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January 26, 2021

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 (16 Supplemental 2)
(17)(18)(19) and (28 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 (the “Department”) and Bay State Gas Company d/b/a Columbia Gas of Massachusetts (“Bay State Gas”) in the above-captioned matter, Eversource Gas Company of Massachusetts d/b/a Eversource Energy (“EGMA” or the “Company”)¹ hereby provides the following responses to address the requirements of Items 17, 18, and 19 of the Consent Order, the second supplemental response to address the requirement of Item 16, and the supplemental response to address the requirements of Item 28.

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.

Second 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). The Company has identified and created three additional repetitive tasks within the Work Management System to drive inspections. See

¹ On October 7, 2020, the Department approved the sale of the business of Bay State Gas to Eversource Energy. The closing on that sale occurred on October 9, 2020. Following closing of the sale, EGMA began serving customers in Bay State Gas’ service territory and operating Bay State Gas’ facilities, and provides this filing today for the Department’s consideration.

Attachment 19-140-16 (d) (Supp.) for all repetitive tasks associated with catalytic heaters, referenced in Table 1 as “South Main St 7.” The three additional tasks are highlighted in yellow.

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.²

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

² For convenience the remaining employees’ reviews have been highlighted.

Item Identifier	Action Item Developed	Completed Date	Completed Details
			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.
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	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
	<p>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 or control room management participation in planning prior to implementation of significant pipeline hydraulic or configuration changes.</p>		
South Main St 7	<p>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.</p>	9/24/2020	<p>See Attachment 19-140-16(d) for RTs created for each catalytic heater in the territory.</p>
South Main St 8	<p>Create a Pre-Job briefing for M&R work. Require all parties on-site to review risks.</p>	8/5/2019	<p>See Attachment 19-140-16(e) for the pre-job briefing form that is required to be reviewed by all parties on-site.</p>
South Main St 9	<p>Create a checklist for jobs within regulator stations.</p>	8/5/2019	<p>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.</p>

Item Identifier	Action Item Developed	Completed Date	Completed Details
			<p>There were employees unavailable during this review. The Company will file a supplemental response once all employees have completed the review.</p> <p>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.</p>
South Main St 10	Tagging of control lines and painting or other visual indicators on valves, so as to more clearly identify the equipment and operations of the equipment within the station.	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.
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 shut-off 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

Item Identifier	Action Item Developed	Completed Date	Completed Details
			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 on incidents (reverse 911, town notifications)	7/12/2019	See Attachment 19-140-16(k) for the letter template that was sent to each 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(l) 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	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-

Item Identifier	Action Item Developed	Completed Date	Completed Details
	may have similar high differentials in pressure.		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 site-specific procedure assessment DPU 19-140 Consent Order item 10.

Compliance Agreement Requirement (17):

Within 180 days of the effective date of this Order, CMA shall perform a review of all inserted mains within its distribution system in Massachusetts and verify all valve boxes on inserted abandoned main have been abandoned in accordance with Company procedure GS 1740.010 Section 3.2.4.

Response:

EGMA reviewed all inserted mains within its distribution system, and has verified that all valve boxes on inserted abandoned main were abandoned in accordance with Company procedure GS 1740.010 Section 3.2.4. To perform this review, EGMA used its GIS system to identify all segments of inserted main. Technicians then walked each segment of inserted main and verified that all valve boxes on inserted abandoned main were abandoned in accordance with procedure GS 1740.010 Section 3.2.4. The review did not identify any valves which were not properly abandoned.

Compliance Agreement Requirement (18):

Within 190 days of the effective date of this Order, CMA shall provide documentation to the Department to show that it has complied with Item 17.

Response:

Please refer to Attachment 19-140-18(a) for documentation of all inserted mains within the Company's distribution system, and the findings of the review discussed above.

Compliance Agreement Requirement (19):

Within 365 days of the effective date of this Order, CMA shall complete field abandonment of all inserted valve boxes identified in Item 17 in accordance with Company procedure GS 1740.010 Section 3.2.4.

Response:

As outlined in Attachment 19-140-18(a), the Company surveyed its inserted mains and concluded that all valve boxes on inserted abandoned main had previously been appropriately abandoned in accordance with procedure GS 1740.010 Section 3.2.4.

Compliance Agreement Requirement (28)

Within 90 days of the effective date of this Order, CMA shall complete a constructability review across all suspended projects to ensure that all applicable departments review construction documents for accuracy, completeness, and correctness, and that the documents or plans be sealed by a professional engineer prior to commencing work.

Supplemental Response

Attachment 19-140-28 Supp. (b) provides the updated status of suspended projects. In the Company's initial response to Compliance Agreement Requirement (28), Attachment 19-140-28(b), provided a list of projects that were suspended in 2019. Five projects identified in that original attachment, while designed in 2019, did not commence in 2019 and therefore were not "suspended." These 5 have been removed from the list of suspended work provided in Attachment 19-140-28 Supp. (b). Additionally, two projects, Project Nos. 19-64911 and 19-65205, were inadvertently included in Attachment 19-140-28(b), and have since been removed. These projects were completed in February and June 2020, prior to the issuance of the Consent Order, and were completed with Department approval utilizing the process that was in place at the time.

Original Response

EGMA developed and implemented a process to review, evaluate, and perform a hazard assessment of the system prior to restarting any suspended projects. The review process develops and implements hazard mitigation plans for each suspended project, and ensures that all restart plans are communicated to all personnel involved with operating or constructing the system prior to restart.

The process utilizes all current gas standards and procedures in effect, defines all stakeholders responsible for the review, describes review documentation and mitigating measures to remedy identified hazards, and requires Professional Engineers to review, approve, and apply their seal to documents and plans prior to commencing work.

The process was implemented in 2020 and applies to all suspended or restarted projects going forward. The process description, documentation form, and relevant gas standards are provided as Attachment 19-140-28(a). Additionally, Attachment 19-140-28(b) provides a list of all projects suspended in 2019, and the date on which the Supplemental Pre-Construction Review was completed. Of the seventeen projects suspended in 2019 that are restarting this year, sixteen have completed the constructability review process, with one project currently in the review process.

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

Very truly yours,



Brendan P. Vaughan

Enclosures

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