



September 26, 2025

Bryan Lethcoe
Director, Southwest Region, Office Pipeline Safety
Pipeline and Hazardous Materials Safety Administration
8701 S. Gessner, Suite 630
Houston TX 77074

**RE: Niagara Mohawk Power Corporation's Liquefied Natural Gas facility in Providence,
RI – CPF 4-2025-040-NOPV**

Dear Mr. Lethcoe:

Thank you for the opportunity to file this short reply to respond to the deficiency noted in the referenced Notice of Probable Violation.

Niagara failed to protect its buried components subjected to external corrosive attack from external corrosion by maintaining its method of cathodic protection, for its steel, cast iron and ductile iron structures, as required by Appendix D of Part 192 in accordance with § 193.2629. Specifically, Niagara failed to repair its cathodic protection after two consecutive annual cathodic protection surveys at its Providence LNG facility yielded unacceptable anode readings.

Niagara is not contesting the finding. In June 2025, Niagara installed a new rectifier which remediated the issue. Readings taken after the rectifier installation have confirmed that the cathodic protection values for the points in question are within the required range. Please refer to Attachment 1 to CPF 4-2025-040-NOPV for the associated records.

If there are any additional clarifications or updates necessary, please do not hesitate to contact us.

Thank you for your attention and consideration of this matter.

Respectfully submitted,

A handwritten signature in black ink that reads "Alexander John Day". The signature is written in a cursive style with a large, stylized 'A' and 'D'.

Alexander Day
Director, Pipeline Safety and Compliance

Enclosure

Cc: Andrew Kohout, Federal Energy Regulatory Commission
Timothy O'Shea, Pipeline and Hazardous Materials Safety Administration
Saurabhkumar Desai, Pipeline and Hazardous Materials Safety Administration
Terri Binns, Pipeline and Hazardous Materials Safety Administration
Chad Hall, Pipeline and Hazardous Materials Safety Administration
Juan Mendoza, Pipeline and Hazardous Materials Safety Administration
Jametta Black, Pipeline and Hazardous Materials Safety Administration
Sheila White, Pipeline and Hazardous Materials Safety Administration
Linda Tran, Pipeline and Hazardous Materials Safety Administration
Ross Turrini, National Grid
James Flannery, National Grid
Aaron Choo, National Grid
Richard Delaney, National Grid
Bryon Knoth, National Grid