

THE STATE OF NEW HAMPSHIRE
SUPREME COURT

NO. 2019-0629

LIBERTY UTILITIES (ENERGYNORTH NATURAL GAS) CORP.
d/b/a LIBERTY UTILITIES – KEENE DIVISION
PUBLIC UTILITIES COMMISSION CASE DG-17-068

APPEAL OF TERRY CLARK PURSUANT TO SUPREME COURT RULE 10

**EMERGENCY MOTION OF APPELLANT FOR IMMEDIATE
SUSPENSION OF COMMISSION ORDERS PURSUANT TO RSA 541:18**

Terry Clark (“Clark”), the appellant in this appeal, hereby respectfully moves this Honorable Court to immediately suspend the three Public Utility Commission (“Commission”) orders at issue in this proceeding, as identified below, pursuant to RSA 541:18, on grounds as follows:

1. This appeal, accepted by order of the Court on December 19, 2019, concerns Clark’s climate, health, safety and other challenges to three Commission orders authorizing Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities – Keene Division (“Liberty Utilities”) to engage in a five phase natural gas conversion and expansion project in Keene.¹ The three orders, Order No. 26,065 (Oct. 20, 2017), Order No. 26,274 (Jul. 26, 2019) and Order No. 26,294 (Sep. 25, 2019) (collectively, the “Commission Orders”), and the grounds supporting the appeal, are thoroughly discussed in Clark’s petition for appeal, the contents of which are hereby restated and incorporated in full herein in support of this motion.

2. RSA 541:18 provides:

“541:18 Suspension of Order. – No appeal or other proceedings taken from an order of the commission shall suspend the operation of such order; provided, that the supreme court may order a suspension of such order pending the determination of such appeal or other proceeding

¹ Liberty Utilities has appeared in this proceeding, through its counsel, Attorney Michael Sheehan.

whenever, in the opinion of the court, justice may require such suspension; but no order of the public utilities commission providing for a reduction of rates, fares, or charges or denying a petition for an increase therein shall be suspended except upon conditions to be imposed by the court providing a means for securing the prompt repayment of all excess rates, fares, and charges over and above the rates, fares, and charges which shall be finally determined to be reasonable and just.”

Id. (emphasis added).

3. According to a January 15, 2020 article in the online edition of the Keene Sentinel, a copy of which is Exhibit “A” to this motion, Liberty Utilities is moving forward with its Keene project during this appeal. The article states:

“John Shore, a Liberty spokesman, said in an email Wednesday that the company has already converted its commercial customers in Monadnock Marketplace to compressed natural gas, the project’s first phase. ‘We are currently working with the PUC on a plan to convert the remaining customers in Keene to natural gas,’ he wrote. ‘This will be phased in over multiple years. Mr. Clark’s appeal has not affected our timeline.’”

However, there is no indication that Liberty Utilities has ever been authorized under the Commission Orders to move forward with the first phase of the project—let alone move forward with the remaining phases of the project after July—by filing and receiving approval for the company’s business plan “for the conversion and operation of the proposed natural gas system” that was required to be filed within 90 days of July 26, 2019 under [Order No. 26,274 \(Jul. 26, 2019\)](#). *Id.* at 15; App. at 15. Nor has the company met other clear requirements for moving forward with the project set forth under [Order No. 26,294 \(Sep. 25, 2019\)](#).

4. Contrary to the article (Ex. A), Liberty Utilities is not “currently working with the PUC” on the remaining work for the Keene project—at least in any capacity that authorizes it to currently move forward with construction, converting or adding any equipment or infrastructure, or any other aspects of the project that are disruptive or otherwise disturb the *status quo*. To the

extent that the utility may derive *any* authority to act under the Commission Orders—which Clark disputes, averring them to be void *ab initio*, for the reasons enumerated in his petition—Liberty Utilities has plainly not yet obtained it.

5. Clarifying and confirming the Commission’s original declaratory ruling,² [Order No. 26,274 \(Jul. 26, 2019\)](#) concludes with a very clear requirement for Liberty Utilities:

“... within 90 days of this order, Liberty shall file with the Commission its business plan and its operations and maintenance plans for the conversion and operation of the proposed natural gas system.”

Id. at 15; App. at 15. The order expressly conditioned any work going forward on the utility first meeting this requirement. *Id.* at 14 (“Accordingly we grant Liberty the permission and approval to undertake the conversion of the Keene system, **subject to the conditions set forth herein ...**”) (emphasis added); App. at 14.

6. As of September 25, 2019, the utility still plainly had not met the 90-day filing requirement, as [Order No. 26,294 \(Sep. 25, 2019\)](#) clarified, in response to the company’s request for clarification, that the business plan applied to both conversion and expansion aspects of the project. *See id.* at 7 (“Liberty also asked for clarification whether the Commission intended that it file a business plan and operations and maintenance plans for the ‘conversion’ of existing propane-air customers or only for system ‘expansion’ through the addition of new gas customers”); App. at 23; and 11-14 (discussing “conversion/expansion” issue and filing requirements with respect to the same); App. at 27-30. [Order No. 26,294 \(Sep. 25, 2019\)](#) also clarified that the business plan should be comprehensive, and include not only information on customer commitments, but also detailed cost information and “updated DCF analyses based on detailed engineering plans.” *Id.* at 14; App. at 30. The order did not relieve the utility from the

² [Order No. 26,065 \(Oct. 20, 2017\)](#).

obligation to file such a business plan as to phase one (or any other phase); rather, it made clear that it was required for every phase, as a (pre)condition for approval. *Id.* at 13 (“We therefore reiterate and clarify that **before** Liberty begins to convert and expand *any* phase of its distribution system it must make several filings and obtain approvals, as outlined below.”) (emphasis added); App. at 29; *id.* at 14 (“such DCF analyses are **the first step in gaining approval for each phase** of the conversion/expansion”) (emphasis added); App. at 30. The Commission did relieve Liberty Utilities of any further customer commitment obligation with respect to phase one, but only that aspect of the business planning requirement as to that one phase, and only because the commitment had been demonstrated. *Id.* at 14-15; App. at 30-31. The order indicated that a business plan was required “**to demonstrate that Liberty’s New Hampshire ratepayers are not burdened with unfair or unwarranted costs.**” *Id.* at 14 (emphasis added); App. at 30.

7. It would also, obviously, be prudent to establish that the company’s plans for all five phases have a real chance of sustained viability, especially when Keene has adopted the emissions reduction goals of the [Paris Climate Accord](#), App. at 229, *before* the utility begins disrupting the city and third parties with construction, changes and additions to equipment and infrastructure, or engaging in any other aspects of the project that are disruptive or otherwise disturb the *status quo*.

8. However, a review of the docket for the case below establishes that the utility’s only filing in response to the Commission’s 90-day filing directive in [Order No. 26,274 \(Jul. 26, 2019\)](#) at 15; App. at 15, was an October 24, 2019 letter enclosing, inter alia, the company’s “operations and maintenance plans for the conversion and operation of the proposed natural gas system.” See [Commission Docket No. DG 17-068](#). A copy of this October 24, 2019 filing

letter, including its enclosures, is Exhibit “B” to this motion. This filing clearly does not comply with the Commission’s business plan filing requirements and October 24, 2019 was the deadline for the utility to meet the 90-day filing directive of [Order No. 26,274 \(Jul. 26, 2019\)](#). Liberty Utilities has no basis to claim that it ever met the business plan precondition for *any* project work, and the deadline for meeting it has passed.

9. The utility has otherwise not met express Commission requirements for engaging in any work on phases 2-5 that were spelled out in [Order No. 26,294 \(Sep. 25, 2019\)](#).

The Commission was clear: “We therefore reiterate and clarify that **before Liberty begins** to convert and expand **any phase** of its distribution system it must make several filings and obtain approvals, as outlined below.” *Id.* at 13; App. at 29. Included in the Commission’s requirements, “**prior to beginning construction of any phase of the conversion/expansion [after the first phase Monadnock Marketplace]**, Liberty is required to secure a customer commitment level that will produce at least 50 percent of the revenue requirement associated with the new facilities needed for that phase from those customers within 10 years, calculated on a present value basis.” *Id.* at 14 (emphasis added); App. at 30. Moreover, the utility must submit reports and other filings for each phase of the project, including, not only the detailed business plan previously discussed, but cost reports that must be “**filed 180 days before construction begins** for any other phase [after phase one] of the conversion/expansion ...” *Id.* at 14-16 (emphasis added); App. at 30-32. Additionally the order requires that “**before proceeding with any phase** of the conversion/expansion of the Keene system from propane-air to natural gas, Liberty must file detailed and final plans for engineering, construction, installation, testing, operations, public awareness, maintenance, emergency response, procedures, and schematics, including qualifications and training of personnel, in sufficient detail as requested by the Safety

Division.” *Id.* at 13 (emphasis added); App. at 29. “[T]he Commission must affirmatively approve each adequacy assessment filed by the Safety Division, **prior to the commencement of construction** on each successive phase of the conversion/expansion ...” *Id.* Also, each approval phase must include a public comment period concerning required utility filings and the Safety Division’s reports. *Id.* at 10; App. at 26.

10. Clark’s counsel has not received any of the required filings, or notice of any of the required approvals or public comment periods, discussed in the previous paragraph for phases 2-5 of the Keene project—other than the utility’s October 24, 2019 filing evidenced by Exhibit “B” to this motion—and a review of [Commission Docket No. DG 17-068](#) confirms a lack of the requisite filings, approvals and public comment periods.

11. Thus, even assuming *arguendo* that they were *ever* lawful, enforceable and not void (assumptions contrary to Clark’s position), the Commission Orders clearly precluded Liberty Utilities from moving forward with the project after the July 26, 2019 [Order No. 26,274](#), and all conversion/expansion work should have ceased as of that date. The company should have known this; it certainly seems to have understood it just two days prior to [Order No. 26,274 \(Jul. 26, 2019\)](#), when the company acknowledged in a July 24, 2019 filing, which urged issuance of the order because the utility wanted to complete 60 days of conversion work on phase one by September, that:

“Resolving Mr. Clark’s 2017 motion is the last unresolved issue in this docket and the only obstacle to Liberty beginning the conversion process for the Marketplace customers.”

App. at 336. The “resolution” of Clark’s motion was [Order No. 26,274 \(Jul. 26, 2019\)](#) and, by extension, [Order No. 26,294 \(Sep. 25, 2019\)](#), with their requirements that the utility has never met—and, of course, the “resolution” includes this pending appeal. Clark’s claims have

remained an “unresolved issue” after the utility’s July 24, 2019 filing as they have not been settled by any final legal determination, and [Order No. 26,274 \(Jul. 26, 2019\)](#) and [Order No. 26,294 \(Sep. 25, 2019\)](#) only added to the legal “obstacle” the utility faced in moving forward, that has never been removed.

12. The company must be relying on not only a misinterpretation of the Commission Orders, but authorization to enforce those orders under [RSA 541:18](#), as well, to work on the project during this appeal, but such reliance is misplaced. Any authority under [RSA 541:18](#) would not have arisen until September 25, 2019, when [Order No. 26,294](#) denied the parties’ final motions for rehearing on September 25, 2019. *Appeal of Seacoast Anti-Pollution League*, 125 N.H. 708 (1985) (“An unsuspended commission order becomes effective upon completion (or denial) of rehearing, unless a request for suspension is promptly filed with, and granted by, this court.”). However—again, assuming *arguendo* its ultimate validity—such authority would still be subject to the terms of the Commission Orders, including the business plan filing and approval requirements for project work under [Order No. 26,274 \(Jul. 26, 2019\)](#) and [Order No. 26,294 \(Sep. 25, 2019\)](#). Not ever having met the business plan requirements for approval (as well as other requirements for phases 2-5), the company has never been able to claim even colorable authority to work on the project under [RSA 541:18](#), even should the Commission Orders withstand Clark’s other challenges to their validity and enforceability.

13. There was no reasonable basis for the utility to reverse its (correct) thinking and conclude that there was no “unresolved issue” or “obstacle” preventing it from moving forward with the project after its July 24, 2019 filing. App. at 336.

14. But, as Liberty Utility’s spokesman represents that phase one conversion work has been done (Ex. A), the company apparently plowed ahead with the work it wanted to do in

July, App. at 335-336, anyway. Given that the company's July 24, 2019 filing indicated "we must begin the conversion process now in order to finish by the end of September," App. at 336, and the utility apparently considered [Order No. 26,274 \(Jul. 26, 2019\)](#) all it needed for a "resolution" to Clark's legal challenge to proceed, the work likely commenced just after the July 25th order and was probably done, or substantially done, by the time [Order No. 26,294 \(Sep. 25, 2019\)](#) even issued (and any claim of colorable authority under [RSA 541:18](#) could arise).

15. While the company's representative asserts that Liberty Utilities has maintained its timeline for the project and intends to maintain that timeline, despite this appeal, it is unclear what that timeline is. Discovery which could have identified the timeline was not allowed below, and even Commission Staff has been kept in the dark on the utility's plans, as the Safety Division has expressed concerns about their amorphous, "little detail," ever-evolving, sometimes ill-conceived and too-often "temporary" nature. App. at 326-327. Staff itself does not seem to have the correct current timeline, as the last timeline "understood by the Safety Division" is provided in Appendix 1-C to the Staff Adequacy Assessment of Compressed Natural Gas Installation dated October 5, 2018, filed below, App. at 326, and it shows the utility starting on phase two in the Spring of 2019, *id.* at 327, which would, even if legally authorized (again, a fact Clark disputes) have been inconsistent with the Commission's obvious understanding, under its July and September 2019 orders, that phases 2-5 had not begun yet. *See generally* [Order No. 26,274 \(Jul. 26, 2019\)](#) and [Order No. 26,294 \(Sep. 25, 2019\)](#); App. at 1-32. From the utility's July 24, 2019 filing, App. at 335-336, and its representative's recent statements (Ex. A), the company has only been working on phase one to date and, if it were working on any other phases, that work should have been nipped in the bud with the Commission's July 26, 2019 and September 25, 2019 orders and requirements for project work.

16. But, from the timeline discussed by the Safety Division, Liberty Utilities intends to start construction on phases three and four of the project this spring, and will break ground on phase five next spring. App. at 327. Thus, with the phase two work still to do, the utility likely intends to engage in construction on all four remaining phases of the project beginning this spring and continuing into next year—probably essentially covering the timeline of this appeal.

17. Frankly, it is shocking that the utility would proceed so plainly at its peril. Besides the many obstacles to moving forward discussed herein, the Commission Orders upon which Liberty Utilities grounds the lawfulness of its project work are, for several reasons articulated in Clark’s petition for appeal, unlawful, void *ab initio*, a legal nullity of no force or effect at any time, affording no past or current authority for such work under the Commission Orders, [RSA 541:18](#), or otherwise. *See generally* petition for appeal. Moreover, it is extremely disappointing that the utility would not just wait, given the gravity of public interest concerns raised with its project in this appeal, for confirmation of the lawfulness of its project before proceeding with it. As noted by the Safety Division, Liberty Utilities has been “planning” Keene for years, without ever having any real “plan,” App. at 326; the company could have waited the roughly one more year for the decision on this appeal.

18. But, as the utility has expressed that it is working on the Keene project and intends to continue working on the project, it would be appropriate for the Court to suspend the Commission Orders under [RSA 541:18](#) during this appeal.

19. The standard for granting this motion for suspension of the Commission Orders is set forth in *Union Fidelity Life Ins. Co. v. Whaland*, 114 N.H. 549 (1974):

“First, there must be a showing that the plaintiff will suffer irreparable harm, occasioned by circumstances beyond his control, if the order is given immediate effect. Second, it must be clear that the harm to the plaintiff outweighs the public interest in enforcing the order for the

duration of the appeal. *N. H. Milk Dealers' Ass'n v. N.H. Milk Control Bd.*, 107 N.H. 150, 218 A.2d 363 (1966); *Cumberland Farms v. N.H. Milk Control Bd.*, 104 N.H. 364, 187 A.2d 388 (1963); 2 F. Cooper, *State Administrative Law* 629-30 (1965); see Annot., 24 L.Ed.2d 925 § 7 (1970); Note, *Judicial Review of Administrative Decisions in Ohio*, 34 Ohio S.L.J. 853, 875-76 (1973). The mere fact that an administrative decision may cause injury or inconvenience to the plaintiff is insufficient to warrant a suspension of order. *Tilton v. Boston & Me. R.R.*, 99 N.H. 503, 113 A.2d 543 (1955); *New England Tel. & Tel. Co. v. State*, 97 N.H. 555, 92 A.2d 408 (1952).”

Id. at 550.

20. This motion meets the two-prong standard. In terms of the first prong, by its own admission, Liberty Utilities will continue to work on the Keene project during this appeal, thereby plainly irreparably harming Clark by circumstances beyond his control if the Commission Orders are not immediately suspended for its duration. *Union Fidelity Life Ins. Co. v. Whaland*, *supra*, 114 N.H. at 550. Every shovel in the ground will make it more difficult for Clark to protect and restore the *status quo*, minimally requiring more litigation—as the company well knows, and likely counts on in pushing forward with the project despite lack of authorization. As a misunderstanding of the Commission Orders is the only “authority” the utility or third parties may rely on for continued project work, a suspension of the orders will preclude any claim of reasonable reliance on the orders for project construction or conversion/expansion work of any nature, and thereby prevent such work and protect and preserve Clark’s rights (as well as the rights of third parties). As for the second prong, the public interest favors Clark on this motion because it is in the public interest to have a final determination of the issues presented in this appeal before allowing Liberty Utilities to dig up and disrupt too much of the City of Keene. *Union Fidelity Life Ins. Co. v. Whaland*, 114 N.H. at 550. Moreover, for the reasons set forth in Clark’s petition for appeal and the sources cited therein, the public interest analysis weighs in favor of Clark as the utility’s project is against the

public interest due to associated climate, health, safety and other concerns. *Id.* Although the rights of Liberty Utilities are not part of the standard analysis for granting this motion, *id.*, the company has no claim of harm in not being able to proceed on the Keene project without lawful authority. On information and belief, the only “urgency” the utility claims in needing to proceed with the Keene project is that it will lose leasehold rights to land used for the current propane air system in 2029. But that is nine years from now, the entire project is supposed to take only 4-7 years—more likely only four at most if they stick to their aggressive construction timeline of beginning phases 2-5 all within the space of three years, App. at 327—and time has been knocked off the schedule by the phase one work already (improperly) completed. Assuming it is successful on the merits, there will be plenty of time for Liberty Utilities to finish the Keene project by 2029, after this appeal.

21. For all of the reasons aforesaid, justice requires the immediate allowance of this motion and suspension of the Commission Orders during this appeal. [RSA 541:18](#); *Union Fidelity Life Ins. Co. v. Whaland, supra*.

22. As Clark has not filed a motion to stay with the Commission (there should have been no need as Liberty Utilities was already “stayed” by its noncompliance), it is not clear to Clark’s counsel whether a Supreme Court Rule 7-A(1) waiver is necessary to process this motion, *i.e.*, whether the motion for “suspension” under [RSA 541:18](#) is considered a Supreme Court Rule 7-A “stay” of a “lower tribunal” order by this Court. Research has revealed no case law on point, but a review of the Supreme Court Rules suggests that Rule 7-A does not apply to this motion. This is a Rule 10 appeal, which only refers to the Commission as an “agency,” not a “tribunal.” Rule 7-A does not use the word “agency” once. The word “tribunal” is not included in the Supreme Court Rule 3 definitions, and the definition of “[a]dministrative agency” provides

only: “Includes agency, board, commission, or officer.” Moreover, [RSA 541:18](#) itself does not require the filing of a motion to stay with the Commission as a pre-condition to the filing of a motion for suspension with the Court. Clark’s counsel apologizes to the Court in the event that this motion should not have been filed without first pursuing a motion to stay with the Commission. But, particularly with the spring construction season fast approaching, counsel dared not delay bringing this matter before the Court until the Commission’s decision on a motion to stay as Clark would have no control over the length of time required for the Commission’s determination. For these reasons and the other reasons, facts and extraordinary circumstances set forth herein and in Clark’s petition for appeal, Clark avers that he is entitled to a Rule 7-A(1) waiver, if necessary, and, if necessary, hereby moves for one.

WHEREFORE, for the reasons expressed, Clark respectfully requests that this Honorable Court:

- A. Grant this Motion and immediately suspend [Order No. 26,065 \(Oct. 20, 2017\)](#), [Order No. 26,274 \(Jul. 26, 2019\)](#) and [Order No. 26,294 \(Sep. 25, 2019\)](#) under [RSA 541:18](#) during this appeal; or
- B. Schedule a hearing on this matter; and
- C. Provide such other relief as is just and reasonable.

Respectfully submitted,

Terry Clark,

Dated: January 22, 2020

By: /s/ Richard M. Husband
Richard M. Husband, Esquire
10 Mallard Court
Litchfield, NH 03052
(603) 883-1218
RMHusband@gmail.com
N.H. Bar No. 6532

CERTIFICATE OF SERVICE

I, Richard M. Husband, Esquire, hereby certify that on the 22nd day of January, 2020, I served copies of the foregoing motion and this notice of filing on the Attorney General and all counsel and parties registered with the electronic filing system via the system, and on the Public Utilities Commission via first-class mail, postage prepaid, copies of the foregoing motion served on Attorney Fabrizio and Executive Director Howland.

/s/ Richard M. Husband
Richard M. Husband, Esquire

EXHIBIT “A”



https://www.sentinelsource.com/news/local/liberty-conversion-to-natural-gas-continues-in-keene-amid-appeal/article_26d40a90-f214-5782-b664-0c89324dc680.html

FEATURED

TOP STORY

Liberty: Conversion to natural gas continues in Keene amid appeal

By PAUL CUNO-BOOTH Sentinel Staff

Jan 15, 2020



The Liberty Utilities building in Keene, as seen in March 2016.

Michael Moore / Sentinel Staff

Despite a pending appeal, Liberty Utilities says its plans to switch Keene's propane/air system to natural gas remain on track.

The N.H. Public Utilities Commission gave Liberty the go-ahead in July to start the conversion. Keene City Councilor Terry M. Clark, who has opposed the introduction of natural gas for health and environmental reasons, appealed that order to the N.H. Supreme Court in late October.

John Shore, a Liberty spokesman, said in an email Wednesday that the company has already converted its commercial customers in Monadnock Marketplace to compressed natural gas, the project's first phase.



"We are currently working with the PUC on a plan to convert the remaining customers in Keene to natural gas," he wrote. "This will be phased in over multiple years. Mr. Clark's appeal has not affected our timeline."

About 1,200 customers use the propane/air system. Keene is the only community in the country where Liberty operates such a system.

Liberty has described natural gas as safer and more reliable than the existing system. An issue at the company's Emerald Street distribution center in December 2015 caused a citywide gas problem in which emergency personnel took four people to the hospital and checked more than 1,000 homes and businesses for carbon monoxide.



In 2017, Liberty asked the PUC to rule that the same franchise that allows the company to operate a propane/air system in Keene also extends to natural gas.

Clark's appeal argues the PUC followed a flawed process and introducing natural gas is contrary to the public interest "due to climate, health and other concerns."

He has been especially concerned about the health implications of gas extracted by fracking. Liberty has said it will procure gas from various sources.

Paul Cuno-Booth can be reached at 352-1234, extension 1409, or pbooth@keenesentinel.com. Follow him on Twitter at [@PCunoBoothKS](https://twitter.com/PCunoBoothKS).

EXHIBIT “B”

**KEENE – CNG CONVERSION
PROPOSED PURGE PLAN
CONVERSION SECTION 1**

(To be used in conjunction with O&M Manual sections Chapters 5, 6, 7, and 9)

Job Order Number: 43C18821-18304

Two Way Feed: ☐ One Way Feed: ☒ (Flow Arrows Indicated on Sketch)

Bypass Needed? No Size: Choose size"

Tie-In Reference Locations: Chili's

Originator Signature: *Brian R. Frost*

1. SEE SOP call Gas Control at beginning of Phase 1 Conversion.
2. Person in charge will review purge plan with crew performing job and will determine the number of crew members needed.
3. Close all valves on risers within scope of work and disconnect service after valve.
4. Begin converting all customer appliances and meter fits within scope to accommodate natural gas.
5. Close valves V1, V2, V3, V4, V13, and buried service line valve to Chili's.
6. Install flare set up on Long Horn Steakhouse service (PB-R1), insure flare set up is 50' from any structure.
7. Install nitrogen injection set up at I-1.
8. Begin flaring operation, then open valve V2.
9. Inject nitrogen at I-1 and purge main towards flare PB-R1. Once flame goes out confirm CGI reading of 1% or less gas at flare point.
10. Temporarily stop injecting nitrogen at I-1, disconnect flare set up at Long Horn and secure service.
11. Install flare set up at PB-R8, insure flare set up is 50' from any structure.
12. Begin flaring operation, then open valve V13.
13. Resume nitrogen injection at I-1, and purge main towards flare PB-R8. Once flame goes out confirm CGI reading of 1% or less gas at flare point. Secure service.
14. Install flare set up at Chili's server (PB-R9), insure flare set up is 50' from any structure.
15. Begin flaring operation, then open buried service line valve to Chili's.
16. Resume nitrogen injection at I-1, and purge main towards flare PB-R9. Once flame goes out confirm CGI reading of 1% or less gas at flare point.
17. Stop injecting nitrogen at I-1, disconnect flare set up at PB-R9 and secure service.
18. Close valve V2.
19. Each riser valve in the conversion section shall be replaced before completing the pressure test. Valve replacement may be completed at any time before the test as long as the gas service is depressurized. Before testing open riser valves and plug or blind flange ends.

20. Conduct 2 hour 90 psig pressure test on mains and services within scope to establish 60 psig MAOP. Use air as the test medium. After test depressurize pipe.
21. Once pressure test is complete, open valve V2. Close valve V13 and buried service line valve to Chili's.
22. Open purge point at PB-R1, and inject 1 tank slug of nitrogen at I-1 to start purge into service.
23. Slowly open valve V1 and continue purge into service with natural gas towards purge point PB-R1. Continue until three readings of 95-100% gas at purge point.
24. Remove purge point set up at PB-R1.
25. Open purge point PB-R8, then slowly open valve V13 to purge main into service with natural gas. Confirm three readings of 95-100% gas at purge point.
26. Remove purge point set up at PB-R8.
27. Open purge point PB-R9, then slowly open buried service line valve to Chili's to purge service into service with natural gas. Confirm three readings of 95-100% gas at purge point.
28. Remove purge point set up at PB-R9, nitrogen/air injection set up, and cap fittings.
29. Reconnect all customers within scope of work and begin relights once customer conversions are complete.
30. Leak survey all gas mains and services within conversion section 1.
31. SEE SOP call Gas Control at completion of Phase 1 Conversion.

**KEENE – CNG CONVERSION
PROPOSED PURGE PLAN
CONVERSION SECTION 2**

(To be used in conjunction with O&M Manual sections Chapters 5, 6, 7, and 9)

Job Order Number: 43C18821-18304

Two Way Feed: ☐ One Way Feed: ☒ (Flow Arrows Indicated on Sketch)

Bypass Needed? No Size: Choose size"

Tie-In Reference Locations: Price Chopper

Originator Signature: *Kevin R. Frost*

1. SEE SOP call Gas Control at beginning of Phase 2 Conversion.
2. Person in charge will review purge plan with crew performing job and will determine the number of crew members needed.
3. Close all valves on risers within scope of work and disconnect service after valve.
4. Begin converting all customer appliances and meter fits within scope to accommodate natural gas.
5. Close valves V5 and V6. Verify that valves V3 and V4 remain closed from the last phase.
6. Install flare set up on Old Party Store service (PB-R2), insure flare set up is 50' from any structure.
7. Install nitrogen injection set up at I-2.
8. Begin flaring operation.
9. Inject nitrogen at I-2 and purge main towards flare at PB-R2. Once flame goes out confirm CGI reading of 1% or less gas at flare point PB-R2. Temporarily stop injecting nitrogen at I-2 and secure service.
10. Move flare setup to I-5. Resume nitrogen injection at I-2 and purge towards flare at I-5. Once flame goes out confirm CGI reading of 1% or less gas at flare point I-5. Secure I-5.
11. Each riser valve in the conversion section shall be replaced before completing the pressure test. Valve replacement may be completed at any time before the test as long as the gas service is depressurized. Before testing open riser valves and plug or blind flange ends.
12. Conduct 2 hour 90 psig pressure test on mains and services within scope to establish 60 psig MAOP. Use air as the test medium. After test depressurize pipe.
13. Once pressure test is complete, open valve V4.
14. Open purge point at PB-R2, and inject 1 tank slug of nitrogen at I-2 to start purge into service.
15. Slowly open valve V3, and continue purge into service with natural gas towards purge point PB-R2. Continue until three readings of 95-100% gas at purge point.
16. Simultaneously close purge point at PB-R2 and open purge point at I-5. Continue purge into service at I-5 until three readings of 95-100%.
17. Remove purge point set ups, nitrogen injection set up, and cap fittings.

18. Reconnect all customers within scope of work and begin relights once customer conversions are complete.
19. Leak survey all gas mains and services with conversion section 2.
20. SEE SOP call Gas Control at completion of Phase 2 Conversion.

**KEENE – CNG CONVERSION
PROPOSED PURGE PLAN
CONVERSION SECTION 3**

(To be used in conjunction with O&M Manual sections Chapters 5, 6, 7, and 9)

Job Order Number: 43C18821-18304

Two Way Feed: ☐ One Way Feed: ☒ (Flow Arrows Indicated on Sketch)

Bypass Needed? No Size: Choose size"

Tie-In Reference Locations: NH Liquor Store

Originator Signature: *Chris R. Frost*

1. SEE SOP call Gas Control at beginning of Phase 3 Conversion.
2. Person in charge will review Purge plan with crew performing job and will determine the number of crew members needed.
3. Close all valves on risers within scope of work and disconnect service after valve.
4. Begin converting all customer appliances and meter fits within scope to accommodate natural gas.
5. Close valves V7 and V8. Verify that valves V5 and V6 remain closed from the last phase.
6. Close buried service line valve to Michael's.
7. Install flare set up on NH Liquor Store service (PB-R3), insure flare set up is 50' from any structure.
8. Install nitrogen injection set up at I-3.
9. Begin flaring operation.
10. Inject nitrogen at I-3 and purge main towards flare at PB-R3. Once flame goes out confirm CGI reading of 1% or less gas at flare point.
11. Temporarily stop injecting nitrogen at I-3, disconnect flare set up from NH Liquor Store meter fit and secure service.
12. Install flare set up on Michaels's service (PB-R4), insure flare set up is 50' from any structure.
13. Begin flaring operation, then open buried service line valve to Michael's.
14. Resume nitrogen injection at I-3, and purge main with air towards flare at PB-R4. Once flame goes out confirm CGI reading of 1% or less gas at flare point. Secure service.
15. Each riser valve in the conversion section shall be replaced before completing the pressure test. Valve replacement may be completed at any time before the test as long as the gas service is depressurized. Before testing open riser valves and plug or blind flange ends.
16. Conduct 2 hour 90 psig pressure test on mains and services within scope to establish 60 psig MAOP. Use air as test medium. After test depressurize pipe.
17. Once pressure test is complete, open valve V6 and close the buried service valve to Michael's.
18. Open purge point at PB-R3, and inject 1 tank slug of nitrogen at I-3 to start purge into service.
19. Slowly open valve V5 and continue purge into service with natural gas towards purge point PB-R3. Continue until three readings of 95-100% gas at purge point.

20. Open purge point PB-R4, then slowly open buried service valve to Michael's to purge service into service with natural gas. Confirm three readings of 95-100% gas at purge point.
21. Remove purge point set ups, and nitrogen/air injection set up and cap fittings.
22. Reconnect all customers within scope of work and begin relights once customer conversions are complete.
23. Leak survey all gas mains and services with conversion section 3.
24. SEE SOP call Gas Control at completion of Phase 3 Conversion.

**KEENE – CNG CONVERSION
PROPOSED PURGE PLAN
CONVERSION SECTION 4**

(To be used in conjunction with O&M Manual sections Chapters 5, 6, 7, and 9)

Job Order Number: 43C18821-18304

Two Way Feed: ☐ One Way Feed: ☒ (Flow Arrows Indicated on Sketch)

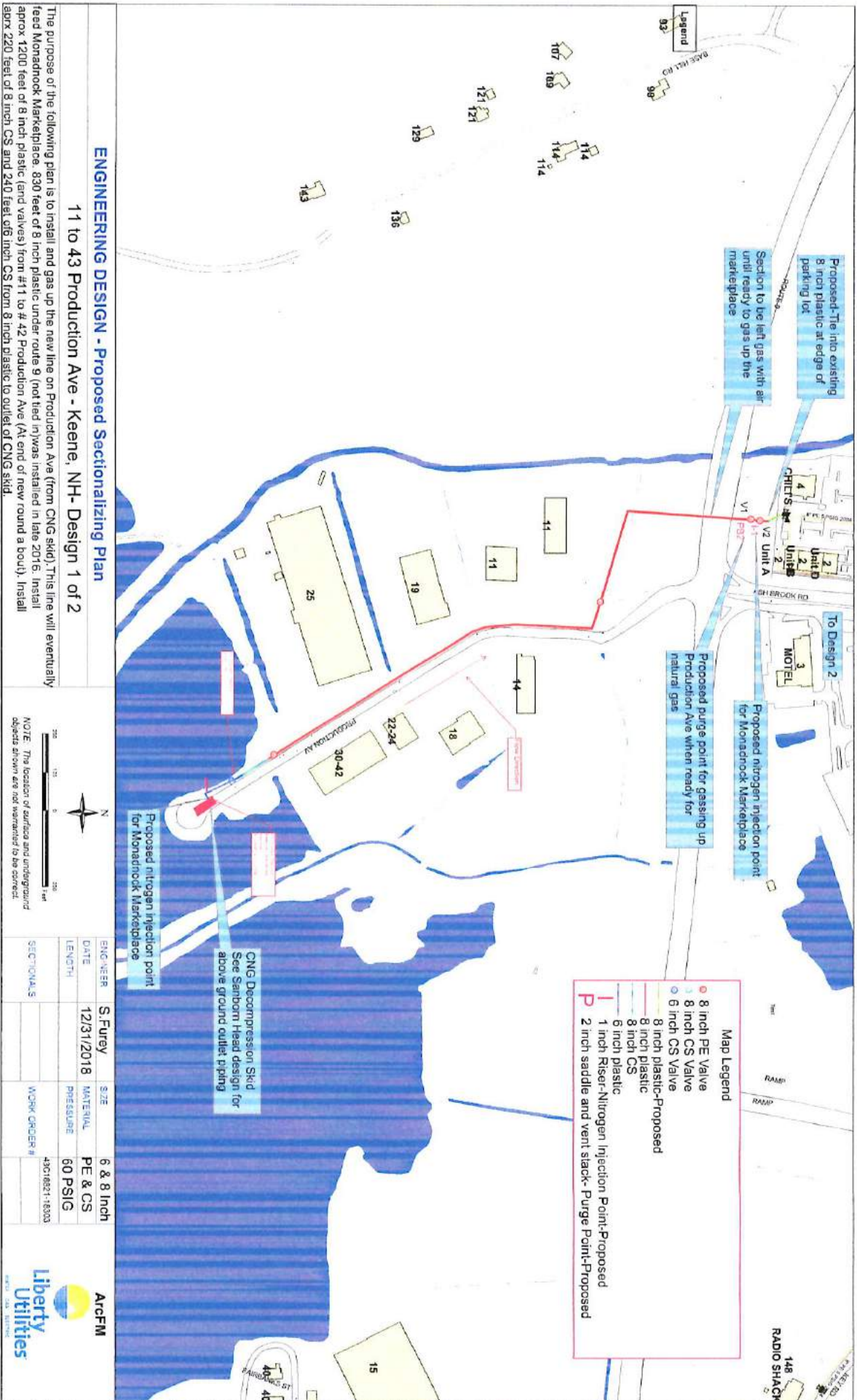
Bypass Needed? No Size: Choose size"

Tie-In Reference Locations: Key Rd

Originator Signature: *Brian R. Frost*

1. SEE SOP call Gas Control at beginning of Phase 4 Conversion.
2. Person in charge will review purge plan with crew performing job and will determine the number of crew members needed.
3. Close all valves on risers within scope of work and disconnect service after valve.
4. Begin converting all customer appliances and meter fits within scope to accommodate natural gas.
5. Close valves V9, V10, V11 and V12. Verify that valves V7 and V8 remain closed from the last phase.
6. Install flare set up on PB1 on Key Rd, insure flare set up is 50' from any structure.
7. Install nitrogen injection set up at I-4.
8. Begin flaring operation, then open valve V8.
9. Inject nitrogen at I-4 and purge main towards flare at PB1. Once flame goes out confirm CGI reading of 1% or less gas at flare point.
10. Temporarily stop injecting nitrogen at I-4 and secure PB1.
11. Install flare set up at PB-R7 on Planet Fitness service, insure flare set up is 50' from any structure.
12. Begin flaring operation, then open valve V12.
13. Resume nitrogen inject at I-4 and purge main towards flare at PB-R7. Once flame goes out confirm CGI reading of 1% or less gas at flare point.
14. Temporarily stop injecting nitrogen at I-4 and secure service.
15. Install flare set up at PB-R6 on Target Store service, insure flare set up is 50' from any structure.
16. Begin flaring operation, then open valve V11.
17. Resume nitrogen injection at I-4, and purge main towards flare at PB-R6. Once flame goes out confirm CGI reading of 1% or less gas at flare point.
18. Stop nitrogen injection at I-4 and secure service.
19. Close valve V8.
20. Each riser valve in the conversion section shall be replaced before completing the pressure test. Valve replacement may be completed at any time before the test as long as the gas service is depressurized. Before testing open riser valves and plug or blind flange ends.
21. Conduct 2 hour 90 psig pressure test on mains and services within scope to establish 60 psig MAOP. Use air as test medium. After test depressurize pipe.
22. Once pressure test is complete, open valve V8, and close valves V11 and V12.

23. Open purge point at PB1, and inject 1 tank slug of nitrogen at I-4 to start purge into service.
24. Slowly open valve V7 and continue purge into service with natural gas towards purge point PB1. Continue until three readings of 95-100% gas at purge point.
25. Remove purge point setup at PB1.
26. Open purge point PB-R7, then slowly open valve V12 to purge main into service with natural gas. Confirm three readings of 95-100% gas at purge point.
27. Remove purge point setup at PB-R7.
28. Open purge point PB-R6, then slowly open valve V11 to purge main into service with natural gas. Confirm three readings of 95-100% gas at purge point.
29. Remove purge flare set up at PB-R6, and nitrogen/air injection set up and cap fittings.
30. Reconnect all customers within scope of work and begin relights once customer conversions are complete.
31. Leak survey all gas mains and services with conversion section 4.
32. At interface of propane air system and natural gas system located at valves V9 and V10, cut and cap system between valves to separate system.
33. Open valves V9 and V10.
34. SEE SOP call Gas Control at completion of Phase 4 Conversion.



11 to 43 Production Ave - Keene, NH- Design 1 of 2

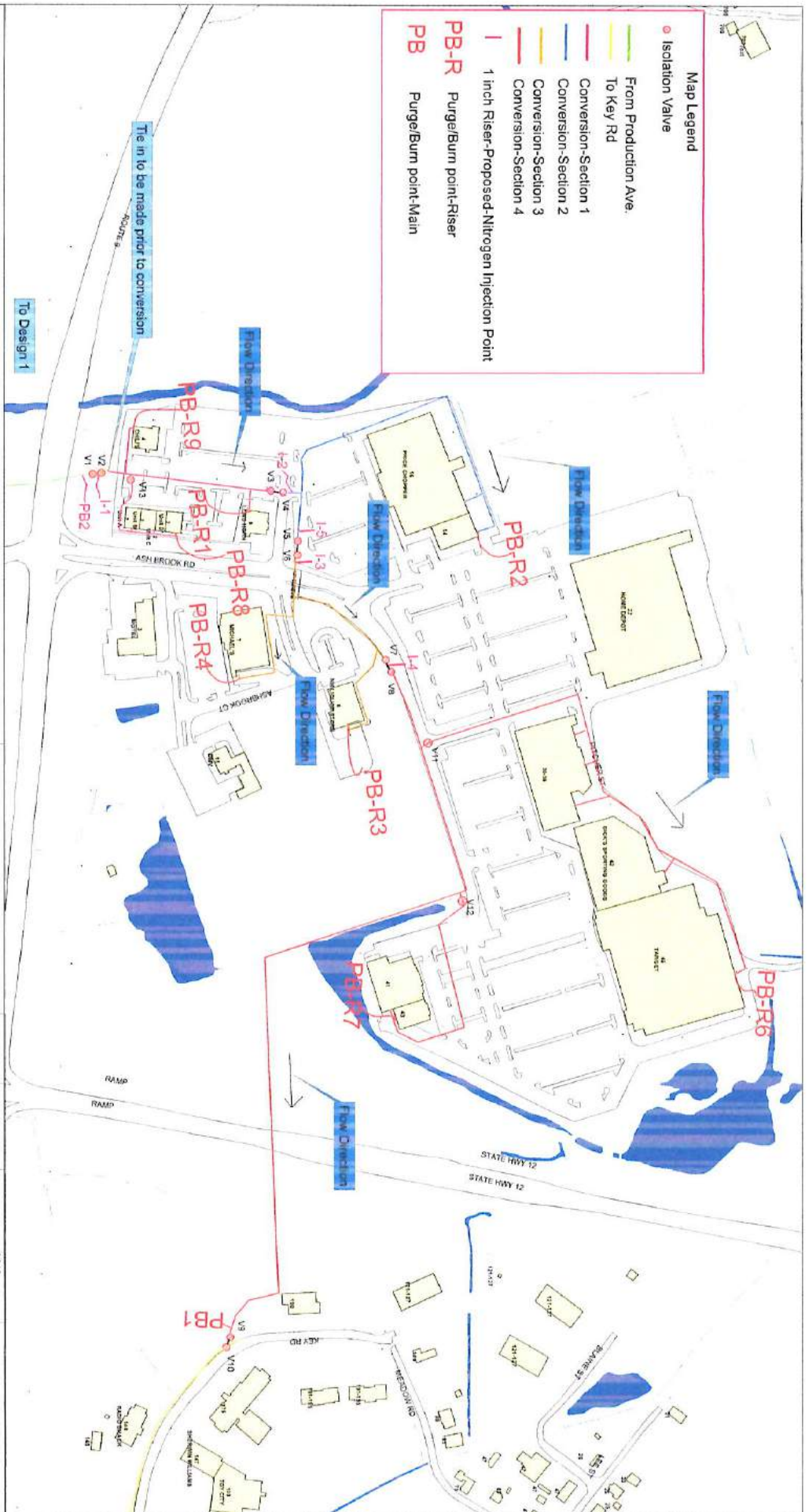
The purpose of the following plan is to install and gas up the new line on Production Ave (from CNG skid). This line will eventually feed Mesquite Markelbach. 830 feet of 8 inch plastic under route 9 (not fed in) was installed in late 2016. Install approx 1200 feet of 8 inch plastic (end valves) from #11 to # 42 Production Ave (A) end of new round a bou). Install approx 220 feet of 8 inch CS and 240 feet of 6 inch CS from 8 inch plastic to outlet of CNG skid.



ENGINEER	S. Furey	SIZE	6 & 8 inch
DATE	12/31/2018	MATERIAL	PE & CS
LENGTH		PRESSURE	60 PSIG
SECTIONALS		WORK ORDER #	49C10621-18300

Map Legend

- Isolation Valve
- From Production Ave.
- To Key Rd
- Conversion-Section 1
- Conversion-Section 2
- Conversion-Section 3
- Conversion-Section 4
- 1 inch Riser-Proposed Nitrogen Injection Point
- PB-R Purge/Burn point-Riser
- PB Purge/Burn point-Main



ENGINEERING DESIGN - Proposed Sectionalizing Plan

Monadnock Marketplace, Keene NH (Design 2 of 2)

The purpose of the following plan is to sectionalize sections of Monadnock Marketplace in order to convert the system from propane air to natural gas. Double valves and 1 inch risers in valve boxes will be utilized for sectionalizing, and purging

ENGINEER	S. Furey	SIZE	N/A
DATE	12/31/2018	MATERIAL	N/A
LENGTH		PRESEQUENCE	60 PSIG
SECTIONALS		WORK ORDER #	430718027-18034

NOTE: The location of surfaces and underground objects shown are not warranted to be correct.

Liberty Utilities

ARC FM

**KEENE – CNG CONVERSION
CONTINGENCY PLAN
CONVERSION SECTION 1**

(To be used in conjunction with O&M Manual sections Chapters 5, 6, 7, and 9)

Job Order Number: 43C18821-18304

Two Way Feed: ☐ One Way Feed: ☒ (Flow Arrows Indicated on Sketch)

Bypass Needed? No Size: Choose size"

Tie-In Reference Locations: Chili's

Originator Signature: *Brian R. Frost*

1. This procedure applies in the event the pressure test on conversion section 1 is unsuccessful. It is intended to restore gas service as soon as possible.
2. Isolate conversion section 1 into multiple pieces by closing V13 and buried service valve to Chili's.
3. Conduct 2 hour 90 psig pressure test on isolated conversion section 1 to establish 60 psig MAOP. Use air as the test medium. After test depressurize pipe.
4. If pressure test is successful then proceed with purging and energizing isolated main section. Otherwise start relay or repair of conversion section 1 gas mains.
5. To start purge of isolated section 1 open valve V2. Install nitrogen tank at I-1 and open purge riser at PB-R1.
6. Inject nitrogen (1 tank slug), immediately slowly open valve V1 so natural gas follows after nitrogen slug, and purge main into service through purge stack located at I-2. Purge until three readings of 95-100% gas at purge point.
7. Once purge is complete fully open valve V1, and remove purge stack at PB-R1.
8. To reinstate gas services, and main at V13, disconnect and test each section separately. Work with customers to reinstate service in a manner that provides least disruption to businesses (for example reinstate service to restaurants first, then to space heating customers second).
9. To reinstate service at Chili's disconnect the service pipe at the buried service valve, retest service according to O&M requirements, make any required repairs or relay service, and purge from main to riser valve.
10. To reinstate service to main downstream of valve V13, disconnect main at V13, pressure test according to O&M requirements, make any required repairs or relay main and services. Shut all buried service valves and purge from V13 to PB-R8. After gas main is energized, purge each service from the buried service valve to the riser.

**KEENE – CNG CONVERSION
CONTINGENCY PLAN
CONVERSION SECTION 2**

(To be used in conjunction with O&M Manual sections Chapters 5, 6, 7, and 9)

Job Order Number: 43C18821-18304

Two Way Feed: ☐ One Way Feed: ☒ (Flow Arrows Indicated on Sketch)

Bypass Needed? No Size: Choose size"

Tie-In Reference Locations: Price Chopper

Originator Signature: *Brian R. Frost*

1. This procedure applies in the event the pressure test on conversion section 2 is unsuccessful. It is intended to restore gas service as soon as possible.
2. Isolate mains and services on conversion section 2 by cutting and capping the 4" PL 5# (2005) main just upstream of the service connection for Price Chopper.
3. Conduct 2 hour 90 psig pressure test on conversion section 2 from V5 to cut and cap point to establish 60 psig MAOP. Use air as the test medium. After test depressurize pipe. Retest services to Price Chopper and old party store separately. After test depressurize pipe.
4. Relay or repair gas facilities where the leak is observed. Once completed connect services back to the main and start purge into service.
5. Set up nitrogen tank at I-2 and open purge point at PB-R2
6. Open valve V4 and inject 1 tank of nitrogen to begin purge into service. Immediately introduce natural gas by opening valve V3 and purging to PB-R2 until three readings of 95-100% gas are observed at purge point PB-R2.
7. Remove purge stacks and nitrogen setup. Cap all fittings.
8. Reconnect all customers and relight.

**KEENE – CNG CONVERSION
CONTINGENCY PLAN
CONVERSION SECTION 3**

(To be used in conjunction with O&M Manual sections Chapters 5, 6, 7, and 9)

Job Order Number: 43C18821-18304

Two Way Feed: ☐ One Way Feed: ☒ (Flow Arrows Indicated on Sketch)

Bypass Needed? No Size: Choose size"

Tie-In Reference Locations: NH Liquor Store

Originator Signature: *Brian R. Frost*

1. This procedure applies in the event the pressure test on conversion section 3 is unsuccessful. It is intended to restore gas service as soon as possible.
2. Isolate section 3 by closing buried service valves to Michael's and the NH Liquor Store.
3. Conduct 2 hour 90 psig pressure test on isolated conversion section 3 to establish 60 psig MAOP. Use air as the test medium. After test depressurize pipe.
4. If pressure test is successful then proceed with purging and energizing isolated main section. Otherwise start relay or repair of conversion section 3 gas mains.
5. To start purge of isolated section 1 open valve V6 and V7. Install nitrogen tank at I-3 and open purge riser at I-4.
6. Inject nitrogen (1 tank slug), immediately slowly open valve V5 so natural gas follows after nitrogen slug, and purge main into service through purge stack located at I-4. Purge until three readings of 95-100% gas at purge point.
7. Once purge is complete, completely close valve V7, fully open valve V5, remove purge stack at I-4, and cap nitrogen connection at I-3.
8. To reinstate gas services, disconnect and test each section separately. Work with customers to reinstate service in a manner that provides least disruption to businesses.
9. To reinstate service at Michael's and the NH Liquor Store disconnect the service pipe at the buried service valve, retest service according to O&M requirements, make any required repairs or relay service, and purge from main to riser valve.

**KEENE – CNG CONVERSION
CONTINGENCY PLAN
CONVERSION SECTION 4**

(To be used in conjunction with O&M Manual sections Chapters 5, 6, 7, and 9)

Job Order Number: 43C18821-18304

Two Way Feed: ☐ One Way Feed: ☒ (Flow Arrows Indicated on Sketch)

Bypass Needed? No Size: Choose size"

Tie-In Reference Locations: Key Rd

Originator Signature: *Brian R. Frost*

1. This procedure applies in the event the pressure test on conversion section 4 is unsuccessful. It is intended to restore gas service as soon as possible.
2. Isolate conversion section 4 into three pieces by closing valves V11 and V12. Conduct 2 hour 90 psig pressure test on primary piping run from V8 to V9 to establish 60 psig MAOP. Use air as the test medium. After test depressurize pipe.
3. If pressure test is successful on primary piping run between valves V11 and V12 then proceed with purging and energizing isolated main section. Otherwise start relay or repair of gas mains.
4. To start purge of the primary piping run of section 4 open valve V8. Install nitrogen tank at I-4 and open purge riser at PB1.
5. Inject nitrogen (1 tank slug), immediately slowly open valve V7 so natural gas follows after nitrogen slug, and purge main into service through purge stack located at PB1. Purge until three readings of 95-100% gas at purge point.
6. Once purge is complete, completely close the valve on purge stack PB1, fully open valve V7, and remove purge stack at PB1.
7. To reinstate service to main downstream of valve V11, disconnect main at V11, pressure test according to O&M requirements, after test depressurize pipe, and relay or repair main and services. Shut all buried service valves and purge from V11 to PB-R6. After gas main is energized, purge each service from the buried service valve to the riser.
8. To reinstate service to main downstream of valve V12, disconnect main at V12, pressure test according to O&M requirements, after test depressurize pipe, and relay or repair main and services. Shut all buried service valves and purge from V12 to PB-R7. After gas main is energized, purge each service from the buried service valve to the riser.

Supervisors can print a copy of this APPROVED SOP and review with field personnel.

Gas Control should check the GREEN box in the "SOP STEPS" section to change this SOP to INPRG. SAVE then close form

APPROVED

Author

Created	9/11/2017	SOP Status	APPROVED
SOP/WO#	43C18821-18303	Rev #	4
Emp	Brian.Frost@libertyutilities.com	Emp #	9784
Cell #	603-475-9143	Dept.	Engineering

Job Location

Division	Southern	Town	Keene
On Street	KNE Monadnock Marke...	Cross St #1	
Cross St #2		Cross St #3	

SOP Details

Est. Start Date	9/23/2019	Job Type	Supply
System Pressure	60 PSI	Nature of Work	Other

Within 200' of a regulator Station or new main is > 2500'

Are there multiple pressures within work zone: YES

Scope

Convert Monadnock Market Place from Propane-Air to Natural Gas and purge new main into service on Production Ave.

43C18821-18303 4 **SOP STEPS**

Gas Control 603-216-3621

In Progress ☒ In Progress By

STEP 1

Critical Step, Mobilization - Notify Gas Control the first day on site GAS CONTROL - (603) 216-3621

Is this a critical step YES contact gas Control prior to execution

Are there multiple pressures in work zone YES

Min Pressure / Min Temp 40 # / 20 F

STEP 2

NOTE: Prior to this SOP, CNG Skid to be brought online and purged with gas through regulators up to 60 psig distribution system regulator inlet block valves. Confirm with I&R before continuing with steps contained within in this SOP.

Is this a critical step NO, call to Gas Control is required

Are there multiple pressures in work zone YES

Min Pressure / Min Temp 40 # / 20 F

STEP 3

Make sure blocking valves (V1 and V2) separating Propane-Air system from newly active Keene Natural Gas system are closed and properly marked to prevent inadvertent opening.

Is this a critical step NO, call to Gas Control is required

Are there multiple pressures in work zone YES

Min Pressure / Min Temp 40 # / 20 F

STEP 4

Install purge riser at PB2 the end of newly installed 8" PE (see attached map).

Is this a critical step NO, call to Gas Control is required

Are there multiple pressures in work zone YES

Min Pressure / Min Temp 40 # / 20 F

STEP

5	Open purge riser at PB2 to depressurize air blanket that existed on gas main from CNG skid to valve V2. Keep purge riser PB2 open. Inject 1 tank slug of nitrogen on downstream side of 60 psig distribution system regulators. Immediately after nitrogen injection, open inlet block valves to 60 psig distribution regulators to flow gas and purge main into service until three reading of 95-100% gas reading are obtained at purge point. CALL GAS CONTROL once purge is complete.	Is this a critical step	<input checked="" type="checkbox"/> YES contact gas Control prior to execution	Min Pressure / Min Temp	40 # / 20 F
	Are there multiple pressures in work zone	<input checked="" type="checkbox"/> YES			
STEP					
6	The following conversions must be completed in order to ensure natural gas is available for conversion from Propane-Air to natural can occur. See attached "Combined Purge Plan" CALL GAS CONTROL prior to each conversion phase and once each conversion phase is completed. Prior to each conversion phase, ensure all personal are in place needed for conversion prior to customer shutdowns.	Is this a critical step	<input checked="" type="checkbox"/> NO, call to Gas Control is required	Min Pressure / Min Temp	40 # / 20 F
	Are there multiple pressures in work zone	<input checked="" type="checkbox"/> YES			
STEP					
7	Call Gas Control Begin Phase 1 Conversion	Is this a critical step	<input checked="" type="checkbox"/> YES contact gas Control prior to execution	Min Pressure / Min Temp	40 # / 20 F
	Are there multiple pressures in work zone	<input checked="" type="checkbox"/> YES			
STEP					
8	Call Gas Control Phase 1 conversion Complete	Is this a critical step	<input checked="" type="checkbox"/> YES contact gas Control prior to execution	Min Pressure / Min Temp	40 # / 20 F
	Are there multiple pressures in work zone	<input checked="" type="checkbox"/> YES			
STEP					
9	Call Gas Control begin Phase 2 Conversion	Is this a critical step	<input checked="" type="checkbox"/> YES contact gas Control prior to execution	Min Pressure / Min Temp	40 # / 20 F
	Are there multiple pressures in work zone	<input checked="" type="checkbox"/> YES			
STEP					
10	Call Gas Control Phase 2 conversion Complete	Is this a critical step	<input checked="" type="checkbox"/> YES contact gas Control prior to execution	Min Pressure / Min Temp	40 # / 20 F
	Are there multiple pressures in work zone	<input checked="" type="checkbox"/> YES			
STEP					
11	Call Gas Control begin Phase 3 Conversion	Is this a critical step	<input checked="" type="checkbox"/> YES contact gas Control prior to execution	Min Pressure / Min Temp	40 # / 20 F
	Are there multiple pressures in work zone	<input checked="" type="checkbox"/> YES			
STEP					
12	Call Gas Control Phase 3 conversion Complete	Is this a critical step	<input checked="" type="checkbox"/> YES contact gas Control prior to execution	Min Pressure / Min Temp	40 # / 20 F
	Are there multiple pressures in work zone	<input checked="" type="checkbox"/> YES			
STEP					
13	Call Gas Control begin Phase 4 Conversion	Is this a critical step	<input checked="" type="checkbox"/> YES contact gas Control prior to execution	Min Pressure / Min Temp	40 # / 20 F
	Are there multiple pressures in work zone	<input checked="" type="checkbox"/> YES			
STEP					
14	Call Gas Control Phase 4 conversion Complete	Is this a critical step	<input checked="" type="checkbox"/> YES contact gas Control prior to execution	Min Pressure / Min Temp	40 # / 20 F
	Are there multiple pressures in work zone	<input checked="" type="checkbox"/> YES			
STEP					
15	Critical Step, Notify Gas Control on job completion.	Is this a critical step	<input checked="" type="checkbox"/> YES contact gas Control prior to execution	Min Pressure / Min Temp	40 # / 20 F
	Are there multiple pressures in work zone	<input checked="" type="checkbox"/> YES			
ADD STEP					

Comments		
Gas Planning	i:\0#\.w\utilities\amills	2018-12-31
no issues, Gas Engineering personnel or designee to be onsite for purge in/out steps		
Minimum Pressure	40 #	Minimum Temperature 20 F
I & R	i:\0#\.w\utilities\gclement	2017-09-27
no issues, I & R personnel will be onsite		
Gas Control	i:\0#\.w\utilities\jridge	2017-09-29
Reviewed		
Mapping	i:\0#\.w\utilities\arenauld	9/28/2017

FIELD CHANGES	
<div> <div>Not Approved</div> <div> <input type="checkbox"/> </div> </div>	<div> <div>i:\0#\.w\utilities\b frost</div> </div>