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February 28, 2019

Via Hand-Delivery

Randall Knepper, Director, Safety Division
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, NH 03301-2429

**Re: Docket No. DG 17-068; Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a
Liberty Utilities – Keene Division**

Dear Mr. Knepper:

In Order No. 26,065 (Oct. 20, 2017), the Commission affirmed Liberty's right to distribute natural gas in Keene, and stated that Liberty could not introduce natural gas into the Keene system "until the Commission's Safety Division has found the required plans and reports adequate, and completed its physical inspection of the facilities as described above."

The Company provided its "plans and reports" to the Safety Division in late 2017 (the "2017 Plan"). The Safety Division provided its assessment of the 2017 Plan on October 5, 2018, finding that the Company needed to make a number of corrections and updates:

The Safety Division has completed its adequacy review. Our findings are enclosed in the attached report, which includes recommendations in each section for changes, improvements, and other actions to be taken before the proposed CNG system is launched. The Safety Division recommends the Commission accept the comprehensive report and require Liberty to address each concern and recommendation and to refile an amended and annotated plan that demonstrates compliance actions taken in response to the report. Upon receipt of the amended plan, the Safety Division will review the plan and recommend final approval for the commencement of the proposed conversions and supply of the Keene system.

October 5, 2018, Safety Division cover letter.

The Company has now "address[ed] each concern and recommendation" and, due to the voluminous nature of the documents, encloses a USB flash drive that contains the "amended and annotated plan that demonstrates compliance actions taken in response to the report" (the "2019 Plan").

The documents on the USB flash drive are as follows. First, is a Table of Contents that lists the following nine folders:

1. Site and Decompression-Skid Design
2. Pressure Test Schematics and Chart Records
3. Emergency
4. Operator Qualification and Operating Procedures
5. Maintenance
6. Public Awareness Plan
7. Conversion Plan- SOP
8. Marketplace records
9. 7 Day Storage Requirement

Second, within each folder listed above are the documents that make up the 2019 Plan. Those documents are labeled and organized according to the above Table of Contents. For example, the folder containing the "Site and Decompression-Skid Design," contains six separate documents labeled 1.1 through 1.6, and the folder titled "Emergency" also contains six documents, labeled 3.1 through 3.6.

Finally, the USB flash drive contains an Excel document titled, "Liberty Utilities Keene CNG Response" (the "Response"). In this document, the Company has listed: (i) every "concern and recommendation" from the Safety Division's 2018 report, organized according to the table of contents above; (ii) the appropriate page references to the location in the 2017 Plan from where the concerns and recommendations arose; (iii) a brief description of the "Safety Division's Comments;" (iv) a brief description of the action Liberty has taken to address those comments; and (v) the specific location where the correction or update can be found within the 2019 Plan.

To illustrate how the Response is organized, below is an excerpt from the first page of the first tab ("Eng System Schematics"), line 16, of the Response.

Safety Division Recommendation	Section	11/13/17 Submittal Page No.	Safety Division Comments	Corresponding Bates Page Number(s) 11/13/17	Liberty Notified	Liberty Utilities Document Status 3/1/19	Liberty 3/1/19 Document	Corresponding Page Number
4	Applicable Codes and Standard	1	"Transmission" should be replaced with "Transportation" in 49 CFR part 192 reference	BP 0013	Yes	Complete-Corrected mislabel.	1.1	3

In this example, reading left to right, the Company is responding to the Safety Division's fourth recommendation in the section of the 2017 Plan titled "Applicable Codes and Standards." The Safety Division's recommendation is to change the word "transmission" to "transportation" on page 1 of that section of the 2017 Plan, which was at Bates Page 0013. The next boxes indicate that Liberty had been notified of this recommendation, that the correction has been made, and that the corrected language can be found in document 1.1 of the 2019 Plan at page 3.

Note that the following documents on the USB drive have an effective date of April 1, 2019. The updates in those documents relating to this Keene CNG report as contained on the USB drive will not change, but there may be unrelated changes between now and April 1 that occur in the normal course because this is the season when we ask for feedback from internal subject matter experts and make appropriate edits.

- Keene Emergency Plan
- CNG Operation and Maintenance Plan
- Public Awareness Plan
- Operator Qualification Plan

The Company is confident that the Safety Division will find the 2019 Plan addresses all of the Safety Division's comments and recommendations, and respectfully asks the Safety Division, after it has finished its review, to simply inform the Commission that the 2019 Plan is compliant with the Order.

Finally, please note that we consider the 2019 Plan to be confidential pursuant to RSA 91-A:5, IV, Puc 201.06, Puc 201.07, and Puc 203.08. Since we have a good faith basis to seek confidential treatment of the 2019 Plan, we will file a motion for confidential treatment at or before the commencement of any future hearing that may occur that involves the 2019 Plan.

As always, let us know if you have any questions.

Sincerely,



Michael J. Sheehan

Enclosure

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 2/22/2019	Liberty 2/22/2019 Document	Corresponding Page Number
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	Complete. See Sanborn PID1. The insulating flange on piping to Production Ave as well as the (2) insulating unions on the generator run have been added to the drawing set.	1.3	2
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	Complete-See Sanborn PID1. M1 and M2 updated to reflect PID1. Liberty installed API 5L X52 and API 5L X42.	1.3	2, 3, & 4
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	Complete. PID1 is accurate. Maintenance sheets updated with correct set points.	1.3	2
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	Complete. PID1 is accurate. Maintenance sheets updated with correct set points.	1.3	2
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	Complete-See Sanborn PID1, M1, M2, & M3. In Winter of 2018 Liberty ordered a Chromatograph for the decompression skid. The location of the Chromatograph is depicted on drawing M2. The 1 inch thread o let, nipple, and valve for the sample probe was installed and pressure tested in February 2019. Installation of the sample probe and Chromatograph is scheduled for April of 2019 and prior to gas flowing to customers. Liberty will also be adding the ability for its Gas Control to shut down the skid during an emergency. XNG will not have this capability. Also, in 2018 Liberty installed a gas meter at the Emerald St propane plant.	1.2	4 & 5

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 Diagram No.	Safety Division Comments	Corresponding Bates Page Number(s) 11/30/17	Liberty Notified	Liberty Utilities Document Status 2/22/2019	Liberty 2/22/2019 Document	Corresponding Page Number
1	Table of Contents	1	Attachments are mislabeled Section 16. There are no other sections labeled after 6.	BP 0012	YES	Complete- Corrected labeling.	1.1	2
2	Scope	1	AMSE B1.8 should be deleted	BP 0013	YES	Complete-Eliminated B3.8 reference.	1.1	3
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	Complete- Eliminated B3.8 reference.	1.1	3
4	Applicable Codes and Standards	1	"Transmission" should be replaced with "Transportation" in 49 CFR part 192 reference	BP 0013	YES	Complete- Corrected mislabel.	1.1	3
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	Complete-Corrected drawing set on P-003.	1.1	11

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 Diagram No.	Safety Division Comments	Corresponding Bates Page Number(s) 11/30/17	Liberty Notified	Liberty Utilities Document Status 2/22/2019	Liberty 2/22/2019 Document	Corresponding Page Number
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	Changed hydro to reflect 1.5%, changed test values	1.1	11
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	Complete- Set points corrected.	1.1	11
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	Complete- Set points corrected.	1.1	11
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	Complete- Set points corrected.	1.1	11
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	Changed hydro to reflect 1.5%, changed test values	1.1	12
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	Complete- Set points corrected.	1.1	12
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	Complete- Set points corrected.	1.1	12

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 inconsistent 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	Complete- Set points corrected.	1.1	12
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	Changed hydro to reflect 1.5%, changed test values	1.1	12
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	Complete- Set points corrected.	1.1	13
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 inconsistent 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	Complete- Set points corrected.	1.1	13
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 inconsistent 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	Complete- Set points corrected.	1.1	13
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	Changed hydro to reflect 1.5%, changed test values	1.1	14
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	Complete- Set points corrected.	1.1	14
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 inconsistent 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	Complete- Set points corrected.	1.1	14

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	Complete- Set points corrected.	1.1	14
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	Complete- Verified in field the copper as 1". Changed P- 003	1.1	11
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	Complete-Routed on P-003 through the gas regulator room to roof.	1.1	11
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	Complete- Both are now 100 A and B on P-003. XNG has ordered 3 new Titeflex hoses since the Safety Division's site visit. Hoses are 25 feet each and the 3 hoses were pressure tested by manufacturer at 1.5x MAOP. 2 hoses are to be used immediately and 1 as a spare.	1.1	36
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	Complete- Changed drawing to PRV 222B	1.1	13
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	Complete-Clarified gas regulator room as Class 1, div 2 per NFPA 52. NFPA 52 sec 11.3.2.14.3 states classified areas shall not extend beyond and unpierced wall, roof, or vapor tight partition. The Boiler room is treated under NFPA 54, just like a conventional mechanical space. The gas processing room and boiler room is separated by a sealed wall or vapor tight partition.	1.1 & 1.3	Page 14 of 1.1 and page 8 of 1.3
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	Complete-Liberty Utilities has posted signs indicating not to connect hose trailer to decompression skid if trailer is over 4250 psig MAOP. See Sanborn Head Site Safety Drawing. Also, this was incorporated into Liberty's skid operating procedures.	3.4 & 4.2	Page 1 of 3.4 and page 2 of 4.2

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								
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 2/22/2019	Liberty 2/22/2019 Document	Corresponding Page Number
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	Complete- Added material descriptions 25 and 35 to bill of materials.	1.1	17

<p>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</p>								
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 2/22/2019	Liberty 2/22/2019 Document	Corresponding Page Number
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	Complete-Page left blank to show deletion.	1.1	156
2	Swagelok 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	Complete-Page left blank to show deletion.	1.1	159
3	Swagelok 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	Complete-Page left blank to show deletion.	1.1	165
4	Swagelok 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	Complete-Page left blank to show deletion.	1.1	176
5	Swagelok 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	Complete-Page left blank to show deletion.	1.1	185
6	Swagelok 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	Complete-Page left blank to show deletion.	1.1	200
7	Swagelok 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	Complete-Page left blank to show deletion.	1.1	203
8	Swagelok 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	Complete-Page left blank to show deletion.	1.1	205
9	Swagelok 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	Complete-Page left blank to show deletion.	1.1	208
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	Complete- Replaced page with 1/4 inch valve, added tags V-217 A,B and V-203A,B	1.1	253
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	Complete- Flow diagram updated to show the correct order	1.1	12
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	Complete-Changed component tag to from V 212 A to 208A	1.1	254
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	Complete-Page left blank to show deletion of BP 698. 659 duplicate deleted.	1.1	254
13	Apollo 70-100 BC Series Ball Valve	-	Valve 249 not found on P-004 or P-005	BP 0992	NO	Complete-Page left blank to show deletion.	1.1	548
14	Apollo 70-100 BC Series Ball Valve	-	Valve 250 not found on P-004 or P-005	BP 0993	NO	Complete-Page left blank to show deletion.	1.1	548
15	Apollo 70-100 BC Series Ball Valve	-	Valve 251 not found on P-004 or P-005	BP 0994	NO	Complete-Page left blank to show deletion.	1.1	548

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 Diagram No.	Safety Division Comments	Corresponding Bates Page Number(s) 11/30/17	Liberty Notified	Liberty Utilities Document Status 2/22/2019	Liberty 2/22/2019 Document	Corresponding Page Number
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	Liberty Utilities acknowledges that due to the tubing on the front of the skid being considered transmission class piping, per federal regulations an ICDA inspection will be required every 7 years from the date of the initial inspection and pressure test on 10.19.2017. However, due to this being a temporary facility Liberty is confident that this facility will be off line by the due date for the scheduled inspection assuming Liberty goes live in 2019. When it is time for that inspection, the permanent facility in Keene should be online. If it is not, Liberty Utilities has the ability to bring in its temporary LNG skid and shutdown the CNG skid to conduct all inspections required by federal and state code that cannot be conducted while the skid is in operation.	N/A	N/A

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 2/22/2019	Liberty 2/22/2019 Document	Corresponding Page Number
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	Complete- Reference to ASME B31.8 removed. Liberty has replaced the Test Procedure with a Pressure test report. Liberty did not contest the NOPV; however, it has updated the pressure test report to reflect the Safety Division's comments and accurately show the sections that were tested. Liberty has also provided pressure charts that were signed and dated by the Technicians performing the tests.	1.2	3
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	Complete-Updates have been made to the pressure test report.	1.2	7-11; 21
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	Complete-Liberty acknowledges this and did not contest the NOPV. Liberty has provided a pressure test report showing the pipe sections that were tested during each pressure test. Pressure charts were signed and dated by the Technicians performing the tests.	2.1 through 2.12	Multiple
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	Complete-Liberty acknowledges this and did not contest the NOPV. The pressure tests were conducted on 10/16/2017, 10/17/2017, and 10/19/2017	N/A	N/A
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	Complete-Updated pressure test report.	1.2	3-4
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	Complete-Updated pressure test report.	1.2	3-4
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	Complete-Updated pressure test report.	1.2	3-4
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	Complete-Updated pressure test report	1.2	4

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	Complete-Added Sanborn Head drawing to Apex pressure test report to show limits of pressure test	1.2	11
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	Complete-Added Sanborn Head drawing to Apex pressure test report to show limits of pressure test	1.2	11
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	Complete-Liberty has confirmed with the Technician who performed the tests that the 1400 psig MAOP test went to V-233A/B. The 105 psig MAOP test was conducted on the other side of the valve V-233A/B.	1.2	9
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	Complete. Labeling corrected.	1.2	6
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	Complete. Set points corrected.	1.2	7
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	Complete. Set points corrected.	1.2	8
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	Complete. Set points corrected.	1.2	9
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	Complete. Set points corrected.	1.2	10
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	Complete-Limits provided	1.2	11
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	Complete- Changed to MAOP. Discharge is shown for the 105 psig system. The report only applies to the 4250 psig, 1400 psig, and 105 psig MAOP systems as stated on page 3. Liberty has provided a pressure test report. Pressure charts were signed by Technicians performing the pressure tests.	1.2	3, 21
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	Complete- Discharge is shown for the 105 psig system. The report only applies to the 4250 psig, 1400 psig, and 105 psig MAOP systems as stated on page 3. Liberty has provided a pressure test report . Pressure charts were signed by Technician performing the tests.	1.2	3
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	Complete- Discharge is shown for the 105 psig system. The report only applies to the 4250 psig, 1400 psig, and 105 psig MAOP systems as stated on page 3. Liberty has provided a pressure test report . Pressure charts were signed by Technician performing the tests. Piping updates have been made to the schematics.	1.2	3, 23, 24

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	Complete- Discharge is shown for the 105 psig system. The pressure test report only applies to the 4250 psig, 1400 psig, and 105 psig MAOP systems as stated on page 3. Liberty has provided an updated pressure test report .	1.2	3, 23, 24
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3.2 Liberty Keene 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(s) 11/30/17	Liberty Notified	Liberty Utilities Document Status 2/22/2019	Liberty 2/22/2019 Document	Corresponding Page Number
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	Complete. Bullet added. Liberty has added the ability to remotely shut down the decompression skid in the event there is an emergency. XNG will not have this ability.	3.1	4
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	Complete. Appendix J reference added.	3.1	5
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	Complete. Note added.	3.1	18
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	Complete. Note added.	3.1	18
5	J. Emergency Response	20	Appendix J needs to be referenced.	BP 1459	YES 12/01/17	Complete. Note added.	3.1	20
6	Appendix A	33	Level 1 Event Other should include emergency shutdowns associated with the CNG facility.	BP 1472	YES 12/01/17	Complete. CNG added.	3.1	33
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	Complete-Note added.	3.1	43
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	Complete. 16 Ashbrook removed from propane air and added to natural gas in appendix J.	3.1	55 & 68
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	Complete. IC added in place of R. Macdonald	3.1	66 & 67

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(s) 11/30/17	Liberty Notified	Liberty Utilities Document Status 2/22/2019	Liberty 2/22/2019 Document	Corresponding Page Number
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 they will adopt Liberty Utilities emergency plan with an effective date of April 2019. Liberty has included the Emergency plan letter acceptance by XNG in the 3/1/19 report.	3.1 & 3.2	Page 64 of 3.1 & page 1 of 3.2
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	This is not applicable since the plans are being merged into appendix J	N/A	NA
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	This is not applicable since the plans are being merged into appendix J	N/A	N/A

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(s) 11/30/17	Liberty Notified	Liberty Utilities Document Status 2/22/2019	Liberty 2/22/2019 Document	Corresponding Page Number
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	Complete-See Site Safety Drawing and skid matrix. 50% LEL changed to alarm only. Liberty has also included in both Sanborn Head and the skid matrix that Liberty and not XNG will have ability to remotely shut down skid. This will ensure immediate reaction by Liberty Gas Control if there is an emergency at the site. The skid matrix and site safety drawing will be kept in Liberty's project specific online PDF library and in the project binder on site at 43 Production Ave	3.3 and 3.4	Pages 1 and 2 of 3.3 & page 1 of 3.4

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(s) 11/30/17	Liberty Notified	Liberty Utilities Document Status 2/22/2019	Liberty 2/22/2019 Document	Corresponding Page Number
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	See 4.2 comments. Removed 3.6 from Emergency section as requested by PUC Safety Division and moved to 4.2.	4.2	N/A
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	See 3.6 safety division recommendation 1 comments by Liberty.	N/A	N/A
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	See 3.6 safety division recommendation 1 comments by Liberty.	N/A	N/A
4	Trailer Arrival c) Hose Station Preparation	1	This section should Reference Drawing P-003, as earlier suggested.	BP 1521	YES 12/01/17	See 3.6 safety division recommendation 1 comments by Liberty.	N/A	N/A
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	See 3.6 safety division recommendation 1 comments by Liberty.	N/A	N/A
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	See 3.6 safety division recommendation 1 comments by Liberty.	N/A	N/A
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-Liberty interprets this as a statement and not an action item. Section 4 is the reason why Liberty included this in the emergency documentation to the Safety Division. This document is referenced in the Liberty emergency plan.	3.1	65

4.1 - Liberty Keene O&M & OQ Plan Updates and Summary Submittal Date 11/12/17								
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 2/22/2019	Liberty 2/22/2019 Document	Corresponding Page Number
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	Complete. Liberty Utilities under the existing O & M, chapter 12-G Pressure Limiting and Regulating Stations, section 6.1.1 states the following "Station-specific procedures, where applicable, are addressed in the "I&R Station Book."" Liberty shall add the hose connection procedure to its online library labeled "NH Keene Division Compressed Natural Gas Facility Operation and Maintenance Manual" by 4/1/2019. This is located in the same location where Liberty stores documents such as the Emergency Plan and Public Awareness Plan.	5.2	1
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. Liberty has provided a draft operator qualification plan with the Safety Divisions recommendations incorporated into the document. Liberty updates the plan annually with an effective date of 4/1/2019. The document is in draft due to possible additional updates by subject matter experts outside the Keene CNG update that may occur in March 2019. Changes requested by the Safety Division in this report will not be changed prior to 4/1/2019. Appendix B updated and Appendix G (pressure regulation).	4.1	52, 188, 189, and 217
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	Appendix G section 2 states the following, "All Company and Contractor personnel performing Covered Task #3LU "Connection and Disconnection of CNG Trailer at Decompression Skids" must be qualified under Covered Task #70." Drivers will also have #3LU and 70.	4.1	211
4	OQ Plan Updates	1	LU3 should say #3LU in the bulleted item.	BP 1534	YES 12/5/2017	4.1 - Liberty Keene O&M & OQ Plan Updates and Summary Submittal Date 11/12/17" document not included in 3/1/2019 update. Replaced with Liberty OQ plan with an effective date of 4/1/2019 or report 4.1	N/A	N/A
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	4.1 - Liberty Keene O&M & OQ Plan Updates and Summary Submittal Date 11/12/17" document not included in 3/1/2019 update. Replaced with Liberty OQ plan with an effective date of 4/1/2019 or report 4.1	N/A	N/A

4.3-CNG Awareness XNG Trailer Training Submittal Date 11/09/17								
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 2/22/2019	Liberty 2/22/2019 Document	Corresponding Page Number
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-Slide 10 added Liberty Utilities and XNG to personnel oversight. Added definition of evacuation and ERG explanation to slide 32.	4.11	10 & 32

4.4-Response to NH PUC Safety PP Questions Submittal Date 11/11/17								
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 2/22/2019	Liberty 2/22/2019 Document	Corresponding Page Number
1		1	Comments are listed in response	BP 1574	YES 12/5/2017	Liberty provided response to Safety Divisions questions in 11/13/2017 submittal. Document submitted again for the 3/1/2019 report. Liberty interprets Safety Division comments as a statement and not a action item.	4.12	1

4.5-Liberty Utilities I & R and Keene Technician Training Submittal Date 11/7/2017								
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 2/22/2019	Liberty 2/22/2019 Document	Corresponding Page Number
1	LU Keene	1	Keene employees to be initially trained and tested on covered tasks 59, add 60,62,63, 65 add #3LU	BP 1576	YES 12/5/2017	Keene employees all were trained and qualified by written and performance exams in #3LU in 2017 and 59,60,62,63,65 by early 2019. Training summary updated. ITS reports showing qualifications have been submitted under 4.10.	4.5	1

4.10- Covered Tasks CNG Training Submittal Date 11/7/2017								
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 2/22/2019	Liberty 2/22/2019 Document	Corresponding Page Number
1	Legend	1	Personnel is misspelled as "Personal"	BP 1580	YES 12/5/2017	Complete. Spelling corrected.	4.4	1
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	Complete. This is stated in document 5.1	5.1	3

4.11- Covered Task #3LU Submittal Date 11/7/2017								
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 2/22/2019	Liberty 2/22/2019 Document	Corresponding Page Number
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-See 4.1- Operator Qualification Plan_NH_1April2019_draft.docx-	4.1	188

4.12- Abnormal Operating Conditions Submittal Date 11/11/2017								
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 2/22/2019	Liberty 2/22/2019 Document	Corresponding Page Number
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-See 4.1- Operator Qualification Plan_NH_1April2019_draft.docx-	4.1	218

4.15- ITS XNG OQ Task Report Submittal Date 11/07/2017								
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 2/22/2019	Liberty 2/22/2019 Document	Corresponding Page Number
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–BP 1599	YES 12/5/2017	XNG has committed to Liberty Utilities to have all personnel qualified by 4/15/2019 as specified under section 4.4 of this report. Liberty will provide that documentation to the Safety Division when complete.	Blank	Blank

4.18-ITS Liberty Utilities NH Qualified Task Report Submittal Date 11/08/2017								
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 2/22/2019	Liberty 2/22/2019 Document	Corresponding Page Number
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–BP 1607	YES 12/5/2017	Complete #3LU has been added to ITS. Liberty Utilities has included an ITS report showing that all 4 Liberty Keene Technicians are fully operator qualified as specified under the covered task list section 4.4 (including #3LU). Liberty has also submitted an ITS report for the Manager of Keene showing that he is qualified in #3LU in case he has to be on site during a CNG delivery.	4.10	Pages 1–5

4.2-CNG Sequence of Operations Submittal Date 11/12/17								
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 2/22/2019	Liberty 2/22/2019 Document	Corresponding Page Number
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	Liberty Utilities' existing O & M, chapter 12-G Pressure Limiting and Regulating Stations, section 6.1.1 states the following "Station-specific procedures, where applicable, are addressed in the 'I&R Station Book.'" Liberty shall add the hose procedure to its online library labeled "NH Keene Division Compressed Natural Gas Facility Operation and Maintenance Manual" by 4/1/2019. See document 5.2 of this report to see a snapshot of where the document will be stored.	5.2	1
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	Complete-Trailer connections are A and B as depicted in P-003 and as stated in 4.2 of this report.	4.2	1
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-Also updated contact information for XNG Dispatch.	4.2	1
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. References added where applicable.	4.2	1-5
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	Complete. References added where applicable.	4.2	1-5
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	Complete. References added where applicable.	4.2	1-5

3.6 XNG CNG Skid Operating Procedures Submittal Date 11/13/17								
Safety Division Recommendation	Section	Submittal Page No.	Safety Division Comments	Page Number(s) 11/30/17	Liberty Notified	Liberty Utilities Document Status 2/22/2019	Liberty 2/22/2019 Document	Corresponding Page Number
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	See 4.2 comments. Removed 3.6 from Emergency section as requested by PUC Safety Division and moved to 4.2.	N/A	N/A
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	See 4.2 comments	N/A	N/A
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	See 4.2 comments	N/A	N/A
4	Trailer Arrival c) Hose Station Preparation	1	This section should reference Drawing P-003 as earlier suggested.	BP 1521	YES 12/01/17	See 4.2 comments	N/A	N/A
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. Language added to 4.2.	4.2	2
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	See 4.2 comments	N/A	N/A
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-Documents is referenced in the emergency plan appendix J.	3.1	65

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(s) 11/30/17	Liberty Notified	Liberty Utilities Document Status 2/22/2019	Liberty 2/22/2019 Document	Corresponding Page Number
1	Table of Contents	1	Section 7 should match Chapter 7 Header	BP 1613 BP 1616	YES 12/01/17	Maintenance activities is now section 8 and it does match chapter 8 header now.	5.1	1 and 5
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	Liberty Utilities' existing O & M, chapter 12-G Pressure Limiting and Regulating Stations, section 6.1.1 states the following "Station-specific procedures, where applicable, are addressed in the 'I&R Station Book.'" Liberty shall add the maintenance plan to its online library labeled "NH Keene Division Compressed Natural Gas Facility Operation and Maintenance Manual" by 4/1/2019. This online site is where Liberty publishes documents such as the operator qualification and public awareness plan.	5.2	1
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	Complete. Clarification stated. This is section 4 now.	5.1	3
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 replaced mandated to all. This is section 4 now. Also, language added Liberty on site requirement in section 4.2.1	5.1	3
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 updated. This is now section 5.	5.1	3
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	Complete and references added. This is now section 6.	5.1	4
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	The correct Oasis is HC308	5.1	5
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	Complete-P&ID reference numbers, component page numbers, and sizing where applicable have been added to the key components section.	5.1	3 and 4
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	Complete. See inspection frequency "annual" 8.1.4	5.1	5
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	Complete-P&ID reference numbers, component page numbers, and sizing where applicable have been added to the maintenance activity section.	5.1	5-8

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	Complete. See section 8.1.1	5.1	5
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	Complete. Frequency of inspections have been added to each maintenance activity. Each activity is annual.	5.1	5-8

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(s) 11/30/17	Liberty Notified	Liberty Utilities Document Status 2/22/2019	Liberty 2/22/2019 Document	Corresponding Page Number
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. Inspector and date added to document. Liberty is submitting blank forms due to the fact that the skid is not operational. Prior to flowing gas to customers Liberty intends on performing a full assessment of the decompression skid and completing these forms. Set point is 40 PSI. See Sanborn Head drawing. Inlet specified as MAOP due to fluctuations in operating pressure due to demand. This is consistent with the rest of the maintenance sheets.	5.3	1
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. Inspector and date added to document. Liberty is submitting blank forms due to the fact that the skid is not operational. Prior to flowing gas to customers Liberty intends on performing a full assessment of the decompression skid and completing these forms. Set point is 50 PSI. See Sanborn Head drawing.	5.3	2
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. Inspector and date added to document. Liberty is submitting blank forms due to the fact that the skid is not operational. Prior to flowing gas to customers Liberty intends on performing a full assessment of the decompression skid and completing these forms. Set point is 45 PSI. See Sanborn Head drawing.	5.3	3
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. Inspector and date added to document. Liberty is submitting blank forms due to the fact that the skid is not operational. Prior to flowing gas to customers Liberty intends on performing a full assessment of the decompression skid and completing these forms. Set point is 50 PSI. See Sanborn Head drawing.	5.3	4
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. Inspector and date added to document. Liberty is submitting blank forms due to the fact that the skid is not operational. Prior to flowing gas to customers Liberty intends on performing a full assessment of the decompression skid and completing these forms.	5.4	5

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(s) 11/30/17	Liberty Notified	Liberty Utilities Document Status 2/22/2019	Liberty 2/22/2019 Document	Corresponding Page Number
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. Inspector and date added to document. Liberty is submitting blank forms due to the fact that the skid is not operational. Prior to flowing gas to customers Liberty intends on performing a full assessment of the decompression skid and completing these forms. Set point is 65 PSI. See Apex drawings.	5.5	1
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. Inspector and date added to document. Liberty is submitting blank forms due to the fact that the skid is not operational. Prior to flowing gas to customers Liberty intends on performing a full assessment of the decompression skid and completing these forms. Set point is 70 PSI. See Apex drawings.	5.5	2
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. Inspector and date added to document. Liberty is submitting blank forms due to the fact that the skid is not operational. Prior to flowing gas to customers Liberty intends on performing a full assessment of the decompression skid and completing these forms.	5.5	3

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(s) 11/30/17	Liberty Notified	Liberty Utilities Document Status 2/22/2019	Liberty 2/22/2019 Document	Corresponding Page Number
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. Inspector and date added to document. Liberty is submitting blank forms due to the fact that the skid is not operational. Prior to flowing gas to customers Liberty intends on performing a full assessment of the decompression skid and completing these forms. Inlet changed to 4250 PSI and outlet 400 PSI. See Apex drawings.	5.7	1
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. Inspector and date added to document. Liberty is submitting blank forms due to the fact that the skid is not operational. Prior to flowing gas to customers Liberty intends on performing a full assessment of the decompression skid and completing these forms. Inlet changed to 4250 PSI and outlet 450 PSI. See Apex drawings.	5.7	2
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. Inspector and date added to document. Liberty is submitting blank forms due to the fact that the skid is not operational. Prior to flowing gas to customers Liberty intends on performing a full assessment of the decompression skid and completing these forms. Inlet changed to 4250 PSI and set point 1350 PSI. See Apex drawings.	5.7	3

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(s) 11/30/17	Liberty Notified	Liberty Utilities Document Status 2/22/2019	Liberty 2/22/2019 Document	Corresponding Page Number
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. Inlet changed to 4250 PSI. See Apex drawings.	5.8	1

6.1 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(s) 11/30/17	Liberty Notified	Liberty Utilities Document Status 2/22/2019	Liberty 2/22/2019 Document	Corresponding Page Number
1	NGA 2.0 Glossary of Terms	-	Excavation Definition is listed twice. Suggest elimination of duplicate.	BP 1643	NO	Complete. Liberty has provided a draft public awareness plan with the Safety Division's recommendations incorporated into the document. Liberty updates the plan annually with an effective date of 4/1/2019. The document is in draft form due to possible additional updates by subject matter experts that may occur in March 2019 but are outside the Keene CNG project scope. Changes requested by the Safety Division in this report will not be changed prior to 4/1/2019.	6.1	8
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	Updates complete.	6.1	8 and 9
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	Liberty has made a note that this was formerly 36773 and now 16667	6.1	7
4	NGA 3.0 Program Administration	-	Section 3.4 Change OpId 16667 to 36773 for Amherst Propane system on first line of Table for Propane Pipeline Assets	BP 1646	YES 10/27/2017	Liberty has made changes to NGA 1.0 noting 36773 is now 16667	6.1	11
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	Complete. Liberty has added 4.1.5 "other"	6.1	11
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	Complete. The document is correct and verified.	6.1	17
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	See Gas Fitters, Plumbing and Heating Contractors. Liberty Utilities NH is not involved in the installation of gas appliances and does not maintain a list of gas fitters or plumbing and heating contractors. There is no regular messaging to this group. A list could be generated and a message could be developed if necessary.	6.1	18
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	See miscellaneous section. Messages for the following categories will be developed as needed or requested: - 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	6.1	18
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	Complete. Bullets have been added to the Public Awareness Plan. Notification letters completed by Liberty Communications are ready to be sent to comply with bullets. Liberty cannot send notifications until just prior and after the conversion and subject to PUC approval of the Keene CNG project. Also, Liberty has received stickers to be applied to gas meters with regards to propane air vs. natural gas which will be affixed at the time of customer conversions.	6.1	31

7.1 Keene Conversion Standard Operating Procedure (SOP) 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 2/22/2019	Liberty 2/22/2019 Document	Corresponding Page Number
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	Complete. Removed draft 2 from header	7.1	1
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	Complete. Added MAOP to Keene Conversion SOP.	7.1	1

7.2 Keene CNG Conversion Proposed Purge Plan Sections 1, 2, 3, 4 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 2/22/2019	Liberty 2/22/2019 Document	Corresponding Page Number
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	Complete-Chapters 5, 6, 7, and 9 referenced. Flow arrows have been added to the design drawings	7.2 and 7.3	Page 1 of 7.2 and page 1 and 2 of 7.3
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	Complete. Liberty has removed the O & M reference and added "Mains and Services" language. Liberty intends on pressure testing the mains and services in each section under one pressure test. The O & M states the following: -Chapter 9-Test Requirements section 6.5.1-General- "Whenever practical, test the services and the main at the same time" -Chapter 9-Test Requirements section 6.7 (d)-"The test pressure shall be at least 150 percent of maximum operating pressure. However, maximum test pressure shall not be more than three (3) times the design pressure of the pipe."	7.2	1
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	Complete-Chapters 5, 6, 7, and 9 referenced. Flow arrows have been added to the design drawings	7.2 and 7.3	Page 2 of 7.2 and page 1 and 2 of 7.3
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	Complete. Liberty has removed the O & M reference and added "Mains and Services" language. Liberty intends on pressure testing the mains and services in each section under one pressure test. The O & M states the following -Chapter 9-Test Requirements section 6.5.1-General- "Whenever practical, test the services and the main at the same time" -Chapter 9-Test Requirements section 6.7 (d)-"The test pressure shall be at least 150 percent of maximum operating pressure. However, maximum test pressure shall not be more than three (3) times the design pressure of the pipe."	7.2	2
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	Complete-Chapters 5, 6, 7, and 9 reference added. Flow arrows have been added to the design drawings	7.2 and 7.3	Page 3 of 7.2 and page 1 and 2 of 7.3

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	Complete. Liberty has removed the O & M reference and added "Mains and Services" language. Liberty intends on pressure testing the mains and services in each section under one pressure test. The O & M states the following -Chapter 9-Test Requirements section 6.5.1-General- "Whenever practical, test the services and the main at the same time" -Chapter 9-Test Requirements section 6.7 (d)-"The test pressure shall be at least 150 percent of maximum operating pressure. However, maximum test pressure shall not be more than three (3) times the design pressure of the pipe."	7.2	3
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	Complete-Chapters 5, 6, 7, and 9 reference added. Flow arrows have been added to the design drawings	7.2 and 7.3	Page 4 of 7.2 and page 1 and 2 of 7.3
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	Complete. Liberty has removed the O & M reference and added "Mains and Services" language. Liberty intends on pressure testing the mains and services in each section under one pressure test. The O & M states the following -Chapter 9-Test Requirements section 6.5.1-General- "Whenever practical, test the services and the main at the same time" -Chapter 9-Test Requirements section 6.7 (d)-"The test pressure shall be at least 150 percent of maximum operating pressure. However, maximum test pressure shall not be more than three (3) times the design pressure of the pipe."	7.2	4

7.3 Keene CNG Conversion Proposed Purge Maps 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 2/22/2019	Liberty 2/22/2019 Document	Corresponding Page Number
1	PB- R6	1	No service is shown to Dicks Sporting Good #43.	BP 1703	YES 12/01/17	Complete. See purge maps. Address is #42	7.3	2
2	PB- R6	1	Valve and service to Target #46 is not shown correctly.	BP 1703	YES 12/01/17	Complete. See purge maps.	7.3	2
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	Complete. See purge maps.	7.3	1

7.4 Keene CNG Conversion Proposed PUC Requests 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 2/22/2019	Liberty 2/22/2019 Document	Corresponding Page Number
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	Complete. This is Mattress Firm.	7.4	1

8.2 Keene Original Monadnock Plaza Installation Records 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 2/22/2019	Liberty 2/22/2019 Document	Corresponding Page Number
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	Complete-Liberty has added street addresses to the original records as requested. Liberty Utilities has scanned in all known records from the Keene office into fortis up through 2015. This electronic database is by street address. Typically historical service cards are not revised; however, when scanning into the fortis system the service cards are assigned a street address in the electronic database. That way if a business name is changed it does not impact the records since the street address is in fortis. Liberty has also plotted all known service lines into Arc FM up through 2015. Currently Liberty is scanning and updating GIS with records through 2018. Each record is reviewed by the Supervisor and then by Mapping for quality prior to upload.	8.1	1-169
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	192.383 does not require excess flow valves on meter sizes greater than 1 MCFH. Prior to converting the system to natural gas Liberty plans on combining Planet Fitness and Mattress Firm to one riser with a target date of April 1, 2019. Liberty will be compliant with 192.383 once complete.	N/A	N/A
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	Complete. Liberty intends on pressure testing the mains and services in each section under one pressure test. See SOP. The O & M states the following - Chapter 9-Test Requirements section 6.5.1-General- "Whenever practical, test the services and the main at the same time" -Chapter 9-Test Requirements section 6.7 (d)-"The test pressure shall be at least 150 percent of maximum operating pressure. However, maximum test pressure shall not be more than three (3) times the design pressure of the pipe".	7.2	4
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	Complete. Liberty intends on pressure testing the mains and services in each section under one pressure test. See SOP. The O & M states the following - Chapter 9-Test Requirements section 6.5.1-General- "Whenever practical, test the services and the main at the same time" -Chapter 9-Test Requirements section 6.7 (d)-"The test pressure shall be at least 150 percent of maximum operating pressure. However, maximum test pressure shall not be more than three (3) times the design pressure of the pipe."	7.2	4
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	Complete. Liberty intends on pressure testing the mains and services in each section under one pressure test. See SOP. The O & M states the following - Chapter 9-Test Requirements section 6.5.1-General- "Whenever practical, test the services and the main at the same time" -Chapter 9-Test Requirements section 6.7 (d)-"The test pressure shall be at least 150 percent of maximum operating pressure. However, maximum test pressure shall not be more than three (3) times the design pressure of the pipe."	7.2	1

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	Complete. Liberty intends on pressure testing the mains and services in each section under one pressure test. See SOP. The O & M states the following - Chapter 9-Test Requirements section 6.5.1-General- "Whenever practical, test the services and the main at the same time" -Chapter 9-Test Requirements section 6.7 (d)-"The test pressure shall be at least 150 percent of maximum operating pressure. However, maximum test pressure shall not be more than three (3) times the design pressure of the pipe."	7.2	1
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	Complete. Liberty intends on pressure testing the mains and services in each section under one pressure test. See SOP. The O & M states the following - Chapter 9-Test Requirements section 6.5.1-General- "Whenever practical, test the services and the main at the same time" -Chapter 9-Test Requirements section 6.7 (d)-"The test pressure shall be at least 150 percent of maximum operating pressure. However, maximum test pressure shall not be more than three (3) times the design pressure of the pipe." Liberty has also provided an abandonment record for the 14 feet of 1 inch used for a chart recorder.	7.2 and 8.1	Pages 1–5 of 7.2 and page 221 and 222 of 8.1
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	Keene adheres to Liberty's O & M. When field work is performed, ASBUILT records are completed on main and service cards and the pressure charts are included in the document set. Records are then submitted to the Supervisor for quality assurance and then to mapping to review and scan into the electronic fortis database along with being plotted in Arc FM. This is a reliable system Liberty has developed throughout the years. After the 60 psig MAOP 1.5X pressure test is performed on each section of the Marketplace, Liberty will submit drawings and pressure charts to mapping to scan into the electronic database for the life of pipeline.	N/A	N/A

9.1- 7 Day Storage Requirement						
Safety Division Recommendation	Section	11/13/17 Submittal Page No.	Safety Division Comments	Liberty Utilities Document Status 2/22/2019	Liberty 2/22/2019 Document	Corresponding Page Number
1		N/A	Liberty has not provided a detailed set of expansion plans or how the Keene system will be converted. It does not address the 7 -day storage requirement.	Liberty Utilities submitted documentation to the Safety Division in September 2018 with regard to the 7 day storage requirement and how Liberty is meeting that requirement for Production Ave and Monadnock Marketplace. Liberty will have 2 CNG trailers on site at all times and also has a contract with XNG to deliver additional trailers to the site. The November 13, 2017 submittal by Liberty was requesting approval of the Temp CNG Station on Production Ave and for the conversion of the Marketplace only. The purpose of this project is to allow Liberty to permanently shut off the problematic blowers at the propane air plant on Emerald St. Liberty is currently conducting an alternative site analysis to determine where the permanent CNG/LNG facility will be located. It is not feasible for Liberty to provide additional expansion plans until the permanent site is determined. Liberty's current plan is to convert the entire Keene system to 60 psig which would require replacing the existing cast iron with plastic gas mains and services which it will start in the 2019 CY and is included in the December CIBS filing.	9.1	1

Liberty Keene Critical Valve Impact as contained in the Pressure Test Documentation and Conversion 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 2/22/2019	Liberty 2/22/2019 Document	Corresponding Page Number
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	Complete. Liberty has removed the proposed 6 inch valves from the SOP design drawing.	7.3	1
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	Liberty Utilities does not have any requirement in its critical valve plan stating that this valve should be made critical. Liberty Utilities has designated the (2) station remote operated valves on the front of the decompression skid critical. The critical valve numbers are V-100A & V-100B. Liberty Utilities' critical valve plan states the following Critical Valves at Stations/Plants 1/31/2019. In January 2019 Liberty Utilities submitted the most up to date critical valve plan to the Safety Division. Per Section 1.3a(a): The first immediate inlet valve(s) of regulator stations shall be designated a Critical Valve. The Critical Valve will be located upstream of the regulator station and not contained within the regulator station building or vault itself.	N/A	Submitted January 2019
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	The six inch steel valve is located outside the fence line. The critical valve number is 4505-70. Liberty Utilities' critical valve plan states the following Critical Valves at Stations/Plants. 1/31/2019. Per Section 1.3a(b): The first immediate outlet valve(s) of any Take (Gate) Station that is located outside of the secured or fenced area shall be designated a Critical Valve.	N/A	Submitted January 2019
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	According to the definition of a highway contained in a letter dated 11/22/2006 from the Safety Division, Liberty is not required to add the valves as critical. See Liberty Utilities' updated critical valve plan dated 1/31/2019. In January 2019 Liberty submitted the most up to date critical valve plan to the Safety Division. Per Section 1.3a(e): Highway Crossings: Each side of a State or Federal designated highway* shall have a designated Critical Valve. This would include all direct buried pipelines, directionally bored pipelines or any other similar method using a type of trenchless technology. Any above ground highway pipeline crossing (bridge) shall have Critical Valves on each side of the bridge within the immediate vicinity of the bridge. *Highway as defined in NHPUC Letter to Keyspan dated November 22, 2006 "Valves on each side of a major highway, railroad or river crossing operating at greater than 12 in w.c. Major highways are those that have a state designated route that are often found with controlled access right of ways or limited access right of ways although some highways may not have these delineations. This does not include Route 101 A, portions of Route 3. It would include the Everett Turnpike, Rte 293, 393, Henri Bourque Highway." The Company includes interstate 93 a major highway as well.	N/A	Submitted January 2019

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	<p>According to the definition of a highway contained in a letter dated 11/22/2006 from the Safety Division, Liberty is not required to add the valves as critical. See Liberty Utilities' updated critical valve plan dated 1/31/2019. Liberty in January 2019 submitted the most up to date critical valve plan to the Safety Division. Per Section 1.3a(e): Highway Crossings: Each side of a State or Federal designated highway* shall have a designated Critical Valve. This would include all direct buried pipelines, directionally bored pipelines or any other similar method using a type of trenchless technology. Any above ground highway pipeline crossing (bridge) shall have Critical Valves on each side of the bridge within the immediate vicinity of the bridge.</p> <p>*Highway as defined in NHPUC Letter to Keyspan dated November 22, 2006 "Valves on each side of a major highway, railroad or river crossing operating at greater than 12 in w.c. Major highways are those that have a state designated route that are often found with controlled access right of ways or limited access right of ways although some highways may not have these delineations. This does not include Route 101 A, portions of Route 3. It would include the Everett Turnpike, Rte 293, 393, Henri Bourque Highway." The Company includes interstate 93 a major highway as well.</p>	N/A	Submitted January 2019
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	<p>The plans that the Safety Division provided in its report were proposed plans from Liberty Utilities and were the plans if Liberty was to use Production Ave for the permanent site. The purpose of the decompression skid on Production Ave is to permanently shut off the problematic blowers at the Emerald St propane air facility. Since Production Ave is surrounded by wetlands, in order to build on the site Liberty would have to permit and fill the wetlands around the decompression skid. Instead and to comply with DES requirements, Liberty has performed an alternative site analysis to determine if other locations existed that did not require impacting wetlands. Liberty is close to an agreement with a property owner for the proposed permanent facility and from their conversion plans can be generated. Until then it is not feasible to submit proposed plans to the Safety Division. Phase 2 through 5 as the Safety Division references would not apply until the final plan set is generated. Liberty's has designated 3 critical valves at the production ave CNG facility. 2 valves on the front of the decompression skid and 1 valve on the outlet of the CNG fence. For the existing 5 psig system from Emerald St, Liberty has designated 4 valves critical at the Emerald St propane air plant and their numbers are LPGKNE-01, 4506-40, 4506-70, KNE001H. Liberty has also made 2 valves critical that on either side of a river crossing on Island St. The valve numbers are KNE001W and KNE002W. For the highway crossings see Liberty's response to Safety Division recommendations # 4 and 5.</p>	N/A	Submitted January 2019
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	<p>Per Attachment J of the DG 11-040 Settlement Agreement, the sectionalizing plan portion states "On the portions of EnergyNorth's distribution system that is high pressure (greater than a 13.5 inches water column), Critical Valves shall be designed so as to limit isolation zones pursuant to the applicable criteria listed below, based on the smallest number of customers affected in each instance: of more than 2% of EnergyNorth's customer base shall be without gas at any one time unless Curtailment Plans, as defined in Condition17, are implemented; Maximum of 1,250 gas customers may be isolated at any one time, regardless of location; Of towns which have greater than 100 gas customers but less than 1,250 gas customers, no more than 25% of the customer base within the town borders can be interrupted at any one time; Of towns where the population of gas customers is greater than 1,250, each isolation area shall be less than 25% of the customer base." Since less than 25% of Keene customers will initially exist on either the Propane-Air 5# system or the Natural Gas 60 PSIG System, the outlet valves from either the CNG Skid (4505-70) or the Propane-Air Plant (LPGKNE-01) are sufficient to meet this requirement.</p>	N/A	Submitted January 2019