



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 4-2025-041-NOA**

Dear Mr. Lethcoe:

Thank you for the opportunity to file this short response to the inadequacies raised in the referenced Notice of Amendment.

Niagara's manual of written emergency procedures for its Providence, Rhode Island, LNG facility was inadequate to handle each type of emergency identified under paragraph (a) of § 193.2509 and each fire emergency in accordance with §193.2509(b)(3). Specifically, Niagara's Facility Response Plan, FRP-4 SP 7.0 failed to contain instructions on coordinating with the appropriate local officials to prepare its emergency evacuation plan.

Niagara's response plan did not include information or steps required to protect the public, such as: which local authorities to contact in the event of an incident; requirements to host or participate in emergency drills designed to prepare Niagara's personnel and local authorities to respond to facility emergencies and foster cooperative relationships; guidance on how to coordinate with local authorities during emergencies that require evacuation of the facility and community; or requirements for records of drills or discussions with local authorities to be retained.

Niagara is not contesting the findings and has made several changes to its Emergency Plans and Procedures since the inspection to address these concerns and is in the process of making additional modifications, as outlined below.

Niagara has already made updates to the following Emergency Plans and Procedures:

1. 00 LNG E00 LNG Operations Emergency Plan
2. 00 LNG E03 Emergency Administration
3. 00.PR-E01 Supplemental Notifications

Please refer to Attachments 1-3 to CPF 4-2025-041-NOA for copies of these documents.

Niagara is also making further changes to the following Emergency Plans and Procedures:

1. 00 LNG E03 Emergency Administration
Adding sections 2.1 and 2.2 to address 193.2509.
2. FP01 Fire Department Tours
Adding 2.2(a)(7) to explicitly include “Any information the Fire Department requests to create a community action plan.”
3. PQT02 Emergency Scenario Drill Program.
Adding 2.2(g) & (h), which explicitly includes plant and community evacuations in drill scenarios.
Adding 6.1(d)(1), which defines the term “local officials.”

Please refer to Attachments 4-6 to CPF 4-2025-041-NOA for draft copies of these documents.

Niagara believes that these changes sufficiently address the inadequacies outlined in the Notice of Amendment.

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

Thank you for your attention and consideration of this matter.

Respectfully submitted,



Alexander Day
Director, Pipeline Safety and Compliance

Enclosure

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