

- 2) Identify all areas within your service territory that have multiple pipelines that operate at different pressures within the same municipal block or cross street segmentation. For each area, all pipeline system records must identify distinctly and clearly each of the pipelines in the area by pressure and include installation date, nominal pipe diameter, pipe material, and any fitting used. Location information must be provided that will allow field personnel to know exact location(s) of each pipeline including those abandoned in place. All services must be drawn to within a city block or nearest cross street to show the service/meter connection to appropriate main segment. Service insertions and main insertions must be denoted, along with any fittings used within the area. Any planned work involving an area in which multiple pressure pipelines exist must be reviewed and documented by appropriate construction and engineering personnel. All pipeline systems within which multiple pressure pipelines coexist on the same street block must be given precedence for final documentation record updates (i.e. mapping) once any construction, maintenance, or repair activity resulting in configuration changes is completed.

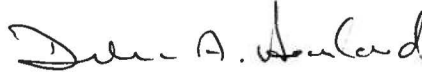
- 3) Any district regulating station must have details drawn of piping configurations, materials, and pipeline sizes within the station, as well as piping outside the station within a one block radius in all directions of the station. Venting details, sensing line termination points, sensing line connections, sensing line materials including carrier or casing material, if inserted, must be shown. Upstream and downstream valves must be indicated, including those within a station and in the surrounding area external to the station. All corrosion system details such as anode locations, connection points, cathodic protection measuring points, and rectifier system components must be included. All instrumentation devices that record information related to flow, pressure, and temperature sensing and instrumentation points must be shown. All high pressure, intermediate pressure, and low pressure mains must be clearly shown with typical flow directions. Every effort should be made to include other utilities' infrastructure, physical geographic information such as buildings, addresses, poles, fence lines, curb lines, drainage and sewer infrastructure, and similar features that may potentially aid an individual performing work on the gas system. Photo documentation of pipeline components should be included in documentation whenever possible. Detailed updates should be completed within 60 days of receipt of this letter.

- 4) The Company's procedures must explicitly incorporate requirements that qualified regulator station personnel familiar with instrumentation and regulation must be present whenever work is performed at or near regulator stations, including first, second, and third party excavations.

The Commission expects gas utilities to proactively prevent any over-pressurization under all circumstances and strictly enforces, and will continue to enforce, compliance with gas safety standards. Over-pressurization violations, no matter how small, will trigger enforcement action.

Accordingly, you are directed to provide the Commission's Safety Director with the information enumerated above by December 1, 2018. If you consider any of the information requested to be confidential, you should follow the rules for seeking confidential treatment of that information. Any necessary follow-up action is delegated to the Commission's Safety Division Director.

Sincerely,

A handwritten signature in black ink, appearing to read "Debra A. Howland". The signature is fluid and cursive, with the first name being the most prominent.

Debra A. Howland
Executive Director

cc: Gary Epler, Esq.
Michael Sheehan, Esq.
Randy Knepper