

Pipeline Services
525 Milam Street
Shreveport, LA 71101

October 5, 2007

Mr. Rodrick M. Seeley
Director, Southwest Region
Pipeline and Hazardous Material Safety Administration
U.S. Department of Transportation
8701 South Gessner, Suite 1110
Houston, TX 77074

Re: CenterPoint Energy Gas Transmission Company, CPF 4-2007-1005M,
Final Integrity Management Program Plans and Procedures

Dear Mr. Seeley:

On April 3, 2007, CenterPoint Energy Gas Transmission Company (CEGT) received a Notice of Amendment (NOA) dated March 29, 2007, issued by the Southwest Region of the Department of Transportation's Office of Pipeline and Hazardous Materials Safety Administration (PHMSA). In the NOA, PHMSA stated that, based on PHMSA's review of CEGT's Integrity Management Program (IMP) conducted in Shreveport, Louisiana, during the weeks of September 12-16 and November 14-18, 2005, PHMSA had identified apparent inadequacies within CEGT's IMP plans or procedures.

On June 29, 2007, after receiving an extension of time from PHMSA, CEGT submitted amended IMP procedures to comply with the NOA. Those IMP procedures have now been approved through CEGT's Management of Change (MOC) process. Accordingly, CEGT hereby submits its final IMP procedures to comply with the NOA.

During CEGT's MOC process, additional changes were made to seven of the documents that CEGT sent to PHMSA on June 29, 2007:

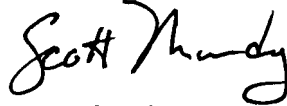
- PS-03-01-200 "HCA Segment Identification"
- PS-03-01-214 "Data Management"
- PS-03-01-232 "External Corrosion Direct Assessment"
- PS-03-01-132 "Dry Gas Internal Corrosion Direct Assessment"
- PS-03-01-135 "Pressure Testing for Assessment"

PS-03-01-145 "Remediation"
O&M Book 1 Procedure 219 "Population Density and HCA Field
Survey"

The changes to these seven documents did not impact the substance of the NOA response. The remaining thirty documents included with this letter are the same as those submitted on June 29, 2007, except the "draft" annotation has been removed and the effective dates, revision dates, and revision numbers have been updated."

Please contact me if you have any questions about this submission.

Sincerely,

A handwritten signature in black ink that reads "Scott Mundy". The signature is written in a cursive, flowing style.

Scott A. Mundy
Director, Pipeline Integrity
CenterPoint Energy Gas
Transmission Company

cc: Walter L. Ferguson
Debbie Ristig
Johnny Cavitt