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October 11, 2018

Debra A. Howland, Executive Director and Secretary  
New Hampshire Public Utilities Commission  
21 S. Fruit Street, Suite 10  
Concord, NH 03301-2429

**Re: DG 18-103: Petition for Authority to Operate as a Public Utility in the Towns of Kingston and Atkinson**

***Qualification of Lewis Builders, Inc.***

Dear Ms. Howland:

In compliance with the Commission's Order No. 26,178 in the above-reference Docket,<sup>1</sup> Northern Utilities ("Unitil" or the "Company") provides this report on the qualifications of Lewis Builders Development, Inc. ("Lewis Builders") to perform work in connection with the installation of the Company's pipeline extension in Atkinson.

Commission rule Puc 506.01 requires, among other things, that individuals performing certain activities on new or existing pipeline facilities meet operator qualifications in accordance with 49 C.F.R. Part 192, Subpart N. The Company maintains a robust Operator Qualification ("OQ") Program as required by 49 C.F.R. Part 192 Subpart N to ensure that individuals performing covered tasks on a pipeline facility are appropriately qualified or, alternatively, directed and observed by a qualified individual.<sup>2</sup> On an annual basis, the Company files a copy of its OQ Written Plan with the Commission's Safety Division Staff.

As noted in Order No. 26,178, Lewis Builders will provide the excavation and backfilling in connection with the installation of the Company's main extension in Atkinson. The work to be performed by Lewis Builders is a "covered task" under Unitil's OQ Written Plan, and is further described and allowed in Company O&M Procedure 4-F *Excavation Practices* Section 4.0, a copy of which is appended to this report. Under O&M Procedure 4-F Section 4.0, customers or approved customer contractors are permitted to perform

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<sup>1</sup> Northern Utilities, Inc., Order Granting Franchise Authority at 14 (October 3, 2018).

<sup>2</sup> 49 C.F.R. § 192.805 allows for individuals not otherwise qualified pursuant to Subpart N to perform a covered task (as defined in the qualification program) "if directed and observed by an individual that is qualified."

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excavation and backfill activities associated with main and service installation under the direct supervision of qualified personnel. While Lewis Builders is not currently Operator Qualified to perform excavation and backfilling tasks, all work performed by Lewis Builders will be under the direct supervision of qualified personnel as allowed under Section 7 of the Company's OQ Written Plan. Though a copy of the Company's current OQ Written Plan is on file with the Commission (as noted above), Section 7 is excerpted and appended to this report as Attachment 2 for ease of reference.

New England Utility Constructors Inc. ("NEUCO") will provide the labor and equipment for the actual pipe installation and other ancillary activities (e.g., pipe handling, pipe joining, tracer wire, caution tape, etc.) associated with the installation. Consistent with the Company's OQ Written Plan, NEUCO employs personnel that are Operator Qualified by the Northeast Gas Association (NGA) and will, as Until's agent, have direct oversight of Lewis Builders for all excavation and backfill activities with stop work authority in the event that any issues arise. NEUCO's oversight of Lewis Builders will comply with the requirements of the OQ Written Plan, including but not limited to Section 7. Also, the Company will have a full-time construction inspector assigned to the project to oversee the activities of both NEUCO and Lewis Builders. Lastly, the Company's Compliance Inspectors will be performing Quality Assurance / Quality Control Audits during the construction.

We trust that this letter provides sufficient information as required by the Commission order, but please do not hesitate to call if you have additional questions.

Sincerely,



Christopher J. LeBlanc  
Vice President, Gas Operations  
Unitil Service Corp.