



March 7, 2024

Via Overnight Delivery Service

Robert Burrough
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
840 Bear Tavern Road, Suite 300
West Trenton, NJ 08628

Re: UGI Energy Services, LLC

Response to Notice of Amendment CPF 1-2024-006-NOA

Dear Mr. Burrough:

This letter constitutes the formal response of UGI Energy Services, LLC ("UGIES") to your Notice of Amendment letter on behalf of the Pipeline Hazardous Materials and Safety Administration ("PHMSA") dated February 15, 2024 (the "NOA"), asserting apparent inadequacies in UGIES' plans and procedures and specific actions that UGIES must take to comply with the pipeline safety regulations, at its central gas control room facilities in Wyomissing, Pennsylvania.

The NOA asserts that UGIES' Central Gas Control Room Management Plan violated 49 CFR §192.631 (e) (5) by failing to provide the actual provisions of how the monitoring of content and volume of general activity being directed to and required of each controller is conducted or identified along with describing how the workload study must be conducted.

In response to the assertions in Item 1, UGIES has amended its procedure "Central Gas Control Room Management Plan", specifically Chapter 4 Alarm Management, to include specific provisions for monitoring and performing the workload study to the basis standard. The revised procedure is included with this letter.

I believe the attached revised procedures satisfy PHMSA's concerns in this matter. Please contact me at (610) 373-7999, ext. 1218 if you have any additional questions regarding this response.

Very truly yours,

A handwritten signature in black ink that reads "Brian Heintzelman".

Brian Heintzelman
Vice President – Operations

Robert Burrough, Director, Eastern Region
PHMSA
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Enclosures:

Relevant Updated Sections of “Central Gas Control Room Management Plan”