



Dear Mr. Michael J. Sullivan,

As a municipal partner who is important to us, we realize you may have some concerns relative to the Merrimack Valley natural gas event on September 13th. We are reaching out to provide you with an update on some actions Columbia Gas of Massachusetts has taken to enhance safety.

Since the September 13th event, NiSource, the parent company of Columbia Gas of Massachusetts, has identified and moved ahead with new steps to enhance system safety and reliability and to safeguard against over pressurization across all of its operating companies.

We constantly leverage additional information we gather and the lessons we learn to continually improve, and to reduce the risk of an event similar to the September 13th event.

Of note, NiSource has committed to invest approximately \$150 million to achieve the following infrastructure improvements:

**OVER PRESSURE PROTECTION DEVICES:** As part of our commitment to state-of-the-art safety on our systems, we will be installing automatic pressure control equipment, referred to as “slam-shut” devices, on every low-pressure system. While these devices are neither required nor routinely installed on low pressure systems, they provide an additional level of control and protection. They operate like circuit-breakers; when they sense operating pressure that is too high or too low, they immediately shut down gas to the system, regardless of the cause. These devices operate independently of other pressure control devices, so they will automatically shut down the system to prevent over pressurization.

**REMOTE MONITORING:** Likewise, while remote monitoring is neither required nor routinely installed in this type of system, we plan to install it in certain low pressure systems to provide another means of assuring safe operation. Remote monitoring will provide gas control centers the ability to receive pressure alarms on a real time basis.

Additionally, following the September 13th event we:

- Initiated and have nearly completed a field survey of all our low-pressure regulator systems to identify all available options to enhance the safe, reliable operation of this regulator station equipment – full completion is expected in the near future.
- Initiated and have nearly completed an engineering design review of all the low-pressure regulator stations to determine how best to install additional over pressurization protection systems – full completion is expected in the near future.
- Implemented a process so that when excavation work is proposed near a regulator station, it will be made a top priority, requiring company personnel to be present to observe any excavation.
- Enhanced procedures for identifying potential risks and developed remedial response procedures when replacing, reconfiguring or abandoning gas distribution mains.

We are also cooperating with the National Transportation Safety Board (NTSB) investigation and are implementing the NTSB’s urgent safety recommendations issued on November 14, 2018. As you may know, the Massachusetts Department of Public Utilities has brought on the independent firm Dynamic Risk Assessment Systems, Inc. to assess the natural gas distribution systems in Massachusetts, and we are participating in that process. Additionally, consistent with new legislation in Massachusetts, we are utilizing professional engineers to review and certify engineering designs.

Lastly, we are pleased to report that Columbia Gas of Massachusetts is in the process of implementing a Safety Management System (SMS). This is an advanced systematic approach to managing safety, including the necessary organizational structures, accountabilities, policies and procedures. Through this process, we will be working to predict potential risks and taking steps to mitigate them before they occur. We look forward to keeping you informed as this process progresses.

We share your concern for the safety of natural gas distribution systems. We will continue to take steps to enhance the safety of our customers and the public.

We look forward to continuing this dialogue and further follow-up in your municipality as we move forward with our annual planning and collaboration efforts for our mutual construction projects within your community.

Please do not hesitate to reach out if you have questions. Thank you.

Sincerely,

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