



January 3, 2023

Mr. Robert Burrough
Director – Eastern Region
US Department of Transportation -Pipeline and Hazardous Materials Safety Administration
840 Bear Tavern Road, Suite 300
West Trenton, NJ, 08628

Re: Granite State Gas Transmission Response - CPF 1-2022-074-NOA

Dear Mr. Burrough,

This letter is being provided by Granite State Gas Transmission (the “Company”) to respond to the Notice of Amendment (NOA) received on November 17, 2022. The Company filed a response on September 9, 2022 after receiving PHMSA’s Written Preliminary Findings on August 29, 2022 for the audit conducted on July 11, 2022 through the 15,2022. The response filed on September 9, 2022 addresses the actions laid out in the NOA received on November 17, 2022. The Company refiled that response to address the NOA on December 1, 2022 however a cover letter acknowledging CPF-1-2022-NOA was not included. Please see Attachment-CPF-1-2022-074-NOA for the response filed on September 9, 2022.

If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Meggan Pena".

Meggan Pena

Director Pipeline Safety & Compliance



September 9, 2022

Mr. Steven Giarratano
General Engineer - Inspector, PHP-100 – Eastern Region
US Department of Transportation -Pipeline and Hazardous Materials Safety Administration
840 Bear Tavern Road, Suite 300
West Trenton, NJ, 08628

Re: 22-233000 - Granite State Gas Transmission, Inc. - WPF

Dear Mr. Giarratano,

This letter is being provided by Granite State Gas Transmission (the "Company") to respond to the post-inspection Written Preliminary Findings received on August 29, 2022 for the audit conducted on July 11th through the 15th. All procedures referenced in the responses below have been implemented as of September 9, 2022.

**Maintenance & Operations: Gas Pipeline Abnormal Operations
(MO.GOABNORMAL.ABNORMALREVIEW.P) Question 5**

No process that including requirements for periodically reviewing the response of operator personnel to determine the effectiveness of the process or where an effectiveness review is documented

Unitil Response

The Company has updated procedure 220.05.03 Abnormal Operations section 3.1.4 to address a periodic effectiveness review on abnormal operating condition (AOC) identifications as well as where that effectiveness review is being documented see Attachment-PHMSA-2022-O&M Audit-01.

**Maintenance and Operations: Gas Pipeline Operations
(MO.GO OMEFFECTREVIEW.P) Question 7**

Procedure lacking details on process of QA/QC. Per operator QA/QC is done once per month by supervisor on how to address QA/QC findings. Requirements not in writing.

Unitil Response

The Company has established a new procedure, 10.01.05 Operations and Maintenance QA/QC, to capture the QA/QC process being conducted once per month by supervisors. Please see Attachment-PHMSA-2022-O&M Audit-02.

**Maintenance and Operations: Gas Pipeline Operations
(MO.GO.SRC.P) Question 13**

No adequate guidance which instruct personnel who perform operation and maintenance activities to recognize conditions that potentially may be safety-related conditions which are subject to reporting requirements of 191.23 in accordance with 192.605(d).

Unitil Response

The Company has updated procedure 100.001.002 Emergency Plan Training section 2.1.1 to address the training of safety related condition identification, see Attachment-PHMSA-2022-O&M Audit-03. Procedure 220.005.002 Safety Related Condition Identifications section 2.1 was also updated, see Attachment-PHMSA-2022-O&M Audit-04. Finally, the Company also enhanced the test associated with the training in section 2.1.2 100.001.002. This test is updated annually but there is core content that is always included (e.g. protecting life and property, incident command structure, safety related condition identification and reporting, etc.). Please see the questions that will be added on safety related conditions to the 2023 test:

- 1.) The discovery of a safety related condition should be reported to who?
 - A. Director, Pipeline Safety and Compliance
 - B. Manager, Gas Engineering
 - C. Supervisor, Transmission Operations
 - D. No reporting is necessary
- 2.) Situations that are considered safety related conditions (check situation if applicable):
 - ☐ Cathodically protected and coated pipeline operating at a hoop stress of 20% or more where there is localized corrosion pitting discovered
 - ☐ Evacuation of a building
 - ☐ Impaired serviceability of pipeline due to unintended movement or abnormal loading by environmental causes
 - ☐ Exceedance of the MAOP that exceeds the margin (allowable build-up)

If you have any questions, please do not hesitate to contact me.

Sincerely,



Meggan Pena

Director Pipeline Safety & Compliance