



APR 15 2014

Mr. Gary Kenny
Gas Safety Manager
Maine Public Utilities Commission
18 State House Station
Augusta, Maine 04333-0018

Re: Docket No. PHMSA-2013-0243

Dear Mr. Kenny:

The Pipeline and Hazardous Materials Safety Administration (PHMSA) has reviewed your letter of October 21, 2013, providing notification that the Maine Public Utilities Commission (MPUC) issued a State waiver to Northern Utilities, Inc. d/b/a Unitil (Unitil – MPUC Docket No. 2011-00360) contingent upon PHMSA’s approval. The MPUC waiver (MPUC Docket No. 2011-00360) grant allows various diameters (½ through 12-inches) of steel (coated and bare) and plastic distribution pipelines to operate at a maximum allowable operating pressure (MAOP) determined through alternative evaluation measures. MAOP determination must be conducted by Unitil to meet the requirements of §§ 192.619(a)(1), 192.619(a)(2), 192.621(a)(1) and provisions of Chapter 420 of MPUC Rules.

Unitil’s waiver request to the MPUC consists of MAOP determination deficiencies in 40 distribution systems (40 distribution segments in Unitil gas distribution system) in the State of Maine. The systems consist of various pipe diameters (½ through 12-inches), approximately 384 miles of pipe, and MAOPs from 30 pounds per square inch (psi) to 500 psi as described in Attachment A– dated 03-20-2014 (enclosed).

Unitil requested this waiver from the MPUC to:

- Operate 40 distribution systems at MAOPs listed in Attachment A, after determination of the MAOP through evaluation of design pressure, pressure test, and materials installed in the distribution systems at MAOPs listed in Attachment A; and
- All of the 40 distribution systems require a waiver from §§ 192.619(a)(1) and 192.621(a)(1) due to lack of design pressure and material records. Unitil has evaluated these 40 distribution systems based upon an 8-step material review process that included: records evaluation, station component evaluation, historical operating pressure, leak history and cathodic protection, evaluation of system

overpressure protection, isolated system pressure tests, evaluation of minimum system pressure requirements, and field investigation. The system evaluation procedures being implemented by Unitil have been reviewed and accepted by the MPUC. The following distribution systems (4, 6, 7, 8, 12, 15, 16, 19, 24, 25, 27, and 42) have documented pressure test records; distribution systems (26, 29, 30, 33, and 46) were or will be statically pressure tested; distribution systems (1, 2, 14, 20, 22, 23, and 31) will be non-statically tested (with natural gas); and distribution systems (3, 5, 9, 10, 13, 17, 28, 34, 35, 36, 37, and 40) will require pressure tests. Systems containing bare pipe (Systems 21, 39, 41, and 43) will not be pressure tested, but will have the bare pipe segments replaced with 49 CFR Part 192 and Chapter 420 of MPUC Rules (Code) compliant material by December 31, 2024.

- Non-static pressure testing with natural gas must be at a minimum of the test pressure shown in Attachment A for the entire distribution system being tested.

PHMSA does not object to the MPUC waiver that allows Unitil to conduct reviews of: material documents, onsite pipe and other component material evaluations, historical operating pressures, pressure test documents, and recalculation of design pressures to meet §§ 192.619(a)(1), 192.619(a)(2), 192.621(a)(1) and applicable provisions of Chapter 420 of MPUC Rules. PHMSA's "no objection" to the MPUC waiver is conditioned on certain actions to be taken by the MPUC in a revised waiver that would require Unitil to develop and implement the following additional measures for MAOP determination along with the conditions in the MPUC waiver:

- 1) Unitil must develop and implement procedures for conducting and documenting field investigations and material assessments for 40 pipeline systems with a §§ 192.619(a)(1) or 192.621(a)(1) waiver as noted in Attachment A. These procedures must include a documented review and confirmation by engineering and onsite operational assessments of the material condition to either support the MAOP or to lower the MAOP based upon the findings from the material assessment.
 - a) The Unitil Integrity Management (IM) Plan must identify missing, inadequate, or incomplete material and pressure test records to determine MAOP, which constitutes an integrity "threat" in accordance with § 192.1007(b). In such cases, Unitil must provide a process and procedures to gain knowledge, identify threats, conduct assessments, evaluate, identify and implement measures to address integrity, field inspection, and records findings, conduct pressure tests, verify MAOPs, remediate defects, monitor results, and report results in accordance with §§ 192.1005, 192.1007, 192.1011, and 192.1013 and Paragraphs 1 through 9. Unitil must review its field data acquisition forms (Forms) to ensure they capture the information identified in the IM Plan in accordance with § 192.1007(a)(3) and make necessary revisions to Forms to ensure adequate gathering of the needed information. Following the implementation of the revised Forms, Unitil must provide training to staff regarding their responsibilities to complete Forms and communicate to staff the importance of gathering accurate and complete data and information for IM and MAOP determination.

- b) The process and procedures required in Paragraph 1(a) above must include but are not limited to: verification of pipeline materials during field assessments, assessments and verification of transitions from carbon steel to plastic pipe, obtaining and evaluation of all available records, tests for slow crack growth resistance, verification of wall thickness, and performance of material properties tests.
- c) If material records are not available for line pipe, valves, flanges, and components operating above 124 psi MAOP, and are greater than 6-inch nominal diameter, and are greater than Grade B yield strength (35,000 psi), Unitil must take the following actions to determine and verify material physical characteristics:
 - i) For aboveground locations: Unitil must develop and implement procedures for conducting non-destructive or destructive tests, examinations, and assessments for line pipe, flanges, fittings, or other pipeline components during future repairs, replacements, or maintenance activities.
 - ii) For buried pipeline facilities: Unitil must develop and implement procedures for conducting non-destructive or destructive tests, examinations, and assessments for buried line pipe, flanges, fittings, or other components during future excavations associated with replacements, relocations, anomaly direct examinations, in situ evaluations, repairs, remediations, maintenance, or any other reason for which the pipe segment is exposed, except for segments exposed during excavation activities that are in compliance with § 192.614, until completion of the minimum number of excavations have been conducted as noted in (d) below.
 - iii) For carbon steel line pipe: Unitil must develop and implement procedures for documenting line pipe diameter, wall thickness, grade (yield strength), coating type, and seam type, as applicable. If a seam factor (§ 192.113) of 0.6 or 0.8 for unknown seam type is used in MAOP determination calculations, seam type does not require verification. Distribution systems with carbon steel pipe (Grade B or A, or 6-inch nominal diameter or less) do not require a field verification for grade (yield strength).
 - iv) For pipeline valves, flanges, fitting, and other pipeline components other than line pipe: Unitil must develop and implement procedures for establishing and documenting the pressure rating or material grade, as applicable, for the pipeline segments installed and in-service to confirm MAOP. Distribution systems with carbon steel flanges, fittings, or other components (Grade B or A, or 6-inch nominal diameter or less) do not require a field verification for grade (yield strength).
- d) Procedures for conducting destructive or non-destructive tests, examinations and assessments in accordance with Paragraphs (1)(a), 1(b) and 1(c) above for buried distribution systems (mains), when excavated, replaced, repaired, or maintained must be conducted at intervals of no less than:
 - i) 1- location for pipeline facilities less than 1-mile in length;
 - ii) 1-location per mile for pipeline facilities 1-mile or longer up to a maximum total of 20 test locations, subject to a minimum of one (1) test location for each type of carbon steel line pipe material in the system and at each aboveground pipeline facility for mains;

- iii) Material assessments or test locations must be proportionally spaced throughout the pipeline system. Test locations must be spaced at a defined spacing interval so that representative samples can be tested along the pipeline system; and
 - iv) All mains and service lines of all material types must be inspected for material documentation (see Paragraphs 1)(a) and 1(b) above) to verify MAOP when excavated or when above ground facilities are maintained by Unitil.
 - e) High and medium density polyethylene (plastic), wrought iron, and any unknown pipe type must have procedures for MAOP verification, integrity verification, and remediation when assessed in accordance with Paragraphs 1(a) and 1(b) (§§ 192.1005, and 192.1007) for materials confirmation to meet §§ 192.619(a)(1), 192.621(a)(1), and MPUC waiver conditions.
 - i) Plastic pipe must have tests to determine properties (diameter, wall thickness and tolerances, tensile strength, hydrostatic burst pressure, hydrostatic design pressure, chemical resistance, ultraviolet (UV) degradation, slow crack growth resistance, and any other tests required for integrity confirmation) including an ultraviolet (UV) degradation test (ASTM D2513-99, “Standard Specification for Thermoplastic Gas Pressure Pipe, Tubing, and Fittings”), slow crack growth resistance test (ASTM F1473-13, “Standard Test Method for Notch Tensile Test to Measure the Resistance to Slow Crack Growth of Polyethylene Pipes and Resins”), and tensile strength test (ASTM D638-03 “Standard Test Method for Tensile Properties of Plastics”) whenever a section of pipe with historically known issues or any unknown or undocumented plastic pipe has a section cut-out. Examples of plastic pipe with historically known integrity issues are identified in PHMSA Advisory Bulletins (ADB 99-01, 99-02, 02-07, and 07-01) and National Transportation Safety Board Special Investigative Report (NTSB Number: SIR-98/01 “Brittle-like cracking in Plastic Pipe for Gas Service”).
 - ii) Plastic pipe assessment and test results must have engineering and operational reviews for distribution system integrity, MAOP, susceptibility to premature brittle-like failures due to stress intensification, transitions from plastic pipe to carbon steel pipe, re-evaluation intervals, operational procedures updated including squeeze-off practices, and evaluations for any needed pipe replacements such as replacement of pipe with historically known issues that is in-service.
 - iii) Wrought iron and any unknown pipe type must have procedures for assessment, evaluation, and remediation or replacement based upon integrity and MAOP findings. Re-evaluation intervals must be established based upon integrity findings, leakage results, and remediation or replacement methods used.
 - f) Assessment findings must be reviewed to confirm the MAOP as a step in the assessment procedure. If pipe segments are found with wall thickness, grade, seam or any other properties or conditions that would make it necessary that the MAOP be lowered, procedures must be in place by Unitil for notification to MPUC and the lowering of pipe segment MAOP, remediation of pipe segment, or replacement of the pipe segment.
- 2) Distribution System 46 cannot have its MAOP raised above its past MAOP of 99 psi without documentation of the following:

- a) Upgrading procedure and pipeline segment assessment that meets 49 CFR Part 192, Subpart K (§§ 192.553 and 192.557);
 - b) Subpart J pressure test to a minimum of 1.5 times MAOP;
 - c) Material properties assessment in accordance with Paragraph 1 above; and
 - d) Field direct assessment of all above and below ground pipeline facilities, overpressure protection, patrols, and leakage surveys must be implemented in accordance with MPUC Waiver (Docket No. 2011-00360 Order), Paragraph 3(a) criteria for leak surveys.
- 3) All pressure test medium, pressures, and test durations must meet the applicable sections of 49 CFR Part 192, Subpart J, and applicable provisions of Chapter 420 of MPUC Rules and the following:
- a) All pressure tests (static and non-static) must be documented in accordance with § 192.517 for the life of the pipeline segment;
 - b) Prior to the pressure testing of any distribution system, Unitil must implement the conditions of §§ 192.557(a), (b) and (c). A leak survey must be conducted within five (5) days before the pressure test and all leaks must be repaired prior to the pressure test as required in § 192.557(b);
 - c) Pressure tests must be at a minimum of 1.5 times MAOP; and
 - d) Attachment A lists “proposed future MAOP” for each distribution system.
- 4) The test segment isolation valves must be manned during pressure test to be able to immediately isolate the test segment, if there are safety concerns.
- 5) All bare pipeline segments and wrought iron segments in Unitil distribution systems must be replaced as follows:
- a) All buried bare pipeline segments in distribution systems (21, 39, 41, and 43) must be replaced by December 31, 2024. MPUC Waiver (Docket No. 2011-00360 Order), Paragraph 3 safety measures must be implemented and maintained until these pipeline systems are replaced. By December 31, 2020, 50 percent of the bare pipeline segment mileage must be replaced.
 - b) All wrought iron in distributions systems must be replaced by December 31, 2020.
 - c) If Unitil finds any additional buried bare pipeline segments or wrought iron segments in the distribution systems listed in Attachment A, these segment assessment findings must be reported to the MPUC within five (5) working days of the finding and must be replaced by Unitil within five (5) years of the finding.
- 6) The MPUC waiver must require all procedures and records developed by Unitil for MAOP determination including purchase order, drawings, specifications, material properties (including specification, grade or mechanical properties, and pressure rating), field assessment, pressure test, remediation measures, and MAOP records to be kept for the life of the pipeline system.

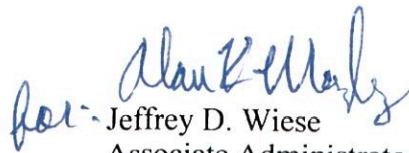
- 7) MPUC may use pressure reduction as an alternative measure for MAOP determination:
 - a) Pressure Reduction: Reduce the pipeline segment MAOP to no greater than the highest actual operating pressure sustained by the pipeline during the past 18 months divided by the greater of either: 1.50 or the applicable class location factors in § 192.619(a)(2)(ii) or pressure test factor in § 192.513. The highest actual sustained pressure must have been reached for a minimum cumulative duration of eight (8) hours during a continuous 30-day period. The reduced MAOP must account for differences between upstream and downstream pressure on the pipeline by use of either the lowest operating pressure for the entire segment or using an appropriate operating pressure gradient that must be maintained and not exceeded for the pipeline (i.e., location specific operating pressure).
- 8) The Unitil waiver must have a condition for the MPUC to be able to revoke, suspend, modify, or enforce a waiver (special permit) in accordance with both § 190.341(h) and Chapter 420 of MPUC Rules, Paragraph 8 (Enforcement Procedures).
- 9) The MPUC waiver must require the following:
 - a) Within six (6) months of this waiver, Unitil must develop and implement procedures as required by this waiver and include these procedures into its Operations and Maintenance Manual (Plan) in accordance with § 192.605 and provide MPUC notification of the completion of this requirement by an Executive Vice President, President, or CEO of Unitil.
 - b) A periodic review consisting of an annual report from Unitil to the MPUC of assessment findings, patrols, surveys, and remedial measures implemented by Unitil and the annual report must be signed by an Executive Vice President, President, or CEO of Unitil.
 - c) Unitil distribution system MAOP's must be at or below the MAOP's documented in "Attachment A: Unitil Distribution Systems, dated 03/20/2014."
 - d) MPUC must approve of the material documentation assessments as required by these waiver conditions as being completed prior to Unitil discontinuing this annual review process and removing procedures developed for this waiver from its Operations and Maintenance Manual. This process (MPUC waiver conditions and Paragraphs 1 through 9 above) conducted by Unitil must meet all of the following requirements:
 - i) conducted until all of Paragraphs 9(d)(ii), (iii), and (iv) below are met or a minimum of five (5) years, whichever is longer,
 - ii) conducted assessments in accordance with the MPUC waiver and Paragraphs 1 through 9;
 - iii) confirmed material integrity and MAOP to be acceptable, pipe remediated, or MAOPs lowered, as applicable, and
 - iv) receipt of a "no objection" from the MPUC to Unitil regarding material confirmation findings, assessments, pressure tests, and completion of waiver conditions.

- 10) Any integrity issues found during direct assessments, inspections, surveys, or pressure tests with any of the Unitil pipeline systems in Attachment A that require additional measures for MAOP determination and public safety that are beyond the MPUC waiver, MPUC must notify PHMSA's Associate Administrator for Pipeline Safety prior to implementing any additional measures for MAOP determination.

If the MPUC includes all of the above measures to MPUC Docket No. 2011-00360, MPUC does not need to resubmit the waiver request for PHMSA's review, but is requested to send a copy of the revised MPUC waiver to us after MPUC approval.

If you wish to discuss this or any other pipeline safety matter, my staff would be pleased to assist you. Please call John Gale, Director of Regulations, at 202-366-0434 for regulatory matters or Kenneth Lee, Director of Engineering and Research, at 202-366-2694 for technical matters. Thank you for your continued efforts in pipeline safety.

Sincerely,

for Jeffrey D. Wiese

Associate Administrator for Pipeline Safety

Enclosed: Attachment A – Unitil Distribution Systems, dated 03-20-2014

PHMSA Docket 2013-0243 and Maine Public Utilities Commission - Docket No. 2011-00360 - Unitil 01-14-2013 PHMSA 03-20-2014

| System No. | Distribution System | Water for 192.619(a) and 192.621(a) Pressure (1) | | Water for 192.619(b) and 192.621(b) Pressure (2) | Pipe Diameter | MAOP (psi) | Prepared Testing with Material per MAOP | Prepared Testing with Material per MAOP | Prepared Future MAOP | Prepare Water from Testing | Meticulous | Main | | Services | | Year of Main Installation/Leak | Field Investigation |
|------------|---|--|------------------------------------|--|--------------------|------------|---|---|----------------------|----------------------------|---------------------|--------------|------------------------------------|----------|-----|--------------------------------|---------------------|
| | | Total Length (feet) | Percentage with Test Documentation | | | | | | | | | Total Number | Percentage with Test Documentation | | | | |
| 1 | Railroad Avenue, Biddeford | Yes | Yes | Yes | 6, 4, 2, 1 | 30 | Yes | 84 | 56 | Yes | CS, HDPE | 13,111 | 31 | 55 | 85 | 1963/1993 | See Note 6 |
| 2 | Biddeford Industrial Park | Yes | Yes | Yes | 8, 6, 4, 2, 1 | 40 | Yes | 60 | 40 | Yes | CS, HDPE, HDPE | 31,233 | 56 | 71 | 70 | 1973/2006 | See Note 6 |
| 3 | Twine Mill, Kennebunk | Yes | Yes | Yes | 6, 4, 2 | 39 | Yes | 150 | 39 | Yes | CS, HDPE | 6,855 | 92 | 13 | 85 | 1992/2007 | See Note 6 |
| 4 | PHSY, Kittery | Yes | No | No | 6, 4 | 39 | Yes | 84 | 39 | Yes | CS, HDPE | 6,730 | 100 | 4 | 100 | 2003/2003 | See Note 6 |
| 5 | River Rd IP, Lewiston | Yes | Yes | Yes | 4 | 56 | Yes | 84 | 56 | Yes | CS, HDPE | 2,016 | 55 | 3 | 56 | 1919/2008 | See Note 6 |
| 6 | Shepard's Cove, Kittery | Yes | No | No | 8, 2, 1 | 500 | Yes | 150 | 300 | Yes | CS | 23,638 | 100 | 27 | 100 | 2002/2004 | See Note 6 |
| 7 | Debbie Lane, Eliot & Kittery | Yes | No | No | 6, 4, 2 | 56 | Yes | 84 | 56 | Yes | HDPE | 12,120 | 100 | 64 | 100 | 1993/2007 | See Note 6 |
| 8 | Shepleigh Road, Kittery | Yes | No | No | 4, 2 | 56 | Yes | 84 | 56 | Yes | PE | 4,275 | 98 | 12 | 83 | 1960/1989 | See Note 6 |
| 9 | Goddard Road, Lewiston | Yes | Yes | Yes | 8, 6, 4, 2, 1 | 56 | Yes | 84 | 56 | Yes | CS, PE, HDPE | 441,595 | 96 | 2,401 | 99 | 1960/2007 | See Note 6 |
| 10 | Lewiston Auburn IP | Yes | No | No | 12, 8 | 250 | Yes | 375 | 250 | Yes | CS | 360,083 | 100 | 40 | 35 | 1968/2007 | See Note 6 |
| 11 | High Line, Westbrook to Lewiston | Yes | No | No | 8, 6, 4, 2, 1 | 39 | Yes | 150 | 39 | Yes | CS, HDPE | 53,224 | 90 | 72 | 37 | 1995/2007 | See Note 6 |
| 12 | Lisbon - 39 psig | Yes | Yes | Yes | 8, 6, 4, 2 | 80 | Yes | 120 | 80 | Yes | CS, HDPE | 71,836 | 94 | 201 | 68 | 1989/2006 | See Note 6 |
| 13 | Poland Road IP, Lewiston & Auburn | Yes | No | No | 6, 4, 2 | 39 | Yes | 150 | 39 | Yes | CS, HDPE | 13,253 | 100 | 21 | 100 | 2001 | See Note 6 |
| 14 | Pineblow, New Gloucester | Yes | No | No | 2 | 12 | Yes | 30 | 12 | Yes | CS | 1,848 ft | 100 | 300 ft | 100 | Not Shown | See Note 6 |
| 15 | Northeast Millworks, North Berwick | Yes | No | No | 6, 4, 2 | 40 | Yes | 60 | 40 | Yes | PE, HDPE | 25,470 | 100 | 114 | 100 | Not Shown | See Note 6 |
| 16 | Pratt & Whitney, North Berwick | Yes | No | No | 6, 4, 2 | 56 | Yes | 100 | 56 | Yes | PE, PP, OS, unknown | 1,830 | 23 | 24 | 67 | 1946/2001 | See Note 6 |
| 17 | Cascade Road, Old Orchard Beach | Yes | Yes | Yes | 6, 2, 1 | 30 | Yes | 45 | 30 | Yes | CS | 28,195 | 41 | 104 | 63 | 1946/2007 | See Note 6 |
| 18 | Waldo Street, Portland | Yes | Yes | Yes | 12, 10, 6, 4, 2, 1 | 125 | Yes | N/A | 125 | Yes | CS, PE, HDPE | 58,501 | 54 | 632 | 89 | 1931/2007 | See Note 6 |
| 19 | Congress Street-125 psig, Portland - replac | Yes | Yes | Yes | 4, 4, 2, 2, 1 | 56 | Yes | 84 | 56 | Yes | CS, PE, HDPE | 1,522 | 2 | 107 | 24 | 1973/1989 | See Note 6 |
| 20 | B & M, Portland | Yes | Yes | Yes | 6, 2, 1 | 30 | Yes | 45 | 30 | Yes | PE | 550 | 100 | 12 | 100 | 1984 | See Note 6 |
| 21 | State Street, Portland | Yes | No | No | 4, 1, 1/2 | 60 | Yes | 84 | 56 | Yes | PE | 1,050 ft | 100 | 4 | 100 | Not Shown | See Note 6 |
| 22 | Douglas Street, Portland | Yes | No | No | 2 | 56 | Yes | 84 | 56 | Yes | PE | 1,363 | 100 | 4 | 100 | 1986/1983 | See Note 6 |
| 23 | Blueberry Road, Portland | Yes | No | No | 2 | 56 | Yes | 84 | 56 | Yes | PE | 730 | 100 | 4 | 100 | 1988 | See Note 6 |
| 24 | 380 Riverside, Portland | Yes | No | No | 2 | 36 | Yes | 54 | 36 | Yes | CS, PE | 6,438 | 20 | 28 | 64 | 1972/2005 | See Note 6 |
| 25 | 470 Riverside, Portland | Yes | No | No | 2 | 30 | Yes | 30 | 30 | Yes | PE | 1,148 | 100 | 3 | 100 | 1991 | See Note 6 |
| 26 | Riverside - Golf Course, Portland | Yes | No | No | 2 | 30 | Yes | 30 | 30 | Yes | PE | 427 | 100 | 3 | 100 | 1986 | See Note 6 |
| 27 | Riverside @ Waldron, Portland | Yes | No | No | 2 | 30 | Yes | 30 | 30 | Yes | CS, PE, HDPE | 37,397 | 84 | 253 | 64 | 1971/2006 | See Note 6 |
| 28 | 765 Warren Avenue, Portland | Yes | Yes | Yes | 8, 6, 4, 2, 1 | 30 | Yes | 84 | 56 | Yes | PE | 11,898 | 100 | 71 | 100 | 1931/1995 | See Note 6 |
| 29 | Riverside @ Forest, Portland | Yes | No | No | 6, 4, 2 | 56 | Yes | 45 | 30 | Yes | CS, HDPE, HDPE | 20,410 | 85 | 90 | 100 | 1972/2005 | See Note 6 |
| 30 | Moody Street, Saco | Yes | Yes | Yes | 6, 4, 2 | 30 | Yes | 45 | 30 | Yes | CS, HDPE | 58,304 | 64 | 26 | 71 | 1983/2005 | See Note 6 |
| 31 | Seaco Birch | Yes | No | No | 6, 4, 2 | 56 | Yes | 84 | 56 | Yes | CS, HDPE | 22,300 | 99 | 30 | 30 | 1986/2005 | See Note 6 |
| 32 | Route 103, Sanford & Wells | Yes | No | No | 6, 4, 2 | 30 | Yes | 45 | 30 | Yes | CS, PE, HDPE | 105,439 | 96 | 580 | 83 | 1971/2007 | See Note 6 |
| 33 | Roundwood, Scarborough | Yes | No | No | 6, 4, 2 | 56 | Yes | 84 | 56 | Yes | CS, PE, HDPE | 379,879 | 53 | 3,155 | 75 | 1923/2008 | See Note 6 |
| 34 | Scarborough Industrial Park | Yes | Yes | Yes | 6, 4, 2, 1 | 30 | Yes | N/A | 30 | Yes | UNK | 10,922 | 99.5 | 132 | 93 | 1979/2007 | See Note 6 |
| 35 | Seeth Portland | Yes | Yes | Yes | 10, 8, 6, 4, 2 | 200 | Yes | 150 | 39 | Yes | CS, HDPE | 13,888 | 55 | 32 | 41 | 1954/2001 | See Note 6 |
| 36 | Darling Avenue, South Portland | Yes | No | No | 1-1/4, 2 | 56 | Yes | 84 | 56 | Yes | PE | 174,535 | 60 | 859 | 75 | 1946/2007 | See Note 6 |
| 37 | Payne Rd System, South Portland & Portland | Yes | Yes | Yes | 4, 5, 4, 3, 1 | 39 | Yes | N/A | 39 | Yes | CS | 6,195 | 100 | 3 | 100 | See Note 6 | See Note 6 |
| 38 | Marchwood High School, South Berwick | Yes | No | No | 4, 5, 4, 3, 1 | 56 | Yes | N/A | 56 | Yes | CS, PE, HDPE | 174,535 | 60 | 859 | 75 | 1946/2007 | See Note 6 |
| 39 | Larrabee Road, Westbrook | Yes | Yes | Yes | 4, 5, 4, 3, 1 | 56 | Yes | N/A | 56 | Yes | CS, PE, HDPE | 174,535 | 60 | 859 | 75 | 1946/2007 | See Note 6 |
| 40 | Poland Road IP, Lewiston & Auburn | Yes | No | No | 4, 5, 8 | 39 | Yes | 150 | 39 | Yes | CS | 6,195 | 100 | 3 | 100 | See Note 6 | See Note 6 |

Main: UNKNOWN Services: 9,299
 Total Main: 2,839,210
 Total With Test Records: 1,639,954
 Percentage with Test Records: 89.72%

The following user added to keep track of the various users:
 Orange - System that Unitil had pressure tested prior to the water filling.
 Green - System scheduled to be tested all, or in part, for pressure testing after 9/1/13.
 Blue - System originally prepared to be tested under non-static flu (with water).
 Yellow - System that had 100% pressure documentation.
 Gray - Water from testing, prepared contained information at historical pressure.

1) BS - base steel; CS - carbon steel; HDPE - high density polyethylene; MDPE - medium density polyethylene; PP - (SDR11, 21); WI - 61 foot of untested iron; UNK - Unknown
 2) Per note in 8-P per MAOP Basis Results that 56 psig is the lowest rated component, an field investigation is required.
 3) For systems having a regulator station tested in accordance with 192.619(c)(2) see Maine Regulator Station Prepared MAOP Testing
 4) System 21, 39 and 43 are base pipe systems and will require replacement by December 31, 2024.
 5) All pressure test duration must meet Subpart J requirements for duration.
 6) Field investigations will be required on all systems with water for 192.619(a)(1) and 192.621(c)(1).