

United States Senate

WASHINGTON, DC 20510

November 15, 2018

Stephen H. Bryant
President and Chief Operating Officer
Columbia Gas of Massachusetts
4 Technology Drive
Westborough MA 01581

Joseph Hamrock
President and Chief Executive Officer
NiSource
801 E. 86th Avenue
Merrillville IN 46410

Dear Mr. Bryant and Mr. Hamrock,

We write to request additional documents regarding the operation of the natural gas distribution system in Merrimack Valley, Massachusetts. After reviewing your response to our October 4, 2018 letter—which highlighted the insufficiency of your Operations and Maintenance Manual, Emergency Management Plan, and Distribution Integrity Management Program—and examining similar materials from other natural gas distribution companies, we are even more concerned that Columbia Gas did not have appropriate safeguards in place to avoid disaster. It is our fear that the lack of these safeguards may have contributed to the September 13 explosions, which caused one person to be killed, more than twenty others to be injured, and months of disruption and financial hardship for residents of the Merrimack Valley Region.

The preliminary report assembled by the National Transportation Safety Board (NTSB) and other conversations with pipeline workers and safety experts suggest that the explosion may have been tied to a faulty understanding of the distribution system in the area of the upgrade work being done on and before September 13, 2018. According to the NTSB, the disaster was caused by the unanticipated abandonment of a gas distribution line attached to two pressure-sensing monitors, which reacted to the loss of gas by opening up the regulator and allowing higher-pressure gas to flow into the low-pressure system. It is imperative that Columbia Gas tracks the configuration of its pipeline system and understands exactly how it changes over time and through multiple work projects.

Please respond to the following questions and requests by November 19, 2018:

1. Please provide all the work orders for the tie-ins to the S. Union Street line from Winthrop Ave to Market Street.

2. Please provide the original project layout for the replacement of the S. Union Street pipeline from two cast iron mains to a single plastic main.
3. Were any changes made to the original project layout between August 2016 and September 2018? If so, please provide any documentation of these changes.
4. Please provide the project layout, including any changes made over its duration, for the capping of the Market Street low-pressure line.
5. The Columbia Gas Control Room Management Plan states that, “The Company will utilize a change management process to document pipeline equipment or configuration changes either in an electronic database, by hardcopy, or by other applicable means deemed appropriate by Gas Control Management.”¹ Please detail any change management process employed by Columbia Gas, including samples of each document required by Gas Control Management.
6. The Gas Control Room Management Plan also states that “If there is intent to plan, or to implement physical changes to pipeline equipment or configuration, communications regarding such intentions shall be established between control room representatives, and respective management, and field operations personnel.”²
 - a. Was Gas Control aware of all changes made to the plan of work being conducted in the area and the potential implications that these changes would have for the system under construction?
 - b. Are there any standards for the “communications regarding such intentions,” including standards to document these communications?
 - c. Please describe to whom this policy is referring with the term “respective management.”
 - d. Would Gas Control be made aware of the cutting and capping of a distribution line? If not, why not?
 - e. Does Columbia Gas feel this change management system is sufficient? If so, why? If not, how does it intend to improve its change management system?
7. Please provide the Supply & Optimization policy and procedure “Change Management for SCADA and Operations,” as referenced in the Control Room Management Plan.
8. Please provide any additional policies, guidelines, or flowcharts that govern change management at Columbia Gas and help workers track changes to their projects or work orders.
9. The Operations and Maintenance Manual states that the pressure regulating stations should be inspected “once each calendar year at intervals not to exceed 15 months.” Please provide the regulator inspection records for the Merrimack Valley system.
10. The manual directs that, “Records of each inspection shall be documented in the Company’s work management system or other applicable records.”³ Please provide the system of documentation used by Columbia Gas for regulator station inspections.

¹ “Control Room Management Plan,” Columbia Gas (Jan. 1, 2018) at Page 15.

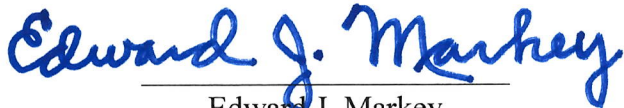
² “Control Room Management Plan,” Columbia Gas (Jan. 1, 2018) at Page 15.

³ GS 1750.010 (MA) at Page 7.

Mr. Joe Hamrock
Mr. Steve Bryant
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We look forward to your prompt response. Should you have any questions, please contact Morgan Gray in Senator Markey's office at 202-224-2742.

Sincerely,



Edward J. Markey
United States Senator



Elizabeth Warren
United States Senator