

KEEGAN WERLIN LLP

ATTORNEYS AT LAW
99 HIGH STREET, SUITE 2900
BOSTON, MASSACHUSETTS 02110

(617) 951-1400

TELECOPIER:
(617) 951-1354

September 25, 2020

VIA ELECTRONIC MAIL

Mark Marini, Secretary
Department of Public Utilities
One South Station, 5th Floor
Boston, MA 02110

Re: Bay State Gas Company d/b/a Columbia Gas of Massachusetts – D.P.U. 19-140
Compliance Agreement Consent Order Requirements (23), (24), (25), (26) and
(27)

Dear Mr. Marini:

Pursuant to the Consent Order, and associated Compliance Agreement, dated August 14, 2020, between the Pipeline Safety Division (the “Division”) of the Massachusetts Department of Public Utilities and Bay State Gas Company d/b/a Columbia Gas of Massachusetts (“CMA” or the “Company”) in the above-captioned matter, the Company hereby provides the following responses to address the requirements of Items 23, 24, 25, 26, and 27 of the Consent Order.

Compliance Agreement Requirement (23)

Within 30 days of the effective date of this Order, CMA shall address the following violations and concerns regarding Gables Condominiums....

Response:

CMA addressed the violations and concerns regarding Gables Condominiums as follows:

- 404 Regency Lane: The meter at this location does not have enough support and is less than the minimum 6” above surface grade. In addition, the regulator vent terminal is less than the minimum 12” above grade and is within 10’ of the building air intake.
 - Per Table 1 of “CMA Response 19-PL-08 Gables Condominiums Abington,” filed 11/15/2019, provided herewith as Attachment 19-140-23(a), the concerns referenced were repaired on 7/1/2019.
- 402 Regency Lane: The meter at this location does not have enough support, is less than the minimum 6” above surface grade, is missing the DPU decal, and has a 2011 sticker. In addition, the regulator vent terminal is less than the minimum 12” above

grade and is within unsatisfactory proximity of a first floor opening and 10' of the building air intake.

- Per Table 1 Attachment 19-140-23(a), the concerns referenced were repaired on 6/25/2019 and 7/9/2019.
 - Per Table 2 of Attachment 19-140-23(a) the meter was changed 7/1/2019.
- 410 Regency Lane: The meter at this location does not have enough support, is less than the minimum 6" above surface grade and has a 2011 sticker. In addition, the regulator vent terminal is within 10' of the building air intake and within unsatisfactory proximity of a first floor opening and rotating electrical equipment.
 - Per Table 1 of Attachment 19-140-23(a) the concerns referenced were repaired on 7/1/2019.
 - Per Table 2 of Attachment 19-140-23(a) the meter was changed 7/1/2019.
- 412 Regency Lane: The meter at this location does not have enough support, is less than the minimum 6" above surface grade and has a 2011 sticker. In addition, the regulator vent terminal is within unsatisfactory proximity of a first floor opening and rotating electrical equipment.
 - Per Table 1 of Attachment 19-140-23(a), the concerns referenced were repaired on 6/27/2019 and 7/2/2019.
 - Per Table 2 of Attachment 19-140-23(a), the meter was changed 7/1/2019.
- 414 Regency Lane: The meter at this location does not have enough support, is less than the minimum 6" above surface grade and has a 2011 sticker. In addition, the regulator vent terminal is less than the minimum 12" above grade and is within unsatisfactory proximity of a first-floor opening, within unsatisfactory proximity of a first floor opening and rotating electrical equipment, and within 10' of the building air intake.
 - Per Table 1 of Attachment 19-140-23(a), the concerns referenced were repaired on 7/1/2019 and 7/8/2019.
 - Per Table 2 of Attachment 19-140-23(a), the meter was changed 7/1/2019.
- 416 Regency Lane: The meter at this location does not have enough support, is less than the minimum 6" above surface grade and has a 2011 sticker. In addition, the regulator vent terminal is within unsatisfactory proximity of rotating electrical equipment.
 - Per Table 1 of Attachment 19-140-23(a), the concerns referenced were repaired on 6/27/2019.
 - Per Table 2 of Attachment 19-140-23(a), the meter was changed 7/1/2019.

- 418 Regency Lane: The meter at this location does not have enough support and has a 2011 sticker. In addition, the regulator vent terminal is within 10' of the building air intake.
 - Per Table 1 of Attachment 19-140-23(a), the concerns referenced were repaired on 6/27/2019.
 - Per Table 2 of Attachment 19-140-23(a), the meter was changed 9/25/2019.

- 422 Regency Lane: The meter at this location does not have enough support and has a 2011 sticker.
 - Per Table 1 of Attachment 19-140-23(a), the concerns referenced were repaired on 7/1/2019.
 - Per Table 2 of Attachment 19-140-23(a) the meter was changed 7/1/2019.

- 303 Regency Lane: The meter at this location does not have enough support, is less than the minimum 6" above surface grade and has a 2011 sticker. In addition, the regulator vent terminal is less than the minimum 12" above grade.
 - Per Table 1 of Attachment 19-140-23(a), the concerns referenced were repaired on 6/27/2019 and 7/9/2019.
 - Per Table 2 of Attachment 19-140-23(a) the meter was changed 6/24/2019.

- 301 Regency Lane: The meter at this location does not have enough support and has a 2011 sticker. In addition, the regulator vent terminal is within 10' of the building air intake.
 - Per Table 1 of Attachment 19-140-23(a), the concerns referenced were repaired on 6/27/2019.
 - Per Table 2 of Attachment 19-140-23(a) the meter was changed 8/1/2018.
 - Attachment 19-140-23(b) is a photo of the meter at this location with a 2018 sticker.

- 309 Regency Lane: The meter at this location does not have enough support, is less than the minimum 6" above surface grade and has a 2011 sticker.
 - Per Table 1 of Attachment 19-140-23(a), the concerns referenced were repaired on 6/27/2019 and 7/8/2019.
 - Per Table 2 of Attachment 19-140-23(a) the meter was changed 6/24/2019.

- 311 Regency Lane: The meter at this location does not have enough support, is less than the minimum 6” above surface grade and has a 2011 sticker.
 - Per Table 1 of Attachment 19-140-23(a), the concerns referenced were repaired on 6/27/2019.
 - Per Table 2 of Attachment 19-140-23(a) the meter was changed 6/24/2019.

- 313 Regency Lane: The meter at this location does not have enough support, is less than the minimum 6” above surface grade and has a 2011 sticker. In addition, the regulator vent terminal is within unsatisfactory proximity to rotating electrical equipment.
 - Per Table 1 of Attachment 19-140-23(a), the concerns referenced were repaired on 7/1/2019 and 7/9/2019.
 - Per Table 2 of Attachment 19-140-23(a) the meter was changed 6/26/2019.

- 315 Regency Lane: The meter at this location does not have enough support, is less than the minimum 6” above surface grade and has a 2011 sticker.
 - Per Table 1 of Attachment 19-140-23(a), the concerns referenced were repaired on 6/27/2019 and 7/9/2019. The job order screen shot below shows meter fit was supported.
 -

```
JOB ORDER NUM: 17-5549131-00 *JOB TYPE: 3843 *LOC NUM: 8100 SPEC BUD:
JOB SUMMARY: AOC BURIED METER *REIMB/ADV: N VAR: N INC TAX: N
*CO/CONTRACT: A APPRV BY: DATE: JO STAT: EX EXECUTED
PROJECT ID: 16 - 40371 PROJECT NAME: CMA AOC INSPECTION STAT DT: 07/09/19
FACILITY ID: FACILITY TYPE:
FUNCTION ID: FUNCTION TYPE:
CO PREM ID: *CITY: ABI COUNTY: 023 PLYMOUTH
SITE ID: 161174001 MAP NUM: MP SYS NO: 80002002 LOC PR: N
JO NUM: 17-5549131-00 *JOB TYPE: 3843 *LOCATION NUMBER: 8100
SUMMARY: AOC BURIED METER

COMMENTS
PAINTED/REPIPE REG VENT/DUGOUT METER
SUPPORTED METER FIT
```

- Per Table 2 of Attachment 19-140-23(a) the meter was changed 6/26/2019.

- 323 Regency Lane: The meter at this location does not have enough support, is less than the minimum 6” above surface grade and has a 2011 sticker. In addition, the regulator vent terminal is less than the minimum 12” above grade and within unsatisfactory proximity of a first floor opening into the building.

- Per Table 1 of Attachment 19-140-23(a) the concerns referenced were repaired on 6/25/2019.
- Per Table 2 of Attachment 19-140-23(a) the meter was changed 6/26/2019.
- 321 Regency Lane: The meter at this location does not have enough support, is missing the DPU decal, and has a 2011 sticker.
 - Per Table 1 of Attachment 19-140-23(a), the concerns referenced were repaired on 6/25/2019.
 - Per Table 2 of Attachment 19-140-23(a) the meter was changed 6/26/2019.
- Across from 402 & 404 Tamarack: The meter at this location does not have enough support and has a 2011 sticker. In addition, the regulator vent terminal is within unsatisfactory proximity of a first floor opening into the building and rotating electrical equipment.
 - Per Table 1 of Attachment 19-140-23(a), AOCs were repaired at 400 Tamarack Ln 402 and 400 Tamarack Ln 404 on 7/30/2019. Across from this location, 400 Hampton Way 410 was repaired on 7/25/2109 as shown below.

```
JOB ORDER NUM: 19-7270538-00 *JOB TYPE: 3843 *LOC NUM: 8100 SPEC BUD:
JOB SUMMARY: REPLACE METER FIT *REIMB/ADV: N VAR: N INC TAX: N
*CO/CONTRACT: A APPRV BY: DATE: JO STAT: EX EXECUTED
PROJECT ID: - PROJECT NAME: STAT DT: 07/25/19
FACILITY ID: FACILITY TYPE:
FUNCTION ID: FUNCTION TYPE:
CO PREM ID: *CITY: ABI COUNTY: 023 PLYMOUTH
SITE ID: 943325008 MAP NUM: 059 SYS NO: 80002002 LOC PR: N
LOC AT: 400 HAMPTON WY 410 ZIP: 02351
JOB ORDER NUM: 19-7270538-00 *JOB TYPE: 3843 *LOC NUM: 8100 SPEC BUD:
JOB SUMMARY: REPLACE METER FIT JOB STATUS: EX EXECUTED

COMMENTS
REPLACED AC250 HP FIT/PAINT FIT/REPIPE REG VENT/LEFT LOCKED OFF/NO C.C.
```

- Additionally, per Table 2 of Attachment 19-140-23(a) the meter was changed at 400 Hampton Way 410 on 7/15/2019.
- Across from 602 Hampton: The meter at this location does not have enough support. In addition, the regulator vent terminal is within unsatisfactory proximity of a first floor opening into the building and the building air intake.
 - This work was completed under job order number 17-5570857-00, shown in the screen shots below:

```
JOB ORDER NUM: 17-5570857-00 *JOB TYPE: 3843 *LOC NUM: 8100 SPEC BUD:
JOB SUMMARY: AOC BURIED METER *REIMB/ADV: N VAR: N INC TAX: N
*CO/CONTRACT: A APPRV BY: DATE: JO STAT: EX EXECUTED
PROJECT ID: 16 - 40371 PROJECT NAME: CMA AOC INSPECTION STAT DT: 07/09/19
FACILITY ID: FACILITY TYPE:
FUNCTION ID: FUNCTION TYPE:
CO PREM ID: *CITY: ABI COUNTY: 023 PLYMOUTH
SITE ID: 758384006 MAP NUM: 59 SYS NO: 80002002 LOC PR: N
LOC AT: 300 HAMPTON WY 309 ZIP: 02351
AKA: CUSTOMER NAME NOT KNOWN ???-???-???? WELDER FLAG(Y/N): N
BEGIN STR NUM: END STREET NUM: MAP CORRECTIONS(Y/N): N
BETWEEN: JOB HLD: N
AND: RT NUM:
TAX DIST: 0000111 FOOTAGE: WORK UNITS:
JOB ORDER NUM: 17-5570857-00 *JOB TYPE: 3843 *LOC NUM: 8100 SPEC BUD:
JOB SUMMARY: AOC BURIED METER JOB STATUS: EX EXECUTED

COMMENTS
PAINTED/REPIPE REG VENT/DUGOUT METER
SUPPORTED FIT
```

Compliance Agreement Requirement (24)

Within 30 days of the effective date of this Order, CMA shall provide a review of the following gas standards: Meter Set Assembly Location and Installation Requirements (GS 3020.035) and Meter Set Assembly Protection Residential and Small Commercial (GS 3020.040).

Response:

After review of Meter Set Assembly Location and Installation Requirements (GS 3020.035 – Attachment 19-140-24(a)) and Meter Set Assembly Protection Residential and Small Commercial (GS 3020.040 – Attachment 19-140-24(b)), the Company determined that these standards adequately cover clearance, support and protection requirements, and service regulator vent requirements for meter set assemblies. In addition to a thorough written explanation on these topics, visual diagrams within each standard provide additional guidance for employees to reference. All field employees and leadership roles who support field employees have been given a documented review of these standards. This review is documented in the Company’s response to Consent Order Item #26.

Compliance Agreement Requirement (25)

Within 45 days of the effective date of this Order, CMA shall provide documentation to the Department to show that it has complied with items 23 and 24.

Response:

Please see the above responses, Attachments 19-140-23(a) and (b), Attachments 19-140-24(a) and (b) and Attachment 19-140-26.

Compliance Agreement Requirement (26)

Within 45 days of the effective date of this Order, CMA shall provide training to appropriate management and field personnel regarding gas standards GS 3020.035 and GS 3020.040 and shall perform an evaluation of Construction Maintenance personnel qualifications to ensure that all field crews are properly qualified to perform covered tasks.

Response:

CMA Operations and Construction employees, as well as appropriate management personnel received training and reviewed GS 3020.035 and GS 3020.040 to reinforce the content of the standard's requirements and management's expectation of compliance with the standards. The name of each employee trained, date of the training, and the name of training instructor are provided as Attachment DPU 19-140-26. An evaluation of employee operator qualification for Task NGA-WE-CT85- "Meter Assembly Abnormal Operating Conditions" was performed for the Construction and Maintenance personnel that perform the covered task.

All employees were found to be properly qualified to perform this covered task, with the exception of 11 new employees and 1 employee who is out from work on disability. These employees will be qualified prior to performing the covered task.

Compliance Agreement Requirement (27)

Within 45 days of the effective date of this Order, CMA shall provide documentation to the Department to show that it has complied with Item 26.

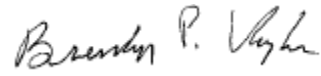
Response:

Please refer to the Company's response to Compliance Agreement Requirement (26) and Attachment DPU-19-140-26.

###

Thank you very much for your attention to this matter. Please contact me with any questions.

Very truly yours,

A handwritten signature in black ink that reads "Brendan P. Vaughan". The signature is written in a cursive style with a large initial 'B'.

Brendan P. Vaughan

Enclosures

Cc: Laurie E. Weisman, Esq. – Hearing Officer
Service List, D.P.U. 19-140



A NiSource Company

4 Technology Drive, Suite 250
Westborough, MA 01581
Phone: (508) 836-7026
Cell: (508) 864-1836
ksilver@nisource.com

Katherine M. Silver
Operations Compliance Manager

November 15, 2019

VIA ELECTRONIC MAIL

Richard Enright, Director
Pipeline Engineering and Safety Division
Department of Public Utilities
One South Station
Boston, MA 02110

Re: D.P.U 19-PL-08, Abington Gables Condo Meters (6/5/19)

Dear Mr. Enright:

Bay State Gas Company d/b/a Columbia Gas of Massachusetts (“CMA” or “Company”) is in receipt of the Exit Letter, dated October 9, 2019 (“Exit Letter”), issued by the Pipeline Safety Division (“Division”) of the Department of Public Utilities (“Department”) regarding the meters investigated at Gables Condominiums in Abington (“Gables Condominiums”) on June 11, 2019. This letter constitutes the Company’s written response provided within 30 days of the issuance of the Division’s Exit Letter.¹ As always, the Company would be happy to meet with the Division to discuss this Response or answer any other questions the Division may have.

In the Exit Letter, the Division states it received a customer complaint from a former Columbia Gas employee who lives at Gables Condominiums. The customer indicated he had informed the Company of numerous violations over the past four years. The Company has reviewed its customer records for the addresses listed in the Exit Letter, as well as the Company’s “Plant and Service” database, which tracks such customer requests and responses. The Company did not identify any complaints received from a customer residing at Gables Condominiums during that time frame prior to 2018. The Company did, however, identify one customer meter set inquiry related to a buried meter in 2018 from among the listed addresses. Prior to the customer’s inquiry, the Company had already identified the buried meter during a walking leak survey of Gables Condominiums the Company performed in 2017. In accordance with the Company’s gas standards, the buried meter was pending remediation in 2020.

The Company maintains and modifies as appropriate, its plans, procedures, and programs that it is required to establish per 49 CFR Part 192.

¹ The Company obtained a seven-day extension from the Division for responding, which was memorialized in an email dated November 6, 2019. The Company appreciates this accommodation.

Columbia Gas of Massachusetts
D.P.U. 19-PL-08
November 15, 2019
Page 2 of 4

The Exit Letter cites alleged violations of 49 CFR Part 192.13. The Company's service installations at Gables Condominiums took place in 2003 and were based on the Company procedures that applied at the time of installation. During a leak survey that took place in the fall of 2017, the Company reviewed the meter installations at Gables Condominiums for compliance with its updated 2017 gas standards and identified numerous abnormal operating conditions ("AOCs"), including several the Division subsequently observed in 2019.

Over time, the Company has updated its gas standards to provide stronger guidance. Applicable here, CMA GS 1650.024(MA), Inspection for Abnormal Operating Conditions (AOC), was originally published January 1, 2017, and last amended January 1, 2018. This gas standard provides guidance for the recognition, notification and documentation of AOCs on meter set assemblies and service lines (including risers) and appropriate time frames for mitigation. As noted above, Gable Condominiums was last surveyed in the fall of 2017. Several AOCs were identified at that time, and job orders were created for remediation in accordance with GS 1650.024(MA).

On June 11, 2019, the Company received an email from Mr. Townsend setting forth the AOCs he observed during his inspection. Notwithstanding the time frames permitted by the gas standard, the Company expedited the repairs that were outlined in Mr. Townsend's email. The AOCs identified by Mr. Townsend were promptly remediated. See Table 1 below for the completed Work Management System (WMS) Job Order remediations, which involve work other than replacing meters. As Table 1 indicates, this work was completed by July 30, 2019. Table 2 contains completed Customer Information System (CIS) Job Orders, which address meter replacements. All except two were remediated in June or July 2019, with the final two completed in August and September 2019, respectively.

Table 1-Completed (WMS) Remediations Locations Identified in Exit Letter

Job Order	Address	Cty Cd	Entered Dt	Complete Dt	Execute Comments
19715025600	600 HAMPTON WY 602	ABI	2019-07-26	2019-07-26	PAINT FIT/REPIPE REG VENT/
19724285300	301 REGENCY LN 3	ABI	2019-06-17	2019-06-27	SUPPORTED/PAINTED/ NO REG ISSUE FOUND SHOWED DPU IN THE FIELD
19724285600	303 REGENCY LN 3	ABI	2019-06-17	2019-06-27	REPIPED MANIFOLD/FIXED REG VENT/PAINTED/SUPPORTED
19724286400	303 REGENCY LN 3	ABI	2019-07-09	2019-07-09	REPIPE REG VENT/PAINTED/DUGOUT METER
19724287700	309 REGENCY LN 3	ABI	2017-10-17	2019-07-08	DUGOUT METER/REPIPED REG VENT/PAINTED/
19724287900	309 REGENCY LN 3	ABI	2019-06-17	2019-06-27	DUGOUT METER/PAINTED/SUPPORTED
19724288000	311 REGENCY LN 3	ABI	2019-06-17	2019-06-27	DUGOUT METER/PAINTED/SUPPORTED
19724288100	313 REGENCY LN 3	ABI	2017-10-17	2019-07-09	REPIPE REG VENT/PAINTED/DUGOUT METER
19724393600	313 REGENCY LN 3	ABI	2019-06-17	2019-07-01	ASSITED CREW ALL READS NEG DUG OUT AND ADDED METER SUPPORT- EVERYTHING TO CODE
19724394100	315 REGENCY LN 3	ABI	2017-10-17	2019-07-09	PAINTED/REPIPE REG VENT/DUGOUT METER
19724394300	315 REGENCY LN 3	ABI	2019-06-17	2019-06-27	PAINTED/DUGOUT METER/LEFT SAFE
19724394400	321 REGENCY LN 3	ABI	2019-06-17	2019-06-25	SECURED METER WITH METER BRACKET
19724670300	323 REGENCY LN 3	ABI	2019-06-17	2019-06-25	REGULATOR VENT: 12" OFF GROUND/ 36" FROM SPRINKLER VENT, METERS: 6" OFF GROUND. SECURED FIT WITH BRACKETS.
19724670800	402 REGENCY LN 4	ABI	2017-10-17	2018-04-06	METER J93040 402 REGENCY BLD 4 COMPLETE
19724671400	402 REGENCY LN 4	ABI	2017-10-17		
19724674400	402 REGENCY LN 4	ABI	2019-06-17	2019-06-25	REGULATOR VENT: 12" OFF GROUND/ 36" FROM SPRINKLER VENT. METERS: 6" OFF THE GROUND. FIT SECURED WITH BRACKETS.
19724674800	402 REGENCY LN 4	ABI	2019-07-09	2019-07-09	REPIPE REG VENT/PAINTED/DUGOUT METER
19724675200	404 REGENCY LN 4	ABI	2019-06-17	2019-07-01	DUGOUT METER/REPIPED REG VENT/INSTALL SUPPORT /PAINTED
19724677300	410 REGENCY LN 4	ABI	2017-10-17	2019-07-02	ALREADY DONE
19725085300	410 REGENCY LN 4	ABI	2019-06-17	2019-07-01	ASSITED CREW ALL READS NEG PIPED VENT AWAY AND ADDED SUPPORT
19725085700	412 REGENCY LN 4	ABI	2017-11-22	2019-07-02	PAINT/REPIPE REG VENT/SUPPORT
19725085800	412 REGENCY LN 4	ABI	2019-06-17	2019-06-27	PAINTED/DUGOUT METER/SUPPRTED/PIPE REG AWY
19725086000	414 REGENCY LN 4	ABI	2017-10-17	2019-07-08	PAINTED/DUGOUT METER/REPIPED REG.VENT
19725086100	414 REGENCY LN 4	ABI	2019-06-17	2019-07-01	ASSITED CREW ALL READS NEG PIPED VENT AWAY AND ADDED SUPPORT TO THE FIT. DUG OUT METER
19725086300	416 REGENCY LN 4	ABI	2019-06-17	2019-06-27	DUGOUT/PAINTED/PIPED REG VENT AWAY SUPPORTED FIT
19725086400	418 REGENCY LN	ABI	2019-06-17	2019-06-27	SUPPORTED/PAINTED NO REG ISSUE FOUND-SHOWED DPU IN THE FIELD
19725086500	422 REGENCY LN 4	ABI	2019-06-17	2019-07-01	DUGOUT METER/INSTALL SUPPORT/PAINTED FIT/REPIPE REG
19728242100	400 TAMARACK LN 402	ABI	2019-07-30	2019-07-30	PAINT FIT/SUPPORT FIT
19728243300	400 TAMARACK LN 404	ABI	2019-07-30	2019-07-30	SUPPORT FIT/PAINT FIT

Columbia Gas of Massachusetts
D.P.U. 19-PL-08
November 15, 2019
Page 4 of 4

Table 2-Completed (CIS) Remediation's Locations Identified in Exit Letter

Job Order	Address	Cty Cd	Complete Dt	Execute Comments
248486301	402 REGENCY LN	ABI	7/1/2019	CHANGED METER 7/1/19
805066302	410 REGENCY LN	ABI	7/1/2019	CHANGED METER 7/1/19
484066302	412 REGENCY LN	ABI	7/1/2019	CHANGED METER 7/1/19
299676306	414 REGENCY LN	ABI	7/1/2019	CHANGED METER 7/1/19
261276301	416 REGENCY LN	ABI	7/1/2019	CHANGED METER 7/1/19
689657303	418 REGENCY LN	ABI	9/25/2019	METER CHANGED 9/25/19
33186307	422 REGENCY LN	ABI	7/1/2019	CHANGED METER 7/1/19
44766306	303 REGENCY LN	ABI	6/24/2019	CHANGED METER 6/24/19
205736304	301 REGENCY LN	ABI	8/1/2018	METER CHANGED 8/1/18
279786305	309 REGENCY LN	ABI	6/24/2019	CHANGED METER 6/24/19
204276304	311 REGENCY LN	ABI	6/24/2019	CHANGED METER 6/24/19
205736304	313 REGENCY LN	ABI	6/26/2019	CHANGED METER 6/26/19
694966308	315 REGENCY LN	ABI	6/26/2019	METER CHANGED 6/26/19
627866308	323 REGENCY LN	ABI	6/26/2019	METER CHANGED 6/26/19
668676306	321 REGENCY LN	ABI	6/26/2019	METER CHANGED 6/26/19
610286308	400 HAMPTON WAY 410	ABI	7/15/2019	METER CHANGED 7/15/19

The Company appreciates the opportunity to provide information on the areas of concern identified by the Division in the Exit Letter, including Tables 1 and 2, which demonstrate the Company has remediated all AOCs identified by the Department. The Company is committed to supporting the Division's investigation and furthering those efforts in a productive manner, including by meeting with the Division to discuss the matters set forth herein.

Also enclosed is a Motion for Protective Treatment for customer information.

Please do not hesitate to contact me with any questions you may have.

Sincerely,



Katherine M. Silver

cc: Laurie E. Weisman, General Counsel, DPU
Terrence Townsend, Public Utilities Engineer
Justin R. Evans, Public Utilities Engineer
George Sheehan, Public Utilities Engineer
Martin Poulin, V.P. & General Manager, CMA
Kenneth Christman, Esq, NCSC
Shaela Collins, Director, Regulatory Policy, CMA
Sara Rundell, Senior Counsel, NCSC
Mark Kempic, President, CMA
Kevin Sullivan, Manager, Operating Center Brockton, CMA

LOCATION: 301 REGENCY LANE

DATE OF PHOTO: 9/8/2020





Distribution Operations

Gas Standard

Effective Date: 08/01/2017	Meter Set Assembly Location and Installation Requirements	Standard Number: GS 3020.035
Supersedes: 06/01/2016		Page 1 of 12

Companies Affected:

<input type="checkbox"/> NIPSCO	<input checked="" type="checkbox"/> CGV	<input checked="" type="checkbox"/> CMD
	<input checked="" type="checkbox"/> CKY	<input type="checkbox"/> COH
	<input checked="" type="checkbox"/> CMA	<input checked="" type="checkbox"/> CPA

REFERENCE 49 CFR Part 192.353, 192.355, 192.357, 192.467, 192.479, 24 CFR Part 3280

1. GENERAL

Each meter and service regulator, whether inside or outside a building, must be installed in a readily accessible location and be protected from corrosion and other damage, including, if installed outside a building, vehicular damage that may be reasonably anticipated.

For the purpose of this standard, "readily accessible" means having direct access (e.g., located outdoors), without the need to remove/open any panel, door, or similar obstruction, and with ample space for maintenance or replacement of the meter and/or regulator.

The purpose of this standard is to provide guidance for the location and installation of meter set assemblies.

For the purpose of this standard, a meter set assembly also includes, where installed, first/second/third cut (as required) service regulators.

2. MATERIALS

Company approved drawings should be used to fabricate meter set assemblies. In cases where a Company approved drawing is not available, use only Company stocked materials (i.e., items stocked by warehousing partner) or materials identified on Company approved drawings. Materials used shall meet or exceed the maximum allowable operating pressure (MAOP) or design pressure of the inlet and outlet pressure systems, respectively. Contact local Field Engineering for design assistance regarding high pressure meter set assemblies with no corresponding Company approved drawing, if necessary.

The use of close all-thread nipples is prohibited.

Connections made of lead or other easily damaged material shall not be used in the installation of meters or regulators.

3. PROTECTION FROM ATMOSPHERIC CORROSION

All above ground piping that is part of the meter set assembly shall be coated or painted with an approved material in accordance with GS 1420.050 "Coating Methods for Fabricated Stations & Settings."

This document is considered CONTROLLED only when viewed electronically on the Company's intranet. Printed or other electronic copies may not be current, and the intranet version should be used to verify.



Distribution Operations

Gas Standard

Effective Date: 08/01/2017	Meter Set Assembly Location and Installation Requirements	Standard Number: GS 3020.035
Supersedes: 06/01/2016		Page 2 of 12

Refer to the applicable GS 1450.010 “Atmospheric Corrosion” and GS 1650.020 “Inspection of Risers and Meter Set Assemblies for Abnormal Operating Conditions” for inspection, documentation and remediation requirements with respect to atmospheric corrosion.

4. METER SET ASSEMBLY LOCATION

The preferred location of a meter set assembly is outside a building.

The meter set assembly should be installed in a location where damage from outside forces is not reasonably expected to occur. Examples include, but are not limited to, vehicular traffic, snow and ice, construction equipment, and falling objects. Avoid installing the meter set assembly under fire escapes.

Outside meter set assemblies shall be located such that potential damage from snow accumulation and/or falling ice and snow is limited. Locating the meter set assembly along an outside building wall under a roof gable or overhang should be sufficient protection.

The following factors should be considered when selecting a suitable location for the meter set assembly.

- a. Type of road (e.g. private, residential, federal or state highway, limited access highway).
- b. Road attributes (e.g. curb/no curb, guide rail/no guide rail, etc.).
- c. Function of driveway (e.g., residential, commercial, industrial).
- d. Type of off-road activity (e.g., four-wheeling, snowmobiling, farming operations).
- e. Natural barriers, (e.g. swales, earth embankments, terrain, etc.).
- f. Weather-related conditions (e.g., ice, snow, snow removal).

When it is not possible to install the meter set assembly as outlined in this section, protection shall be provided as indicated in GS 3020.040 “Meter Set Assembly Protection Residential and Small Commercial.”

When it is necessary to install a meter set assembly inside a building, refer to Section 6 “Meters and Regulators Installed Inside a Building” below for meter and regulator location requirements.

5. MANIFOLD METER INSTALLATIONS

A master meter valve shall be installed on the riser, except as noted below. Individual meter valves controlling each meter shall also be installed.

Exception: For an existing manifold of less than six (6) meters served by a Low Pressure system, no master meter valve is required.



Distribution Operations

Gas Standard

Effective Date: 08/01/2017	Meter Set Assembly Location and Installation Requirements	Standard Number: GS 3020.035
Supersedes: 06/01/2016		Page 3 of 12

If a single service regulator is installed serving multiple meters, a master meter valve shall be installed upstream of the service regulator on the riser in addition to individual meter valves controlling each meter.

If individual service regulators are installed for each meter, the meter valves shall be installed upstream of each service regulator in addition to the master meter valve installed on the riser.

On new or replaced manifold meter settings, each meter shall be identified with a weather proof tag at the meter valve, meter bar, or house piping, as close as practical to the meter, indicating the apartment number or address that it serves. On existing meter manifolds, when gas is turned on to one or more of the meters on the manifold, the meter shall be identified with a weather proof tag at the meter valve, meter bar, or house piping as close as practical to the meter indicating the apartment number or address that it serves.

6. METERS AND REGULATORS INSTALLED INSIDE A BUILDING

Meters installed inside a building must be located in a ventilated space and not less than three (3) feet from any source of ignition or heat which might damage the meter.

Each service regulator installed within a building must be located as near as practical to the point of service line entrance. Refer to Section 8 below for regulator venting requirements.

Where feasible, the upstream regulator in a series must be located outside the building, unless it is located in a separate metering or regulating building.

For meter set assemblies installed inside a warehouse, manufacturing, or similar building, consider protection from mobile equipment (e.g., forklifts) and potential falling objects.

7. METER CLEARANCE

The distance between the meter and any obstruction to the sides, rear, top, or bottom should be a minimum of six (6) inches but in no case shall the meter touch the ground. Distance between the meter and any obstruction from the front should be a minimum of 36 inches, with the exception of meter protection.

It is preferred not to install a meter set assembly under a deck/porch. However, if no other options are practical, a meter set assembly shall have sufficient access to allow for future maintenance and operation of the meter and operation of the shut-off valve. For such installations, follow the requirements contained in Section 8 below for regulator vent line installation.

8. SERVICE REGULATOR VENT REQUIREMENTS

Meter set assemblies with service regulator(s) shall comply with the requirements of this section. This section is not applicable for meter set assemblies supplied from low pressure pipelines or those without service regulator(s).



Distribution Operations

Gas Standard

Effective Date: 08/01/2017	Meter Set Assembly Location and Installation Requirements	Standard Number: GS 3020.035
Supersedes: 06/01/2016		Page 4 of 12

Service regulator vents and relief vents shall terminate outdoors where gas from the vent can escape freely into the atmosphere and away from any opening(s) into a building.

Consideration should be given as to the location of the service regulator and/or relief device to avoid sources of ignition and the possibility of vent terminal freeze-ups. Regulator vent skirts or a vent line extending the vent terminal away from the potential source of moisture should be considered if the potential for vent terminal blockage due to freeze-up is evident.

The regulator and/or relief device vent; vent line, if so equipped; screen; and cap, if present; shall be properly sized, installed, and free of blockage, restrictions or valves, with no external leakage.

Consideration should be given for protection of regulator or relief vents that are located remote from the meter set assembly. Refer to guidance in GS 3020.040 "Meter Set Assembly Protection Residential and Small Commercial."

8.1 Aboveground Vent Lines

When a regulator and/or relief device is located inside a building, each regulator and/or relief device shall have a separate metallic relief vent line vented to the outdoors so in the event gas is discharged, it will not create a hazard. Under no circumstance shall the relief vent lines of separate regulators and/or relief devices be manifolded.

If tubing is used for the relief vent line, it shall be metallic and one size larger than the relief opening. In no case shall corrugated tubing be used as a regulator relief vent line.

Relief vent lines shall be as short as possible, and when in excess of ten (10) feet in length or contain more than two (2) elbows, shall be increased one nominal pipe size for each additional ten (10) feet of length. Each elbow in the vent line will contribute approximately three (3) feet in effective length, including the termination elbow.

Service regulators installed outdoors of a building requiring a relief vent line, may be equipped with a PVC vent line conforming to UL 651, schedule 40 or schedule 80 rigid PVC conduit, secured with PVC compatible joining cement/adhesive. Under no circumstance shall the relief vent line be combined with another regulator relief vent line. The same sizing guidance provided above applies.

8.2 Belowground Vent Lines

That portion of the regulator vent line that is exposed shall be installed in accordance with the requirements set forth in Section 8.1 of this standard. Under no circumstance shall the relief vent lines of separate regulators and/or relief devices be manifolded.

When no other alternatives exist and it becomes necessary to install a portion of the regulator vent line underground, that portion of the belowground vent line shall be constructed of:

Effective Date: 08/01/2017	Meter Set Assembly Location and Installation Requirements	Standard Number: GS 3020.035
Supersedes: 06/01/2016		Page 5 of 12

- a. Steel pipe in accordance with the requirements in the 3020 Series of the Gas Standards and protected against corrosion in reference to the 1400 series of the Gas Standards, or
- b. Polyethylene pipe installed in accordance with the 3020 Series of the Gas Standards.

Relief vent lines shall be as short as possible, and when in excess of ten (10) feet in length or contain more than two (2) elbows (including the termination elbow), shall be increased one nominal pipe size for each additional ten (10) feet of length. Each elbow in the vent line will contribute approximately three (3) feet in effective length. All elbows and fittings shall be welded by a qualified welder in accordance with the applicable Company Welding Manual.

Record the location of belowground vent lines within the sketch area on Form GS 3020.012-1 "Service Line Record" in accordance with GS 3020.012 "Service Line Records."

8.3 Service Regulator Vent Terminal Requirements

NOTE: All measurements shall be taken from the service regulator vent terminal (relief opening) (see Exhibits A and B).

Except as noted below, the vent terminal:

- a. Shall be installed outdoors above grade, at a minimum height of 12 inches above grade.
- b. In flood-prone areas (refer to Columbia Gas Emergency Manual Form 6.14), a minimum height in excess of 12 inches may be required to prevent the entry of water into the vent terminal.
- c. Shall be installed to protect it from the entry of insects by a screen or an approved vent cap, and be installed so as to prevent the entry of rainwater.
- d. Shall be located not less than three (3) feet radially and not directly below any rotating electrical equipment (e.g., an air conditioning unit).
- e. Should be installed with a minimum of three (3) feet radial separation from an electric meter, electric panel, electric outlet, electric pedestal, electrical equipment disconnect, or pad mounted transformer, etc. When it is not possible to install the regulator vent terminal with a three (3) foot radial separation, a minimum of one (1) foot radial separation shall be maintained between the regulator vent terminal and any of the electric equipment listed above.
- f. Shall be located three (3) feet radially from, and not below, any first floor opening into a building, such as a door, window(s) (that can be opened) or other gravity air opening(s) into a building (including clothes dryer exhaust terminals, and appliance air intakes).



Distribution Operations

Gas Standard

Effective Date: 08/01/2017	Meter Set Assembly Location and Installation Requirements	Standard Number: GS 3020.035
Supersedes: 06/01/2016		Page 6 of 12

- g. Shall be located not less than ten (10) feet radially from, and not below any forced air inlet into a building (excluding appliance air intakes).

NOTE: It may be acceptable for reduced clearances from building openings and potential sources of ignition when approved self-operated diaphragm service regulators equipped with over pressure protection and vent limiting devices are installed.

9. METER ALIGNMENT AND SUPPORT

Each meter set assembly shall be installed in such a manner as to minimize stress on both the piping and the meter and/or service regulator. A meter set assembly shall be supported by at least one of the following methods:

- a. Wall bracket (see Exhibit C).
- b. Support stakes (see Exhibit D).
- c. Other methods approved by leadership.

NOTE: Corrosion control methods should be considered when supporting a meter set assembly. Refer to GS 1420.050 "Coating Methods for Fabricated Stations and Settings" for guidance on coatings to be used above ground and at the soil-to-air interface for the support structure, as well as the meter set assembly. Refer to GS 1420.530 "Installation of Insulators" for guidance on insulating the setting from the support structure, if necessary.

10. MOBILE HOME/MANUFACTURED HOME METER SET ASSEMBLY – ADDITIONAL REQUIREMENTS

- a. The meter set assembly (including service regulator if necessary), shall be rigidly supported at the service riser and at the house line outlet on the mobile/manufactured home (manufactured home). See Exhibit E.
- b. The meter set assembly shall be connected to the mobile/manufactured home gas supply connection by a listed gas supply connector for manufactured homes, not less than ¾ inch I.D. tubing size, with a rated capacity equal to, or greater than the connected Btu/h rating of the connected appliances. The gas supply connection shall not be located beneath an exit door of the manufactured home and the connector end must be located outside of the skirting. See Exhibit E.
- c. The gas pressure serving a manufactured home shall not exceed 14 inches water column.
- d. All manufactured homes utilizing fuel gas for any purpose shall be equipped with a natural gas piping system that is acceptable for LP-gas.



Distribution Operations

Gas Standard

Effective Date: 08/01/2017	Meter Set Assembly Location and Installation Requirements	Standard Number: GS 3020.035
Supersedes: 06/01/2016		Page 7 of 12

11. CHECK METER SETTING FOR INSULATION

A visual check shall be made to ascertain that an insulator between the house lines and service line is installed. When the service line or gas carrying portion of the riser is metallic, the meter insulator shall be electrically tested with an approved instrument (refer to GS 1430.250 "Verifying Electrical Continuity and Isolation") to ensure that the insulator is working properly. If none exists or the existing one is ineffective, a new insulator shall be installed in accordance with GS 1420.530 "Installation of Insulators."

12. PREVENTING ELECTRICAL SHOCK

Personnel working at a customer's premise need to be aware of potential electrical shock hazards. To reduce the risk of an electric shock, employees shall make contact with the gas piping on both the inlet and outlet side of the meter set assembly with a volt meter, or at a minimum, with a non-contact voltage detector prior to any contact with the meter set assembly. Refer to HS&E Safety Notice, "Electrical Hazard - Electrical Current on a Meter Setting."

If voltage is detected, discontinue work at the site and contact the Integration Center to generate an order for service personnel to further investigate the voltage. Refer to GS 6500.100 "Residential and Small Commercial Meter Requirements" for additional guidance.

13. METER AND/OR REGULATOR BURIED ENCLOSURES

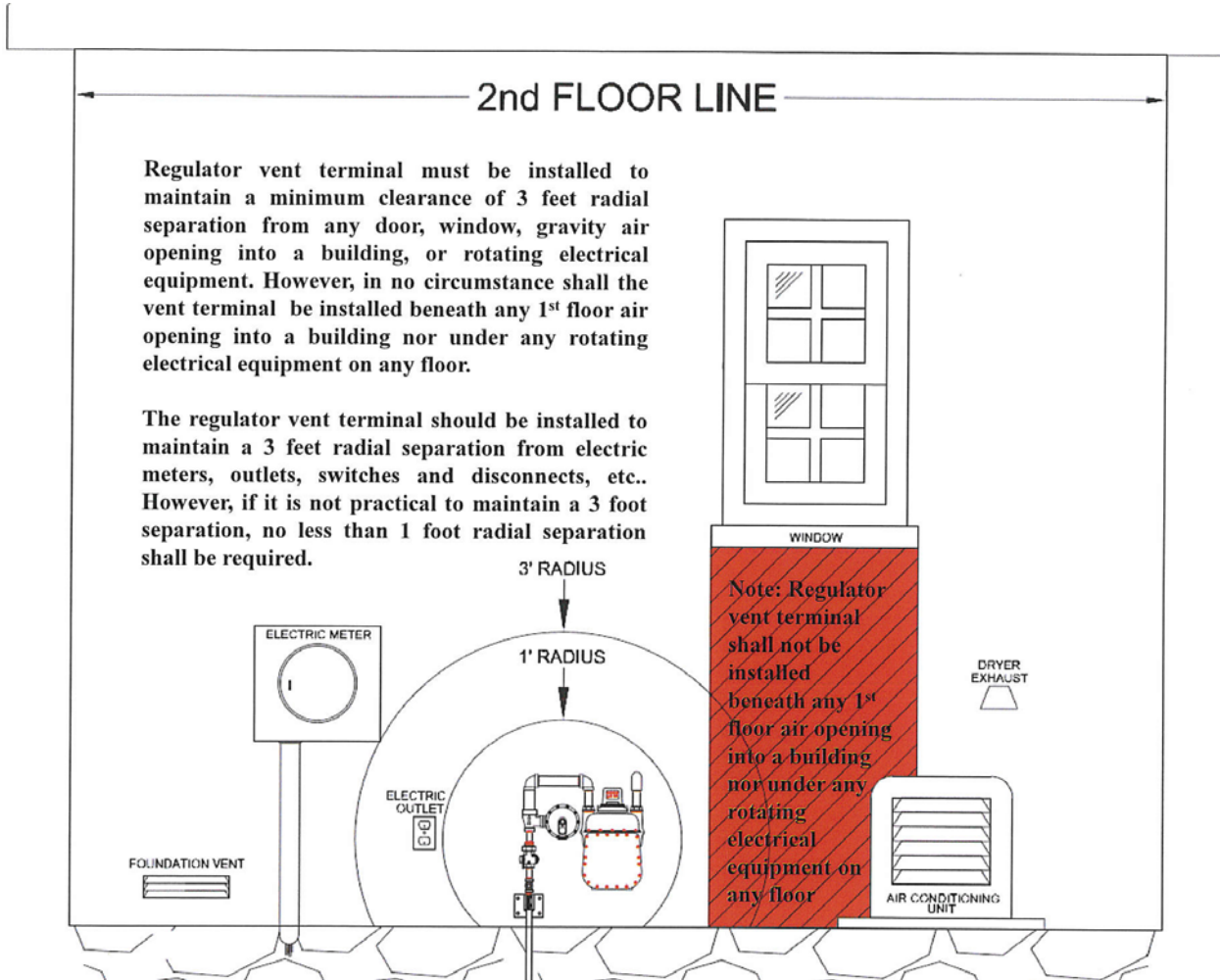
The preference is to install customer meters and/or regulators above ground. However, if the installation of the meter and/or regulator in a buried enclosure is necessary, the installation should be planned in a location outside of anticipated vehicular traffic. If vehicular traffic cannot be avoided, the enclosure that houses a customer meter and/or regulator shall be able to support that traffic. Contact local Field Engineering or Gas Transmission and M&R Design for design assistance if the enclosure cannot be located outside of anticipated vehicular traffic.

14. RECORDS

The meter set assembly location and the location of belowground vent lines shall be recorded on Form GS 3020.012-1 "Service Line Record" in accordance with GS 3020.012 "Service Line Records."

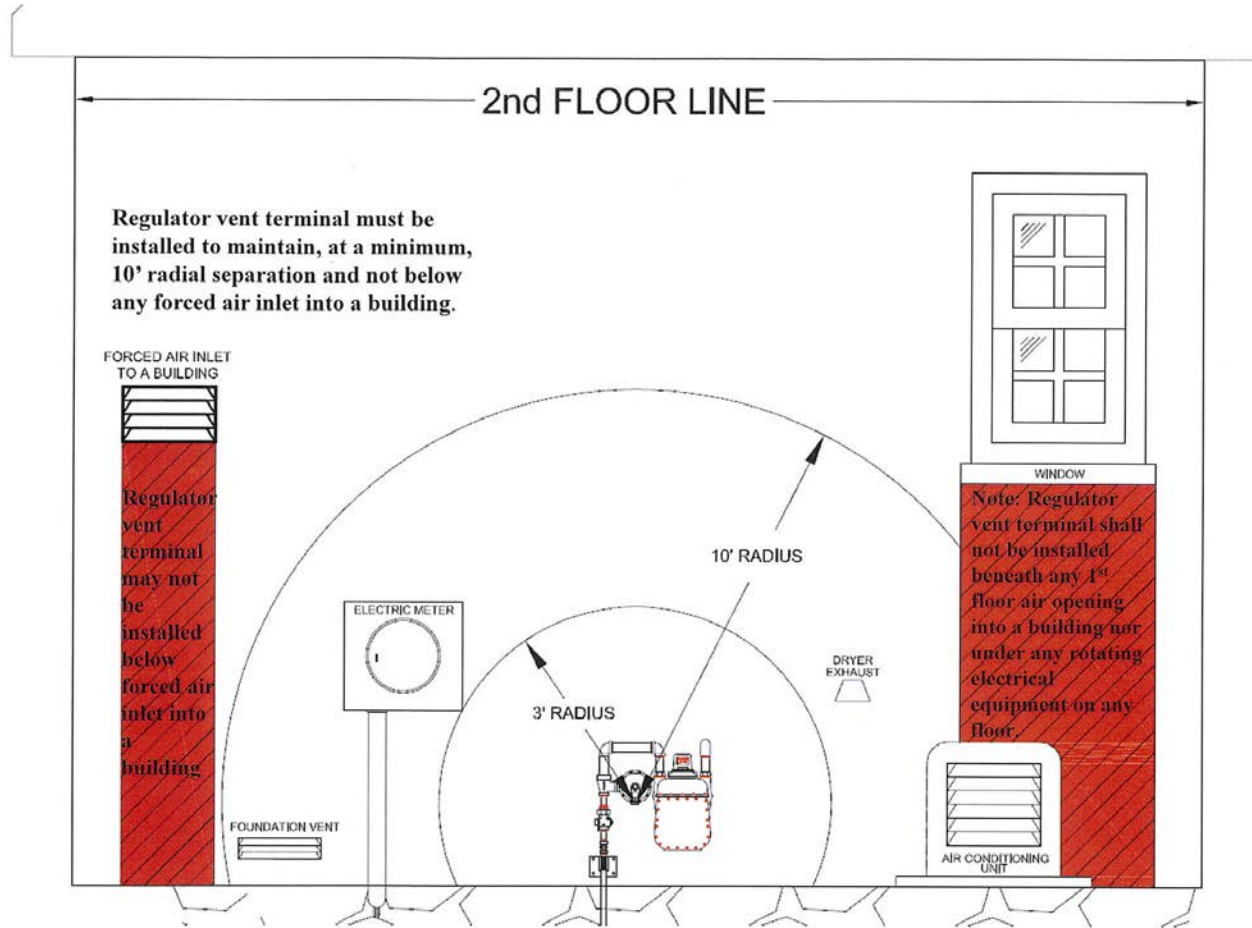
Effective Date: 08/01/2017	Meter Set Assembly Location and Installation Requirements	Standard Number: GS 3020.035
Supersedes: 06/01/2016		Page 8 of 12

EXHIBIT A



Effective Date: 08/01/2017	Meter Set Assembly Location and Installation Requirements	Standard Number: GS 3020.035
Supersedes: 06/01/2016		Page 9 of 12

EXHIBIT B



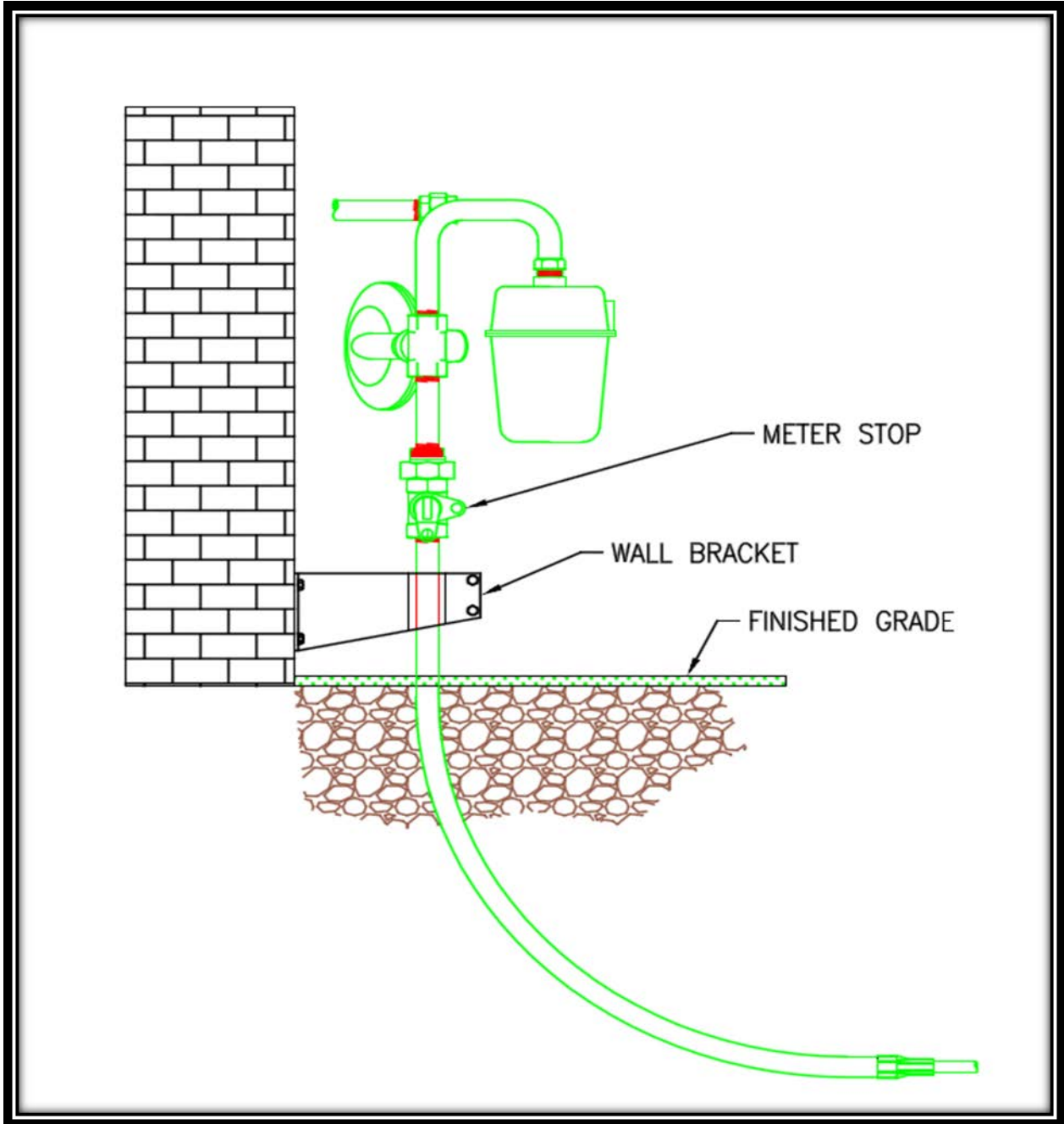


Distribution Operations

Gas Standard

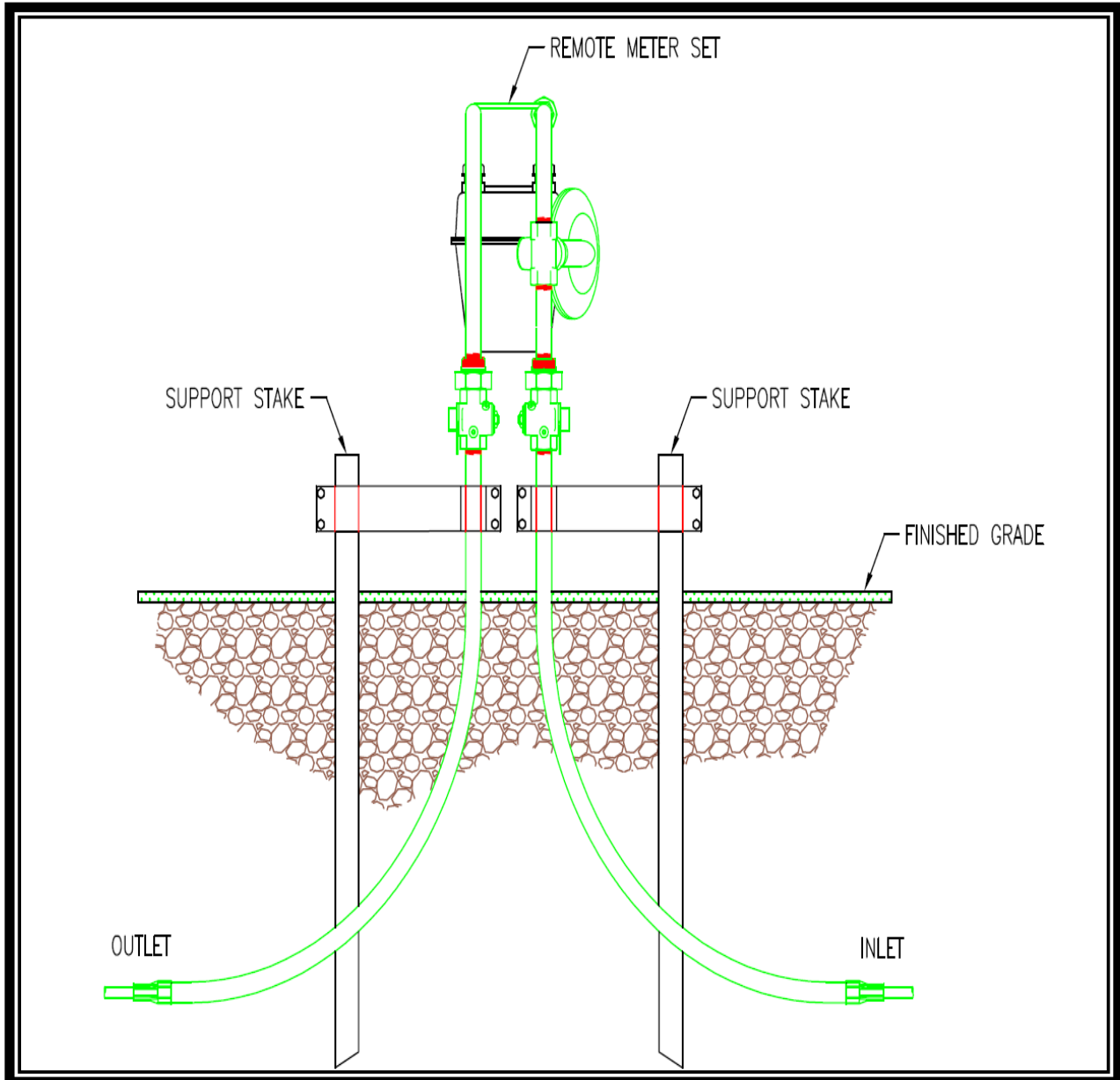
Effective Date: 08/01/2017	Meter Set Assembly Location and Installation Requirements	Standard Number: GS 3020.035
Supersedes: 06/01/2016		Page 10 of 12

EXHIBIT C



Effective Date: 08/01/2017	Meter Set Assembly Location and Installation Requirements	Standard Number: GS 3020.035
Supersedes: 06/01/2016		Page 11 of 12

EXHIBIT D



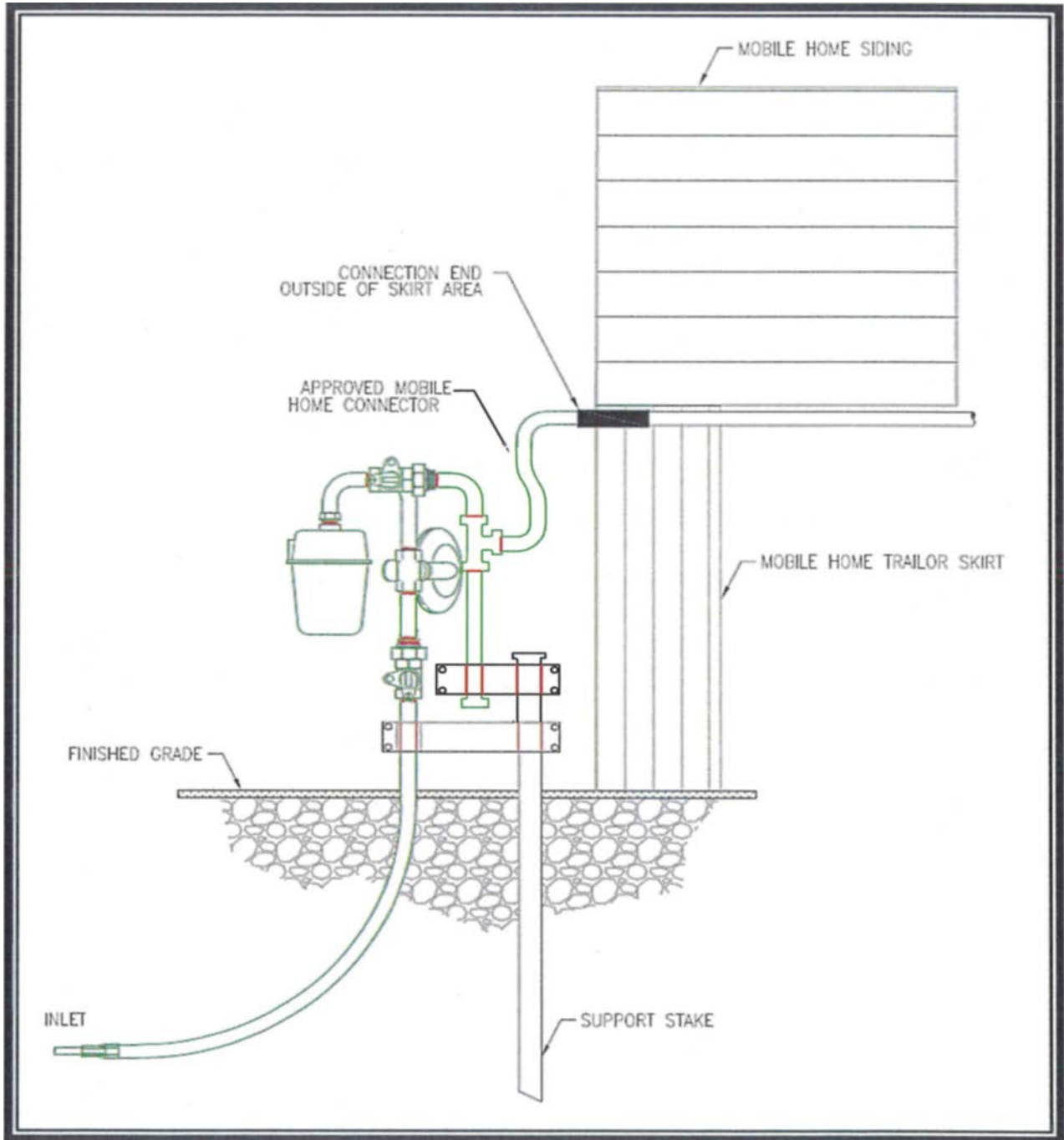


Distribution Operations

Gas Standard

Effective Date: 08/01/2017	Meter Set Assembly Location and Installation Requirements	Standard Number: GS 3020.035
Supersedes: 06/01/2016		Page 12 of 12

EXHIBIT E





Distribution Operations

Gas Standard

Effective Date: 06/01/2016	Meter Set Assembly Protection Residential and Small Commercial	Standard Number: GS 3020.040
Supersedes: N/A		Page 1 of 7

Companies Affected:

<input type="checkbox"/> NIPSCO	<input type="checkbox"/> CGV	<input checked="" type="checkbox"/> CMD
	<input checked="" type="checkbox"/> CKY	<input checked="" type="checkbox"/> COH
	<input checked="" type="checkbox"/> CMA	<input checked="" type="checkbox"/> CPA

REFERENCE Title 49 CFR 192.353

1. GENERAL

Each meter and service regulator, whether inside or outside a building, shall be installed in a readily accessible location and be protected from corrosion and other damage, including, if installed outside a building, vehicular damage that may be reasonably anticipated.

For the purpose of this standard, "readily accessible" means having direct access (e.g., located outdoors), without the need to remove/open any panel, door, or similar obstruction, and with ample space for maintenance or replacement of the meter and/or regulator.

This standard sets forth the requirements for protecting new, replaced, and existing residential and small commercial outside meter set assemblies. For the purpose of this standard, a meter set assembly also includes, where installed, first/second/third cut (as required) service regulators.

For large commercial and industrial meter set assembly and/or service regulator protection requirements, refer to the following applicable gas standards.

GS 2300.030, "Metering Station Design-8C to 23M Rotary Meters"	GS 2300.040, "Metering Station Design-Turbine Meters"
--	---

For existing meter protection that does not meet the requirements of this gas standard (e.g., no meter protection; inadequate meter protection, such as smaller bollards or inadequate bollard spacing), document and remediate according to the applicable version of GS 1650.020 "Inspection of Risers and Meter Set Assemblies for AOCs" or GS 1650.020(VA) "Inspection Program for Risers and Meter Set Assemblies for AOCs." If no version of GS 1650.020 is applicable, report meter set assembly protection concerns to local leadership.

2. LOCATION

For meter set assembly location requirements, refer to GS 3020.035 "Meter Set Assembly Location and Installation Requirements."

When it is not possible to install the meter set assembly as outlined in GS 3020.035 "Meter

<p><i>This document is considered CONTROLLED only when viewed electronically on the Company's intranet. Printed or other electronic copies may not be current, and the intranet version should be used to verify.</i></p>



Distribution Operations

Gas Standard

Effective Date: 06/01/2016	Meter Set Assembly Protection Residential and Small Commercial	Standard Number: GS 3020.040
Supersedes: N/A		Page 2 of 7

Set Assembly Location and Installation Requirements,” protection shall be provided as indicated in Section 3 below.

3. INSTALLATION OF METER SET ASSEMBLY PROTECTION

3.1 Protection from Vehicular Damage - Bollards

Except for an engineered meter set assembly protection design, bollards shall be installed to protect the meter set assembly as set forth in this section.

See Exhibits A, B, C, D and E for typical bollard application, spacing and installation requirements.

3.2 Protection from Snow and Ice

Where a roof overhang does not cover the meter set assembly, consideration shall be given to providing additional protection (e.g., protective meter enclosure) in locations where it is reasonably anticipated that snow or ice accumulation could negatively impact the meter set.

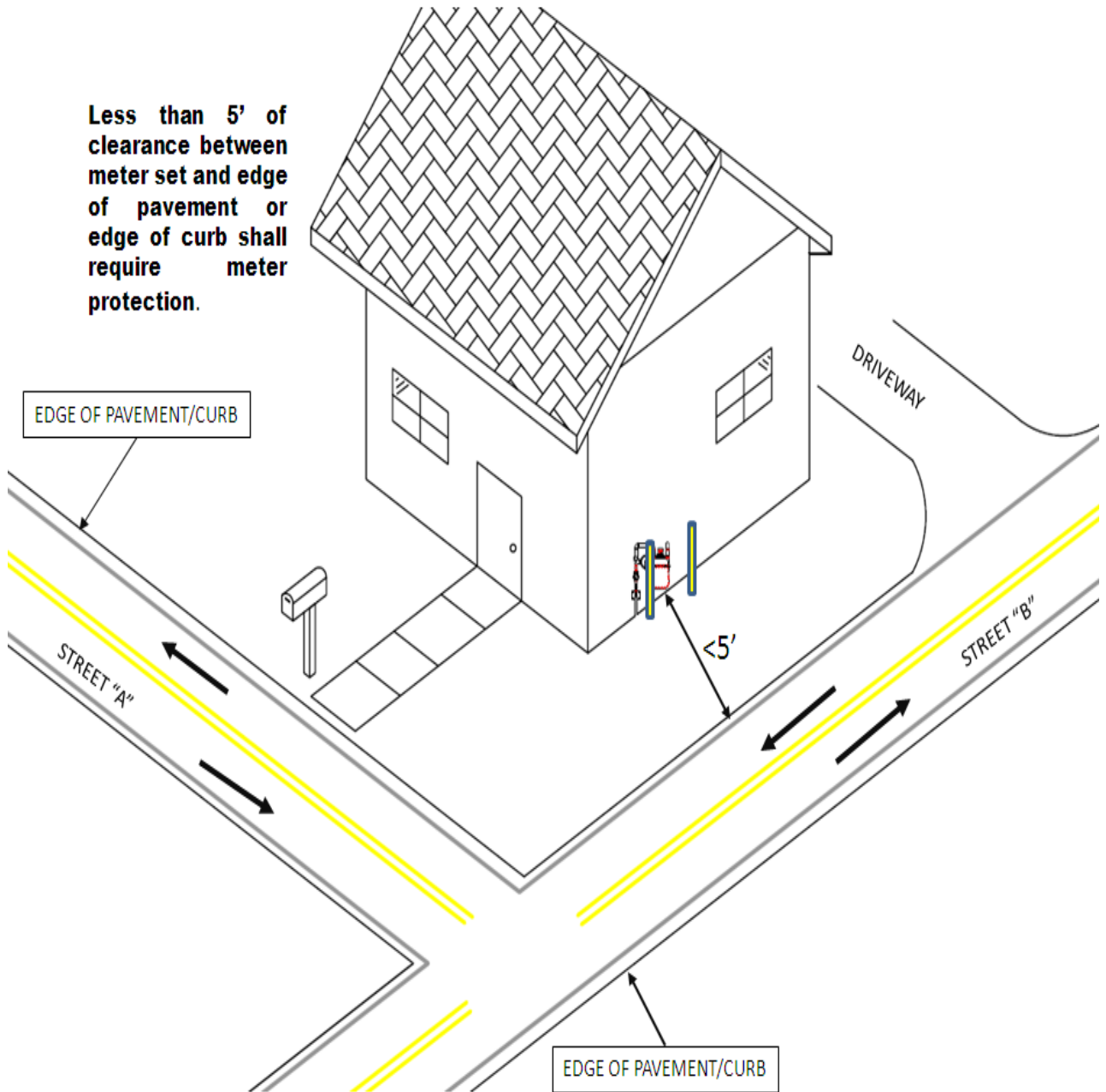


Distribution Operations

Gas Standard

Effective Date: 06/01/2016	Meter Set Assembly Protection Residential and Small Commercial	Standard Number: GS 3020.040
Supersedes: N/A		Page 3 of 7

EXHIBIT A



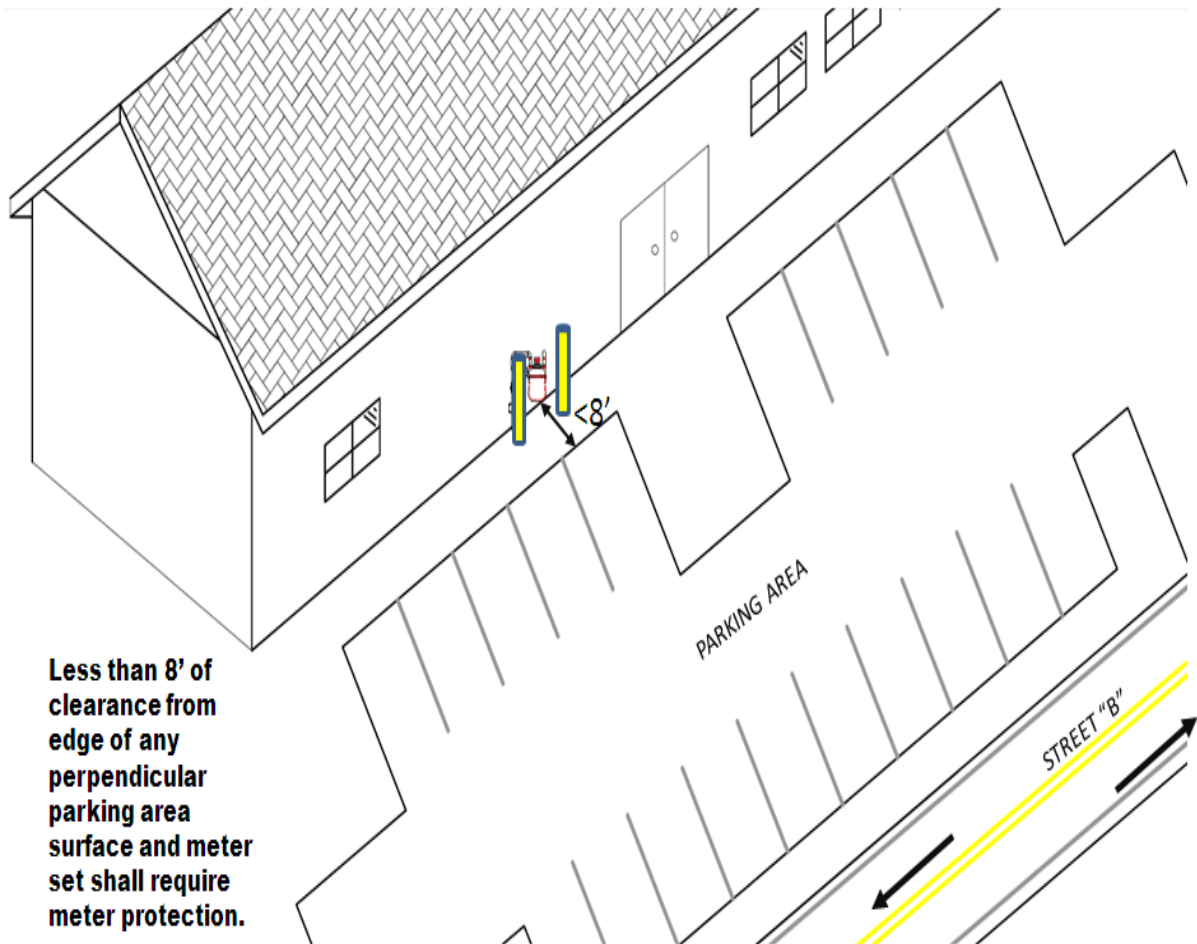


Distribution Operations

Gas Standard

Effective Date: 06/01/2016	Meter Set Assembly Protection Residential and Small Commercial	Standard Number: GS 3020.040
Supersedes: N/A		Page 4 of 7

EXHIBIT B





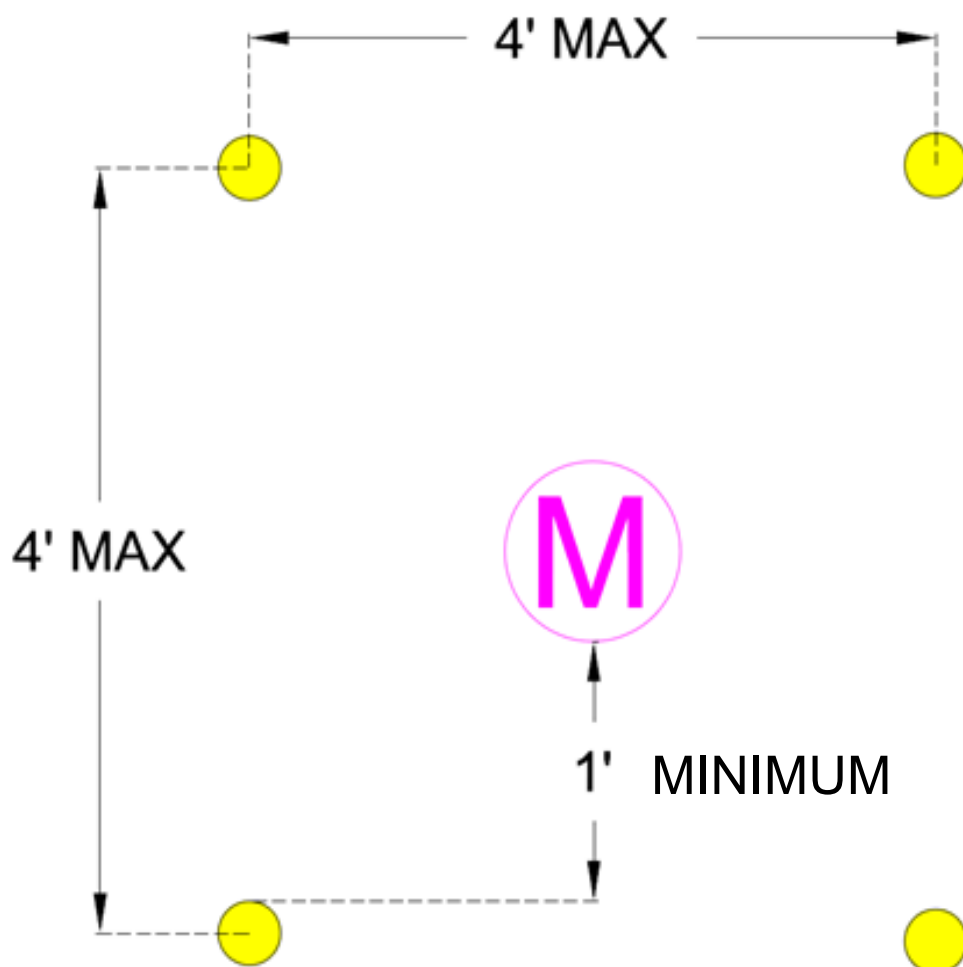
Distribution Operations

Gas Standard

Effective Date: 06/01/2016	Meter Set Assembly Protection Residential and Small Commercial	Standard Number: GS 3020.040
Supersedes: N/A		Page 5 of 7

EXHIBIT C

Typical Remote Meter Set



NOTE: Actual site location will dictate if bollards need to be spaced closer than 4' apart (e.g., farm field or wooded area where snowmobiles or all-terrain vehicle may be anticipated in the area.)



Distribution Operations

Gas Standard

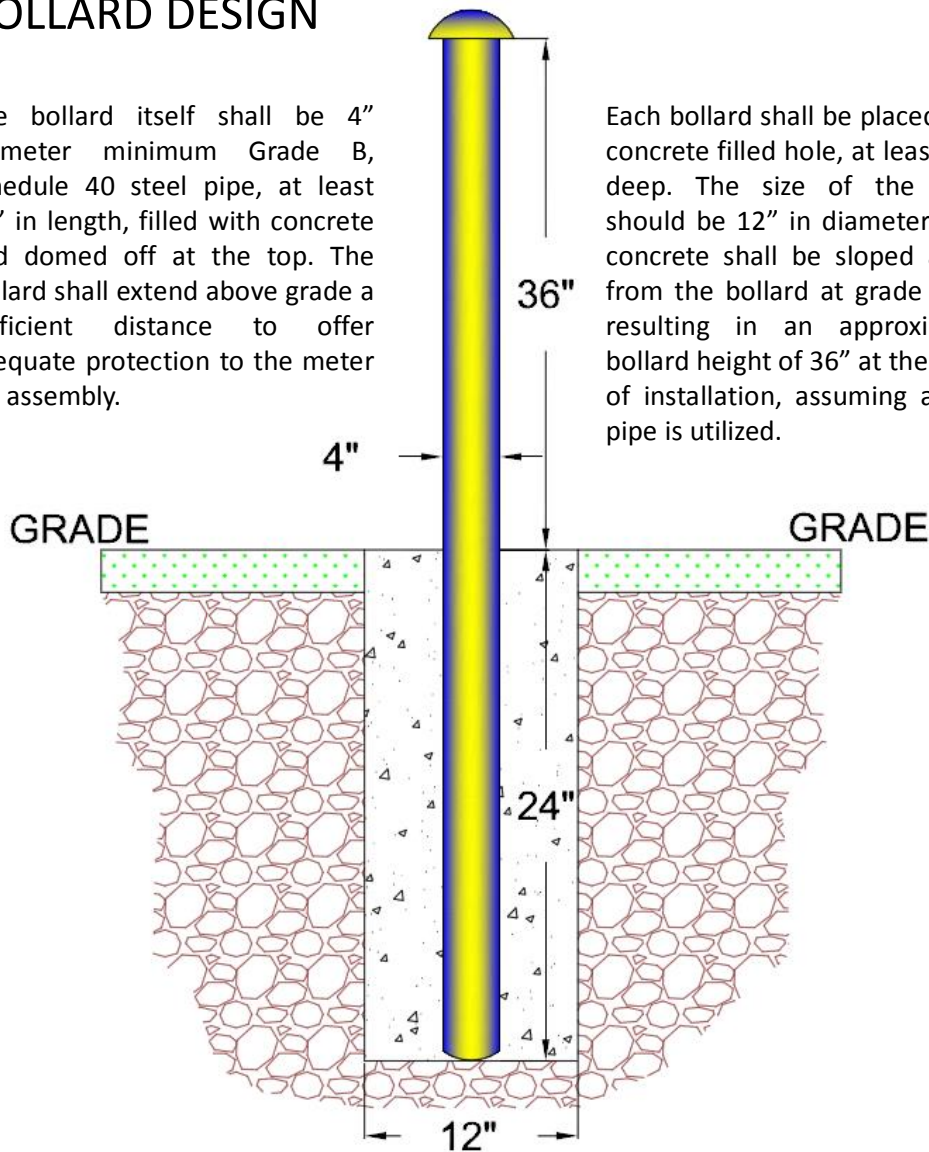
Effective Date: 06/01/2016	Meter Set Assembly Protection Residential and Small Commercial	Standard Number: GS 3020.040
Supersedes: N/A		Page 6 of 7

EXHIBIT D

**STANDARD
BOLLARD DESIGN**

The bollard itself shall be 4" diameter minimum Grade B, schedule 40 steel pipe, at least 60" in length, filled with concrete and domed off at the top. The bollard shall extend above grade a sufficient distance to offer adequate protection to the meter set assembly.

Each bollard shall be placed in a concrete filled hole, at least 24" deep. The size of the hole should be 12" in diameter. The concrete shall be sloped away from the bollard at grade level resulting in an approximate bollard height of 36" at the time of installation, assuming a 60" pipe is utilized.





Distribution Operations

Gas Standard

Effective Date: 06/01/2016	Meter Set Assembly Protection Residential and Small Commercial	Standard Number: GS 3020.040
Supersedes: N/A		Page 7 of 7

EXHIBIT E

Bollard Installation Requirements

- Meter settings located less than 5 feet from a roadway, driveway or driving surface edge or road side edge of curb, shall be protected by the installation of at least 2 bollards.
- Meter settings exposed to perpendicular vehicle parking shall have at least 2 bollards installed if the curb edge or edge of driving surface is less than 8 feet from the meter set.
- Maximum spacing of bollards is 4 feet on center.
- If more than 2 bollards are required to protect the meter set assembly, the maximum spacing of the bollards shall not exceed 4 feet.
- Bollards shall be installed no closer than 1 foot from the front of the meter set assembly and shall be positioned to allow adequate room for operation and maintenance activities.

NOTES: A deviation from the standard 4” diameter bollard may be considered in residential, low speed, locations (e.g., where meter protection is required due to close proximity to a driveway). Any deviation from the above requirements shall be approved by local leadership overseeing the installation of the bollards and documented on the Service Line Record (see GS 3020.012 “Installation of Service Lines – Records”).

TOPIC:	Training on gas standards GS 3020.035 and GS 3020.040	
Employee Name	Date of Training	Instructor(s)
Mark Bishop	8/18/2020	Alyssa Severino
Chris Deluca	8/18/2020	Alyssa Severino
Jim Flaherty	8/18/2020	Alyssa Severino
Mike DiChristopher	8/18/2020	Alyssa Severino
Tom McCarthy	8/18/2020	Alyssa Severino
Clint Shone	8/18/2020	Alyssa Severino
Richard Gardner	8/18/2020	Alyssa Severino
Brian Kelleher	8/18/2020	Alyssa Severino
Thomas Werbiskis	8/22/2020	George Ghareeb
Jeffery Kolodziej	9/15/2020	George Ghareeb
Stephen Andras	9/15/2020	George Ghareeb
Robert Biron	8/22/2020	George Ghareeb
Walter Piekarski	9/15/2020	George Ghareeb
Dale Thouin	8/22/2020	George Ghareeb
Eric Fenton	8/22/2020	George Ghareeb
James Nodwell	8/22/2020	George Ghareeb
Grzegorz Galicki	8/22/2020	George Ghareeb
Renee Lafleche	9/15/2020	George Ghareeb
Dan Holve	8/22/2020	George Ghareeb
Scott Lessing	8/22/2020	George Ghareeb
Timothy Fitzpatrick	9/16/2020	Ken Wells
Joe Sousza	8/30/2020	Ken Wells; Jen Angelari
Brandon Ceglanski	8/20/2020	Ken Wells; Jen Angelari
Steve Bezemes	8/20/2020	Ken Wells; Jen Angelari
William Broderick	8/20/2020	Ken Wells; Jen Angelari
Dennis Matthews	8/20/2020	Ken Wells; Jen Angelari
David Murphy	Short Term Disability	
Kyle Brigham	9/16/2020	Ken Wells
Donaldo Estevam	9/16/2020	Ken Wells
Larry Bezemes	9/22/2020	Ken Wells; Jen Angelari
Mike Johnson	9/22/2020	Ken Wells; Jen Angelari
James Samowski	9/16/2020	Ken Wells
David Williams	9/22/2020	Ken Wells; Jen Angelari
Steve Malenfant	8/20/2020	Ken Wells; Jen Angelari
Robert Forester	8/20/2020	Ken Wells; Jen Angelari
Chelsea Slates	8/20/2020	Ken Wells; Jen Angelari
Lisa Broderick	8/20/2020	Ken Wells; Jen Angelari
Sharon Sumner	8/20/2020	Ken Wells; Jen Angelari
Rick Bedard	Short Term Disability	
Joe Curran	8/24/2020	Mike Francis
Steve Cassie	8/24/2020	Mike Francis
Russ Berry	8/24/2020	Mike Francis
Chris janelle	8/24/2020	Mike Francis
Michael Neal	8/24/2020	Mike Francis
Michael Sottili	8/24/2020	Mike Francis

Joseph Fiorante	8/24/2020	Mike Francis
Bob McCann	8/24/2020	Mike Francis
Brian Hanion	8/24/2020	Mike Francis
Tyler Gallardetz	9/23/2020	Mike Francis
Joshua Desrosiers	8/30/2020	Ken Wells; Jen Angelari
Frank Efezokhae	8/24/2020	Mike Francis
Sean Pollard	8/24/2020	Mike Francis
Steven fiers	8/24/2020	Mike Francis
Jeffrey Kandrotas	8/24/2020	Mike Francis
Michael Six	8/24/2020	Mike Francis
Garret Suliveras	8/21/2020	Mark Vigeant
Glen Harrington	8/21/2020	Mark Vigeant
William Dubois	8/21/2020	Mark Vigeant
Brian Donovan	8/21/2020	Mark Vigeant
Derek Souza	8/21/2020	Mark Vigeant
Sean Foley	8/21/2020	Mark Vigeant
Kevin Hanlon	8/21/2020	Mark Vigeant
Ryan Landry	8/21/2020	Mark Vigeant
Nate Carroll	8/21/2020	Chris Campo
Tim Stanton	8/22/2020	Chris Campo
Joe Sapienza	8/23/2020	Chris Campo
Angel Vargas	8/24/2020	Ray Roy
Joseph Marino	8/24/2020	Ray Roy
Ryan Howe	8/24/2020	Ray Roy
Nathan Desrochers	8/24/2020	Ray Roy
Matthew Fagundes	8/24/2020	Ray Roy
Ismael Sanabria	8/24/2020	Ray Roy
Jason Ferreira	8/24/2020	Ray Roy
Cody Malenfant	8/24/2020	Ray Roy
Victor Monroy	8/24/2020	Ray Roy
Miguel Diaz	8/24/2020	Ray Roy
Ian Dawkins	8/24/2020	Ray Roy
Joe Harrold	8/24/2020	Ray Roy
Ray McNutt	8/24/2020	Ray Roy
Raymond Roy	8/24/2020	Chris Campo
Ryan DeCoste	8/24/2020	Chris Campo
Mark Vigeant	8/24/2020	Chris Campo
Robert McCabe	8/24/2020	Chris Campo
Mike Francis	8/24/2020	Chris Campo
Thomas Leary	8/20/2020	David Bayeur
Steven Lemire	8/20/2020	David Bayeur
Brett Colson	Short Term Disability	
Paul Byrne	8/20/2020	David Bayeur
William Snow	9/14/2020	Khristina Armstrong
Jason McCarthy	8/20/2020	David Bayeur
Jason Ferrero	9/14/2020	Khristina Armstrong
Matthew Bogacz	8/20/2020	David Bayeur

Carlo Camerota	8/20/2020	David Bayeur
Thomas Fitzell	8/20/2020	David Bayeur
Shawn Riley	8/20/2020	David Bayeur
Nicholas Bisson	8/20/2020	David Bayeur
James Skrocki	9/15/2020	George Ghareeb
Jamie Buiso	8/19/2020	Rick Ross
Emmett Callahan	8/19/2020	Rick Ross
Robert Caron	8/19/2020	Rick Ross
Adam Christensen	8/19/2020	Rick Ross
Jared Cousineau	9/14/2020	Khristina Armstrong
Michael Downie	8/19/2020	Rick Ross
Artur Formejster	8/19/2020	Rick Ross
Nicholas Hedge	8/19/2020	Rick Ross
Kenneth Hodge	9/15/2020	George Ghareeb
Edward Kopyscinski	8/19/2020	Rick Ross
Anthony Manzi	8/19/2020	Rick Ross
Thomas mehlich	8/19/2020	Rick Ross
Mark Ogorzalek	8/20/2020	Rick Ross
Michael Poindexter	8/19/2020	Rick Ross
Henry Proko	8/19/2020	Rick Ross
William Richardson	8/19/2020	Rick Ross
Fernando Rodriguez	9/14/2020	Khristina Armstrong
Thomas Saloio	9/14/2020	Khristina Armstrong
Robert Say	9/14/2020	Khristina Armstrong
Geoffrey Simpson	8/19/2020	Rick Ross
Donald Veilleux	8/19/2020	Rick Ross
Gary Whalen	8/20/2020	Rick Ross
James Ramage	8/19/2020	Rick Ross
Andrew Grassetti	9/14/2020	Khristina Armstrong
Scott Ingram	8/18/2020	Mark Bronner
Keith LeBlanc	8/18/2020	Mark Bronner
Sam Loftus	8/18/2020	Mark Bronner
Matthew Rokosz	8/18/2020	Mark Bronner
Richard Rousseau	8/18/2020	Mark Bronner
Nicholas Schott	8/18/2020	Mark Bronner
Kurt Sears	8/18/2020	Mark Bronner
Jeffrey Zajac	8/18/2020	Mark Bronner
Brendan Baker	Military	
Andrew Betsold	8/13/2020	Steven Negron; John Baker
Daniel Blinn	8/13/2020	Steven Negron; John Baker
Matthew Carrington	8/13/2020	Steven Negron; John Baker
Matthew Cavallo	8/13/2020	Steven Negron; John Baker
Randolph Christian	8/13/2020	Steven Negron; John Baker
Melvin Cosme	8/13/2020	Steven Negron; John Baker
Kevin Docherty	8/13/2020	Steven Negron; John Baker
Marcio Duarte	8/13/2020	Steven Negron; John Baker
Patrick Earle	8/13/2020	Steven Negron; John Baker

Joseph Efantis	8/13/2020	Steven Negron; John Baker
John Fiorini	8/13/2020	Steven Negron; John Baker
Robert Fritz	8/13/2020	Steven Negron; John Baker
Kevin Ghareeb	9/9/2020	Steven Negron
Joshua Grandfield	8/13/2020	Steven Negron; John Baker
Conner Harris	8/13/2020	Steven Negron; John Baker
Todd Kelley	8/13/2020	Steven Negron; John Baker
Christopher Lenkowski	8/13/2020	Steven Negron; John Baker
Andrew Love	8/13/2020	Steven Negron; John Baker
Raymond Mitchell	8/13/2020	Steven Negron; John Baker
Matthew Mongeon	8/13/2020	Steven Negron; John Baker
James Moylan	8/13/2020	Steven Negron; John Baker
Federico Nieves	8/13/2020	Steven Negron; John Baker
David O'Keefe	8/13/2020	Steven Negron; John Baker
Michael Poirier	8/13/2020	Steven Negron; John Baker
Jeremy Provost	8/13/2020	Steven Negron; John Baker
Christopher Roy	8/13/2020	Steven Negron; John Baker
Johnathan Stone	8/13/2020	Steven Negron; John Baker
Jeremy Wizerman	8/13/2020	Steven Negron; John Baker
Nicholas Monahan	8/13/2020	Steven Negron; John Baker
Joseph Efantis	8/13/2020	Steven Negron; John Baker
Fernando Aguirre	8/21/2020	Robin Greeley
Kimberly Angelo	8/21/2020	Robin Greeley
Heriberto Ayala	8/21/2020	Robin Greeley
Michale Brouillette	8/21/2020	Robin Greeley
Seth Bush	8/21/2020	Robin Greeley
Stephen Lampro	9/9/2020	Robin Greeley
Peter marcotte	8/21/2020	Robin Greeley
Isaac Rivera	8/21/2020	Robin Greeley
Anthony Rogers	8/21/2020	Robin Greeley
Richard Viens	8/21/2020	Robin Greeley
John Weir	8/21/2020	Robin Greeley
Crystal Whalen	Long Term Disability	
Angel Cruz	8/21/2020	Robin Greeley
Kevin Barnes	8/21/2020	Scott Goodwin
Michael Brunelle	8/21/2020	Scott Goodwin
Luis Cotto	8/21/2020	Scott Goodwin
Brian Douthwright	8/21/2020	Scott Goodwin
Juan Fuentes	8/21/2020	Scott Goodwin
Christopher Hartmann	8/21/2020	Scott Goodwin
Jon Lamountain	9/9/2020	Robin Greeley
Daniel Maslowski	8/21/2020	Scott Goodwin
Jeremy Rodrigues	8/21/2020	Scott Goodwin
Michael Rokosz	8/21/2020	Scott Goodwin
Juan Suarez	8/21/2020	Scott Goodwin
Greg Miner	8/21/2020	Scott Goodwin
Michael Brady	8/20/2020	Carl Herisse

Francey Paul	8/20/2020	Carl Herisse
Scott Risotti	8/20/2020	Carl Herisse
Woodford Gordon	8/20/2020	Carl Herisse
Kimani Carleton	8/20/2020	Carl Herisse
Howard Lake	8/20/2020	Carl Herisse
Sean Stewart	8/20/2020	Carl Herisse
Brian Doyle	8/20/2020	Carl Herisse
Gary Parece	8/20/2020	Carl Herisse
Bret Vickery	8/20/2020	Carl Herisse
Kelan Galligan	8/20/2020	Carl Herisse
Thomas Puopolo	8/20/2020	Carl Herisse
Kyle Wasylow	8/20/2020	Carl Herisse
James Duhamel	8/28/2020	Kevin Brooks
Troy Duarte	8/28/2020	Kevin Brooks
William Greene	8/28/2020	Kevin Brooks
Nick Pothier	8/28/2020	Kevin Brooks
Brian McMullin	8/28/2020	Kevin Brooks
Josh Rameau	8/28/2020	Kevin Brooks
Michael Edwards	8/28/2020	Kevin Brooks
Bill McRae	8/28/2020	Kevin Brooks
Eric Sundberg	8/28/2020	Kevin Brooks
Chris Augenti	8/28/2020	Kevin Brooks
Paul Poitras	8/28/2020	Kevin Brooks
Brandon Lee	8/28/2020	Kevin Brooks
John Ginnetty	8/28/2020	Kevin Brooks
William Curtis	8/20/2020	Jon Hunter
Stephen Doherty	8/20/2020	Jon Hunter
Jason Ford	8/20/2020	Jon Hunter
Julie Hallisey	8/20/2020	Jon Hunter
Timothy Heath	8/20/2020	Jon Hunter
Robert Johnson	8/20/2020	Jon Hunter
Arthur Jones	8/20/2020	Jon Hunter
William Kearney	8/20/2020	Jon Hunter
John Pringle	8/20/2020	Jon Hunter
Kevin Santos	8/20/2020	Jon Hunter
Luis Travassos	8/20/2020	Jon Hunter
Stephen Doherty	8/21/2020	Steven Davis
David Larrimore	8/21/2020	Steven Davis
David Lopes	8/21/2020	Steven Davis
Tim Greene	8/21/2020	Steven Davis
Chris Asack	8/21/2020	Steven Davis
John Hallisey	8/21/2020	Steven Davis
Cole Methot	8/21/2020	Steven Davis
Adam Partee	8/21/2020	Steven Davis
Paul Francey	8/21/2020	Steven Davis
Dylan St. Laurent	8/21/2020	Steven Davis
Paul Hucksam	8/21/2020	Steven Davis

Brian Bassett	8/21/2020	Steven Davis
Brendan Wayslow	8/21/2020	Steven Davis
Corey Dixon	8/21/2020	Steven Davis
Adam Bemis	8/21/2020	Steven Davis
Jason Conly	8/20/2020	Michael Moniz
John Lettieri	8/20/2020	Michael Moniz
Rodolpho Pena	8/20/2020	Michael Moniz
Fancis Walsh	8/20/2020	Michael Moniz
Daniel Croyle	8/20/2020	Michael Moniz
David Lopes	8/20/2020	Michael Moniz
Thiago Raggi	8/20/2020	Michael Moniz
Ian Wellington	8/20/2020	Michael Moniz
John Dayter	8/20/2020	Michael Moniz
Derek Lyon	8/20/2020	Michael Moniz
Faustino Resendes	8/20/2020	Michael Moniz
Dwight Williamson	8/20/2020	Michael Moniz
Sean Devaney	8/20/2020	Michael Moniz
Ryan Pascarelli	8/20/2020	Michael Moniz
Justin Santocristo	8/20/2020	Michael Moniz
Steve Zdonek	8/20/2020	Michael Moniz
Marc Campea	8/20/2020	Adam Rivers
John Curry	8/20/2020	Adam Rivers
John Lemieux	8/20/2020	Adam Rivers
William Hill	8/20/2020	Adam Rivers
Michael Chapman	8/20/2020	Adam Rivers
Michael Daxberger	8/20/2020	Adam Rivers
David McKinnon	8/20/2020	Adam Rivers
Matthew Clifford	8/20/2020	Adam Rivers
Zack Desouza	8/20/2020	Adam Rivers
Scott Barba	8/20/2020	Adam Rivers
Daniel Cobb	8/20/2020	Adam Rivers
John Dodd	8/20/2020	Adam Rivers
Stephen Prior	8/20/2020	Adam Rivers
Victor Santiago	8/20/2020	Adam Rivers
Mike Cataloni	8/18/2020	John Stevens
Tom Monahan	8/18/2020	John Stevens
Tim Skinner	8/18/2020	John Stevens
Carlos Figueroa	8/18/2020	John Stevens
Tim Sousa	8/18/2020	John Stevens
Tom Cornetta	8/18/2020	John Stevens
Gene McKenna	8/18/2020	John Stevens
Steve kane	8/18/2020	John Stevens
Sean Kane	9/16/2020	Anthony White
Mike Clifford	8/18/2020	John Stevens
Dave Cornetta	9/16/2020	Anthony White
Steve Shea	9/16/2020	Anthony White
John Ryan	8/18/2020	John Stevens

Ralph Webber	8/18/2020	John Stevens
Habte Webb	8/18/2020	John Stevens
Ray Buffery	8/18/2020	John Stevens
John Mullins	8/18/2020	John Stevens
Duncan Anslow	8/20/2020	Robert Sacco
Brian Reis	8/20/2020	Robert Sacco
Larry Cicchetti	8/20/2020	Robert Sacco
Shane Whittaker	8/20/2020	Robert Sacco
William Beals	8/20/2020	Robert Sacco
Carlos Daveiga	8/20/2020	Robert Sacco
Chris Mellow	8/20/2020	Robert Sacco
John Spano	8/20/2020	Robert Sacco
Steve Botelho	8/20/2020	Robert Sacco
Rick French	8/20/2020	Robert Sacco
Frank Langer	8/20/2020	Robert Sacco
Peter Murphy	8/20/2020	Robert Sacco
Brian St. Onge	8/20/2020	Robert Sacco
Scott Buckley	8/20/2020	Robert Sacco
Mike Gerard	8/20/2020	Robert Sacco
William Sylvester	8/20/2020	Robert Sacco
Michael Grochowski	9/15/2020	George Ghareeb
Eric Ciecko	8/20/2020	Nick Sanchez
Mark Deforge	8/20/2020	Nick Sanchez
Felix Diaz	8/20/2020	Nick Sanchez
Daniel Leonard	8/20/2020	Nick Sanchez
Mark Raymond	8/20/2020	Nick Sanchez
Christopher Ryan	8/20/2020	Nick Sanchez
James Soares	8/20/2020	Nick Sanchez
David Whitehead	8/20/2020	Nick Sanchez