

State of Vermont
Department of Public Service
112 State Street
Drawer 20
Montpelier, VT 05620-2601
TEL: 802-828-2811

FAX: 802-828-2342
TTY VT: 800-734-8390
email: vtcps@state.vt.us
<http://publicservice.vermont.gov/>

July 16, 2012

Jeffrey D. Wiese
Associate Administrator for Pipeline Safety
Pipeline and Hazardous Materials Safety Administration
Office of Pipeline Safety
1200 New Jersey Ave., S.E.
Washington, D.C. 20590

RE: Replacement of cast iron pipelines and plans addressing high risk pipelines

Dear Mr. Wiese,

Thank you for your letter of June 13, 2012. I recognize the benefits the Pipeline and Hazardous Materials Safety Administration brings to pipeline safety and appreciate the opportunity to offer comments on the Vermont Gas Safety program. The Vermont Public Service Department has a long history of gas safety and has experienced only one reportable gas pipeline incident during the past 10 years. However, we understand this history does not eliminate threats to public safety and we remain committed to program and our partnership with PHMSA.

We are aware of the potential risks to public safety associated with cast iron pipe and the recent incidents which occurred nationally and illustrated the consequences of this risk. In 1989, Vermont's only natural gas distribution company began a program to replace all cast iron (and bare steel) in its system. Our Gas Safety Program monitored this project through completion in 2004. The absence of natural gas cast iron pipe in Vermont has been indicated in several responses from our department, to PHMSA inquiries, and in the company's annual reports submitted to PHMSA.



Earlier this year, PHMSA issued an Advisory Bulletin addressing potential material degradation of Driscopipe 8000. Vermont's natural gas company has installed this material extensively in their distribution system. Our department forwarded the advisory to the company and requested any information related to it. The company has not experienced any material failures similar to the descriptions included in the advisory; however they did experience one leak due to nylon contamination. We will continue to monitor this issue.

Vermont also addresses high risk pipelines through adoption of the federal requirements for Transportation and Distribution Integrity Management. We will continue to monitor these programs as they are administered by the gas pipeline operators in our state. In addition to the Vermont Gas Safety Program, our department focuses on the significant risk of excavation damage to pipelines, and other facilities, via promotion and enforcement of the Underground Utility Damage Prevention System laws of Vermont.

I hope this letter adequately addresses the issues of your letter. Please contact us if you have any questions or if we can be of further assistance.

Sincerely,



Elizabeth H. Miller
Commissioner