



442 Civic Center Drive, Ste. 100 • Augusta, ME 04330 • Phone: (207) 621-8000 • [www.SummitNaturalGasMaine.com](http://www.SummitNaturalGasMaine.com)

---

January 16, 2015

Gary A. Kenny, PE  
Gas Safety Manager  
Maine Public Utilities Commission  
18 State House Station  
Augusta, ME 04330-1039

RE: THE INVESTIGATION OF ELECTROFUSION TEES  
**Response to letter dated December 29, 2014 (via e-mail)**

Dear Mr. Kenny:

In your letter dated December 29, 2014 to Mr. Michael Minkos, concerning the investigation of electrofusion tees, you requested by close of business on Friday January 16, 2015, a report to include the following:

- Why, after the initial discovery of improperly installed tees, did SNGME's Quality Assurance and Quality Control plan and the inspection process not catch subsequent improper installations;
- Corrective actions to be taken to ensure that all materials are installed in accordance with procedures; and
- A summary of any other systematic investigations SNGME may be conducting regarding other types of fittings, based on findings, and related to specific contractors and/or crews.

In response to these requests, SNGME offers the following:

1. As was discussed at the January 9, 2015 informal conference related to the NOPV issued by the Commission on July 11, 2014, Docket 2014-00221, the discovery of the extent of the issues related to electrofusion tees as related to pipe preparation has uncovered inadequacies in the Company's Quality Assurance and Control Plan and inspection processes. We instituted some immediate stop gap measures to address the issue in the field and will be modifying the aforementioned plan and inspection process for the 2015 construction season. This will include staffing additions, additional/improved inspection requirements and reporting and a re-dig plan for reviewing random installations. We found one poorly installed tee by CCB in the review of installed electrofusion installations that was initiated as a result of agreed upon steps at our earlier informal conferences. We had not picked up on any systemic problem with CCB's installation overall until the failure of the Lawrence Avenue tee. Since that time, we have taken several steps including stop-work orders and crew dismissals to ensure that those involved in that installation did not continue on the project.
2. SNGME has initiated a thorough review of the CCB electrofusion tee installations as was outlined during our recent informal conference. We will report to you regularly on our progress, which will continue until we have inspected all installations. We are committed to replace all installations which do not pass visual inspection or are found to be otherwise deficient. We have scheduled the full battery of GTI training for the inspector ranks prior to OQ testing in 2015 and have/are in the process of instituting

a more comprehensive, streamlined inspection process that will eliminate these types of systemic issues going forward. We are also in the process of re-evaluating our contractor base.

3. We continue to replace any tees installed by 2013 contractors PES and CCB that do not pass visual inspection. We are not currently investigating any other fittings or contractor installations. You have been made aware of the service riser pressure limitations that have been previously discussed. The distribution systems that are impacted by these limitations are being operated accordingly.

If you have any questions or concerns in the future, feel free to contact me at any time.

Sincerely,

Keith Lincoln  
Senior Director, Operations and Construction

cc: Mike Tanchuk  
Stacey Fitts  
Tim Johnston  
SUI Legal