

United States Senate

WASHINGTON, DC 20510

October 12, 2018

Marcy Reed
President and Chief Operations Officer
Massachusetts Jurisdiction
National Grid
40 Sylvan Rd
Waltham, MA 02451

Dear Ms. Reed,

We write to express our concern and seek answers on the over-pressurization incident in Woburn, Massachusetts, on Monday, October 8, 2018. This incident left around 300 houses without natural gas, and the Department of Public Utilities (DPU) issued an order banning National Grid from performing any work other than emergency and compliance work until the company's safety practices have been reviewed.

As you know, following an over-pressurization disaster in Lawrence, North Andover, and Andover on September 13, 2018, 25 people were injured, one was killed, and thousands of families have been left without gas service for a significant period of time. Over-pressurization of a natural gas distribution system poses serious dangers and should never be taken lightly, especially when assessed together with other recent expressions of alarm over National Grid's attitude toward safety.

Only ten days before the over-pressurization event in Woburn, the DPU issued an order in response to a request by Boston Gas Company and Colonial Gas Company, are subsidiaries of National Grid, to raise rates on Massachusetts ratepayers. In this order, the DPU wrote, "The Companies' persistent disregard for federal and state pipeline safety [...] shows a cavalier disregard for Department requirements and a failure to abide by pipeline safety laws and regulations to the detriment of the Companies' ratepayers."¹

And less than a week before the incident, the DPU found that National Grid may have violated federal gas pipeline safety regulations in 29 separate instances since July 1, giving the company 30 days to respond to these allegations.² These incidents included unattended excavations within

¹ D.P.U. 17-170 on pages 310-311

² Colin A. Young, *DPU Gives National Grid 30 Days to Respond to Possible Safety Violations*, State House News Service (October 2, 2018), <http://www.patriotledger.com/news/20181002/dpu-gives-national-grid-30-days-to-respond-to-possible-safety-violations>.

200 feet of regulator stations and improper pipe installation practices. Taken altogether, these incidents and findings provide ample reasons for heightened concern.


We request answers to the following questions by October 16, 2018:


1. News reports indicate that around 300 residents were left without service as a result of this incident. Exactly many customers were left without service after the over-pressurization?
2. What is the maximum allowable operating pressure of the distribution line in which the incident occurred?
3. What was the highest pressure reading recorded during the incident?
4. How was the over-pressurization recognized by system operators?
5. Please provide a timeline of the incident, including:
 - a. When the over-pressurization happened;
 - b. When any alarms or other alerts were registered in the National Grid system;
 - c. When the gas service was shut off to the area;
 - d. When DPU was alerted to the incident; and
 - e. When all the affected homes had been checked by National Grid workers and had their meters turned off.
6. Please provide a complete and unredacted copy of your latest Operations and Maintenance (O&M) Manual.
7. Did the company follow the procedures set forth in the O&M Manual in performing the work and responding to the October 8 over-pressurization event?
 - a. If not, how did National Grid diverge from the written procedures?
8. Was National Grid conducting this work itself, or was it being performed by a contractor? If a contractor was involved in this job, please provide the name of the contractor performing the service.
 - a. If a contractor was performing this work, have you confirmed that these contractors had the certifications and qualifications necessary to perform the work?
 - b. If a contractor was performing this work, were any qualified National Grid employees on hand to oversee the work?
9. Were the pressure gauges at the regulator station continually monitored by National Grid employees throughout the duration of the work?
 - a. If not, why not?
10. Please provide your latest Emergency Response Plan.
11. As National Grid went into homes to complete the relight process, did technicians, electricians, or other crew members check home appliances to ensure that none was damaged by the surge in gas pressure?
 - a. If not, why not?
 - b. If yes, will National Grid pay to replace any damaged appliances?
12. Is National Grid planning to replace any pipelines within the affected area?

- a. If not, why not?
 - b. If yes, by when will the replacements be completed?
13. Was DPU aware of the work being done at the regulator station?
- a. If not, why not?
 - b. If yes, please provide the permits or other documentation submitted to DPU for this job.
14. Please provide all documentation detailing any steps that National Grid has taken to address the 29 incidents of potential misconduct highlighted by the DPU in its September 27 letter, including any changes to the O&M Manual or other changes that National Grid has made to its operating procedures in response to each incident.
15. Please provide a list of any other over-pressurization incidents that have happened on the National Grid distribution system over the past ten years, with a description of the cause of each incident, the type of pipeline system affected, how many homes were affected in each incident, how long any outage may have lasted, and what procedures National Grid implemented as a response to ensure similar incidents did not occur again in the future.

We look forward to your prompt response, and we hope to see evidence of National Grid's commitment to customer safety in your answers and in how this incident is addressed.

Sincerely,


Edward J. Markey
United States Senator


Elizabeth Warren
United States Senator