

The Commonwealth of Massachusetts

DEPARTMENT OF PUBLIC UTILITIES

CONSENT ORDER

June 12, 2020

D.P.U. 20-PL-38

In the matter of Boston Gas Company and Colonial Gas Company, each d/b/a National Grid

I. JURISDICTION

1. This document, with the attached Compliance Agreement and Exhibit A, is a Consent Order entered into between the Pipeline Safety Division (“Division”) of the Department of Public Utilities (“Department”) and Boston Gas Company and Colonial Gas Company, each d/b/a National Grid (collectively “Respondent” or “National Grid”), and is executed in accordance with 220 CMR 69.08.
2. The Division has authority to enter into this Consent Order on behalf of the Department pursuant to Delegation Order, D.P.U. 18-44-A (2017).
3. Failure to comply with the terms of this Order may result in the assessment of civil penalties and referral of this matter to the Attorney General for appropriate action.
4. The terms and conditions of this Order become effective upon signing by the authorized representatives of the Respondent and the Department.
5. Respondent has stipulated and consented to the issuance of this Consent Order.

II. VIOLATIONS AND CIVIL PENALTY

1. Pursuant to G.L. c. 164, §§ 76 and 105A, and 220 CMR 69.02, the Division conducted pipeline safety inspections of the Respondent’s facilities and records regarding various investigations. The matters encompassed by this Consent Order and the allegations pertaining to each matter are referenced in Exhibit A, attached hereto.
2. Based on the information obtained, the Division finds that the Respondent violated pipeline safety regulations contained in 49 C.F.R. Part 192 (“Part 192”), the Massachusetts General Laws, and the Department’s Pipeline Safety regulations, as set forth in Exhibit A.
3. Pursuant to G.L. c. 164, § 105A, the Division hereby imposes upon the Respondent a civil penalty in the amount of \$1,000,000 for all the violations noted in Exhibit A.
4. The Respondent hereby agrees, upon signing and returning this Consent Order to the Division, to remit payment of the civil penalty by check or money order in the amount of

\$1,000,000 made payable to the Commonwealth of Massachusetts, One South Station, Boston, MA 02110.

III. RESPONDENT REQUIREMENTS

1. **Respondent shall sign the Stipulation below and return this complete document to the Division.**
2. All submissions by Respondent in accordance with this Consent Order shall be addressed to:

Director
Pipeline Safety Division
Department of Public Utilities
One South Station
Boston, MA 02110

IV. STIPULATED TERMS


Pursuant to 220 CMR 69.08(1), the Respondent through the signature below, by the person to whom this Consent Order is issued or a duly authorized representative, acknowledges agreement to the terms contained herein without admitting or denying that a violation of any Department or federal pipeline safety law or regulation occurred in relation to the above-noted matters. Further, Respondent agrees to issuance of this Consent Order and stipulates to the following:

1. Respondent, by signing the Stipulation, hereby waives:
 - (a) All rights to informal review pursuant to 220 CMR 69.05;
 - (b) All rights to a hearing pursuant to 220 CMR 69.06;
 - (c) Any and all procedural rights available in connection with the issuance of the Consent Order;
 - (d) All rights to seek any type of administrative or judicial review of the Consent Order;
and
 - (e) Any and all rights to challenge or contest the validity of the Consent Order.
2. Respondent expressly acknowledges that neither Respondent nor the Division has any intention to enter into a contract.
3. The terms and provisions of this Consent Order and Stipulation shall be binding upon, and inure to the benefit of, Respondent and the Division and their successors in interest.
4. Nothing in these Stipulated Terms shall preclude any proceedings brought by the Department to enforce the terms of the Consent Order, and nothing in these Stipulated Terms constitute, nor shall Respondent contend that they constitute, a waiver of any right, power, or authority of any other representative of the Commonwealth or an agency thereof to bring other actions deemed appropriate.

V. FINAL ORDER

1. This Consent Order and Stipulation is intended to be, and shall be construed to be, a final order of the Department issued pursuant to G.L. c. 25, § 5, having the force and effect of a remedial order, pursuant to 220 CMR 69.07(2), and expressly does not form, and may not be considered to form, a contract binding on the Division, the Department, or the Commonwealth of Massachusetts.
2. The terms of this Consent Order and Stipulation, including this paragraph, are not subject to amendment or modification by any extraneous expression, prior agreement, or prior arrangements between the Division and the Respondent, whether oral or written.

By Order of the Division


Richard Enright, Director
Pipeline Safety Division
Department of Public Utilities

Date: 7/14/2020

The undersigned, duly authorized, stipulates to and acknowledges agreement to the terms herein.

Boston Gas Company and Colonial Gas Company, each d/b/a National Grid



Date: 6/20/2020

Mark Prewitt
Vice President, Pipeline Safety & Compliance
National Grid

COMPLIANCE AGREEMENT
BETWEEN THE DEPARTMENT OF PUBLIC UTILITIES
AND BOSTON GAS COMPANY AND COLONIAL GAS COMPANY,
EACH D/B/A NATIONAL GRID

D.P.U. 20-PL-38

Boston Gas Company and Colonial Gas Company, each d/b/a National Grid (collectively “National Grid”) agrees to take the following actions within the specified time periods:

1. Within 120 days of the effective date of this Order, National Grid is to review its training protocols and implement process improvements that demonstrate the Company’s ability to qualify field personnel on both knowledge and skill to perform and properly document covered tasks.
2. Within 180 days of the effective date of this Order, National Grid shall provide documentation to the Department to verify that the requirements of Item 1 have been satisfied.
3. Within 120 days of the effective date of this order, National Grid shall perform leak surveys for any and all Grade 1, 2, and 3 leaks not repaired during the 2018 work stoppage.
4. Within 180 days of the effective date of this Order, National Grid shall provide documentation to the Department to verify that the requirements of Item 3 have been satisfied.
5. Within 120 days of the effective date of this order, National Grid shall remove debris from all critical valves that were filled in prior to or during the 2018 work stoppage.
6. Within 180 days of the effective date of this Order, National Grid shall provide documentation to the Department to verify that the requirements of Item 5 have been satisfied.
7. Within 120 days of the effective date of this order, National Grid shall perform an assessment of its damage-prevention and provide an outline of all process improvements that will be implemented to improve overall damage prevention at National Grid.
8. Within 180 days of the effective date of this order, National Grid shall provide documentation to the Department showing that the requirements of Item 7 have been satisfied.
9. Within 30 days of the effective date of this Order, National Grid shall pay a civil penalty of \$1,000,000 to the Commonwealth of Massachusetts.

D.P.U. 20-PL-38: EXHIBIT A

I. 2018 LEAK INVESTIGATIONS

In 2018, the Division conducted investigations into reported leaks at 61 different locations. These matters arose during the National Grid work stoppage that occurred between June 25, 2018 and January 7, 2019. The matters were docketed as D.P.U. 18-PL-41 through D.P.U. 18-PL-70 and D.P.U. 18-PL-73 through D.P.U. 18-PL-103. The results of the inspections, which included two sets of information requests, showed that National Grid had failed to comply with the federal pipeline safety regulations, as well as state law and regulations, in 34 of these matters.

A. D.P.U. 18-PL-42, Grade █ Leak, █ Quincy

The results of this investigation show that National Grid:

- failed to follow investigation procedures;
- failed to properly document investigations.

B. D.P.U.18-PL-43, Grade █ & █ Leaks, █ Quincy

The results of this investigation show that National Grid:

- failed to follow investigation procedures;
- failed to properly document investigations.

C. D.P.U. 18-PL-45, Grade █ Leak, █ Quincy

The results of this investigation show that National Grid:

- failed to follow investigation procedures;
- failed to properly document investigations.

D. D.P.U. 18-PL-47, Grade █ Leak, █ Dorchester

The results of this investigation show that National Grid:

- failed to follow investigation procedures;
- failed to properly document investigations.

E. D.P.U. 18-PL-48, Grade █ Leak, █ Dorchester

The results of this investigation show that National Grid:

- failed to follow investigation procedures;

J. D.P.U. 18-PL-59, Grade █ Leak, ██████████ Boston

The results of this investigation show that National Grid:

- failed to follow investigation procedures.

K. D.P.U. 18-PL-60, Grade █ Leak, ██████████ Boston

The results of this investigation show that National Grid:

- failed to follow investigation procedures.

L. D.P.U. 18-PL-62, Grade █ Leak, ██████████ Whitman

The results of this investigation show that National Grid:

- failed to follow investigation procedures;
- failed to properly document investigation.

M. D.P.U. 18-PL-65, Grade █ Leak, ██████████ Boston

The results of this investigation show that National Grid:

- failed to follow investigation procedures;
- failed to properly repair leaks (gas readings found during recheck after repair).

N. D.P.U. 18-PL-67, Grade █ Leak, ██████████ Boston

The results of this investigation show that National Grid:

- failed to follow investigation procedures.

O. D.P.U. 18-PL-68, Grade █ Leak, ██████████ Boston

The results of this investigation show that National Grid:

- failed to properly document investigation;

- failed to follow investigation procedures.

P. D.P.U. 18-PL-69, Grade █ Leak, █ Abington

The results of this investigation show that National Grid:

- failed to properly document investigation;
- failed to follow investigation procedures;
- failure to pre-mark construction area.

Q. D.P.U. 18-PL-73, Grade █ Leak, █ Boston

The results of this investigation show that National Grid;

- failed to follow investigation procedures.

R. D.P.U 18-PL-75, Grade █ Leak, █ Dorchester

The results of this investigation show that National Grid:

- failed to follow investigation procedures.

S. D.P.U. 18-PL-76, Grade █ Leak, █ Boston

The results of this investigation show that National Grid:

- failed to follow investigation procedures.

T. D.P.U. 18-PL-80, Grade █ & █ Leak, █ Dorchester

The results of this investigation showed that National Grid:

- failed to follow investigation procedures;
- failed to properly document investigations;
- failed to properly repair leaks (gas readings found during recheck after repair).

U. D.P.U. 18-PL-81, Grade █ Leak, █ Braintree

The results of this investigation showed that National Grid:

- failed to properly document investigation;
- failed to follow investigation procedures;

V. D.P.U. 18-PL-82, Grade █ & █ Leak, █ Newton

The results of this investigation showed that National Grid:

- failed to properly document investigations;
- failed to follow investigation procedures.

W. D.P.U. 18-PL-83, Grade █ Leak, █ Quincy

The results of this investigation showed that National Grid:

- failed to properly document investigation;
- failed to follow investigation procedures.

X. D.P.U. 18-PL-84, Grade █ Leak, █ Dorchester

The results of this investigation showed that National Grid:

- failed to follow investigation procedures.

Y. D.P.U. 18-PL-85, Grade ■ & ■ Leaks, ■■■■■■ Dorchester

The results of this investigation showed that National Grid:

- failed to follow investigation procedures.

Z. D.P.U. 18-PL-86, Grade ■ & ■ ■■■■■■ Roxbury

The results of this investigation showed that National Grid:

- failed to properly document investigations;
- failed to follow investigation procedures.

AA. D.P.U. 18-PL-90, Grade ■ Leak, ■■■■■■ Dorchester

The results of this investigation showed that National Grid:

- failed to properly document investigation;
- failed to follow investigation procedures;

BB. D.P.U. 18-PL-92, Grade ■ Leak, ■■■■■■ Dorchester

The results of this investigation showed that National Grid:

- failed to properly document investigation;
- failed to follow investigation procedures.

CC. D.P.U. 18-PL-93, Grade ■ Leak, ■■■■■■ Quincy

The results of this investigation showed that National Grid:

- failed to properly document investigation;
- failed to follow investigation procedures.

DD. D.P.U. 18-PL-94, Grade █ Leak, █ Newton

The results of this investigation showed that National Grid

- failed to follow investigation procedures.

EE. D.P.U. 18-PL-97, Grade █ Leak, █ Dorchester

The results of this investigation show that National Grid:

- failed to follow investigation procedures;
- failed to properly document investigation.

FF. D.P.U. 18-PL-98, Grade █ Leak, █ Roxbury

The results of this investigation show that National Grid:

- failed to follow investigation procedures.

GG. D.P.U. 18-PL-99, Grade █ Leak, █ Dorchester

The results of this investigation show that National Grid:

- failed to follow investigation procedures;
- failed to properly document investigations.

HH. D.P.U. 18-PL-102, Grade █ Leak, █ Wellesley

The results of this investigation show that National Grid:

- failed to follow investigation procedures.

Based on these failures, the Division finds that National Grid violated the following law and regulations:

1. Part 192, § 192.13(c) - What general requirements apply to pipelines regulated under this part?

(c) Each operator shall maintain, modify as appropriate, and follow the plans, procedures, and programs that it is required to establish under this part.

2. Part 192, § 192.605(a) - Procedural manual for operations, maintenance, and emergencies.

(a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.

3. Part 192, § 192.703(c) - General.

(c) Hazardous leaks must be repaired promptly.

4. Part 192, § 192.805(b), (h) - Qualification program.

Each operator shall have and follow a written qualification program. The program shall include provisions to:

(b) Ensure through evaluation that individuals performing covered tasks are qualified;

(h) After December 16, 2004, provide training, as appropriate, to ensure that individuals performing covered tasks have the necessary knowledge and skills to perform the tasks in a manner that ensures the safe operation of pipeline facilities.

5. G.L. c. 82, § 40B – Dig Safe Law.

Within 72 hours, exclusive of Saturdays, Sundays and legal holidays, from the time the initial notice is received by the system or at such time as the company and the excavator agree, such company shall respond to the initial notice or subsequent notice by designating the location of the underground facilities within 15 feet in any direction of the pre-marking so that the existing facilities are to be found within a safety zone.

6. G.L. c. 144, § 144(b)(2) - Uniform natural gas leaks classification system

(2) A Grade 1 leak shall be a leak that represents an existing or probable hazard to persons or property. Grade 1 leaks require repair as immediately as possible and continuous action until the conditions are no longer hazardous. The gas company shall immediately schedule a completion of repairs and the condition shall be kept under continuous surveillance until the hazard or source of the leak is eliminated.

7. 220 CMR 114.04(3)(a) - Uniform Gas Leak Classification

(3) Each Gas Company shall assess a grade to all reported natural gas leaks as follows:

(a) Grade 1 Leak. A Grade 1 Leak shall be a leak that represents an existing or probable hazard to persons or property. Grade 1 leaks require the immediate commencement of repair and continuous action until the conditions are no longer hazardous, the source of the leak is eliminated, and permanent repairs have been completed.

II. OLDER LEAK INVESTIGATIONS

In addition to the leak matters noted above, the Division investigated National Grid's failure to comply with its procedures and federal pipeline safety regulations regarding leak investigations and repairs at the following locations:

A. D.P.U. 17-PL-01, [REDACTED] Weymouth (NOPV issued 1/5/2017)

The results of this investigation show that National Grid:

- failed to follow leak investigation procedures;
- failed to document readings;
- failed to survey all buildings within two buildings or [REDACTED] of odor location as required.

Based on this investigation, the Division finds that National Grid violated the following regulations: Part 192, §§ 192.13(c), 192.605(a); 192.805(h).

B. D.P.U. 18-PL-09, Grade [REDACTED] Leak, [REDACTED] Jamaica Plain

The results of this investigation show that National Grid:

- failed to properly investigate leak per procedures [REDACTED] in each direction);
- failed to properly complete leak investigation form;
- failed to repair Grade [REDACTED] leak immediately.

Based on this investigation, the Division finds that National Grid violated the following regulations: Part 192, §§ 192.13(c); 192.605(a); 192.703(c); 192.805(b), (h); 220 CMR 114.04(3)(a).

C. D.P.U. 18-PL-28, Grade █ Leak, Malden

The results of this investigation show that National Grid:

- failed to utilize the most recent procedures to perform and document leak investigations;
- failed to properly document findings;
- failed to immediately repair Grade █ leak.

Based on this investigation, the Division finds that National Grid violated the following law and regulations: Part 192, §§ 192.13(c); 192.605(a); 192.703(c); G.L. c. 164, § 144(b)(2); 220 CMR 114.04(3)(a).

D. D.P.U. 18-PL-29, Grade █ Leak, Waltham/West Roxbury

The results of this investigation show that National Grid:

- failed to have adequate utilize the most recent procedures to perform and document leak investigations;
- failed to follow procedures;
- failed to properly document findings;
- failed to immediately repair Grade █ leak.

Based on this investigation, the Division finds that National Grid violated the following law and regulations: Part 192, §§ 192.13(c); 192.605(a); 192.703(c); G.L. c. 164, § 144(b)(2); 220 CMR 114.04(3)(a).

E. D.P.U. 18-PL-33, ██████████ Mashpee

The results of this investigation show that National Grid:

- failed to follow procedures to avoid puncture while investigating leak
- shut off gas to certain customers based on map that incorrectly showed the ██████████

Based on this investigation, the Division finds that National Grid violated the following regulations: Part 192, §§ 192.13(c); 192.605(a). In addition, the Division finds that National Grid violated the following:

1. Part 192, § 192.605(b)(3) - Procedural manual for operations, maintenance, and emergencies.

(b) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.

(3) Making construction records, maps, and operating history available to appropriate operating personnel.

2. 49 C.F.R. Part 196, § 196.103 - What must an excavator do to protect underground pipelines from excavation-related damage?

Prior to and during excavation activity, the excavator must:

(a) Use an available one-call system before excavating to notify operators of underground pipeline facilities of the timing and location of the intended excavation;

(b) If underground pipelines exist in the area, wait for the pipeline operator to arrive at the excavation site and establish and mark the location of its underground pipeline facilities before excavating;

(c) Excavate with proper regard for the marked location of pipelines an operator has established by taking all practicable steps to prevent excavation damage to the pipeline;

(d) Make additional use of one-call as necessary to obtain locating and marking before excavating to ensure that underground pipelines are not damaged by excavation.

3. G.L. c. 82, § 40C - Excavator's responsibility to maintain designation markings; damage caused by excavator.

When excavating in close proximity to the underground facilities of any company when such facilities are to be exposed, non-mechanical means shall be employed, as necessary, to avoid damage in locating such facility and any further excavation shall be performed employing reasonable precautions to avoid damage to any underground facilities including, but not limited to, any substantial weakening of structural or lateral support of such facilities, penetration or destruction of any

pipe, main, wire or conduit or the protective coating thereof, or damage to any pipe, main, wire or conduit.

III. OTHER INVESTIGATIONS

A. D.P.U. 18-PL-25, Critical Valves

In 2018, the Division investigated National Grid's filling of approximately 30 of its critical valves [REDACTED] on or after June 25, 2018, in light of the 2018 work stoppage. National Grid had identified these critical valves (located at [REDACTED] stations) to be at [REDACTED] based on incidents that had occurred during the Boston Gas Company work stoppage in 1993 and [REDACTED]. In defending that decision, National Grid claimed that the [REDACTED]. Nevertheless, National Grid procedures require National Grid to clear any [REDACTED]. Thus, National Grid violated its procedures by filling the [REDACTED] (i.e., [REDACTED]). Based on the information gathered during this investigation, the Division finds that National Grid violated the following regulations: Part 192, §§ 192.13(c); 192.605(a).

B. D.P.U. 18-PL-32, Commercial Point Security

During 2016 and 2017, the Division investigated National Grid's security policy, training, and records for its [REDACTED] liquefied natural gas ("LNG") facility. The results of this investigation show that National Grid:

- failed to post or communicate threat levels;
- relied on an out-of-date training and maintenance manual;
- relied on an out-of-date security equipment checklist;
- [REDACTED];
- [REDACTED];
- relied on security maintenance procedures that were inconsistent with corporate security standard regarding barbed wire spacing requirements;
- [REDACTED];
- had incomplete or inaccurate documentation of security inspections and security patrols.

Based on the information gathered from the investigation, the Division finds that National Grid violated the following section of 49 C.F.R. Part 193 ("Part 193"):

Part 193, § 193.2903 - Security Procedures.

Each operator shall prepare and follow one or more manuals of written procedures to provide security for each LNG plant. The procedures must be available at the plant in accordance with §193.2017 and include at least:

- (a) A description and schedule of security inspections and patrols performed in accordance with §193.2913;
- (b) A list of security personnel positions or responsibilities utilized at the LNG plant;
- (c) A brief description of the duties associated with each security personnel position or responsibility;
- (d) Instructions for actions to be taken, including notification of other appropriate plant personnel and law enforcement officials, when there is any indication of an actual or attempted breach of security;
- (e) Methods for determining which persons are allowed access to the LNG plant;
- (f) Positive identification of all persons entering the plant and in the plant, including methods at least as effective as picture badges; and,
- (g) Liaison with local law enforcement officials to keep them informed about current security procedures under this section.

C. D.P.U. 18-PL-35, Mismarked Facilities

In 2018, the Division investigated pipeline damage arising from National Grid's failure to mark its gas facilities adequately in response to Dig Safe notifications. The evidence in this investigation shows that this occurred on 18 occasions. Based on the information gathered during the investigation, the Division finds that National Grid violated G.L. c. 82, § 40B. In addition, the Division finds that National Grid violated the following:

1. Part 192, § 192.614(a), (c)(5) - Damage prevention program.
 - (a) Except as provided in paragraphs (d) and (e) of this section, each operator of a buried pipeline must carry out, in accordance with this section, a written program to prevent damage to that pipeline from excavation activities.
 - (c) The damage prevention program required by paragraph (a) of this section must, at a minimum:
 - (5) Provide for temporary marking of buried pipelines in the area of excavation activity before, as far as practical, the activity begins.

2. 49 C.F.R. Part 196, § 196.111 - What if a pipeline operator fails to respond to a locate request or fails to accurately locate and mark its pipeline?

PHMSA may enforce existing requirements applicable to pipeline operators, including those specified in 49 CFR 192.614 and 195.442 and 49 U.S.C. 60114 if a pipeline operator fails to properly respond to a locate request or fails to accurately locate and mark its pipeline.

3. 220 CMR 99.06(1), (2) – Marking Procedures.

(1) Within 72 hours, exclusive of Saturdays, Sundays and legal holidays, from the time initial notice is received by the Dig Safe Center, every company shall mark the location of an underground facility by applying a visible marking material, such as paint, on the ground above the facility.

(2) Every company shall use the center-line method to identify the location of its respective underground facilities, whether the facilities are located on private or public property. The underground facility shall be completely located within the safety zone, no more than the width of the facility plus 18 inches on each side from the designated center line.

D. D.P.U. 18-PL-36, [REDACTED] Dorchester

In 2018, the Division investigated National Grid’s abandonment of a plastic service at the above-noted location. Based on the investigation, the Division found that National Grid failed to abandon the service “at or as close as practical to the main” (as defined in 220 CMR 107.03) and failed to follow its written abandonment procedures. In defending its decision, National Grid claimed that the Boston Police Department would not allow it to disconnect at the main (in the middle of road) because of traffic concerns, and that it followed the intent of the procedure. Nevertheless, National Grid could have scheduled the work at night when traffic would not be a concern. Moreover, following the intent of the procedure is not sufficient for compliance with the procedure. The Division further found that National Grid failed to commence the excavation within 30 days of the start date on the Dig Safe ticket. Thus, the Division finds that National Grid violated the following law and regulations: Part 192, §§ 192.13c; 192.605(a). In addition, the Division finds that National Grid violated the following:

1. 220 CMR 99.04(1) – Excavation Notification.

(1) Notice of an excavation shall be tendered to the Dig Safe Center at least 72 hours, exclusive of Saturdays, Sundays, and legal holidays, but not more than 30 days prior to the commencement of an excavation. Such notice shall include an accurate description of the excavation location and the scope of the work to be performed.

2. G.L. c. 82, § 40A – Dig Safe Law.

No excavator installing a new facility or an addition to an existing facility or the relay or repair of an existing facility shall, except in an emergency, make an excavation, in any public or private way, any company right-of-way or easement or any public or privately owned land or way, unless at least 72 hours, exclusive of Saturdays, Sundays and legal holidays but not more than 30 days before the proposed excavation is to be made, such excavator has pre-marked not more than 500 feet of the proposed excavation and given an initial notice to the system. Such initial notice shall set forth a description of the excavation location in the manner as herein defined.

E. D.P.U. 18-PL-37, Various Pipeline Safety Concerns

In 2018, during the work stoppage, the Division investigated various pipeline safety concerns and found among them that National Grid:

- [REDACTED] without monitoring;
- failed to investigate and remediate/repair leaks as required by procedures;
- [REDACTED] without following procedures;
- [REDACTED] without following procedures;
- failed to mark lines after new service installed as required by procedures;
- failed to properly mark out a facility; and
- [REDACTED] in violation of procedures.

Based on the information gathered, the Division finds that National Grid violated the following regulations: Part 192, §§ 192.605(a); 192.614; 192.805(b), (h); The Division also finds that National Grid violated the following:

1. Part 192, § 192.513(a), (b) – Test requirements for plastic pipelines.
 - (a) Each segment of a plastic pipeline must be tested in accordance with this section.
 - (b) The test procedure must insure discovery of all potentially hazardous leaks in the segment being tested.

2. Part 192, § 192.605(b) - Maintenance and normal operations.

(b) The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.

(9) Taking adequate precautions in excavated trenches to protect personnel from the hazards of unsafe accumulations of vapor or gas, and making available when needed at the excavation, emergency rescue equipment, including a breathing apparatus and, a rescue harness and line.

F. D.P.U. 19-PL-01, [REDACTED] Hyannis

In 2018, the Division investigated National Grid's installation of new services and main at the above-referenced location. During the investigation, the Division found the following:

- The crew used a [REDACTED] psig incremental gauge to pressure test the service whereas the procedures require a [REDACTED] psig incremental gauge for service line pressure tests.
- During a second pressure test using the correct gauge, the crew did not use an "Active Pressure Test on Service" tag as required by procedures .
- When performing [REDACTED] at the same location, the crew did not have a [REDACTED] [REDACTED] available as required by procedures.
- One crew member [REDACTED] without having proper operator qualification, and another crew member attempted to help without a [REDACTED] as required by procedures.

Based on the investigation, the Division finds that National Grid violated the following regulations: Part 192, §§ 192.13(c); 192.605(a);. The Division also finds that National Grid violated the following:

1. Part 192, § [REDACTED]

