



Barrow Utilities and Electric Cooperative, Inc.

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February 25, 2024

Dustin Hubbard
Director, Western Region
U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration
12300 W. Dakota Ave., Suite 110
Lakewood, Colorado 80228

Subject: Response to Notice of Amendment, Case #CPF 5-2023-045-NOA

Dear Mr. Hubbard:

Barrow Utilities & Electric Coop., Inc. ("BUECI") provides the following response to the Pipeline and Hazardous Materials Safety Administration's ("PHMSA") December 27, 2023 Notice of Amendment (Case #CPF 5-2023-045-NOA) ("NOA").

I. Response to Notice of Amendment

PHMSA identified apparent inadequacies with BUECI's procedures for Maintenance and Operations, listed as items 1, 2, 4, and 5 in the NOA,¹ and proposed that BUECI submit its amended procedures to PHMSA within 120 days of receipt of the NOA. BUECI requests an extension of 180 days (until **October 23, 2024**) to submit amended procedures to PHMSA.

BUECI is a small nonprofit utility cooperative,² which means its customers are also cooperative owner/members. Its natural gas division has four (4) employees, and serves approximately 1,391 member/owners. As a nonprofit cooperative, BUECI takes the items identified in the NOA very seriously, and wishes to correct them as expeditiously, but also as deliberately, as possible.

Good cause exists for an extension. In addition to working to robustly address the amendments needed in response to the NOA, BUECI is simultaneously also working to carefully and thoroughly address the twenty-two (22) probable violations listed in the Notice of Probable Violation ("NPV") dated December 27, 2023. Further, I have been in my position as General

¹ There is no item 3.

² See AS 10.25 (Alaska Electric and Telephone Cooperative Act).

Manager less than three years, and the Natural Gas Superintendent has been with BUECI since July 2023.

BUECI is working diligently to address the NOA items in order to resolve them in a manner satisfactory to PHMSA. However, after careful review of the NPV and NOA, BUECI has determined that more time is needed in order to submit amended procedures in response to the NOA. Additional time will ensure that BUECI has time to carefully amend its procedures and also provide time for BUECI to consult with PHMSA as may be necessary during this time.

BUECI has appreciated PHMSA's willingness to assist BUECI in responding to the NOA and hopes to continue working closely with PHMSA to satisfactorily address the NOA. Please contact me with any questions you may have.

Sincerely,

Barrow Utilities & Electric Coop., Inc.



Timothy W. Russell,
General Manager