

Whitney, Judith

From: Julie Macuga <juliemacuga@gmail.com>
Sent: Monday, March 12, 2018 7:05 PM
To: PUC - Clerk
Subject: Public Comment re: Vermont Gas
Attachments: PUC Comment Macuga 4.docx

Hello PUC,

I'd like to submit a public comment (attached and below the cut) that is related to, and should be filed under, the following cases:

18-0395-PET

17-4909-PET

17-3550-INV

Thank you,
Julie Macuga

DPS has filed a "Notice of Probable Violation" for issues that were known many months ago. Perhaps because they were aware of citizens' research uncovering these issues? In any case, I was thrilled to hear that the PUC would have to hire a third-party investigator to look into the depth issues in New Haven-- but that's merely the tip of the iceberg. Every time a new issue is brought up, DPS offers to "fix it" with small fines before anything has actually been investigated. Two currently pending cases, 18-0395-PET and 17-4909-PET, need to be put on hold until the full, broad scope investigation called for by intervenors in 17-3550 (The New Haven case) takes place. Otherwise we will only see more reckless construction that puts human lives at risk.

VGS's newest response states that "VGS and the Department both agree that the incidents identified in the Department's NOPV constituted compliance issues and did not put public safety at risk." This is absurd; how can we know that there is no risk unless we actually look into the multiple, systemic, and compounding issues that have been revealed? Are we going to merely take VGS at their word when their mode of operation is to violate the CPG (or federal regulations) first, then, if caught, ask for forgiveness later? What kind of message does that send to other utilities looking to build? To me, it clearly says, "CPG's mean nothing; build whatever you want."

VGS has no incentive to build properly since they have a monopoly on natural gas on the state, and thus make their money by cheaply and quickly building infrastructure. But VGS's clever PR team assures us that all is well, even though the one place we happened to look at in detail, and deliver photographs of to PHMSA, we now know lacks not only depth of cover, but also padding, support, backfill, and perhaps other features of safe construction-- directly adjacent to VELCO high voltage wires.

The fact that intervenors have put forth evidence of 8 different violations should be more than enough reason to put things on hold.

Consider the pipeline explosion in San Bruno, CA, which left 8 people dead. The reason for this explosion? Poor documentation and disregard for the rules. This is strikingly familiar.

PHMSA has stated that the underlying cause of many pipeline failures is lack of compliance with regulations and standards for construction. And they have stated that problems, including corrosion, can occur very

quickly. Shoddy recordkeeping is also a key problem. In Attachment 11 of the most recent filing in 18-0395-PET, VGS states, "... it was determined that some of the locations where trench breakers were designed on paper were omitted because the field conditions warranted them not to be installed. On the other hand, there were locations where there was no designed trench breaker, but field conditions warranted one to be installed. There was no documentation of this process." VGS's solution? "VGS will investigate the areas where a designed trench breaker was not installed. If field conditions show that one is not needed, then it will be documented as to the reason why not. If one is needed, then one will be scheduled to be installed." VGS was working without a plan in place, and while the station numbers for these missing trench breakers have materialized, we still couldn't tell you where they are on a map.

Trench breakers are one of at LEAST 8 issues now before the PUC. Poor documentation and systemic, compounding, violations lead to catastrophic failure. The intervenors in this case are not bringing these issues to the PUC to be a nuisance or to vilify VGS—they just sincerely don't want their friends and neighbors to suffer when this pipeline inevitably fails.

The Department of Public Service has not stepped up to investigate these three interrelated cases, so the public themselves have been forced to stand up to VGS, in hopes of having just a shred of accountability and safety.

DPS has filed a "Notice of Probable Violation" for issues that were known many months ago. Perhaps because they were aware of citizens' research uncovering these issues? In any case, I was thrilled to hear that the PUC would have to hire a third-party investigator to look into the depth issues in New Haven-- but that's merely the tip of the iceberg. Every time a new issue is brought up, DPS offers to "fix it" with small fines before anything has actually been investigated. Two currently pending cases, 18-0395-PET and 17-4909-PET, need to be put on hold until the full, broad scope investigation called for by intervenors in 17-3550-INV (The depth case) takes place. Otherwise we will only see more reckless construction that puts human lives at risk.

VGS's newest response states that "VGS and the Department both agree that the incidents identified in the Department's NOPV constituted compliance issues and did not put public safety at risk." This is absurd; how can we know that there is no risk unless we actually look into the multiple, systemic, and compounding issues that have been revealed? Are we going to merely take VGS at their word when their mode of operation is to violate the CPG (or federal regulations) first, then, if caught, ask for forgiveness later? What kind of message does that send to other utilities looking to build? To me, it clearly says, "CPG's mean nothing; build whatever you want."

VGS has no incentive to build properly since they have a monopoly on natural gas on the state, and thus make their money by cheaply and quickly building infrastructure. But VGS's clever PR team assures us that all is well, even though the one place we happened to look at in detail, and deliver photographs of to PHMSA, we now know lacks not only depth of cover, but also padding, support, backfill, and perhaps other features of safe construction-- directly adjacent to VELCO high voltage wires.

The fact that intervenors have put forth evidence of 8 different violations should be more than enough reason to put things on hold.

Consider the pipeline explosion in San Bruno, CA, which left 8 people dead. The reason for this explosion? Poor documentation and disregard for the rules. This is strikingly familiar.

PHMSA has stated that the underlying cause of many pipeline failures is lack of compliance with regulations and standards for construction. And they have stated that problems, including corrosion, can occur very quickly. Shoddy recordkeeping is also a key problem. Attachment 11 of the most recent filing in 18-0395-PET, VGS states, "...it was determined that some of the locations where trench breakers were designed on paper were omitted because the field conditions warranted them not to be installed. On the other hand, there were locations where there was no designed trench breaker, but field conditions warranted one to be installed. There was no documentation of this process." VGS's solution? "VGS will investigate the areas where a designed trench breaker was not installed. If field conditions show that one is not needed, then it will be documented as to the reason why not. If one is needed, then one will be scheduled to be installed." VGS was working without a plan in place, and while the station numbers for these missing trench breakers have materialized, we still couldn't tell you where they are on a map.

Trench breakers are one of at LEAST 8 issues now before the PUC. Poor documentation and systemic, compounding, violations lead to catastrophic failure. The intervenors in this case are not bringing these issues to the PUC to be a nuisance or to vilify VGS—they just sincerely don't want their friends and neighbors to suffer when this pipeline inevitably fails.

The Department of Public Service has not stepped up to investigate these three interrelated cases, so the public themselves have been forced to stand up to VGS, in hopes of having just a shred of accountability and safety.