

1.1 Liberty Utilities Keene Site and Decompression Skid Design for CNG Submittal Date 11/13/17							
1.1 Mechanical and Electrical ASBUILTS prepared by SANBORN HEAD							
Safety Division Recommendation	Section	11/13/17 Submittal Diagram No.	Safety Division Comments	Corresponding Bates Page Number(s) 11/30/17	Liberty Notified	Liberty Utilities Document Status 12/5/2018	Responsible Department
1	Piping and Instrumentation Diagram PID1	PID1	Insulated Flange identified and located directly on top of Service Valve feeding the Natural Gas Generator was noticed in the field as well as recorded on Main Field Record for 8/30/2017. None is shown on this drawing after V133 and before the excess flow valve. This should be corrected.	BP 0002	No	In-Progress-Sanborn Head target completion date is 1/1/2019	Operations
2	Piping and Instrumentation Diagram PID1	PID1	8 inch and 6 inch piping incorrectly shown as API 5L GrB on drawing. The field crews installed API 5XL52 and API 5XL42 for 8" and 6". Staff recommends that Liberty verify the pipe material that was actually used in the field to what is specified for 2", 4" and 6" diameter piping of PID1. Exact piping material records is essential to establishing properly documented MAOPs.	BP 0002	No	In-Progress-Sanborn Head target completion date is 1/1/2019	Operations
3	Piping and Instrumentation Diagram PID1	PID1	Note Top Run of Monitor Regulator shows setting of 50 psig which is inconsistent with 55 psig shown on BP 1622	BP 0002 BP 1622	No	In-Progress-Sanborn Head target completion date is 1/1/2019	Operations
4	Piping and Instrumentation Diagram PID1	PID1	Note Bottom Run of Monitor Regulator shows setting of 50 psig which is inconsistent with 55 psig shown on BP 1624	BP 0002 BP 1624	No	In-Progress-Sanborn Head target completion date is 1/1/2019	Operations
5	Piping Arrangement M1	M2 and M3	Liberty did not provide Sanborn Head drawing M2 and M3 so components could not be verified for pressure ratings and appropriateness as well as field verification. Safety Division requires submittal of finalized drawings before gas flows.	BP 0003	No	In-Progress-Sanborn Head target completion date is 1/1/2019	Operations

1.2 Liberty Utilities Keene Site and Decompression Skid Design for CNG Submittal Date 11/13/17							
1.2 Low Flow Skid Component Book by APEX Engineering							
Safety Division Recommendation	Section	11/13/17 Submittal Page No.	Safety Division Comments	Corresponding Bates Page Number(s) 11/30/17	Liberty Notified	Liberty Utilities Document Status 12/5/2018	Responsible Department
1	Table of Contents	1	Attachments are mislabeled Section 16. There are no other sections labeled after 6.	BP 0012	YES	In-Progress-Apex Engineering target completion date is 1/1/2019	Engineering
2	Scope	1	AMSE B1 8 should be deleted	BP 0013	YES	In-Progress-Apex Engineering target completion date is 1/1/2019	Engineering

3	Applicable Codes and Standards	1	ASME B31.8-2016 is a standard not adopted by PUC nor federal government (PHMSA) except for very specific instances. Version 2007 is adopted but only for 2 sections which are not applicable to this installation. These sections are required for Alternative Maximum Allowable Operating Pressure (MAOP) designs 192.112 (b) and conversions of pipelines or uprating 192.619 (a). It is unclear why Liberty is incorporating and referencing ASME 31.8 -2016 edition.	BP 0013	YES	In-Progress-Apex Engineering target completion date is 1/1/2019	Engineering
4	Applicable Codes and Standards	1	"Transmission" should be replaced with "Transportation" in 49 CFR part 192 reference	BP 0013	YES	In-Progress-Apex Engineering target completion date is 1/1/2019	Engineering
5	Attachment A Drawing P-003	1	Venting is not shown as installed in the field for Unloading Station A and B.	BP 0021	YES	In-Progress-Apex Engineering target completion date is 1/1/2019	Engineering

1.2 Liberty Utilities Keene Site and Decompression Skid Design for CNG Submittal Date 11/13/17
1.2 Low Flow Skid Component Book by APEX Engineering
Attachment A General Arrangements and P&ID's

Safety Division Recommendation	Section	11/13/17 Submittal Page No.	Safety Division Comments	Corresponding Bates Page Number(s) 11/30/17	Liberty Notified	Liberty Utilities Document Status 12/5/2018	Responsible Department
1	P-003	1	General Notes for TS30 on APEX drawing P-003 state test pressure 1 25% for hydraulic test, or 5313 psig, which is inconsistent with the regulation requirement of 49 CFR Part 192.505 for steel pipelines operating at greater than 30% SMYS. BP 1391 does correctly show the requirement as Calculations for Engineers Test Limit. Requirement is for 1.5 for hydraulic test or 6375 psig. Safety Division notes General Notes for BP 1383, 1384, 1385, 1386 are also incorrectly shown.	BP 0021 BP 1391 BP 1383	YES	In-Progress-Apex Engineering target completion date is 1/1/2019	Engineering
2	P-003	1	General Notes for TS31 on APEX drawing P-003 state operating pressure is 500 psig, which is inconsistent with the set pressures of 600 psig on top run and 700 psig of bottom run and set to open pressure of 400 psig of bypass run as shown on P-004. Safety Division notes General Notes for BP 1383, 1384, 1385, 1386 are also incorrectly shown.	BP 0021 BP 0022 BP 1383	YES	In-Progress-Apex Engineering target completion date is 1/1/2019	Engineering
3	P-003	1	General Notes for TS35 on APEX drawing P-003 state operating pressure is 55 psig, which is inconsistent with the set pressures of 45 psig on top run and 40 psig of bottom run PID1 This is also in consistent with P-005 which states the set pressure is 75 psig. Safety Division notes General Notes for BP 1383, 1384, 1385, 1386 are also incorrectly shown.	BP 0021 BP 0002 BP 1383	YES	In-Progress-Apex Engineering target completion date is 1/1/2019	Engineering
4	P-003	1	General Notes for FB30 on APEX drawing P-003 state operating pressure is 55 psig, which is inconsistent with the set pressures of 45 psig on top run and 40 psig of bottom run PID1 This is also in consistent with P-005 which states the set pressure is 75 psig. Safety Division notes General Notes for BP 1383, 1384, 1385, 1386 are also incorrectly shown.	BP 0021 BP 0002 BP 1383	YES	In-Progress-Apex Engineering target completion date is 1/1/2019	Engineering

5	P-004	1	General Notes for TS30 on APEX drawing P-004 state Test pressure 1 25% for hydraulic test, or 5313 psig, which is inconsistent with the regulation requirement of 49 CFR Part 192.505 for steel pipelines operating at greater than 30% SMYS. BP 1391 does correctly show the requirement as Calculations for Engineers Test Limit. Requirement is for 1.5 for hydraulic test or 6375 psig. Safety Division notes General Notes for BP 1383, 1384, 1385, 1386 are also incorrectly shown.	BP 0022 BP 1391 BP 1384	YES	In-Progress-Apex Engineering target completion date is 1/1/2019	Engineering
6	P-004	1	General Notes for TS31 on APEX drawing P-004 states Operating pressure is 500 psig, which is inconsistent with the set pressures of 600 psig on top run and 700 psig of bottom run and set to open pressure of 400 psig of bypass run as shown on P-004. Safety Division notes General Notes for BP 1383, 1384, 1385, 1386 are also incorrectly shown.	BP 0022 BP 0022 BP 1384	YES	In-Progress-Apex Engineering target completion date is 1/1/2019	Engineering
7	P-004	1	General Notes for TS35 on APEX drawing P-004 state operating pressure is 55 psig, which is inconsistent with the set pressures of 45 psig on top run and 40 psig of bottom run PID1 This is also in consistent with P-005 which states the set pressure is 75 psig. Safety Division notes General Notes for BP 1383, 1384, 1385, 1386 are also incorrectly shown.	BP 0022 BP 0002 BP 1384	YES	In-Progress-Apex Engineering target completion date is 1/1/2019	Engineering
8	P-004	1	General Notes for FB30 on APEX drawing P-004 states operating pressure is 55 psig, which is inconsistent with the set pressures of 45 psig on top run and 40 psig of bottom run PID1 This is also in consistent with P-005 which states the set pressure is 75 psig. Safety Division notes General Notes for BP 1383, 1384, 1385, 1386 are also incorrectly shown.	BP 0022 BP 0002 BP 1384	YES	In-Progress-Apex Engineering target completion date is 1/1/2019	Engineering
9	P-005	1	General Notes for TS30 on APEX drawing P-005 states test pressure 1 25% for hydraulic test, or 5313 psig, which is inconsistent with the regulation requirement of 49 CFR Part 192.505 for steel pipelines operating at greater than 30% SMYS. BP 1391 does correctly show the requirement as Calculations for Engineers Test Limit. Requirement is for 1.5 for hydraulic test or 6375 psig. Safety Division notes General Notes for BP 1383, 1384, 1385, 1386 are also incorrectly shown.	BP 0023 BP 1391 BP 1385	YES	In-Progress-Apex Engineering target completion date is 1/1/2019	Engineering
10	P-005	1	General Notes for TS31 on APEX drawing P-005 state operating pressure is 500 psig, which is inconsistent with the set pressures of 600 psig on top run and 700 psig of bottom run and set to open pressure of 400 psig of bypass run as shown on P-004. Safety Division notes General Notes for BP 1383, 1384, 1385, 1386 are also incorrectly shown.	BP 0023 BP 0022 BP 1385	YES	In-Progress-Apex Engineering target completion date is 1/1/2019	Engineering
11	P-005	1	General Notes for TS35 on APEX drawing P-005 state operating pressure is 55 psig, which is inconsistent with the set pressures of 45 psig on top run and 40 psig of bottom run PID1 This is also in consistent with P-005 which states the set pressure is 75 psig. Safety Division notes General Notes for BP 1383, 1384, 1385, 1386 are also incorrectly shown.	BP 0023 BP 0002 BP 1385	YES	In-Progress-Apex Engineering target completion date is 1/1/2019	Engineering

12	P-005	1	General Notes for FB30 on APEX drawing P-005 state operating pressure is 55 psig, which is inconsistent with the set pressures of 45 psig on top run and 40 psig of bottom run PID1 This is also in consistent with P-005 which states the set pressure is 75 psig. Safety Division notes General Notes for BP 1383, 1384, 1385, 1386 are also incorrectly shown.	BP 0023 BP 0002 BP 1385	YES	In-Progress-Apex Engineering target completion date is 1/1/2019	Engineering
13	P-006	1	General Notes for TS30 on APEX drawing P-006 state Test pressure 1 25% for hydraulic test, or 5313 psig which is inconsistent with the regulation requirement of 49 CFR Part 192.505 for steel pipelines operating at greater than 30% SMYS. BP 1391 does correctly show the requirement as Calculations for Engineers Test Limit. Requirement is for 1.5 for hydraulic test or 6375 psig. Safety Division notes General Notes for BP 1383, 1384, 1385, 1386 are also incorrectly shown.	BP 0024 BP 1391 BP 1386	YES	In-Progress-Apex Engineering target completion date is 1/1/2019	Engineering
14	P-006	1	General Notes for TS31 on APEX drawing P-006 state operating pressure is 500 psig, which is inconsistent with the set pressures of 600 psig on top run and 700 psig of bottom run and set to open pressure of 400 psig of bypass run as shown on P-004. Safety Division notes General Notes for BP 1383, 1384, 1385, 1386 are also incorrectly shown.	BP 0024 BP 0022 BP 1386	YES	In-Progress-Apex Engineering target completion date is 1/1/2019	Engineering
15	P-006	1	General Notes for TS35 on APEX drawing P-006 states Operating pressure is 55 psig which is inconsistent with the set pressures of 45 psig on top run and 40 psig of bottom run PID1 This is also in consistent with P-005 which states the set pressure is 75 psig. Safety Division notes General Notes for BP 1383, 1384, 1385, 1386 are also incorrectly shown.	BP 0024 BP 0002 BP 1386	YES	In-Progress-Apex Engineering target completion date is 1/1/2019	Engineering
16	P-006	1	General Notes for FB30 on APEX drawing P-006 state operating pressure is 55 psig, which is inconsistent with the set pressures of 45 psig on top run and 40 psig of bottom run PID1 This is also in consistent with P-005 which states the set pressure is 75 psig. Safety Division notes General Notes for BP 1383, 1384, 1385, 1386 are also incorrectly shown.	BP 0024 BP 0002 BP 1386	YES	In-Progress-Apex Engineering target completion date is 1/1/2019	Engineering
17	P-003	1	P-003 indicates 1.5 inch diameter copper tubing is used for inlet and outlet of coiled heat exchanger containing propylene glycol. BP0027 Item 18 specifies 1.0 inch diameter general purpose copper tubing. BP0028 indicates the tubing is Item 35 which does not correspond to BM and BP 0029 lists the heat exchanger manifold supply and manifold return as 1 inch diameter. These are Part no IS-XNG-20K-CUT1-001 sheets 1 through 4. The field inspection revealed that 1 inch diameter copper tubing was used	BP 0003 BP 0026 BP 0027 BP 0028 BP 0029	NO	In-Progress-Apex Engineering target completion date is 1/1/2019	Engineering
18	P-003	1	Unloading Station A and B show vent piping as not entering Gas Regulator Room. Field installation indicates penetration into Gas Regulator Room.	BP 0003 BP 0026 BP 0027 BP 0028 BP 0029	NO	In-Progress-Apex Engineering target completion date is 1/1/2019	Engineering

19	P-003	1	Unloading Station A indicates that a different type of flexible hose will be used for Unloading Station A and B. Unloading Station B indicates 1-H-100B which corresponds to BP 0046 and BP 0047 but Unloading Station A states 1-H-A, which has no corresponding hose literature to verify the pressure rating.	BP 0003 BP 0046 BP 0047	NO	In-Progress-Apex Engineering target completion date is 1/1/2019	Engineering
20	P-005	1	P-005 has Pressure Reducing Valve PRV 222B mislabeled as PCV 222B. There are no PCV valves identified as listed on P001, thus it must be mislabeled. There are FCV valves (flow control valves -OASIS manufacturer) but not shown on diagram	BP 0023	NO	In-Progress-Apex Engineering target completion date is 1/1/2019	Engineering
21	P-006	1	P-006 indicates Gas Regulator Room is Class 1 Div 1 and Hydronic Heating Portion is Unclassified. This is not consistent with the description on BP 0014. The Safety Division would have considered the entire Decompression Skid as Class 1 Div 2 and not as depicted on P-006	BP 0024 BP 0014 BP006	NO	In-Progress-Apex Engineering target completion date is 1/1/2019	Engineering
22	-	-	It is critical to incorporate over pressure protection protection schemes based on maximum allowable operating pressures (MAOP). Liberty should clearly delineate at the decompression skid with signage or labeling that all qualified personnel understand that the lower 4200 psig is specified by Liberty and not the standard PRV setting of XNG of 4500 psig.	None	NO	In-Progress-Apex Engineering target completion date is 1/1/2019	Engineering

1.2 Liberty Utilities Keene Site and Decompression Skid Design for CNG Submittal Date 11/13/17
1.2 Low Flow Skid Component Book by APEX Engineering
Attachment B Swagelok Module Drawings & Equipment Selections

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1	IS XNG 20K -CUT 1-001	Sheet 3	Identification corresponds with Annotated (Red Lined) Bill of Material up to Number 23 but Number 25 and Number 35 are called out with no corresponding Bill of Material description	BP 0028	NO	In-Progress-Apex Engineering target completion date is 1/1/2019	Engineering

1.2 Liberty Utilities Keene Site and Decompression Skid Design for CNG Submittal Date 11/13/17
1.2 Low Flow Skid Component Book by APEX Engineering
Attachment C Process Gas Equipment Data Sheets (Non Swagelok Modules) although includes Swagelok valves, regulators and tubing

Safety Division Recommendation	Section	11/13/17 Submittal Number of Pages	Safety Division Comments	Corresponding Bates Page Number(s) 11/30/17	Liberty Notified	Liberty Utilities Document Status 12/5/2018	Responsible Department
1	Swagelok Pressure Reducing Regulator Flow Curves	126 pages	Irrelevant to Keene CNG Installation and Specification. No need to include in Safety Review. Delete BP 0167 thru BP 0293 so that operating personnel do not mistakenly use.	BP 0167 thru BP 0293	NO	In-Progress-Apex Engineering target completion date is 1/1/2019	Engineering

2	Swagelock Pressure Reducing Regulator Flow Curves	31 pages	Irrelevant to Keene CNG Installation and Specification. No need to include in Safety Review. Delete BP 0296 thru BP 0327 so that operating personnel do not mistakenly use.	BP 0296 thru BP 0327	NO	In-Progress-Apex Engineering target completion date is 1/1/2019	Engineering
3	Swagelock Pressure Reducing Regulator Flow Curves	41 pages	Irrelevant to Keene CNG Installation and Specification. No need to include in Safety Review. Delete BP 0333 thru BP 0374 so that operating personnel do not mistakenly use.	BP 0333 thru BP 0374	NO	In-Progress-Apex Engineering target completion date is 1/1/2019	Engineering
4	Swagelock Pressure Reducing Regulator Flow Curves	10 pages	Irrelevant to Keene CNG Installation and Specification. No need to include in Safety Review. Delete BP 0385 thru BP 0395so that operating personnel do not mistakenly use.	BP 0385 thru BP 0395	NO	In-Progress-Apex Engineering target completion date is 1/1/2019	Engineering
5	Swagelock Pressure Reducing Regulator Flow Curves	105 pages	Irrelevant to Keene CNG Installation and Specification. No need to include in Safety Review. Delete BP 0404thru BP 0509so that operating personnel do not mistakenly use.	BP 0404 thru BP 0509	NO	In-Progress-Apex Engineering target completion date is 1/1/2019	Engineering
6	Swagelock Pressure Regulators RHPS Series	38 pages	Irrelevant to Keene CNG Installation and Specification. No need to include in Safety Review. Delete BP 0524 thru BP 0562so that operating personnel do not mistakenly use.	BP 0524 thru BP 0562	NO	In-Progress-Apex Engineering target completion date is 1/1/2019	Engineering
7	Swagelock Pressure Regulators RHPS Series	12 pages	Irrelevant to Keene CNG Installation and Specification. No need to include in Safety Review. Delete BP 0565 thru BP 0577so that operating personnel do not mistakenly use.	BP 0565 thru BP 0577	NO	In-Progress-Apex Engineering target completion date is 1/1/2019	Engineering
8	Swagelock Pressure Regulators RHPS Series	6 pages	Irrelevant to Keene CNG Installation and Specification. No need to include in Safety Review. Delete BP 0579 thru BP 0585so that operating personnel do not mistakenly use.	BP 0579 thru BP 0585	NO	In-Progress-Apex Engineering target completion date is 1/1/2019	Engineering
9	Swagelock Pressure Regulators RHPS Series	60 pages	Irrelevant to Keene CNG Installation and Specification. No need to include in Safety Review. Delete BP 0588 thru BP 0648so that operating personnel do not mistakenly use.	BP 0588 thru BP 0648	NO	In-Progress-Apex Engineering target completion date is 1/1/2019	Engineering
10	Swagelok 40 G Series Ball Valve	-	P-004 correctly indicates Valve 217 A , Valve 217 B , Valve 203A and Valve 203 B are 0.25 in Swagelok valves while BP 693 incorrectly identifies this and states it's a 0.5 in Swagelok valve. It also incorrectly labels it as V 230	BP 0693	NO	In-Progress-Apex Engineering target completion date is 1/1/2019	Engineering
11	Oasis 700 Series Ball Valve	-	P-004 indicates 1 inch Oasis ball valve208A and PSV 213 2" x 3" Anderson Greenwood (Emerson) Series 81 spring operated relief valve are upstream of the temperature and pressure transmitters. Field inspection revealed these are located downstream	BP 0694 BP 0022 BP 1385	NO	In-Progress-Apex Engineering target completion date is 1/1/2019	Engineering
11	Oasis 700 Series Ball Valve	-	BP 694 incorrectly identifies this as V 212 A when it should be V 208A	BP 0694 BP 0695 BP 0696	NO	In-Progress-Apex Engineering target completion date is 1/1/2019	Engineering
12	Swagelok 40 G Series Ball Valve	-	These pages are duplicative and misidentify V 230. V 230 doesn't exist on P-004 or P-005.	BP 0698 BP 0659	NO	In-Progress-Apex Engineering target completion date is 1/1/2019	Engineering
13	Apollo 70-100 BC Series Ball Valve	-	Valve 249 not found on P-004 or P-005	BP 0992	NO	In-Progress-Apex Engineering target completion date is 1/1/2019	Engineering

14	Apollo 70-100 BC Series Ball Valve	-	Valve 250 not found on P-004 or P-005	BP 0993	NO	In-Progress-Apex Engineering target completion date is 1/1/2019	Engineering
15	Apollo 70-100 BC Series Ball Valve	-	Valve 251 not found on P-004 or P-005	BP 0994	NO	In-Progress-Apex Engineering target completion date is 1/1/2019	Engineering

2.1 Liberty Utilities Keene Site and Decompression Skid Design for CNG Submittal Date 11/13/17							
2.1 Pressure Test Documentation Keene CNG Piping Test Procedure							
Safety Division Recommendation	Section	11/13/17 Submittal Page No.	Safety Division Comments	Corresponding Bates Page Number(s) 11/30/17	Liberty Notified	Liberty Utilities Document Status 12/5/2018	Responsible Department
1	Apex Appendix B	TS-30	The Safety Division recommends that Liberty operate pressures in a manner such that Integrity Management Regulations per Subpart O Gas Transmission Pipeline Integrity Management provisions are not triggered by the Stainless Steel Tubing components that possibly operate above 20% SMYS. Following the review of actual operational pressure records, Liberty may have to request a waiver from PUC and PHMSA, if applicable, for those portions of the Subpart or other Subparts that may inadvertently be triggered by exceeding the 20% SMYS threshold. This should be determined by Liberty within 6 months of initial operations.	BP 1391	NO	In-Progress-Estimated completion date is 2/1/2019	Engineering

2.1 Liberty Utilities CNG Decompression CNG Piping Test Procedure Submittal Date 11/13/17

Safety Division Recommendation	Section	11/13/17 Submittal Page No.	Safety Division Comments	Corresponding Bates Page Number(s) 11/30/17	Liberty Notified	Liberty Utilities Document Status 12/5/2018	Responsible Department
1	2.0 Reference Standard	1	Section 2.1.3 references ASME B31.8 Gas Transmission and Distribution should be eliminated as previously recommended by Safety Division as B31.8 is not fully incorporated into Part 192 or Puc 500.	BP 1376	Yes 12/5/2017	In-Progress-Estimated completion date is 1/15/2019	Engineering
2	5.0 Test Packages 6.0 Pressure Test Documentation	3	5.1 and 6.1 are duplicative. Valve 233A is supposed to be Carbon Steel according to BP 1385 and P-005. Installation is 2" SST. BP 1397 states 4250 MAWP. MAWP is not a term used in the Part 192 standards. BP 1399 incorrect pipe specifications in Test Section listed. BP 1397 and BP1399 do not match with physical inspection nor do they match with BP 1385 i.e. there is no 10 feet of 0.5 in and 3 feet .375 in SST tubing after P 222A and also does not match with P-005 as shown on BP 1385 regarding TS 35.	BP 1378 BP 1385 BP 1397 BP 1399	Yes 12/5/2017	In-Progress-Estimated completion date is 1/15/2019	Engineering
3	Final Page	6	The purpose of a Signature Page is to ensure that all parties have read and understood the test procedures prior to performing specialized pressure tests. Signature Page should have been completed prior to Pressure Tests being performed on 10/16/17, 10/17/17 and 10/19/17. The Signature Page is dated 10/23/17 and unsigned in the Submittal Date of 11/13/17. "Signature" is misspelled	BP 1381	Yes 12/5/2017	In-Progress-Estimated completion date is 1/15/2019	Engineering
4	7.0 Data Recording Forms	3	The Date of Revision 3 of the CNG Piping Test Procedure is for 10/23/17.		Yes 12/5/2017	In-Progress-Estimated completion date is 1/15/2019	Engineering
5	3.0 Definitions and Terminology	2	Section 3.8 Puc 506.02 (o) is the applicable standard of Documentation for Pressure test per 192.509 (not the federal minimum of 5 years).	BP 1377	Yes 12/5/2017	In-Progress-Estimated completion date is 1/15/2019	Engineering
6	3.0 Definitions and Terminology	2	Section 3.4 sentence is not applicable to this pressure test at Production Avenue as stated but could be applicable to other sites. Since this is a specific test procedure for Liberty's CNG facility which is a Class 3 location, the 80% SMYS limit is not applicable for hydraulic tests at all and the 50% SMYS limitation is applicable only for the pneumatic pressure tests if conducted. (Note: TS30 for the SST portions that have an MAOP of 4250 psig would be operating at hoop stress levels exceeding 30% SMYS and will be conducted by a hydraulic test for 8 hours per 192.505.)	BP 1376	Yes 12/5/2017	In-Progress-Estimated completion date is 1/15/2019	Engineering

7	3.0 Definitions and Terminology	2	Section 3.5 sentence is not applicable to this pressure test at Production Avenue as stated but could be applicable to other sites. Since this is a specific test procedure for Liberty's CNG facility which is a Class 3 location, the 80% SMYS limit is not applicable for hydraulic tests at all and the 50% SMYS limitation is applicable only for the pneumatic pressure test if conducted. (Note: TS31 for the SST portions that have an MAOP of 1400 psig would be operating at hoop stress levels below 30% SMYS thus may be conducted using a pneumatic test if the pressure test lasting 1 hour produces a stress less than 50%. This is the case. This is per 192 507 which also calls for a leak test to be performed between 100 psi and at no more than 20% SMYS which is approximately 1440 psig. 1000 psig is called for in TS31. Note TS 35 and TS FB30 no leak test is required since pressure test is less than 20%)	BP 1376	Yes 12/5/2017	In-Progress-Estimated completion date is 1/15/2019	Engineering
8	3.0 Definitions and Terminology	2	Section 3.8 Puc 506.02 (o) is the applicable standard of Documentation for Pressure test per 192.509 for the life of the pipeline (not the federal minimum of 5 years).	BP1377	Yes 12/5/2017	In-Progress-Estimated completion date is 1/15/2019	Engineering
9	Test Packages	3	5.1 is missing Low Pressure section as stated in 4.12 and on the referenced drawings of Appendix A.	BP 1378	Yes 12/5/2017	In-Progress-Estimated completion date is 1/15/2019	Engineering
10	Pressure Test Documentation	3	6.1 is missing Low Pressure section as stated in 4.12 and on the referenced drawings of Appendix A.	BP 1378	Yes 12/5/2017	In-Progress-Estimated completion date is 1/15/2019	Engineering
11	Pressure Test Documentation	-	The Safety Division could not find any documentation or record for TS35 involving the 2 feet of Stainless Steel Tubing and associated fittings on P 004.	BP 1432 thru BP 1438	NO	In-Progress-Estimated completion date is 1/15/2019	Engineering
12	Appendix A Pressure Test	D-1	This page is mislabeled as "Appendix D Pneumatic Test Procedure". It should say "Appendix A Highlighted PIDs" and the page numberings should be A-1. See Bates Pages 1382. It appears this got inserted with wrong position and information contained on BP 1412.	BP 1382	Yes 12/5/2017	In-Progress-Estimated completion date is 1/15/2019	Engineering
13	Appendix A Pressure Test	-	General Notes for TS35 and FB30 on APEX drawing P-003 state operating pressure is 55 psig which is inconsistent with P-005 which states PCV 222A and 222B are set at 75 psig. See BP 1383	BP 1383	Yes 12/5/2017	In-Progress-Estimated completion date is 1/15/2019	Engineering
14	Appendix A Pressure Test	-	General Notes for TS35 and FB30 on APEX drawing P-004 state operating pressure is 55 psig which is inconsistent with P-005 which states PCV 222A and 222B are set at 75 psig. See BP 1384.	BP 1384	Yes 12/5/2017	In-Progress-Estimated completion date is 1/15/2019	Engineering
15	Appendix A Pressure Test	-	General Notes for TS35 and FB30 on APEX drawing P-005 state operating pressure is 55 psig which is inconsistent with P-005 which states PCV 222A and 222B are set at 75 psig. See BP 1385.	BP 1385	Yes 12/5/2017	In-Progress-Estimated completion date is 1/15/2019	Engineering
16	Appendix A Pressure Test	-	General Notes for TS35 and FB30 on APEX drawing P-006 state operating pressure is 55 psig which is inconsistent with P-005 which states PCV 222A and 222B are set at 75 psig. See BP 1386.	BP 1386	Yes 12/5/2017	In-Progress-Estimated completion date is 1/15/2019	Engineering

17	Appendix A Pressure Test	-	Liberty did not supply in the Nov 13, 2017 submittal nor the Bates Page submittal the marked up Sanborn Head PID 1 in the Test Sequence diagram showing all end point of the low pressure test. This is required per CNG Test Procedure Section 10.1.3 and 10.1.7.	BP 1379 BP 0019	Yes 12/5/2017	In-Progress-Estimated completion date is 1/15/2019	Engineering
18	Appendix B APEX Calculations and Engineer Letter	-	Bates Pate 1397 Pressure Test High Pressure Letter should say "4250 MAOP" not 4250 MAWP. Missing Approval Signature and Date. Lists Station Discharge at 55 psig, which contradicts Maintenance Forms and Sanborn Head PID 1 and APEX drawing P-005, which states PCV 222A and 222B are set at 75 psig. See BP 1385.	BP 1381 BP 1397 BP 1385	Yes 12/5/2017	In-Progress-Estimated completion date is 1/15/2019	Engineering
19	Appendix B APEX Calculations and Engineer Letter	-	Bates Pate 1398 Pressure Test Medium Pressure Letter missing Approval Signature and Date. Lists Station Discharge at 55 psig, which contradicts Maintenance Forms and Sanborn Head PID 1 and APEX drawing P-005, which states PCV 222A and 222B are set at 75 psig. See BP 1385.	BP 1398 BP 1385	Yes 12/5/2017	In-Progress-Estimated completion date is 1/15/2019	Engineering
20	Appendix B APEX Calculations and Engineer Letter	-	Bates Page 1399 Pressure Test Low Pressure Letter Missing Approval Signature and Date. Lists Station Discharge at 55 psig, which contradicts Maintenance Forms and Sanborn Head PID 1 and APEX drawing P-005, which states PCV 222A and 222B are set at 75 psig. See BP 1385. Pipe Specification listing is not correct- there is no 0.5 inch and no 0.375 SST Tubing. The box "Operates less than 100 psig" should be checked off since it is operating at either 100 psig or 75 psig or 55 psig depending upon which document Liberty is intending to reference.	BP 1399 BP 1385	Yes 12/5/2017	In-Progress-Estimated completion date is 1/15/2019	Engineering
21	Appendix B APEX Calculations and Engineer Letter	-	Bates Pate 1400 Pressure Test Low Pressure Letter missing Approval Signature and Date. Lists Station Discharge at 55 psig, which contradicts Maintenance Forms and Sanborn Head PID 1 and APEX drawing P-005 which states PCV 222A and 222B are set at 75 psig. See BP 1385. The box "Operates less than 100 psig" should be checked off since it is operating at either 100 psig or 75 psig or 55 psig depending upon which document is referenced.	BP 1400 BP 1385	Yes 12/5/2017	In-Progress-Estimated completion date is 1/15/2019	Engineering

4.2-CNG Sequence of Operations Submittal Date 11/12/17							
Safety Division Recommendation	Section	Page No.	Safety Division Comments	Corresponding Bates Page Number 11/30/17	Liberty Notified	Liberty Utilities Document Status 12/5/2018	Responsible Department
1	2. Says See 11-1 CNG Operating Procedures Appendices	1	This Operating Procedure has not been submitted nor is it on -line version available to Staff.	BP 1536	Yes 12/5/2017	In-Progress-Estimated completion date is 1/15/2019-Documents effective date in 4/1/2019	Operations
2	Electronic Version Submitted does not Match the Paper Copy Submitted	1	Example is Trailer Connection D. is part of Hose Station Preparation and Vale Opening labeled Part E is now D.	BP 1536	Yes 12/5/2017	In-Progress-Estimated completion date is 1/15/2019	Operations
3	Trailer Arrival: a) Arrival	1	Liberty Does not Reference Phone # to Call Number or which Gas Operations Department to Call. (Gas Control, Production, Keene AWC). Liberty did not incorporate Safety Divisions previous suggestion.	BP 1536	Yes 12/5/2017	Complete	Operations
4	Trailer Arrival c) Hose Station Preparation	1	This section should Reference Drawing P-003 as earlier suggested	BP 1536	Yes 12/5/2017	Complete	Operations
5	System Re-pressurization	2	This section should Reference Drawing P-004 and P-005, P-006 as earlier suggested preferably next to each component	BP 1537	Yes 12/5/2017	In-Progress-Estimated completion date is 1/15/2019	Operations
6	System Re-pressurization	2	This section should Reference Drawing P-004 and P-005, P-006 as earlier suggested preferably next to each component	BP 1537	Yes 12/5/2017	In-Progress-Estimated completion date is 1/15/2019	Operations

3.6 XNG CNG Skid Operating Procedures Submittal Date 11/13/17							
Safety Division Recommendation	Section	11/13/17 Submittal Page No.	Safety Division Comments	Corresponding Bates Page Number 11/30/17	Liberty Notified	Liberty Utilities Document Status 12/5/2018	Responsible Department
1	"2. Says See 11-1 CNG Operating Procedures Appendices"	1	Operating Procedure 11-1 has not been submitted nor is an on -line version available to Staff.	BP 1521	Yes 12/01/17	In-Progress-Estimated completion date is 2/1/2019. Effective date is 4/1/2019.	Operations
2	Throughout Section 3.6	1	Electronic version submitted does not match the paper copy submitted. An example is Trailer Connection D reference is part of Hose Station Preparation and Vale Opening labeled Part E is now Part D.	BP 1521	Yes 12/01/17	In-Progress-Estimated completion date is 2/1/2019. Effective date is 4/1/2019.	Operations
3	Trailer Arrival: a) Arrival	1	Liberty does not reference phone # for Call Number or which Gas Operations Department for Call. (Gas Control, Production, Keene AWC). Liberty did not incorporate Safety Divisions previous suggestion.	BP 1521	Yes 12/01/17	Complete	Operations

4	Trailer Arrival c) Hose Station Preparation	1	This section should reference Drawing P-003 as earlier suggested.	BP 1521	Yes 12/01/17	In-Progress-Estimated completion date is 2/1/2019. Effective date is 4/1/2019.	Operations
5	Trailer Preparation	1	Language should be inserted stating that the technician shall verify that the trailer pressure does not exceed 4,250 psi.	BP 1521	Yes 12/01/17	Complete	Operations
6	System Depressurization	2	This section should reference Drawing P-004, P-005, and P-006 as earlier suggested preferably next to each component.	BP 1522	Yes 12/01/17	In-Progress-Estimated completion date is 1/15/2019	Operations
7	Shut down Procedure	3	This section (4) is the is the critical piece needed for emergencies. The remaining sections are applicable for non-emergency situations.	BP 1523	Yes 12/01/17	Complete-To be referenced in Liberty Emergency Plan-See Emergency Response Plan Review	Operations

6.2 Liberty Utilities Keene Public Awareness Plan Modifications for CNG Submittal Date 11/13/17

Safety Division Recommendation	Section	11/13/17 Submittal Page No.	Safety Division Comments	Corresponding Bates Page Number 11/30/17	Liberty Notified	Liberty Utilities Document Status 12/5/2018	Responsible Department
1	NGA 2.0 Glossary of Terms	-	Excavation Definition is listed twice. Suggest elimination of duplicate.	BP 1643	No	In-Progress-Estimated completion date is 1/1/2019. Document effective date is 4/1/2019. Notifications to public to be sent prior to and after "go live date"	Compliance & Emergency Planning
2	NGA 2.0 Glossary of Terms	-	MUST definition needs description of organization similar to CGA or Dig Safely. Recommend adding the URL for the MUST website with hyperlink as done in other definitions.	BP 1643	No	In-Progress-Estimated completion date is 1/1/2019. Document effective date is 4/1/2019. Notifications to public to be sent prior to and after "go live date"	Compliance & Emergency Planning
3	NGA 1.0 Company Information	-	Add Operator Identification 36773 for Amherst Propane system under OP ID 16667 to Table 1.1 Company Information.	BP 1642	Yes 10/27/2017	In-Progress-Estimated completion date is 1/1/2019. Document effective date is 4/1/2019. Notifications to public to be sent prior to and after "go live date"	Compliance & Emergency Planning
4	NGA 3.0 Program Administration	-	Section 3.4 Change Opld 16667 to 36773 for Amherst Propane system on first line of Table for Propane Pipeline Assets	BP 1646	Yes 10/27/2017	In-Progress-Estimated completion date is 1/1/2019. Document effective date is 4/1/2019. Notifications to public to be sent prior to and after "go live date"	Compliance & Emergency Planning
5	NGA 4.0 Stakeholder Audiences	-	Need to add 4.1.5 "Other" as a Stakeholder Audience since mentioned in Table 1 BP 1648.	BP 1646	Yes 10/27/2017	In-Progress-Estimated completion date is 1/1/2019. Document effective date is 4/1/2019. Notifications to public to be sent prior to and after "go live date"	Compliance & Emergency Planning
6	NGA 5.0 Message Type for Each Audience	-	Do emergency officials have a different phone number for Energy North? 855-242-1091? All others state 855-327-7758. Recommend verifying and institute change if incorrect.	BP 1651	Yes 10/27/2017	In-Progress-Estimated completion date is 1/1/2019. Document effective date is 4/1/2019. Notifications to public to be sent prior to and after "go live date"	Compliance & Emergency Planning
7	NGA 5.0 Message Type for Each Audience	-	Table 2 needs a column added for "Others" under Distribution Operators with applicable Messages identified.	BP 1649	No	In-Progress-Estimated completion date is 1/1/2019. Document effective date is 4/1/2019. Notifications to public to be sent prior to and after "go live date"	Compliance & Emergency Planning
8	NGA 5.0 Message Type for Each Audience	-	Message Content 5.2 should have a designation with associated description that has corresponding designation as in Table 2. For instance, there is no description for Pipeline Location Information, List of Pipeline Operators Potential Hazards, Additional Information , How to Obtain a Summary of Integrity Management Plans, Summary of Integrity Management, Continuing Liaison under Message Content 5.2 so this content description is missing or incomplete.	BP 1650	Yes 10/27/2017	In-Progress-Estimated completion date is 1/1/2019. Document effective date is 4/1/2019. Notifications to public to be sent prior to and after "go live date"	Compliance & Emergency Planning
9	Appendix C	-	"Public Awareness Summary" by S.Furey dated 11/11/17 is recommended to be added to bullet list or referenced as a Supplementary Activity Liberty Utilities has implemented	BP 1635 BP 1663	No	In-Progress-Estimated completion date is 1/1/2019. Document effective date is 4/1/2019. Notifications to public to be sent prior to and after "go live date"	Compliance & Emergency Planning

5.2 Liberty Keene Maintenance Guide Submittal Date 11/13/17							
Safety Division Recommendation	Section	11/13/17 Submittal Page No.	Safety Division Comments	Corresponding Bates Page Number 11/30/17	Liberty Notified	Liberty Utilities Document Status 12/5/2018	Responsible Department
1	Table of Contents	1	Section 7 should match Chapter 7 Header	BP 1613 BP 1616	Yes 12/01/17	Complete	Operations
2	Introduction	2	Plan must be incorporated into Liberty Maintenance Plan no later than March 2018. Section 5.2 is effective immediately in order to be compliant with Part 192.603(a)	BP 1614	Yes 12/01/17	In-Progress-Estimated completion date is 1/15/2019. Liberty requests this to be changed to April 2019. Liberty updates Emergency Plan, OQ Plan, and O & M on an annual basis with an effective date on the updates of April 1st.	Operations
3	3. Maintenance Schedule	2	3.2 says XNG will do additional maintenance on a monthly basis as listed in document yet document in Section 7 calls out for Daily, Monthly and Semiannually and Annual Inspections for boiler related equipment. This appears to be contradictory. Clarification required as to what exact expectation is.	BP 1614 BP 1616 BP 1617	Yes 12/01/17	In-Progress-Estimated completion date is 1/15/2019	Operations
4	3. Maintenance Schedule	2	3.3 should eliminate the word "mandated" and replace with "all". The Safety Division recommends at minimum the first 6 months (up to 1 year) that Liberty personnel be present for all maintenance activities so they witness maintenance inspections being performed, verify qualifications of personnel, attendance activities recorded and documentation forwarded in a monthly basis.	BP 1614	Yes 12/01/17	Complete	Operations
5	4. Records and Documentation	2	4.2 should add clarification of 3.3 recommendation by adding review signature by Liberty Personnel and accompanying date to any forms created by XNG and used at the Keene facility	BP 1614	Yes 12/01/17	Complete	Operations
6	5. System Description	3	Change 5.3 Relief "Capacity" and in T&C to Relief "Settings". Also PSV 213 should reference P&ID as found on P-004 and PSV 232 should reference P&ID as found on P-005.	BP 1615	Yes 12/01/17	In-Progress-Estimated completion date is 1/15/2019	Operations
7	6. Key Components	4	Oasis Male /female fitting calls out for Oasis HC208 BP 45 not 308 as listed in this section.	BP 1615	Yes 12/01/17	In-Progress-Estimated completion date is 1/15/2019	Operations
8	6. Key Components	3 & 4	Staff recommends putting sizes, P&ID reference numbers and accompanying BP number so that maintenance personnel can verify if a change has occurred during routine inspections for the 13 items listed.	BP 1615 BP 1616	Yes 12/01/17	In-Progress-Estimated completion date is 1/15/2019	Operations
9	7. Maintenance Items (Boiler Maintenance)	4	This lists Daily, Monthly and Semiannual Maintenance on Boiler. Does this infer XNG will be on site daily? Who does Semiannual maintenance for water pressure relief valve, water connection inspections?	BP 1616	Yes 12/01/17	In-Progress-Estimated completion date is 1/15/2019	Operations
10	7. Maintenance Items (Boiler Maintenance)	4 to 8	Staff recommends putting sizes, P&ID reference numbers and accompanying BP number so that maintenance personnel can verify if a change has occurred during routine inspections for the 13 items listed.	BP 1616 BP 1617 BP 1618 BP 1619 BP 1620	Yes 12/01/17	In-Progress-Estimated completion date is 1/15/2019	Operations

11	7. Maintenance Items (Boiler Maintenance)	5	Staff recommends in Section C to change reference from page 2 of this manual of Operating Instructions to section HPTP Elite Commercial Boilers Users Manual BP 1031 or HTP Installation, Start-Up, Maintenance, Parts and Warranty Manual if that is what is intended.	BP 1617	Yes 12/01/17	In-Progress-Estimated completion date is 1/15/2019	Operations
12	7. Maintenance Items (Boiler Maintenance)	4 to 8	Staff recommends putting frequency of inspections next to each item 7.1 through 7.13. If meant to be annually for each item then why does 7.11 call out a Monthly Nitrogen Check?	BP 1616 BP 1617 BP 1618 BP 1619 BP 1620	Yes 12/01/17	In-Progress-Estimated completion date is 1/15/2019	Operations

5.3 Liberty Keene 60 Psig Regulator Maintenance Forms Submittal Date 11/13/17

Safety Division Recommendation	Section	11/13/17 Submittal Page No.	Safety Division Comments	Corresponding Bates Page Number 11/30/17	Liberty Notified	Liberty Utilities Document Status 12/5/2018	Responsible Department
1	Regulator Maintenance for 4505A Worker Top Run	1	Set at 45 psi There is no place on form for Inspector or Date. Corrected and completed forms should be resubmitted to the Commission prior to any approval of conversion project.	BP 1621	Yes 12/01/17	Complete-Forms updated- Liberty will not perform annual inspection within 15 month requirement due to the station not being in service. An annual inspection will be completed prior to the station going online in 2019. Reasons for not completing the inspection are below. <ul style="list-style-type: none"> • Station has not been in service since the inspections performed in November 2017 • Station will not be in service for another 5 months; at that point I & R would perform another inspection regardless if one was or was not completed in the next few weeks. • There will be a cost incurred with having XNG deliver a fully pressurized trailer to the site 	Gas Control
2	Regulator Maintenance for 4505AM Monitor Top Run	1	Set at 55 psi There is no place on form for Inspector or Date. Corrected and completed forms should be resubmitted to the Commission prior to any approval of conversion project.	BP 1622	Yes 12/01/17	Complete-Forms Updated- See response in safety division recommendation 1	Gas Control
3	Regulator Maintenance for 4505B Worker Bottom Run	1	Set at 40 psi There is no place on form for Inspector or Date. Corrected and completed forms should be resubmitted to the Commission prior to any approval of conversion project.	BP 1623	Yes 12/01/17	Complete-Forms Updated- See response in safety division recommendation 1	Gas Control
4	Regulator Maintenance for 4505BM Monitor Bottom Run	1	Set at 55 psi There is no place on form for Inspector or Date. Corrected and completed forms should be resubmitted to the Commission prior to any approval of conversion project.	BP 1624	Yes 12/01/17	Complete-Forms Updated- See response in safety division recommendation 1	Gas Control
5	Regulator Maintenance for 4505R Relief Set at 58 Psig	1	There is no place on form for Inspector or Date. Corrected and completed forms should be resubmitted to the Commission prior to any approval of conversion project	BP 1625	Yes 12/01/17	Complete-Forms Updated- See response in safety division recommendation 1	Gas Control

5.5 Liberty Keene 105 Psig Regulator Maintenance Forms Submittal Date 11/13/17

Safety Division Recommendation	Section	11/13/17 Submittal Page No.	Safety Division Comments	Corresponding Bates Page Number 11/30/17	Liberty Notified	Liberty Utilities Document Status 12/5/2018	Responsible Department
1	Regulator Maintenance for 4504A Worker A Run	1	Set at 90 psi There is no place on form for Inspector or Date.	BP 1627	Yes 12/01/17	Complete-Forms Updated- See response in safety division recommendation 1	Gas Control
2	Regulator Maintenance for 4504B Worker B Run	1	Set at 70 psi There is no place on form for Inspector or Date.	BP 1628	Yes 12/01/17	Complete-Forms Updated- See response in safety division recommendation 1	Gas Control
3	Regulator Maintenance for 4504R Relief Set at 100 Psig	1	There is no place on form for Inspector or Date.	BP 1629	Yes 12/01/17	Complete-Forms Updated- See response in safety division recommendation 1	Gas Control

5.7 Liberty Keene 1400 Psig Regulator Maintenance Forms Submittal Date 11/13/17

Safety Division Recommendation	Section	11/13/17 Submittal Page No.	Safety Division Comments	Corresponding Bates Page Number 11/30/17	Liberty Notified	Liberty Utilities Document Status 12/5/2018	Responsible Department
1	Regulator Maintenance for 4503A Worker A Run	1	Set point not listed as in 5.5 and 5.3. Inlet pressure incorrectly listed as 4500 instead of 4250 psig. There is no place on form for Inspector or Date.	BP 1631	Yes 12/01/17	Complete-Forms Updated- See response in safety division recommendation 1	Gas Control
2	Regulator Maintenance for 4503B Worker B Run	1	Set point not listed as in 5.5 and 5.3. Inlet pressure incorrectly listed as 4500 instead of 4250 psig. There is no place on form for Inspector or Date.	BP 1632	Yes 12/01/17	Complete-Forms Updated- See response in safety division recommendation 1	Gas Control
3	Regulator Maintenance for 4503R Relief Set at 1350 Psig	1	There is no place on form for Inspector or Date.	BP 1633	Yes 12/01/17	Complete-Forms Updated- See response in safety division recommendation 1	Gas Control

5.8 Liberty Keene 1400 Psig Regulator Station Forms Submittal Date 11/13/17

Safety Division Recommendation	Section	11/13/17 Submittal Page No.	Safety Division Comments	Corresponding Bates Page Number 11/30/17	Liberty Notified	Liberty Utilities Document Status 12/5/2018	Responsible Department
1	Regulator Station Inspection Form for 4503	1	Inlet pressure incorrectly listed as 4,500 instead of 4,250 psig.	BP 1634	Yes 12/01/17	Complete-Forms Updated- See response in safety division recommendation 1	Gas Control

3.2 Liberty Keene Emergency Response Plan Submittal Date 11/13/17							
Safety Division Recommendation	Section	Page No.	Safety Division Comments	Corresponding Bates Page Number 11/30/17	Liberty Notified	Liberty Utilities Document Status 12/5/2018	Responsible Department
1	C. Plan Summary	4	Needs to add bullet addressing Potential Inadvertent Intermixing of 2 systems (NG and P/A)	BP 1443	Yes 12/01/17	In-Progress-Estimated completion date is 1/1/2019- Document effective date in 4/1/2019	Compliance & Emergency Planning
2	D. Scope	6	Scope needs to incorporate that there is a second supply source located at 43 Production Avenue . Plan currently references only the P/A Plant on Emerald St.	BP 1445	Yes 11/15/17	In-Progress-Estimated completion date is 1/1/2019- Document effective date in 4/1/2019	Compliance & Emergency Planning
3	I. Assignment of Responsibilities for the Support Organizations	18	Section 2 needs to add bullet: Gas Control should coordinate or verify Instrument Readings with XNG Control Center regarding CNG alarms.	BP 1457	Yes 12/01/17	In-Progress-Estimated completion date is 1/1/2019- Document effective date in 4/1/2019	Compliance & Emergency Planning
4	I. Assignment of Responsibilities for the Support Organizations	18	Section 4 re: Production needs to include the CNG Facility in 4th bullet.	BP 1457	Yes 12/01/17	In-Progress-Estimated completion date is 1/1/2019- Document effective date in 4/1/2019	Compliance & Emergency Planning
5	J. Emergency Response	20	Appendix J needs to be referenced.	BP 1459	Yes 12/01/17	In-Progress-Estimated completion date is 1/1/2019- Document effective date in 4/1/2019	Compliance & Emergency Planning
6	Appendix A	33	Level 1 Event Other should include emergency shutdowns associated with the CNG facility.	BP 1472	Yes 12/01/17	In-Progress-Estimated completion date is 1/1/2019- Document effective date in 4/1/2019	Compliance & Emergency Planning
7	Appendix E	42	Needs to add ninth procedure addressing Potential Inadvertent Intermixing of 2 systems (NG and P/A) in both the list and the body of text.	BP 1481	Yes 12/01/17	In-Progress-Estimated completion date is 1/1/2019- Document effective date in 4/1/2019	Compliance & Emergency Planning
8	Appendix F	54	District 4 may need to be updated Level 2's apply to propane air systems but customer lists 16 Ashbrook Rd which will now be natural gas	BP 1490	Yes 12/01/17	In-Progress-Estimated completion date is 1/1/2019- Document effective date in 4/1/2019	Compliance & Emergency Planning
9	Appendix J	65/ 66	Level 2 and 3 High Alerts Reference a particular individual R. MacDonald as IC. Liberty should use language referencing page 14 of ERP, Incident Commander Description.	BP 1504 BP 1505	Yes 12/01/17	In-Progress-Estimated completion date is 1/1/2019- Document effective date in 4/1/2019	Compliance & Emergency Planning

3.3 XNG Emergency Response Plan Submittal Date 11/13/17							
Safety Division Recommendation	Section	11/13/17 Submittal Page No.	Safety Division Comments	Corresponding Bates Page Number 11/30/17	Liberty Notified	Liberty Utilities Document Status 12/5/2018	Responsible Department
1	2. Scope	4	Minor edits references to hose station, when there is no hose station at this site. Weight of CNG not consistent with Section 4. There is no external gas heater.	BP 1510	Yes 12/01/17	Complete-Rather than have two separate emergency plans, Liberty has elected to merge the two plans into one plan. Having one plan will ensure both parties are working off the same document and ensure that there is no confusion if there is an emergency on site. XNG has confirmed that it will adopt Liberty Utilities emergency plan with an effective date of April 2019. Liberty to include letter of acceptance in final report.	Operations
2	4. Quantity of CNG on Site	5	Minor Edits unloaded should be unloading. Max number of trailers says two when it should say three. Empty bay is not always next to Bay 1 as stated.	BP 1511	Yes 12/01/17	Complete-See response to safety division recommendation 1.	Operations
3	6. Incidents	9 & 10	If Appendix J from Recommendation 9 of Liberties ERP gets modified above, this must also get modified.	BP 1515 BP 1516	Yes 12/01/17	Complete-See response to safety division recommendation 1.	Operations

3.5 Site Safety and Security Plan Submittal Date 11/13/17							
Safety Division Recommendation	Section	11/13/17 Submittal Page No.	Safety Division Comments	Corresponding Bates Page Number 11/30/17	Liberty Notified	Liberty Utilities Document Status 12/5/2018	Responsible Department
1	-	-	Staff questioned why the alarm setting at 50% of the lower explosive level would activate a complete system shutdown rather than alarm recognition. There is no external gas heater as referenced.	BP 1520	Yes 12/01/17	In-Progress-Estimation date is 1/15/2019	Operations

3.6 XNG CNG Skid Operating Procedures Submittal Date 11/13/17							
Safety Division Recommendation	Section	11/13/17 Submittal Page No.	Safety Division Comments	Corresponding Bates Page Number 11/30/17	Liberty Notified	Liberty Utilities Document Status 12/5/2018	Responsible Department
1	2. Says See 11-1 CNG Operating Procedures Appendices	1	This Operating Procedure has not been submitted nor is an on-line version available to Staff.	BP 1521	Yes 12/01/17	In-Progress.Estimated completion date is 1/15/2019. Plan effective date is April 2019.	Operations
2	Electronic Version Submitted does not Match the Paper Copy Submitted	1	Example: Trailer Connection D is part of Hose Station Preparation and Vale Opening labeled Part E is now D.	BP 1521	Yes 12/01/17	In-Progress-Estimated completion date is 1/15/2019.	Operations

3	Trailer Arrival: a) Arrival	1	Liberty does not reference phone # to call or which Gas Operations Department to call. (Gas Control, Production, Keene AWC). Liberty did not incorporate Safety Divisions previous suggestion of being specific in the event of an abnormal operating condition is found.	BP 1521	Yes 12/01/17	Complete	Operations
4	Trailer Arrival c) Hose Station Preparation	1	This section should Reference Drawing P-003, as earlier suggested.	BP 1521	Yes 12/01/17	In-Progress-Estimated completion date is 1/15/2019.	Operations
5	Trailer Preparation	1	Language should be inserted stating that the technician shall verify the trailer pressure does not exceed 4,250 psi.	BP 1521	Yes 12/01/17	In-Progress-Estimated completion date is 1/15/2019.	Operations
6	System Depressurization	2	This section should Reference Drawing P-004 , P-005, and P-006 as earlier suggested preferably next to each component.	BP 1522	Yes 12/01/17	In-Progress-Estimated completion date is 1/15/2019.	Operations
7	Shut down Procedure	3	This section (4) is the important section that is the critical piece needed for emergencies. The remaining sections are applicable for non-emergency situations.	BP 1523	Yes 12/01/17	Complete-No update required	Operations

4.1 - Liberty Keene O&M & OQ Plan Updates and Summary Submittal Date 11/12/17							
Safety Division Recommendation	Section	Page No.	Safety Division Comments	Corresponding Bates Page Number 11/30/17	Liberty Notified	Liberty Utilities Document Status 12/5/2018	Responsible Department
1	O & M Updates-Hose Procedure	1	The hose connection procedure should be added or amended to Liberty's O&M Manual prior to CNG system operation.	BP 1534	Yes 12/5/2017	In-Progress-Liberty estimated completion date is 1/15/2019 with an effective date of 4/1/2019	Operations
2	OQ Plan Updates	1	Liberty should amend its OQ plan adding #3LU to Appendix B of current plan and proposed Section 19 of to Appendix G prior to start of flowing gas (not during its normal annual review)	BP 1534	Yes 12/5/2017	Complete-See Operator Qualification Plan_NH_6April2018.docx-#3LU added to appendix B and AOC's added to appendix G under pressure regulation	Compliance & Emergency Planning
3	OQ Plan Updates	1	Liberty should amend its OQ plan Appendix G Section 2. Currently it requires the recognition and reaction to abnormal operator conditions for CNG hose connection to be known by XNG prior to performance even if under the supervision of a qualified individual (Keene Tech) . This is inconsistent with Appendix E	BP 1534	Yes 12/5/2017	Complete-See Operator Qualification Plan_NH_6April2018.docx-#3LU added to appendix B and AOC's added to appendix G under pressure regulation. Hose connection procedure includes recognition of trailer pressure of 4250 psig. Added at request of Safety Division	Compliance & Emergency Planning
4	OQ Plan Updates	1	LU3 should say #3LU in the bulleted item.	BP 1534	Yes 12/5/2017	Complete	Operations
5	OQ Plan Updates	1	"XNG technicians took exams". This statement should be precise and modified to list which Covered Tasks are being referred to.	BP 1534	Yes 12/5/2017	In-Progress-Liberty estimated completion date is 1/15/2019	Operations

4.3-CNG Awareness XNG Trailer Training Submittal Date 11/09/17							
Safety Division Recommendation	Section	Page No.	Safety Division Comments	Corresponding Bates Page Number 11/30/17	Liberty Notified	Liberty Utilities Document Status 12/5/2018	Responsible Department
1	XNG CNG Awareness Training	10 and 16	Training PowerPoint Slide 10: stated PUC has authority to review and approve procedures. Stated local fire will perform response with XNG personnel oversight. - Slide 16: changed this to state evacuation of public 1 mile downwind from site (per ERG 115). This slide is for when there is a fire.	BP 1550 BP 1556	Yes 12/5/2017	Complete-Liberty provided update and response to Safety Division on 11/13/2017	Operations

4.4-Response to NH PUC Safety PP Questions Submittal Date 11/11/17							
Safety Division Recommendation	Section	Page No.	Safety Division Comments	Corresponding Bates Page Number 11/30/17	Liberty Notified	Liberty Utilities Document Status 12/5/2018	Responsible Department
1		1	Comments are listed in response	BP 1574	Yes 12/5/2017	Complete-Liberty provided response to Safety Division on 11/13/2017	Operations

4.5-Liberty Utilities I & R and Keene Technician Training Submittal Date 11/7/2017							
Safety Division Recommendation	Section	Page No.	Safety Division Comments	Corresponding Bates Page Number 11/30/17	Liberty Notified	Liberty Utilities Document Status 12/5/2018	Responsible Department
1	LU Keene	1	Keene employees to be initially trained and tested on covered tasks 59, <u>add 60</u> 62,63, 65 <u>add #3LU</u>	BP 1576	Yes 12/5/2017	In-Progress-Identified Keene Employees are OQ'd in 59, 60, 62,63, and 65. They are qualified under #3LU; however, we need to requalify once the test is developed in ITS. This is ongoing to generate test online	Operations

4.10- Covered Tasks CNG Training Submittal Date 11/7/2017							
Safety Division Recommendation	Section	Page No.	Safety Division Comments	Corresponding Bates Page Number 11/30/17	Liberty Notified	Liberty Utilities Document Status 12/5/2018	Responsible Department
1	Legend	1	Personnel is misspelled as "Personal"	BP 1580	Yes 12/5/2017	Complete	Operations
2	Legend	1	Are only annual inspections conducted by Liberty I&R and XNG? Monthly equipment inspections will also be conducted by XNG and Liberty.	BP 1580	Yes 12/5/2017	In Progress-Estimated completion date is 1/15/2019	Operations

4.11- Covered Task #3LU Submittal Date 11/7/2017							
Safety Division Recommendation	Section	Page No.	Safety Division Comments	Corresponding Bates Page Number 11/30/17	Liberty Notified	Liberty Utilities Document Status 12/5/2018	Responsible Department
1		1	An additional AOC should be added in regard to recognizing and reacting to CNG tank pressures exceeding 4,250 psi.	BP 1581	Yes 12/5/2017	Complete-Available online "Operator Qualification Plan_NH_6April2018" under appendix B and G as stated above	Compliance & Emergency Planning

4.12- Abnormal Operating Conditions Submittal Date 11/11/2017							
Safety Division Recommendation	Section	Page No.	Safety Division Comments	Corresponding Bates Page Number 11/30/17	Liberty Notified	Liberty Utilities Document Status 12/5/2018	Responsible Department
1	19	10	An additional AOC should be added in regard to recognizing and reacting to CNG tank pressures exceeding 4,250 psi.	BP 1592	Yes 12/5/2017	Complete-Available online "Operator Qualification Plan_NH_6April2018"	Compliance & Emergency Planning

4.15- ITS XNG OQ Task Report Submittal Date 11/07/2017							
Safety Division Recommendation	Section	Page No.	Safety Division Comments	Corresponding Bates Page Number 11/30/17	Liberty Notified	Liberty Utilities Document Status 12/5/2018	Responsible Department
1	NA	ITS	The ITS data base report indicates that some XNG personnel are not qualified under all CNG related covered tasks identified by Liberty.	BP 1596 to BP 1599	Yes 12/5/2017	In-Progress. Estimated completion date is 1/15/2019	Quality Management

4.18-ITS Liberty Utilities NH Qualified Task Report Submittal Date 11/08/2017							
Safety Division Recommendation	Section	Page No.	Safety Division Comments	Corresponding Bates Page Number 11/30/17	Liberty Notified	Liberty Utilities Document Status 12/5/2018	Responsible Department
1	NA	ITS	The ITS data base report does not reflect Liberty qualification under covered task #3LU. The data base also indicates that some Liberty personnel are not qualified under all identified CNG related covered tasks.	BP 1603 to BP 1607	Yes 12/5/2017	In Progress-Test was generated in house on paper and technicians passed written and performance exams (Liberty has provided documentation to the Safety Division; however, Liberty is working with ITS to add the exam to the database for tracking purposes. Estimated completion date is 2/1/2019 to have test generated and technicians retested	Technical Training

Liberty Keene Critical Valve Impact as contained in the Pressure Test Documentation and Conversion Procedure							
Safety Division Recommendation	Section	Page No.	Safety Division Comments	Corresponding Bates Page Number 11/30/17	Liberty Notified	Liberty Utilities Document Status 12/5/2018	Responsible Department
1	7.2 Conversion Plan SOP	-	Oct 26 2017 Proposed Sectionalizing Plan shows 2 underground 6 inch valves that were proposed but are not installed. Drawing should be updated to reflect valves were not installed.	BP 1702	Yes 12/5/2017	In-Progress-Estimated completion date 1/15/2019	Engineering
2		-	Liberty should amend its Critical Valve List to include 8" Kerotest Poly Ball Valve Underground Valve #132 (shown on M3).	M3 Drawing	Yes 12/5/2017	In-Progress-Estimated completion date 1/15/2019	Engineering
3	2.2 Pressure Test Doc	-	Although inside the fence of Production Avenue, Valve List to include 6" Kerotest Carbon Steel Ball Valve Underground Valve #129 (shown on M3).	BP 1427 M3 Drawing	Yes 12/5/2017	In-Progress-Estimated completion date 1/15/2019	Engineering
4	7.2 Conversion Plan SOP	-	Oct 26 2017 Proposed Sectionalizing Plan shows V1 and V2 both on North Side of Route 9. There is no critical valve shown on South Side. Nearest valve is 2030 feet to V132. Safety Division notes conflict with Settlement Attachment J of DG 11-040 when and if Liberty consolidate rates and operations.	BP 1702	Yes 12/5/2017	In-Progress-Estimated completion date 1/15/2019	Engineering
5	7.3 Conversion Plan SOP	-	Oct 26 2017 Proposed Sectionalizing Plan shows V9 and V10 both on East Side of Route 12. There is no critical valve shown on West Side. Nearest Valve is considerable distance to V8 on Ashbrook Rd. Safety Division notes conflict with Settlement Attachment J of DG 11-040 when and if Liberty consolidate rates and operations.	BP 1703	Yes 12/5/2017	In-Progress-Estimated completion date 1/15/2019	Engineering
6	7.3 Conversion Plan SOP	-	Liberty did not provide any sectionalizing plan beyond Phase 1 of Monadnock Marketplace. Staff (see Appx 1-C) notes Island St over Ashuelot River in Phase 2, Winchester Street over Ashuelot River in Phase 2, Route 101 in Phase 2, Ashuelot River in Phase 4, Park Avenue Phase 5, Route 12 Phase 4, will require Critical Valves and associated maintenance. Safety Division notes conflict with Settlement Attachment J of DG 11-040 when and if Liberty consolidate rates and operations.	-	Yes 12/5/2017	In-Progress-Estimated completion date 1/15/2019	Engineering
7	7.3 Conversion Plan SOP	-	Liberty did not provide any sectionalizing plan describing how 25% criteria will be met for sectionalizing of town that has high pressure segments. This will be required in detailed analysis.	-	Yes 12/5/2017	In-Progress-Estimated completion date 1/15/2019	Engineering

7.1 Keene Conversion Standard Operating Procedure (SOP) Submittal Date 11/13/17							
Safety Division Recommendation	Section	Page No.	Safety Division Comments	Corresponding Bates Page Number 11/30/17	Liberty Notified	Liberty Utilities Document Status 12/5/2018	Responsible Department
1	Author	1	The status of the SOP says Approved yet the Header says Draft 2. This should be written as final if so.	BP 1693	Yes 12/01/17	In-Progress-estimated completion date is 1/15/2019	Engineering
2	SOP Details	1	System Pressure should be consistent with those mentioned elsewhere Suggest adding MAOP to psig reference to avoid any potential conflict.	BP 1693	Yes 12/01/17	In-Progress-estimated completion date is 1/15/2019	Engineering

7.2 Keene CNG Conversion Proposed Purge Plan Sections 1, 2, 3, 4 Submittal Date 11/13/17							
Safety Division Recommendation	Section	Page No.	Safety Division Comments	Corresponding Bates Page Number 11/30/17	Liberty Notified	Liberty Utilities Document Status 12/5/2018	Responsible Department
1	Conversion Section 1 Sheet 1 of 4	1	Conversion Section 1 states "to be used in conjunction with all applicable sections of O&M". Liberty should specify the precise sections of the O&M Manual that are applicable. It states Flow Arrows indicated on Sketch although Safety Division could not find any. Instead of Sketch reference BP 1703 "Proposed Sectionalizing Plan" dated 9/12/2017	BP 1697	Yes 12/01/17	In-Progress-estimated completion date is 1/15/2019	Engineering
2	Conversion Section 1 Sheet 1 of 4	1	Step 10 is not specific as to which section of Liberty O&M Manual is referenced. Liberty has multiple places that establish within the O&M Manual. Reference BP 1790. A multiple pressure test may be required.	BP 1697	Yes 12/01/17	In-Progress-estimated completion date is 1/15/2019	Engineering
3	Conversion Section 2 Sheet 2 of 4	1	Conversion Section 2 states "to be used in conjunction with all applicable sections of O&M". Liberty should specify the precise sections of the O&M Manual that are applicable. It states Flow Arrows indicated on Sketch although Safety Division could not find any. Instead of Sketch reference BP 1703 "Proposed Sectionalizing Plan" dated 9/12/2017	BP 1698	Yes 12/01/17	In-Progress-estimated completion date is 1/15/2019	Engineering
4	Conversion Section 2 Sheet 2 of 4	1	Step 10 is not specific as to which section of Liberty O&M Manual is referenced. Liberty has multiple places that establish pressures within the O&M Manual. A single pressure test may be adequate.	BP 1698	Yes 12/01/17	In-Progress-estimated completion date is 1/15/2019	Engineering
5	Conversion Section 3 Sheet 3 of 4	1	Conversion Section 3 states "to be used in conjunction with all applicable sections of O&M". Liberty should specify the precise sections of the O&M Manual that are applicable. It states Flow Arrows indicated on Sketch although Safety Division could not find any. Instead of Sketch reference BP 1703 "Proposed Sectionalizing Plan" dated 9/12/2017	BP 1699	Yes 12/01/17	In-Progress-estimated completion date is 1/15/2019	Engineering
6	Conversion Section 3 Sheet 3 of 4	1	Step 10 is not specific as to which section of Liberty O&M Manual is referenced. Liberty has multiple places that establish pressures within the O&M Manual. Reference BP 1765, 1767. A single pressure test may be adequate.	BP 1699	Yes 12/01/17	In-Progress-estimated completion date is 1/15/2019	Engineering

7	Conversion Section 4 Sheet 4 of 4	1	Conversion Section 4 states "to be used in conjunction with all applicable sections of O&M". Liberty should specify the precise sections of the O&M Manual that are applicable. It states Flow Arrows indicated on Sketch although Safety Division could not find any. Instead of Sketch reference BP 1703 "Proposed Sectionalizing Plan" dated 9/12/2017	BP 1700	Yes 12/01/17	In-Progress-estimated completion date is 1/15/2019	Engineering
8	Conversion Section 4 Sheet 4 of 4	1	Step 17 is not specific as to which section of Liberty O&M Manual is referenced. Liberty has multiple places that establish pressures within the O&M Manual. Reference BP 1765, 1767. A multiple pressure test may be required.	BP 1700	Yes 12/01/17	In-Progress-estimated completion date is 1/15/2019	Engineering

7.3 Keene CNG Conversion Proposed Purge Maps Submittal Date 11/13/17

Safety Division Recommendation	Section	Page No.	Safety Division Comments	Corresponding Bates Page Number 11/30/17	Liberty Notified	Liberty Utilities Document Status 12/5/2018	Responsible Department
1	PB- R6	1	No service is shown to Dicks Sporting Good #43.	BP 1703	Yes 12/01/17	In-Progress-estimated completion date is 1/15/2019	Engineering
2	PB- R6	1	Valve and service to Target #46 is not shown correctly.	BP 1703	Yes 12/01/17	In-Progress-estimated completion date is 1/15/2019	Engineering
3	PB- R6	1	Addressing on Production Avenue is incorrect. Noyes Volkswagen is #18 not #14. Autoparts International is #32 not #30.	BP 1702	Yes 12/01/17	In-Progress-estimated completion date is 1/15/2019	Engineering

7.4 Keene CNG Conversion Proposed PUC Requests Submittal Date 11/13/17

Safety Division Recommendation	Section	Page No.	Safety Division Comments	Corresponding Bates Page Number 11/30/17	Liberty Notified	Liberty Utilities Document Status 12/5/2018	Responsible Department
1	PB- R6	1	Mattress Giant is now Sleepy's Mattress see BP 1506. Suggest using the proper Addressing for future records	BP 1704	Yes 12/01/17	In-Progress-estimated completion date is 1/15/2019	Engineering

8.2 Keene Original Monadnock Plaza Installation Records Submittal Date 11/13/17

Safety Division Recommendation	Section	Page No.	Safety Division Comments	Corresponding Bates Page Number 11/30/17	Liberty Notified	Liberty Utilities Document Status 12/5/2018	Responsible Department
1	Main and Service Records of NH Gas Corp	1	The original records need to have a corresponding street address and a corresponding business name. Many of the existing records reference business names that have changed since the original installation of 2005. The GIS Mapping should have source information so that in an emergency the precise record is brought up that pertains to the exact pipeline location. Also since main and service information is available in trucks the original names recorded should tie to the current names of businesses.	BP 1706 through BP 1874	Yes 12/01/17	In-Progress-estimated completion date is 1/15/2019	Engineering
2	Service Records of NH Gas Corp	1	Excess Flow Valves - it is unclear which services Liberty intends to install an excess flow valve and if an existing Excess Flow Valve was installed at each service. Safety Division found an excess flow valve the former I Party (#14 Ashbrook Rd) store. Liberty has the option of putting in excess flow valves for businesses that exceed 1 MCFH meter size.	BP 1811	Yes 12/01/17	In-Progress-estimated completion date is 1/15/2019	Engineering

3	Main and Service Records of NH Gas Corp	1	Liberty's plan should state intentions regarding mains and services that were not originally pressure tested at levels required to establish 60 psig MAOP. Liberty's options are to Uprate per Part 192 Subpart K or reinstall new pipelines that will be pressure tested. Safety Division review revealed 14 feet of 2 inch service feeding the former Circuit City (currently Planet Fitness) and 12 feet former Mattress Giant (currently Sleep's Mattress) along with 700 feet of 2 inch main feeding those buildings may not be operated at 60 psig MAOP without reestablishing 60 psig MAOP per subpart J or K. compliance.	BP 1765 BP 1766	Yes 12/01/17	In-Progress-estimated completion date is 1/15/2019	Engineering
4	Main and Service Records of NH Gas Corp	1	Liberty's plan should state intentions regarding mains and services that were not originally pressure tested at levels required to establish 60 psig MAOP. Liberty's options are to Uprate per Part 192 Subpart K or reinstall new pipelines that will be pressure tested. Safety Division record review revealed 1400 feet of 4 inch main feeding the former Borders, Bed and Bath and Target buildings along with 150 feet of 2 inch main feeding those buildings installed in 2004 may not be operated at 60 psig MAOP without reestablishing 60 psig MAOP per subpart J or K. compliance.	BP 1787	Yes 12/01/17	In-Progress-estimated completion date is 1/15/2019	Engineering
5	Main and Service Records of NH Gas Corp	1	Liberty's plan should state intentions regarding mains and services that were not originally pressure tested at levels required to establish 60 psig MAOP. Liberty's options are to Uprate per Part 192 Subpart K or reinstall new pipelines that will be pressure tested. Safety Division review revealed 160 feet of 4 inch service feeding the Chili's restaurant installed in 2004 may not be operated at 60 psig MAOP without reestablishing 60 psig MAOP per subpart J or K. compliance.	BP 1790	Yes 12/01/17	In-Progress-estimated completion date is 1/15/2019	Engineering
6	Main and Service Records of NH Gas Corp	1	Liberty's plan should state intentions regarding mains and services that were not originally pressure tested at levels required to establish 60 psig MAOP. Liberty's options are to Uprate per Part 192 Subpart K or reinstall new pipelines that will be pressure tested. Safety Division review revealed 70 feet of 2 inch service feeding the former Olive Garden restaurant installed in 2004 may not be operated at 60 psig MAOP without reestablishing 60 psig MAOP.	BP 1793	Yes 12/01/17	In-Progress-estimated completion date is 1/15/2019	Engineering
7	Main and Service Records of NH Gas Corp	1	Liberty's plan should state intentions regarding mains and services that were not originally pressure tested at levels required to establish 60 psig MAOP. Liberty's options are to Uprate per Part 192 Subpart K or reinstall new pipelines that will be pressure tested. Safety Division review revealed 14 feet of 1 inch service between the former Olive Garden restaurant and Chili's installed in 2005 used as a riser for a pressure chart but did not find a corresponding retirement record of the 1 inch diameter riser.	BP 1860 BP 1861 BP 1862	Yes 12/01/17	In-Progress-estimated completion date is 1/15/2021	Engineering

8	Main and Service Records of NH Gas Corp	1	On new pressure systems such as the proposed Keene 60 psig system fed with natural gas. Liberty should set up a document system that clearly identifies, verifies and traces the materials, pressure testing, location of pipeline for every foot of pipe and associated components so that MAOP records can be kept for the life of the pipeline system to ensure compliance with Part 192. Existing system seems to be hap hazard and may potentially lead to mis interpretation in the future. This would include Production Avenue, Ash Brook Rd, Key Rd and future expansions.	BP 1706 through BP 1874	Yes 12/01/17	In-Progress-estimated completion date is 1/15/2019	Engineering
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