



RICHMOND GAS WORKS

Gas Regulatory Compliance
400 Richmond Highway
Richmond, VA 23224
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March 27, 2026

Mr. Robert Burrough
Director
PHMSA Pipeline Safety Eastern Region Office
US Department of Transportation
840 Bear Tavern Road, Suite 300
West Trenton, NJ 08628

RE: CFP 1-2026-014-NOA

Mr. Burrough,

In response to the Notice of Amendment (Notice) referenced above, Richmond Gas Works (the City) is not contesting the Notice and is instead providing a revised Written Qualification Plan (OQ Plan). The revised OQ Plan became effective on March 23, 2026

To address the inadequacy outlined in the Notice, the City has revised Section K of the OQ Plan (formerly Section G of the May 1, 2024 version of the OQ Plan that was reviewed by the State Corporation Commission) to include a requirement to notify the Commission of all changes to the OQ Plan and further highlight significant changes for review and verification. Significant changes are now defined as:

- adding or eliminating covered tasks,
- changing re-qualification intervals for covered tasks,
- changing span of control ratios,
- making major administrative changes, such as a change in software or vendor,
- adopting new training and/or evaluation methods to allow the use of new or improved technology that affects a covered task.

The revised OQ Plan is enclosed for your reference and review. I hope we have addressed your concerns. The City did not incur any costs in fulfilling the requirements of the Notice.

Please let me know if you need any additional information or documentation.

Respectfully,

D.W. Rifenburgh

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Enclosures

Copy:

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