SCADA System" is an independent or redundant system providing similar functionality to the primary SCADA system and this functionality is discussed in the context of the "back-up control room."

Kiantone's references during the PHMSA inspection from August 9, 2021, through August 13, 2021, to "back-up control room(s)" was intended only to identify physical facilities that could be made operational control rooms through the installation of back-up SCADA systems. Those back-up systems do not exist today.

Accordingly, Kiantone has amended its Control Room Procedures Manual to clarify that the two (2) alternate physical locations are "read only" sites, and not redundant back-up SCADA systems located in back-up control rooms. This change should serve to clarify the Procedures Manual to the extent that back-up SCADA testing procedures are not required to be included. A copy of Section 1.1.2, items 9 and 21, as revised is attached hereto as Exhibit A (red lined and clean copies). The changes made to items 10, 11, 14, 17 and 18 are annual updates, not in response to the NOA.

Thank you for your attention to this matter. Should any further information be required or if there are additional questions, please contact the undersigned.

Sincerely,



John R. Wagner, Executive VP
General Counsel and Secretary

Encl: Section 1.1.2
Control Room Procedures Manual

c: George Hopkins, Esq.
Jeremy Archer
David Wortman
Larren Dosser