

Bath Electric Gas & Water Systems

July 7, 2014

To: Kathleen H. Burgess
Secretary
Public Service Commission

From: Guy Hallgren
Director Municipal Utilities
Bath Electric Gas & Water Systems
7 South Ave
Bath, NY 14810

RE: Response to PSC Order Case 14-G-0212

Bath Electric Gas and Water Systems received the PSC Case on June 30, 2014 requesting a response within five business days regarding its practices related to gas plastic pipe fusion training and qualification process. The following information details Bath's responses to the PSC Case 14-G-0212 regarding the practices of qualifying BEGWS construction personnel and contractors to perform fusions on natural gas facilities.

The Bath Electric Gas and Water Systems Underground Line Maintenance (UGLM) construction team is comprised of five people who perform underground gas work for routine maintenance, emergency leak repair, as well as service and main construction. The UGLM field crew has three qualified plastic pipe fusion personnel who are certified through a combination of on the job training, field experience, and field testing. No contract crews have performed any plastic fusion work. There were approximately fifty gas main fusions performed in year 2013. Of those the plastic fusions performed, approximately 20 were butt fusions and the remainder were electrofusion plastic pipe joining. All gas pipe fusion work was under the direct supervision of the UGLM Supervisor. As such, all plastic fusion work was performed by qualified plastic pipe fusion workers. In addition all gas fusion joints were subjected to pressure testing of 1.5 times the pipes maximum allowable operating pressure. No joints made failed the pressure test. Bath believes it is in compliance with 16 NYCRR 255.283, 255.285, 255.303 255.603 (b), and 255.604.

In the future Bath will qualify all UGLM construction workers and contractor as outlined in Bath's Operation & Maintenance procedures (section 6.285 in order to expand our knowledge of the plastic pipe joining process. UGLM personnel will perform annual field testing. In addition, UGLM construction workers will attend formal electrofusion training as well as formal butt fusion training.

The following information is the responses to the Commission Orders 1 thru 10.

1. Document procedures in place to qualify and requalify employees and contractors who perform fusions on plastic:

BEGWS Gas O&M Manual documents the procedure to be used to qualify construction personnel to qualify for joining plastic gas main. Section 6.285 refers the reader to 16 NYCRR 255.285 as its procedure for plastic pipe qualifying for making joints.

Field training was performed by 3 of 5 UGLM personnel at the BEGWS Construction Services shop in October of 2013.

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2. Show testing Procedures in accordance with 16 NYCRR 255.603 (d)

The testing procedures Bath uses in its O&M manual reference the 255.283 and 255.285 in the 16 NYCRR as the basis for conforming to these sections. As such, Bath conforms to these codes.

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- Show company procedures and testing that are administered to qualify and requalify employees and contractors who perform fusions on plastic gas pipe are in compliance with 16 NYCRR 255.285 and 285.283 (a)

See attached training records for last training dated October 8, 2013.

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Plastic Pipe Joining Qualification Record

Date: 10/8/13

Name: DAVID BOGHMAN Employer: BEGWS

Trainer's Name: Andrew Burdin Employer: BEGWS

Butt Fusion

Fusion Machine Information:		
Manufacturer	Model	Serial Number
<u>MP E-Ray 114 P.Hull</u>	<u>430101</u>	<u>001921</u>


Pipe OD (Inches)	Pipe Manufacturer/ Product ID	Pipe Material (Circle One)			Visual Inspection		Destructive Test	
		MDPE	HDPE	Both	Pass	Fail	Pass	Fail
<u>4" IPS</u>	<u>Discoflex 6500 PE2406/2708</u>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
		<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
		<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
		<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>


Electrofusion-Mechanical Coupling

Electrofusion Machine Information		
Manufacturer	Model	Serial Number
<u>E F Technologies</u>	<u>308-1</u>	<u>3080157</u>

Sample Information:						
Fitting Type	Additional Fitting Description	Size	Visual Inspection		Destructive Test	
Electrofusion Coupling	<u>1" GTS electrofusion</u>	<u>1"</u>	<input checked="" type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Electrofusion Service Tee			<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Stub Coupling			<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Bolt-on Service Tee			<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mechanical Coupling			<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Compression Coupling			<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Signatures:

Operator: 

Trainer: 

- Notes:
- Fusion ID card must be retained by the fusion Operator and be available for inspection at all times
 - The Gas Training Department must also retain a completed copy of the Qualification record for future reference

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Bath Electric Gas & Water Systems Plastic Pipe Joining Qualification Record

Date: 10/8/13
 Name: Andrew Burfin Employer: BEGWS
 Trainer's Name: Daniel Borhman Employer: BEGWS

Butt Fusion

Fusion Machine Information:		
Manufacturer	Model	Serial Number
MF Elroy #14 Pitbull	430101	001921

Pipe OD (Inches)	Pipe Manufacturer/ Product ID	Pipe Material (Circle One)			Visual Inspection		Destructive Test	
		MDPE	HDPE	Both	Pass	Fail	Pass	Fail
4" IPS	Discoflex 6500 PE 2406/2708	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
		<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
		<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
		<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Electrofusion-Mechanical Coupling

Electrofusion Machine Information		
Manufacturer	Model	Serial Number
E.F. Technologies	308-1	3080157

Sample Information:						
Fitting Type	Additional Fitting Description	Size	Visual Inspection		Destructive Test	
			Pass	Fail	Pass	Fail
Electrofusion Coupling	upinor 1" CTS Electrofusion	1"	<input checked="" type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Electrofusion Service Tee			<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Stab Coupling			<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Bolt-on Service Tee			<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mechanical Coupling			<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Compression Coupling			<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Signatures: 
 Operator: _____
 Trainer: Daniel Borhman

- Notes:
- 1) Fusion ID card must be retained by the fusion Operator and be available for inspection at all times
 - 2) The Gas Training Department must also retain a completed copy of the Qualification record for future reference

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Bath Electric Gas & Water Systems Plastic Pipe Joining Qualification Record

Date: 10/8/13
 Name: TOSH KNOWLES Employer: BEGWS
 Trainer's Name: DANIEL BORHMAN Employer: BEGWS

Butt Fusion

Fusion Machine Information:		
Manufacturer	Model	Serial Number
MC Elroy #14 Pitbull	430101	001921

Pipe OD (Inches)	Pipe Manufacturer/ Product ID	Pipe Material (Circle One)			Visual Inspection		Destructive Test	
4" IPS	Discoflex 6500 PE 2406/2708	<input checked="" type="radio"/> HDPE	HDPE	Both	<input checked="" type="radio"/> Pass	Fail	<input checked="" type="radio"/> Pass	Fail
		MDPE	HDPE	Both	Pass	Fail	Pass	Fail
		MDPE	HDPE	Both	Pass	Fail	Pass	Fail
		MDPE	HDPE	Both	Pass	Fail	Pass	Fail

Electrofusion-Mechanical Coupling

Electrofusion Machine Information		
Manufacturer	Model	Serial Number
E.F. Technologies	308-1	3080157

Sample Information:						
Fitting Type	Additional Fitting Description	Size	Visual Inspection		Destructive Test	
Electrofusion Coupling	Upinar	1"	<input checked="" type="radio"/> Pass	Fail	<input checked="" type="radio"/> Pass	Fail
Electrofusion Service Tee			Pass	Fail	Pass	Fail
Stub Coupling			Pass	Fail	Pass	Fail
Bolt-on Service Tee			Pass	Fail	Pass	Fail
Mechanical Coupling			Pass	Fail	Pass	Fail
Compression Coupling			Pass	Fail	Pass	Fail

Signatures: _____
 Operator: [Signature]
 Trainer: [Signature]

- Notes:
- 1) Fusion ID card must be retained by the fusion Operator and be available for inspection at all times
 - 2) The Gas Training Department must also retain a completed copy of the Qualification record for future reference

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4. If plastic fusion procedures are out of compliance with 16 NYCRR 255 then stop work on all plastic fusions.
 - a. Except emergency repairs
 - b. Report fusion work stoppage to PSC Staff
 - c. Stop work will remain in place until employees and *contractors* are qualified to begin work.

Bath believes the information provided in sections 1 through 3 above show that it is in compliance with the PSC and Bath's goal of ensuring safety to the customers of Bath customers and the public at large. Bath construction personnel perform frequent (about 4 fusions/month) heat fusion, and electrofusion connections throughout the year. Of the fusion joints made no connections have failed pressure testing performed. In addition, field training has been performed by three of five UGLM construction personnel. Destructive testing as outlined in 16 NYCRR 255.283 was performed. No joints failed testing. See above listed test records.

5. Create list of any persons whose qualifications or requalification's are found to be out of compliance with procedures for performing plastic fusions
 - a. With 16 NYCRR 255.285, 255.303, 255.603, 255.604

Not Applicable

6. Provide a list that includes the date and duration of time for each person whose qualifications and requalification's were not in compliance with 16 NYCRR 255.285, 255.303

Not Applicable

7. Document the number and location plastic fusions performed for each unqualified person

Not Applicable

8. Identify how the company will address any safety risk posed by such employee or contractor.

Not Applicable

9. Define procedures in place to ensure compliance with all gas safety regulations and, in particular, what controls and procedures it use in preparing its 2014 Chief Executive Officers Certification, require by public service law 65 (15)

Bath adheres to the requirements of 16 NYCRR 255. It is referenced in its gas Operations and Maintenance procedures and is the basis for this procedure. The UGLM personnel routinely train and install plastic gas using both butt fusion and electrofusion pipe joining techniques. In addition, its people routinely use online operator qualification (OQ) courses. When pipe joints are made, then an air pressure test is applied to all installed pipe. The combination of these practices ensure compliance with all gas safety regulations.

The Directors position at Bath was vacant through much of 2011 and 2012. It was also vacant from March of 2013 thru December 2014. I assumed leadership of Bath on January 1, 2014. I have a vast array of gas industry experience in both engineering and operations through 20 plus years' experience with NYSEG and Integrity Engineering as well as 8 years with Corning Incorporated as a

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Project Manager in its research and development facility. With the extended vacancies at the director's position it appears the Chief Executive Officers Certification were not authorized through signature. I will fully review and modify Bath's Gas O&M manual for year 2014. Once done the 2014 Chief Executive Officers Certification will be signed as soon as possible and submitted for record.

10. Request for extension may be granted by in writing request, must include justification for the request.

Not Requested

Respectfully,



Guy Hallgren

Guy Hallgren, PMP
Director of Municipal Utilities
Bath Electric Gas & Water Systems
7 South Ave
Bath, NY 14810