



RESPONSIBLE BY NATURE™

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Mr. Dustin Hubbard
Acting Director, Western Region
Pipeline and Hazardous Materials Safety Administration
12300 W. Dakota Avenue, Ste. 110
Lakewood, CO 80228

November 6, 2017

RE: NOTICE OF PROBABLE VIOLATION (NPV) AND PROPOSED
COMPLIANCE ORDER

CPF 5-2017-1012

Dear Mr. Hubbard:

The following is our response to your Notice of Probable Violation dated October 12, 2017, regarding the WestGas Interstate transmission system. WestGas Interstate, Inc. (WGI) is a wholly-owned subsidiary of Xcel Energy, Inc., and is operated by personnel from Public Service Co. of Colorado.

Xcel Energy does not dispute Probable Violation #1 regarding frequency of patrolling, since the period between WGI patrols in 2015 exceeded 7-1/2 months. Similarly, Xcel Energy does not dispute Probable Violation #2 for leak surveys since the period between inspections also exceeded 7-1/2 months in 2015.

Your office proposes the following Compliance Orders as a result of these probable violations:

"1. In regard to Item Number 1 of the Notice pertaining to patrolling of transmission lines, WestGas InterState must establish and document a tracking system to ensure routine patrolling of the pipeline is performed as required by C.F.R. §192.705(b). Additionally WestGas must provide documentation showing completion within 90 days.

2. In regard to Item Number 2 of the Notice pertaining to leakage surveys of transmission line, WestGas InterState must establish and document a tracking system to ensure routine leak survey of the pipeline is performed as required by C.F.R. §192.705(b). Additionally WestGas must provide documentation showing completion within 90 days.

4. *It is requested (not mandated) that WestGas InterState maintain documentation of the safety improvement costs associated with fulfilling this Compliance Order and submit the total to Dustin Hubbard Acting Director, Western Region, Pipeline and Hazardous Materials Safety Administration. It is requested that these costs be reported in two categories: 1) total cost associated with preparation/revision of plans, procedures, studies and analyses, and 2) total cost associated with replacements, additions and other changes to pipeline infrastructure."*

Response to Notice

Xcel Energy does not contest the alleged violations and will follow the compliance orders. With respect to compliance orders #1 and #2, Xcel Energy had previously identified a need to improve its compliance management system. As recently as October 30, 2017, Xcel Energy transitioned to SAP®, new enterprise resource planning software, which includes tracking and reporting of compliance activities on the WGI transmission line.

Xcel Energy also intends to comply with non-mandatory compliance order #4. However, since many costs have occurred in the past, the documentation may need to be in the form of allocations as direct charges may not exist. Xcel Energy will provide a written response to your office no later than January 12, 2018, that documents completion of the compliance orders.

If you have any further questions on this matter, please contact me at 303-294-2071, or Mark Nolan at 303-571-3931.

Sincerely,



Cheryl Campbell
Sr. Vice President, Gas
Xcel Energy Services

lc: Mike Falk, Director
Gas Transmission Operations

Lauren Gilliland, Manager
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