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ATTORNEYS AT LAW

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October 30, 2020

#### **VIA ELECTRONIC MAIL**

Mark Marini, Secretary Department of Public Utilities One South Station, 5<sup>th</sup> 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 (16) (26) and (29)

Supplemental

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 in the above-captioned matter, Eversource Gas Company of Massachusetts d/b/a Eversource Energy¹ ("EGMA" or the "Company") hereby provides the following supplemental responses to address the requirements of Items 16, 26, and 29 of the Consent Order. Also enclosed is the Company's Motion for Protective Treatment.

#### Compliance Agreement Requirement (16)

Within 45 days of the effective date of this Order, CMA shall provide documentation to the Department to show that it has completed all action items developed, based on key failures addressed in the incident report with Item 15.

#### Supplemental Response

In the Company's original response to Compliance Agreement Requirement (16), the Company provided completion detail for each action item developed following the incidents referenced in Compliance Agreement Requirement (15). Items South Main St 3, South Main St 9 and South Main St 13 included sign-off sheets for employee reviews, with a commitment to provide additional sign-off sheets when all employees had completed the necessary reviews. See Attachment 19-140-16 Supp. (a) CONFIDENTIAL for these additional sign-off sheets.<sup>2</sup>

On October 9, 2020 Eversource closed on the sale of the business of Bay State Gas Company by NiSource, Bay State's parent company, as approved by the Department of Public Utilities in D.P.U. 20-59.

For convenience the remaining employees' reviews have been highlighted.

# Original Response:

Please see Table 1, below, and corresponding attachments for completion details of all action items developed, based on key failures addressed in the incident reports filed with Item 15.

Table 1:

Item Identifier	Action Item Developed	Completed Date	Completed Details
South Main St 1	Senior management to reinforce requirement to follow gas standards at all times, and continually remind employees of importance of doing so.	8/26/2019	Employee obligation to follow gas standards is reinforced through enhancement of Standard Operating Procedures and SMS implementation. In 2020 summaries of internal incident reviews have been provided to all employees, to continually remind employees of importance of following gas standards.
South Main St 2	QA/QC the M&R technicians to determine if they are following procedure and/or require additional training. Review outcome of Station Audit and items identified for follow-up.	5/3/2019	See Attachment 19-140-16(a) CONFIDENTIAL for findings of the audit on the technician involved with the incident and follow-up actions. The technician was also requalified and trained. Documentation on the requalification is also included in Attachment 19-140-16(a) CONFIDENTIAL. There was a second technician on site at the time, but he was in training at the time and was not performing work.
South Main St 3	1750.010 & 1170.040 Gas Standard Review. Supply Compliance with batch sheets.	6/9/2019	See Attachment 19-140-16(b) CONFIDENTIAL. The individual on leave will review the standards upon returning.
South Main St 4	Submit modification to GS 1750.010 Standards Evaluation & Approval System (SEAS) request needs to be submitted expanding on procedures (gauges).	6/1/2020	See Attachment 19-140-16(c) for revised GS 1750.010. The standard was most recently updated in September 2020, and the modifications related to gauges have been incorporated into GS 1750.010 Section 5.3.

Item Identifier	<b>Action Item Developed</b>	Completed Date	Completed Details
South Main St 5	Submit SEAS to review GS 1750.010, 1170.040, and 1750.210. Correct any conflict between them (Calling Gas Control).	6/1/2020	See Attachment 19-140-16(c) for revised GS 1750.010, 1170.040, and 1750.210.
South Main St 6	GS 1750.010 modified 4/12/2019 removing language about contacting Gas Control when performing work "onsite." Include in SEAS request to restore language requiring a call to Gas Control when work is performed on site of a SCADA monitored station. (1) Establish communications between control room representatives, operator's management, and associated field personnel when planning and implementing physical changes to pipeline equipment or configuration; (2) Require field personnel to contact the control room when emergency conditions exist and when making field changes that affect control room operations; and (3) Seek control room management participation in planning prior to implementation of significant pipeline	6/1/2020	See Attachment 19-140-16(c) for revised GS 1750.010 The modifications related to calling Gas Control have been implemented and incorporated into GS 1750.010 Section 2. The scope of call outs to Gas Control has expanded beyond just stations monitored by SCADA.

Item Identifier	Action Item Developed	Completed Date	Completed Details
	hydraulic or configuration changes.		
South Main St 7	Verify RTs created/dates appropriate/process for turning on and off catalytic heater. Work with Engineering for appropriate times during the year. Review types of work that need specific job order for station work.	9/24/2020	See Attachment 19-140-16(d) for RTs created for each catalytic heater in the territory.
South Main St 8	Create a Pre-Job briefing for M&R work. Require all parties on-site to review risks.	8/5/2019	See Attachment 19-140-16(e) for the pre-job briefing form that is required to be reviewed by all parties on-site.
South Main St 9	Create a checklist for jobs within regulator stations.	8/5/2019	Attachment 19-140-16(e) contains the pre-job briefing as well as the checklist that is used for jobs within regulator stations. The checklist was revised to align with GS 1750.010's recent revision. Attachment 19-140-16(f) for the batch sheet of the recent review of the checklist and pre-job briefing form. There were employees unavailable during this review. The Company will file a supplemental response once all employees have completed the review.  The Company will continue to enhance standard operating procedures at the M&R stations and details will be supplied in response to DPU 19-140 Consent Order item 12.
South Main St 10	Tagging of control lines and painting or other visual indicators on valves, so as to more clearly identify the	8/14/2019	See Attachment 19-140-16(g) for photo of visual indicators placed on control line and valves at the South Main Street station.

Item Identifier	Action Item Developed	Completed Date	Completed Details
	equipment and operations of the equipment within the station.		
South Main St 11	Verify and tag catalytic heater valves locations at stations.	7/15/2019	Completed per M&R leader and System Ops Manager.
South Main St 12	Review and modify Training Document CDOPM4H.1 Operating and Maintaining Catalytic Heater Installations to include seasonal shut-off steps.	2/21/2020	See Attachment 19-140-16(h). Pages 46 and 47 of the Catalytic Heater Installation, Start-Up and Maintenance section include the added seasonal shutoff steps.
South Main St 13	Review training material for the proper procedure for proceeding forward on a "DO NOT OPERATE" tag.	9/20/2019	There is no training material for proper procedure related to a "DO NOT OPERATE" tag. M&R leader coached technicians verbally on tag. In addition to verbal coaching, see Attachment 19-140-16(f) CONFIDENTIAL for batch sheet of recent review. The Company will file a supplemental response once all employees have completed the review.
South Main St 14	Review process with Gas Control and notification to Integration Center (Over/Under Pressurization)	7/31/2019	See Attachment 19-140-16(i) for the Communications Matrix document that is utilized by Gas Control and the Integration Center to manage communication during events. Following the South Main Street overpressurization, the notification process was reviewed via email communication, as shown in Attachment 19-140-16(j). No alterations to the matrix were required.
South Main St 15	Educate on municipalities practices	7/12/2019	See Attachment 19-140-16(k) for the letter template that was sent to each

Item Identifier	Action Item Developed	Completed Date	Completed Details
	on incidents (reverse 911, town notifications)		municipality the week of 7/8/2019, requesting practices during incidents.
South Main St 16	Proactive – secure the cell phone numbers for all Fire Chiefs in territory	8/28/2019	See Attachment 19-140-16(1) CONFIDENTIAL for fire chief and police chief contact information by municipality.
South Main St 17	Comprehensive review of station. Reconfigure control system.	9/25/2020	See Attachment 19-140-16(m) for the executed job order associated with the reconfiguration.
South Main St 18	Review 3 additional district stations with same high pressure differential and reconfigure them if possible.	9/26/2020	See Attachment 19-140-16(n) for the executed job orders associated with the reconfigurations. Please note there are only two additional stations that required reconfiguration. The reference to three included the work done at South Main St.
South Main St 19	Develop plan to investigate and remediate if needed any Gate Stations that also may have similar high differentials in pressure.	9/8/2020	See Attachment 19-140-16(o) for a five-year plan of investigating and remediating stations with high pressure differentials. Attachment 19-140-16(p) lists the stations that will be investigated, and Attachment 19-140-16(q) details the potential options for remediation.
Chicopee 1	Create a step-by-step checklist of items to be completed (and consider requiring signoff on each step) for this type of maintenance activity.	03/13/2021	A step-by-step checklist of items to be completed for this type of maintenance activity is expected to be created as part of the site-specific procedures assessment that is currently being led by Eversource and is referenced in DPU 19-140 Consent Order item 10.
Chicopee 2	Create a rigorous field culture of following step- by-step procedures when executing routine maintenance activities.	Ongoing	The culture of following step-by-step procedures when executing routine maintenance activities will be implemented upon completion of the

Item Identifier	Action Item Developed	Completed Date	Completed Details
			site-specific procedure assessment DPU 19-140 Consent Order item 10.

# 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 Constructions Maintenance personnel qualifications to ensure that all field crews are properly qualified to perform covered tasks.

# Supplemental Response:

In the Company's response to Compliance Agreement Requirement (26), the Company provided sign-off sheets for all available employees and committed to reviewing the process with five remaining employees upon their return to work. Two of these employees are on indefinite leave, and one employee is on military leave. These three employees cannot be reached for review at this time. Attachment 19-140-26 Supp. (b) CONFIDENTIAL provides sign-off sheets of the two remaining employees.

# Original 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 (29)

Within 45 days of the effective date of this Order, CMA shall revise construction inspector and QA/QC roles to not only correct findings real time, but also create accurate and complete documentation of tasks inspected, findings and resolutions.

D.P.U. 19-140 Compliance Agreement (16), (26) and (29) Supp. 1 Page **8** of **8** 

### Supplemental Response:

In the Company's response to Compliance Agreement Requirement (29), the Company provided sign-off sheets for all available employees. The Company committed to reviewing the process with two additional employees upon their return to work. One of these employees is on indefinite leave and cannot be reached for review at this time. See Attachment 19-140-29 Supp. (c) CONFIDENTIAL for sign off sheet for the final remaining employee.

#### Original Response:

The CMA QA/QC department uses the iAuditor program to document tasks inspected, findings, and resolutions. Use of this program has now been extended to include CMA Construction Inspectors, effective on the date of the Inspectors' training on the program. Training on the expectations and use of this program were completed with all CMA Construction Inspectors responsible for overseeing construction crews using the guidance provided in Attachment 19-140-29(a). These expectations include creating accurate and complete documentation, as well as correcting findings in real time when possible, escalating findings to leadership if they cannot be corrected at the time of finding, and exercising and documenting the use of "stop work authority" if needed. Leaders of both QA/QC employees and Construction Inspectors shared expectations on the importance of accurate, complete, and thorough documentation of tasks inspected, findings, and corrective actions through the use of the iAudtior program. Documentation of these meetings is provided as Attachment 19-140-29(b) (Construction Inspectors) and Attachment 19-140-29(c) (QA/QC employees). Please note that some Construction Inspectors were not available for these reviews because they were off work due to Short Term Disability. These employees are indicated by "N/A – Short Term Disability." These employees will receive the training upon their return to work.

###

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

Very truly yours,

Brendan P. Vaughan

Brendy P. Vayle

Enclosures

Cc: Laurie E. Weisman, Esq. – Hearing Officer

Service List, D.P.U. 19-140

# COMMONWEALTH OF MASSACHUSETTS DEPARTMENT OF PUBLIC UTILITIES

	)	
Bay State Gas Company d/b/a	)	D.P.U. 19-140
Columbia Gas of Massachusetts	)	
	)	

# MOTION OF EVERSOURCE GAS COMPANY OF MASSACHUSETTS d/b/a EVERSOURCE ENERGY FOR PROTECTIVE TREATMENT OF CONFIDENTIAL INFORMATION

# I. INTRODUCTION

Eversource Gas Company of Massachusetts d/b/a Eversource Energy<sup>1</sup> ("EGMA" or the "Company") hereby requests the Department of Public Utilities (the "Department") grant protection from public disclosure of certain confidential, competitively sensitive and proprietary information submitted in compliance with a Consent Order and Compliance Agreement, dated August 14, 2020, with the Department's Pipeline Safety Division (the "Division") in accordance with G.L. c. 25, § 5D, G.L. c. 4, §7 cl. 26(f) and (n), and 220 C.M.R. § 1.04(5)(e).

Specifically, the Company requests that the Department protect from public disclosure confidential personal employee information contained in Attachment 19-140-16 Supp. (a) CONFIDENTIAL, Attachment 19-140-26 Supp. (b) CONFIDENTIAL, and Attachment 19-140-29 Supp. (c) CONFIDENTIAL (together the "Confidential Attachments"). As discussed below, public disclosure of the Confidential Attachments would reveal confidential and proprietary information that would expose the Company's employees to potential abuse. Any such disclosure could harm the competitive business position of the Company.

The Company is contemporaneously providing redacted versions of the Confidential

On October 9, 2020 Eversource closed on the sale of the business of Bay State Gas Company by NiSource, Bay State's parent company, as approved by the Department of Public Utilities in D.P.U. 20-59.

Attachments for the public record and un-redacted versions of the Confidential Attachments to the Hearing Officer and the Office of the Attorney General via electronic mail.

#### II. STANDARD OF REVIEW

The Department is authorized to protect from public disclosure "trade secrets, confidential, competitively sensitive or other proprietary information provided in the course of proceedings." G.L. c. 25, § 5D. In interpreting this statute, the Department has held that G.L. c. 25, § 5D, "places the burden of proof on companies requesting confidential treatment." The Berkshire Gas Company et al., D.P.U. 93-187/188/189/190, at 20 (1994).

Accordingly, a party seeking to protect information from public disclosure must demonstrate that: (1) the information for which protection is sought constitutes trade secrets, confidential, competitively sensitive or other proprietary information; and (2) there is a need to ensure nondisclosure of the information. The Berkshire Gas Company et al., D.T.E. 01-41, at 17 (2001); Western Massachusetts Electric Company, D.T.E. 99-56, at 4 (1999). In assessing the need for nondisclosure, the Department will consider the interests at stake, the likely harm that would result from public disclosure of information, and the public policy implications of such disclosure. See, e.g., D.P.U. 93-187/188/189/190, at 20-23; Boston Gas Company, D.P.U. 92-259, at 106 (1993), Essex County Gas Company, D.P.U. 96-105, at 2-3 (1996). Where a party proves such a need, the Department will protect only so much of the information as is necessary to meet the need for nondisclosure and may limit the length of time that such protection is in effect. D.T.E. 01-41, at 17-18; D.T.E. 99-56, at 4; D.P.U. 93-187/188/189/190, at 20.

#### III. ARGUMENT

Attachment 19-140-16 Supp. (a) CONFIDENTIAL, Attachment 19-140-26 Supp. (b) CONFIDENTIAL, and Attachment 19-140-29 Supp. (c) CONFIDENTIAL contain confidential employee identification information, specifically user identification numbers of Company employees. This information is protected as confidential and maintained by the Company as such. To the extent an individual is not an officer of the Company, this information is not publicly available and should be treated as confidential for reasons of privacy. Pursuant to G.L. c. 4, § 7(26)(c), materials or data "relating to a specifically named individual, the disclosure of which may constitute an unwarranted invasion of personal privacy" are not public records subject to disclosure.

The Department has previously considered the privacy implications of releasing personally identifying employee information to the public and accorded confidential treatment to such information. <u>Aquarion Water Company of Massachusetts</u>, <u>Inc.</u>, D.P.U. 11-43, Hearing Officer Ruling on Motion for Confidential Treatment at 5-6 (Nov. 9, 2011) (privacy concerns with releasing identifying non-officer employee information justified confidential treatment).

Moreover, there is no compelling public policy that would mandate the disclosure of this information. Rather, it is sound public policy to ensure the privacy and security of individuals working for the Company. For these reasons, personal information regarding employees, police and fire chiefs should be protected from public disclosure indefinitely. See also G.L. c. 93H & 201 C.M.R. §§ 17.00 et seq. (protecting against disclosure of "personal information"). This provides an exception from the general statutory mandate in G.L. c. 66, § 10 that all documents and data received by an agency of the Commonwealth are to be viewable public records.

IV. **CONCLUSION** 

The Company respectfully requests that the Department grant the Company's motion and

provide protective treatment for the Confidential Attachments. Furthermore, given that the

Confidential Attachments are not likely to change at any time or to lose their confidential nature,

the Company respectfully requests the Confidential Attachments be protected from disclosure for

an indefinite period of time.

WHEREFORE, the Company respectfully requests that the Department grant its motion

for protective treatment of confidential information.

Respectfully submitted by,

**Eversource Gas Company of** Massachusetts d/b/a Eversource Energy

By its attorney,

Brendan P. Vaughan, Esq.

Keegan Werlin LLP

Brendy P. Vayla

99 High Street, Suite 2900

Boston, Massachusetts 02110

(617) 951-1400

Dated: October 30, 2020

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Eversource Gas Company of Massachusetts d/b/a Eversource Energy D.P.U. 19-140 Attachment 19-140-16 Supp. (a) Page 1 of 5

# **EMPLOYEE BATCH SHEET**



Course Title	LMS ID #	Class Date:	Aug 5, 2020
verify/update setpoints in WMS			
GS 1170.040(MA)		End Date:	Aug 20, 2020
		Location:	Telephone Call
		State	Massachusetts
		Start Time:	
		End Time:	
		1	

Instructor(s): Brendan Levesque

	Employee Name (Please PRINT Only)	Employee ID # (REQUIRED)
1	Dave Garnett	
2.	Tim Maher	
3.	Tim Anderson	
4.	Jorge Pacheco	
5.	Bill Kaszanek	
6.	Herb Gurney	
7.	Dave Fitzgerald (9/3)	
8.	Brian O'leary (9/3)	
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Eversource Gas Company of Massachusetts d/b/a Eversource Energy D.P.U. 19-140 Attachment 19-140-16 Supp. (a) Page 2 of 5

# **EMPLOYEE BATCH SHEET**



Course Title	LMS ID#	Class Date:	Oct 8, 2020
Update on Pre Job Briefing Form,			
Do Not Operate Tags,		End Date:	Oct 8, 2020
Reg Station Checklist Form &		Location:	Telephone Call
GS 1750.010(ma)			
		State	Massachusetts
		Start Time:	
		End Time:	
		<u> </u>	

Instructor(s): Brendan Levesque

1 Dave Garnett 2. Tim Maher 3. Dave Fitzgerald 4. Herb Gurney 5. 6. 7. 8. 9. 10. 11. 11. 12. 12. 13. 14. 15. 16. 16. 16. 16. 16. 17. 18. 19. 19. 19. 19. 19. 19. 19. 19. 19. 19		Employee Name (Please PRINT Only)	Employee ID # (REQUIRED)
3. Dave Fitzgerald 4. Herb Gurney 5. 6. 7. 8. 9. 10. 11. 11. 12. 12. 13. 14. 15. 16. 16. 17. 18. 19. 20. 21. 22. 23. 24.	1	Dave Garnett	
4. Herb Gurney  5. 6. 7. 8. 9. 10. 11. 12. 13. 14. 15. 16. 17. 18. 19. 19. 19. 19. 19. 19. 19. 19. 19. 19	2.	Tim Maher	
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# **REDACTED**



# A NiSource Company

	COURSE				
Title	Version 2 of M & R Check List and "DO NOT Title OPERATE" Tags				
Review changes to Checklist that are in line with changes to GS 1750.010 (MA)		Start T			
			Instruc		

Date:		9/30/2020
Location	Virtual Meeting	
Start Time		10:30
End Time		10:45
Instructor	Dana Argo	

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1 C	huck Docherty		CD/JBC
2 B	enny Rocca	ì	BR/JBC
3 <mark>A</mark>	nthony Eichstaedt		AE/JBC
4 <mark>Ji</mark>	im Clement		JC/JBC
5 <u>G</u>	Glen Halket		GH/JBC
6 <mark>B</mark>	ob Carmel		BC/JBC
7 <mark>N</mark>	Aark Izabel		MI/JBC
8 <mark>D</mark>	Dave Harris		DH/JBC
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Eversource Gas Company of Massachusetts d/b/a Eversource Energy D.P.U. 19-140 Attachment 19-140-16 Supp. (a) Page 4 of 5

# **EMPLOYEE BATCH SHEET**



Course Title	LMS ID #	Class Date:	Oct 16, 2020
Update on Pre Job Briefing Form,			
Do Not Operate Tags,		End Date:	Oct 16, 2020
Reg Station Checklist Form &		Location:	Brockton Op Center
GS 1750.010(ma)			
		State	Massachusetts
		Start Time:	
		End Time:	

	Employee Name (Please PRINT Only)	Employee ID # (REQUIRED)
1	Jorge Pacheco	
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# Columbia Gason of Massachusetts

A NiSource Company

	COURSE
Title	Version 2 of M & R Check List and "DO NOT OPERATE" Tags
	w changes to Checklist that are in line with es to GS 1750.010 (MA)

Date:	9/31/2020	
Location	Virtual Meeting	
Start Time		10:30
End Time		10:45
Instructor	Dana Argo	

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3 Dave Matthews		Vac Reflex
4 Steve Dwinells		
5 Chris Terroux		00_
6 Sean O'Loughlin		Su OXA
7 Chuck Docherty		
8 Benny Rocca		
9 Anthony Eichstaedt		
10 Jim Clement		
11 Bob Carmel		
12 Glen Halket		
13 Mark Izabel		
14 Dave Harris		
15 Steve Setian		
16 Dave Fitzgerald		
17 Jorge Pacheco		
18 Dave Garnett		
19 Herb Gurney		
20 Brian O'Leary		
21 Tim Maher Francis Peña		Fug=



Eversource Gas Company of Massachusetts d/b/a Eversource Energy D.P.U. 19-140 Attachment 19-140-26 Supp. (b) Page 1 of 2

# EMPLOYEE BATCH SHEET

			ASSET FOR STATE OF ST
Course Title: 65 3020.035	Title: 65 3020.035  GS 3020.040  Department: Construction  Lead Instructor: Mike Crochi-er		
	Lead Inst	ructor: Mike Crochi-er	, ,
Course Description:	Additiona	Instructors:	10/13/2020
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# EMPLOYEE BATCH SHEET

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		End Time:	08:30
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3.	Brandon Ceglanski		
4.	Steve Bezemes		
5.	William Broderick		
6.	Dennis Matthews	_	
7.	David Murphy CAlles To Review		
8.	Kyle Brigham	*	
9.	Donaldo Estevam		
10.	Larry Bezemes		
11.	Mike Johnson		
12.	James Samowski		
13.	David Williams		
14.	Steve Malenfant		
15.	Robert Forester		
16.	Joshua Desrosier		
17.	Chelsea Slates		
18.	Lisa Broderick		
19.	SHARON SUMNER DAN GENDRON		
20.	DAN GENDRON		
21.			

Entered in LMS by: Date Entered:

22.

# **REDACTED**

# EMPLOYEE BATCH SHEET

Date Entered:

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COURSE				NISOURCE
TITLE  Pend of all controls	ID #:	-		GAS DISTRIBUTION
Review expectations of Auditor		CLASS DAT	E:	10/8/20
		END DATE		
		LOCATION	law	rence MA
		STATE:	MA	
INSTRUCTOR(S): Jehn	j Angelan	START TIM END TIME:	E:	12:30 pm
NAME OF EMPLOYEE: { Plea	ase PRINT ONLY >		EMPLOYE	E ID#: { REQUIRED }
1. David Muchy.			EI II EO I E	L ID # ! { KEQUIKED }
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Eversource Gas Company of Massachusetts d/b/a Eversource Energy D.P.U. 19-140 Attachment 19-140-29 Supp. (c) Page 2 of 2

August 2020

Columbia Gas of Massachusetts



#### Audience: Construction Inspectors

# Expectations of utilizing iAuditor for construction job site audits:

The Company's expectation is for each inspector to complete one audit in iAuditor per day for each crew working in the field.

For the task being observed, the inspector's responsibility is to utilize iAuditor to ensure that all manufacturer's instructions and standards are being followed (Gas Standards, Federal Standards, State Standards & OSHA standards). It is key that all observations, whether they are marked as "Safe" or "At Risk", must be captured for the section of the audit that is being performed.

All "At Risk" findings must be documented on the audit checklist. Any actions marked "At Risk" that are corrected on site must be accompanied by comments that describe the action taken to correct the issue on site. Follow up actions that cannot be corrected on site will be the responsibility of construction leadership

# Why are we making a change to iAuditor for inspections?

- iAuditor is the most comprehensive and detailed auditing tool that is available for our use. iAuditor also has
  follow up capabilities within the tool to ensure that all "At Risk" items are investigated, corrected, and closed by
  construction leadership.
- As part of the sale of the company, Columbia Gas has committed to improving job site inspections and documentation of these inspections.
- Performing and documenting job site inspections is an important component of the construction group's safety and compliance plan. It is directly related to our Safety Management System (SMS) 4 core responsibilities.

Follow our processes and procedures – ensure that the field workers are following process/procedure and document Identify and report risks – document at risk items

Continue to improve processes and procedures – follow up on at risk items to determine where improvement is needed Identify and proactively take action to prevent things that can go wrong – utilize & document "stop work authority"

Training related to the use of this app will come from your leader or a construction specialist in your area.

#### Points of Inspection Available on Template 1.8

Backfilling	Leakage Pinpointing	Tracer Wire Installation
Apply & Monitoring Corrosion Control	Repair Steel Gas Main	Temporary Bonding
Tapping Pipelines	Install/Replace Main Lines	Backfilling
Purging Pipeline	Casing	Anchors and Supports
Locate and Mark Underground Facilities	Insertion	Repair/Protect Cast Iron
Pressure Testing Pipelines	Steel Pipe Bending	Abandon/Deactivate Gas
Valves (New Installation)	Main Components	Squeeze Off (Plastic Pipe)
		Squeeze Off (Steel Pipe)
	Apply & Monitoring Corrosion Control Tapping Pipelines  Purging Pipeline  Locate and Mark Underground Facilities Pressure Testing Pipelines	Apply & Monitoring Corrosion Control  Tapping Pipelines  Purging Pipeline  Locate and Mark Underground Facilities  Pressure Testing Pipelines  Repair Steel Gas Main Lines  Casing  Insertion  Insertion  Steel Pipe Bending  Pipelines