



08-30-16 11:42 RCVD

August 26, 2016

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Chris Hoidal
Director, Western Region
Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration
12300 West Dakota Avenue, Suite 110
Lakewood, CO 80228

Reference: CPF 5-2016-0009W (Warning Letter)

Dear Mr. Hoidal:

This letter is in response to the referenced Warning Letter dated July 28, 2016. It is Hawaii Gas' position that it has been meeting the minimum requirements of the DIMP regulations regarding records retention of DIMP performance measures and development and implementation of the DIMP manual.

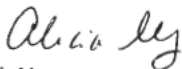
A summary of the Warning Letter items and corresponding records addressing these issues are described below:

1. 49 CFR §192.1011 - What records must an operator keep?
Regarding documentation, Hawaii Gas is submitting information, which we believe addresses the DIMP performance measures required under 49 CFR § 192.1007(e). Although the reference was made to § 192.1011(e), we believe the correct reference is 49 CFR §192.1007(e). This information may not have been furnished during the 2014 PHMSA inspection, however, Hawaii Gas has been tracking and monitoring DIMP performance measures since 2007, as per 49 CFR §192.1007(e). Hawaii Gas is also providing a copy of the original DIMP manual cover page, which indicates 8/11/2011 as the date the plan was implemented.
 - Attachment I – 2013 and 2014 Performance Measures.
 - Attachment II – Copy of original DIMP manual cover page & Table of Contents.

Hawaii Gas believes that the attached documentation satisfies all the issues cited in the Warning Letter, and respectfully requests that issuance of this Warning Letter be reconsidered. Hawaii Gas is committed to operating a safe and reliable pipeline system, and protecting the public and environment from any potential product release.

Should there be any questions regarding the information provided, please contact Ed Sawa, Manager, Pipeline Operations, by phone at (808) 594-5661, or by email at esawa@hawaiiigas.com.

Sincerely,

A handwritten signature in black ink that reads "Alicia Moy". The signature is fluid and cursive, with the first name "Alicia" and the last name "Moy" clearly distinguishable.

Alicia Moy
President & CEO

Enclosures:

Attachment I – 2013/2014 Performance Measures

Attachment II – DIMP Manual Cover Page & Table of Contents