



June 29, 2026

US Department of Transportation  
Docket Management System  
West Building, Ground Floor, Room W12-140  
1200 New Jersey Ave., SE  
Washington, DC 20590-0001

Attention: Docket No. PHMSA-2021-0046

**Re: Comments of The Northeast Gas Association - Meeting of the Gas Pipeline Advisory Committee (Safety of Gas Distribution Pipelines)**

Via E-Gov Web

Dear Sir or Madam:

The Northeast Gas Association<sup>1</sup> (“NGA”) respectfully submits the following comments on behalf of our natural gas distribution company members for consideration by the Pipeline and Hazardous Materials Safety Administration (PHMSA or the Agency) concerning the Gas Pipeline Advisory Committee (GPAC or the Committee) meeting held to review and discuss PHMSA’s proposed rule, “Safety of Gas Distribution Pipelines” Notice of Proposed Rulemaking (NPRM)<sup>2</sup>, as well as the Agency’s associated regulatory analyses, including but not limited to, the cost-benefit and risk assessment analyses within the NPRM and the regulatory impact analyses; the environmental assessments; and other materials pertaining to the NPRM provided in the public docket for this rulemaking.

PHMSA proposes revisions to the pipeline safety regulations to require operators of gas distribution pipelines to update their distribution integrity management programs (DIMP), emergency response plans, operations and maintenance manuals, and safety practices. These proposals implement provisions of the Leonel Rondon Pipeline Safety Act—part of the

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<sup>1</sup> NGA is a regional trade association that focuses on pipeline safety and safety culture, education and training, technology research and development, operations, energy reliability and affordability, planning, and increasing public awareness of natural gas in the Northeast U.S. NGA supports a culture of pipeline safety and environmentally responsible energy delivery practices. NGA represents natural gas distribution companies, transmission companies, liquefied natural gas suppliers and associate member companies. Its member companies provide natural gas service to 13 million customers in 11 states (CT, DE, MA, MD, ME, NH, NJ, NY, PA, RI, VT).

<sup>2</sup> Pipeline Safety: Safety of Gas Distribution Pipelines and Other Pipeline Safety Initiatives, 88 Fed. Reg. 61746 (September 7, 2023).

Protecting our Infrastructure of Pipelines and Enhancing Safety Act of 2020 (a.k.a. PIPES Act of 2020) and a National Transportation Safety Board (NTSB) recommendation directed toward preventing incidents resulting from overpressurization of low-pressure gas distribution systems similar to that which occurred on a gas distribution pipeline system in CMA Merrimack Valley incident on September 13, 2018. Further, PHMSA proposes other pipeline safety initiatives for part 192-regulated pipelines such as updating emergency response plans and inspection requirements.

Major pieces of the proposal with potential impacts on NGA membership include:

- Enhancing construction procedures designed to minimize the risk of incidents caused by system overpressurization.
- Updating DIMP to minimize the threat of and learn from overpressurization incidents.
- Requiring new regulator stations to be designed with two separate methods of overpressure protection and remote gas monitoring, to better prepare gas distribution systems to avoid overpressurization, and limit damage during incidents.
- Strengthening emergency response plans for gas pipeline emergencies, including requirements for operators to contact local emergency responders and keep customers and the affected public informed of what to do in the event of an emergency.

Many of the proposed requirements are specific to low-pressure (LP) systems, which are prevalent in the northeast. The CMA Merrimack Valley incident was a tragic event that reminded the industry of the unique risks associated with LP systems, where options for pressure regulation are limited due to the science of delivering gas at pressure ranges that can adequately meet customer demand and the principles governing the operation of pressure regulation. Operators of LP systems know that widespread outages can occur quickly if gas pressure is impacted by an outside event or by the unintended activation or mis-operation of a pressure or flow device. LP systems will continue to be a critical and necessary form of gas distribution for the foreseeable future; operators who have LP systems must continue to be provided the flexibility to manage the safety and reliability of these systems, within the framework of new regulations to ensure proper overpressure protection.

NGA continues to work collaboratively with the American Gas Association (AGA) and the American Public Gas Association (APGA), (jointly “the Associations”) to develop joint industry comments supported by the experience of a broad spectrum of gas distribution system operators. NGA supports these comments and offers the following supplemental comments for consideration.

**General Comments:**

NGA supports initiatives that further enhance pipeline safety value including broader industry recognition and incorporation of operating practices intended to manage and reduce operational

risk while enhancing system reliability and ensuring integrity of the energy delivery network. NGA appreciates PHMSA's recognition of the value in taking a performance-based approach to proposed regulatory enhancements versus a prescriptive one-size fits all solution. This methodology recognizes the challenges in applicability of regulatory change across a broad range of operating system characteristics without compromising safety and while meeting congressional mandates. Further, NGA supports the Associations' comments that Section 206 of the PIPES Act of 2020 is not written as a rigid retrofit mandate. Congress directed PHMSA to promulgate regulations requiring operators to assess and upgrade district regulator stations serving low-pressure distribution systems "*as appropriate*" to ensure, among other things, that LP systems have secondary or backup pressure-relieving or overpressure protection technology. Congress further provided that, if the Secretary determines it is "*not operationally possible*" for an operator to implement those requirements, the operator must identify actions in its plan that minimize the risk of an overpressurization event.

As the Associations emphasize, the phrase "as appropriate" is important. It confirms that Congress expected the final rule to preserve a measure of engineering judgment and system-specific discretion. The phrase "not operationally possible" is equally important. It confirms that Congress recognized there would be circumstances in which literal station-level implementation of the preferred approach would not be reasonable or feasible as a means of achieving the statutory objective. Read together, these clauses establish a conditional framework – not a universal station-rebuild mandate.

The comments submitted herein build upon the Associations' comments regarding the recent GPAC meeting focusing on proposed code sections within the NPRM that will have substantial regional Local Distribution Company ("LDC") impacts for NGA members and as such, requires further clarification and/or revisions prior to adoption to achieve the intended goals of maximizing public safety value.

## **1. Proposed Rule Effective Dates and Timeframes for Achieving Safety Objectives**

NGA supports the Associations' belief that there will be unintended consequences resulting from the proposed implementation timeframe of twelve-months. NGA members continue to be actively engaged in voluntarily addressing lessons learned from the 2018 CMA Merrimack Valley overpressurization event, and in parallel, addressing recommendations provided in the September 29, 2020, PHMSA advisory bulletin (ADB-2020-02)<sup>3</sup>, and elements of the PIPES Act of 2020. However, the proposals indeed go beyond the scope and pace of change that is reasonable for operators who are already actively implementing measures in anticipation of the forthcoming rules and regulations expected under the Leonel Rondon Pipeline Safety Act—part

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<sup>3</sup> "Pipeline Safety: Overpressure Protection on Low-Pressure Natural Gas Distribution Systems," ADB-2020-02, 85 FR 61097 (Sept. 29, 2020).

of the Protecting our Infrastructure of Pipelines and Enhancing Safety Act of 2020—and National Transportation Safety Board (NTSB) recommendations.

NGA emphasizes that the proposed changes are comprehensive and that a sufficient glidepath is necessary to implement the requisite changes in a safe and efficient manner. Significant time is required for the implementation of these mandated changes, for example, in restructuring emergency response plans, coordination and working collaboratively with jurisdictional First Responders, formalizing specific management of change requirements and associated training and processes, DIMP enhancements, and design changes and upgrades for pressure regulation stations. In some regions of the country, particularly where low-pressure distribution systems prevail, pressure control station enhancements prescribed in the NPRM number in the thousands, far greater than PHMSA estimates. Securing materials, securing and training skilled resources, and evaluating each facility that may require enhancements or complete replacement, will require thoughtful evaluation of timeframes to ensure operators can reasonably meet these deadlines and extract the greatest degree of public safety value from these new requirements. Implementation timeframes need to consider the time required for an operator to secure permits and integrate additional capital improvements within existing pipe replacement programs and other jurisdictionally approved capital improvement plans. Approval of capital to implement these enhanced safety measures is granted as part of the rate making process, which typically occurs once every three or more years. In addition, the complexity of managing and communicating these changes is further complicated by several recently enacted jurisdictional pipeline safety and emissions monitoring regulations in the northeast region, and the resulting challenges are significant and should not be underestimated<sup>4</sup>.

The scope of work required to meet the desired outcome of the proposed regulations is significant. The Associations' comments highlight implementation timeframes that are of concern and suggest practical alternatives that, for example, incorporate risk-based prioritization schedules such that the highest degree of pipeline safety value is realized as quickly as possible.

## **2. Overpressurization:**

NGA supports PHMSA's objective of reducing overpressurization risks on low-pressure natural gas distribution systems and implementing Section 206 of the PIPES Act of 2020. However, we strongly oppose the proposed framework that treats alternative risk-reduction measures as a limited exception requiring PHMSA approval. Congress intended alternative measures to be a broadly available compliance option within a performance-based regulatory framework.

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<sup>4</sup> NJ Rulemaking, N.J.A.C. 14:7-1.19 Effective June 5, 2023, CT Rulemaking, PURA 23-07-2 Effective January 1, 2027, MA Rulemaking, DPU 22-100; Amend 220 CMR 100.00 and 101.00 Effective Oct 11, 2024, NYSDEC Rule 203, Effective March 3, 2022, NYSDPS Case 19-G-0736 16 NYCRR Part 255 Effective March 18, 2022.

Preserve Flexibility Intended by Congress:

NGA contends that Section 206 was not designed as a universal retrofit mandate. The statutory language "as appropriate" and "not operationally possible" indicates Congress expected operators to use engineering judgment and system-specific solutions. PHMSA should therefore allow alternative measures as a standard compliance pathway rather than requiring case-by-case approval. Since the Merrimack Valley overpressurization incident, some operators have made significant progress mitigating the risk of overpressurization utilizing viable, practical, DIMP based system-specific solutions which may not align to a "one size fits all" regulatory mandate.

Broadly Allow Alternatives in Three Circumstances:

Alternative overpressure protection measures should be available in the following situations, as strict retrofit requirements may be impractical and potentially wasteful:

- Full station rebuilds required to install secondary overpressure protection.
- Major station reconfigurations or partial rebuilds involving excavation, piping modifications, or where sense-line relocation is necessary.
- Low-pressure systems scheduled for replacement, retirement, uprating, or conversion under existing modernization programs.

Reassess Cost and Scope Assumptions:

PHMSA's Preliminary Regulatory Impact Analysis (PRIA) significantly understates:

- The number of affected district regulator stations.
- Retrofit and reconstruction costs.
- Ongoing inspection, testing, training, and maintenance expenses.

While PHMSA estimated approximately \$7,500 per station, industry data suggests costs commonly range from \$50,000 to \$176,000 per station, with some urban rebuilds reaching \$2 million. Estimates indicate that more than 4,000 stations may require partial or full reconstruction.

Recognize Alternative Measures as Effective Risk Controls:

NGA membership has identified numerous alternative protections, including:

- System level controls including automated shutoff and remote isolation systems, and system-integrated full capacity relief devices.
- Station level enhancements including monitor regulators, full-relief devices, and slam-shut valves.
- Customer-level protections such as service regulators and smart meter shut-off technologies.
- Detection, automation, and programmatic measures including SCADA systems, real-time analytics, and integrity management or uprating programs.

System-specific protections often reduce risk equally or more efficiently and can be implemented more quickly than major station reconstruction.

Consider Risks Created by Large-Scale Reconstruction:

While supporting PHMSA's proposed Management of Change and construction oversight provisions, NGA notes that rebuilding thousands of regulator stations introduces its own safety risks, including excavation, pressure-control modifications, and sense-line reconfiguration. Additionally, extensive reconstruction could divert resources from other high-priority safety programs such as leak-prone pipe replacement.

Eliminate Routine §192.18 Approval Requirements:

The proposed requirement to obtain approval through the §192.18 notification process is viewed as unworkable for widespread implementation. NGA supports the Associations' recommendation that operators be allowed to identify and implement alternative measures through their Distribution Integrity Management Programs (DIMP) without routine PHMSA approval.

Proposed Compliance Framework:

The Associations recommend:

- 10 years to implement secondary overpressure protection where station retrofits are appropriate.
- 5 years to implement approved alternative risk-reduction measures.

In summary, PHMSA should adopt a flexible, performance-based approach that makes alternative overpressurization mitigation measures broadly available. The Associations believe this approach better reflects Congressional intent, improves practicality and cost-effectiveness, accelerates risk reduction, and maintains safety while avoiding unnecessary reconstruction of thousands of district regulator stations.

**3. Distribution Integrity Management Program (DIMP):**

NGA supports PHMSA's efforts to implement Section 202 of the PIPES Act of 2020 following the CMA Merrimack Valley incident and agrees that operators should evaluate risks associated with low-pressure distribution systems, overpressurization events, and low-probability events. However, we emphasize that Congress did not intend to fundamentally alter the performance-based structure of DIMP or transform it into a prescriptive regulatory framework. NGA therefore supports the Associations' comments urging PHMSA to implement Section 202 in a manner that preserves operator flexibility, risk-based decision-making, and the established principles of DIMP.

PHMSA should avoid expanding DIMP requirements beyond what is necessary to satisfy the Congressional mandate. Specifically, overpressurization should not be established as a new standalone threat category within §192.1007(b). Instead, overpressurization should be evaluated as a consequence through the existing risk assessment requirements of §192.1007(c)(3). Overpressurization typically results from threats already addressed within DIMP, such as equipment failure or operational errors, and existing DIMP processes can effectively evaluate both the causes and consequences of such events without creating a new threat classification.

NGA and the Associations contend that while Section 202's mandate to evaluate cast iron pipe risks must be addressed in the final rule, PHMSA should avoid prescribing material-specific requirements beyond that statutory directive. Their core concern is that singling out one particular pipe material — such as historic plastics with known issues — would paradoxically undermine operator diligence by implying that only listed materials require scrutiny, effectively diminishing the broader duty to assess all pipe materials. The existing DIMP framework is intentionally performance-based, requiring operators to evaluate risks holistically through factors like material type, leak history, and environmental conditions, and we contend that neither PHMSA nor Congress intended to narrow that scope to a prescriptive list. Accordingly, we recommend that the final rule refrain from enumerating specific pipe material types, preserving operators' obligation to weigh the unique risks presented by all materials in their systems.

Additionally, NGA encourages PHMSA to work with State partners in encouraging the accelerated mitigation of leak prone pipe addressing both safety and emissions risk. In 2011, then U.S. DOT Secretary Ray LaHood and PHMSA launched a nationwide "Call to Action" urging pipeline operators and state regulators to accelerate the replacement of the highest-risk, leak-prone pipeline infrastructure. The campaign directly engaged state public utility commissions and pipeline operators to aggressively review systems and invest in modernizing infrastructure. While progress has been made over the last 15 years, significant mileage remains in the ground, and some State regulators and policy makers are ratcheting back these investment mechanisms or deferring approval of utilities' replacement and long-term mitigation plans inadvertently increasing the risk to public safety. We believe that timely, risk-based mitigation including replacement or rehabilitation, where appropriate, of high-risk gas pipeline infrastructure is critical to ensuring public safety while addressing emissions risk. Accordingly, NGA strongly encourages PHMSA to renew and update the 2011 Call to Action to address risk-based approaches in mitigation of leak prone pipe, including replacement and rehabilitation strategies, as expeditiously as possible.

NGA also supports the Associations' position to oppose the proposed notification requirement associated with low-probability event determinations in §192.1007(c)(3)(ii). Existing DIMP requirements, inspection, and enforcement processes already provide sufficient oversight, and the proposed notification requirement would create uncertainty regarding regulatory review and approval. If PHMSA retains the requirement, the Associations request clarification that notifications are informational only and do not constitute requests for approval.

#### **4. Operations and Maintenance (O&M) Procedures for Overpressurization and MOC:**

NGA supports PHMSA's implementation of Section 204 of the PIPES Act of 2020 and the agency's efforts to strengthen safeguards against natural gas distribution system overpressurization. However, NGA supports the Associations' position that the final rule should closely adhere to Congressional intent, preserve operator judgment, and maintain a targeted, performance-based approach focused on the risks that contributed to the Merrimack Valley incident.

A primary concern involves PHMSA's proposed overpressurization response procedures under §192.605(f). The Associations support requiring operators to establish written procedures for responding to indications of potential overpressurization; however, the final rule must restore the statutory phrase "if necessary" when addressing pressure reduction or system shutdown actions. Section 204 expressly recognizes that not every indication of overpressurization requires immediate shutdown or depressurization. Operators' highly trained and qualified personnel that are entrusted to oversee the safety and reliability of the system must retain discretion to evaluate alarms, instrumentation anomalies, transient pressure fluctuations, and other abnormal indications before taking actions that could unnecessarily disrupt service. Indiscriminate shutdowns can create their own safety and reliability risks, including widespread service outages, frozen customer piping, water intrusion into gas systems, and complex service restoration activities.

To this end, NGA members have demonstrated commitment to essential elements of effective O&M procedure development as part of a comprehensive review of safety management system operational controls following the incident in the Merrimack Valley. The PSMS O&M Procedure Development Guideline<sup>5</sup> examines industry leading practices in driving intended operational safety behaviors through effective procedure development and application including potential high-risk activities associated with pressure control.

The Associations also support PHMSA's proposal to establish formal Management of Change (MOC) requirements under §192.605(g), recognizing MOC as an important tool for managing risks associated with system modifications. However, NGA emphasizes that the scope of MOC should be limited to significant and permanent changes that directly affect overpressurization risk. Consistent with the legislative intent of Section 204 and the lessons learned from the CMA Merrimack Valley incident, the Associations recommend that MOC requirements apply primarily to modifications involving pressure regulation, pressure monitoring, and overpressure protection systems. Examples include, but are not limited to, changes to district regulator stations, pressure-control infrastructure, alarm setpoints, monitoring equipment, and significant operational procedures related to pressure control.

NGA cautions that an overly broad MOC requirement could reduce its effectiveness by generating excessive administrative burden and diverting attention from higher-risk activities. The Associations therefore recommend exempting routine maintenance, in-kind replacements, emergency response activities, and changes already governed under Control Room Management regulations. They argue that MOC should remain a focused risk management process applied only where the complexity of the change and its potential consequences justify the additional review and documentation requirements. In summary, NGA members have demonstrated commitment to core principles of management of change following the incident in the Merrimack Valley and have voluntarily developed MOC Guidelines<sup>6</sup> as part of Safety

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<sup>5</sup> Development and Implementation of O&M Procedures Applied to Distribution System Operations, developed by the NGA PSMS Collaborative, [ngapsms.com](http://ngapsms.com)

<sup>6</sup> Management of Change Applied to Local Distribution Company Operations PSMS Technical Guideline, developed by the NGA PSMS Collaborative, available at [www.ngapsms.com](http://www.ngapsms.com)

Management System implementation. The Guideline reinforces the safety value of implementing a change management process commensurate with the complexity of the proposed change thereby avoiding a one-size-fits-all approach that would dilute the risk management benefits of the process.

Regarding construction plan review and certification requirements, NGA supports the Associations' comments that competent personnel review plans for accuracy and completeness before work is performed. However, NGA members recommend that this be limited to projects involving meaningful overpressurization risk and associated consequences, rather than applying it universally to all construction activities. The Associations also request flexibility in determining who may perform such reviews and approval, consistent with the statutory language allowing professional engineers with appropriate gas distribution system experience, subject matter experts, or other knowledgeable personnel to serve in this role. Furthermore, the review and approval process should reflect project complexity and potential risk rather than a one-size-fits-all approach. In this regard, NGA members have demonstrated commitment to core principles of a design review and approval process following the incident in the Merrimack Valley and have voluntarily developed Engineering Design Review Guidelines<sup>7</sup> as part of Safety Management System implementation. The Guideline reinforces the safety value of implementing a scalable design review and approval process commensurate with the complexity and potential risk of the project to maximize safety value.

Lastly, NGA supports the Association comments regarding distinguishing credentials of those performing the review and approval activity and the use of the term *competent* as opposed to *qualified*. NGA believes the congressional mandate intended to address and ensure competency of those individuals of performing the design and review process as distinguished from Operator Qualification. Design and review activities should not be classified as Operator Qualification (OQ) covered tasks because the skills required for engineering review differ substantially from those required for pipeline field operations and maintenance activities.

Overall, NGA supports PHMSA's objective of improving overpressurization prevention and response but urge the agency to implement Section 204 in a manner that preserves operational flexibility, focuses regulatory requirements on activities that materially affect overpressurization risk, and maintains the performance-based principles that have historically governed pipeline safety management systems. A targeted approach will provide greater public safety value, improve practicality, and best ensure the final rule remains aligned with Congressional intent.

## **5. Recommendations for Emergency Response Plan Requirements:**

NGA supports the Associations' comments further supporting PHMSA's efforts to implement Section 203 of the PIPES Act of 2020 but as with the Associations urge the agency to ensure

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<sup>7</sup> Guideline for Gas System Engineering Design Review, developed by the NGA Engineering Design Review task group, included within NGA comments filed under this docket by NGA on Nov. 6, 2023.

the final rule remains closely aligned with Congressional intent and does not expand requirements beyond the statutory mandate.

Scope of Emergency Notification Requirements:

Congress directed PHMSA to establish communication procedures for a limited set of gas distribution emergencies involving an unintended release of gas. Specifically, the law identifies four triggering events:

1. Fire related to an unintended gas release.
2. Explosion.
3. One or more fatalities.
4. Significant service interruption resulting from an unintended gas release.

NGA and the Associations recommend that PHMSA should not create a broader emergency response framework and should limit notification requirements to these statutory events, consistent with recommendations made by the GPAC.

Service Interruption Thresholds:

NGA and the Associations recommend using affected service lines rather than customers as the metric for determining significant service interruptions because it is more objective and consistent with existing PHMSA reporting practices. NGA concurs with the Associations' recommendation which suggest that approximately 270 affected service lines represents a reasonable benchmark for a significant outage based on historical incident data. This issue is critical for all operators whose service territories include large multi-unit buildings. NGA therefore cautions against establishing ambiguous and such low regulatory notification thresholds that will not deliver corresponding pipeline safety value.

Fire-Related Emergency Definitions:

NGA supports the Associations' recommendations to consolidate PHMSA's proposed fire-related emergency categories by focusing on the statutory trigger: a fire resulting from an unintended release of gas. This approach is viewed as more objective than the existing requirement involving fires "near" pipeline facilities, which can be difficult to define and apply consistently.

Opposition to Open-Ended Emergency Categories:

NGA and the Associations strongly oppose PHMSA's proposed catch-all provision that would apply notification requirements to "any other emergency deemed significant by the operator." This provision:

1. Lacks objective criteria;
2. Creates uncertainty for operators and regulators;
3. Expands the rule beyond Congressional intent; and
4. Could lead to inconsistent enforcement.

NGA recommends eliminating this provision entirely.

Public Communication Requirements:

NGA and the Associations support timely public communications during emergencies but contend that PHMSA's proposal exceeds the requirements established by Congress.

Operators should not be required to serve as the primary public information source for all emergency-related information. Under established emergency management frameworks such as the National Incident Management System (NIMS) and Incident Command System (ICS), public communications are often coordinated through a designated Public Information Officer (PIO), which may be a government official or emergency responder rather than the operator. Additionally, Congress required communications "as soon as practicable" after an emergency. The Associations oppose requirements that would compel operators to communicate during an active emergency, when their primary focus should remain on protecting life, stabilizing operations, and coordinating with emergency responders.

Voluntary Opt-In Customer Notification Systems:

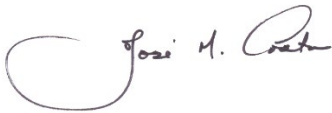
NGA supports the Associations' recommendation to support PHMSA's movement toward a performance-based approach for voluntary customer notification systems. We emphasize that operators vary widely in size, resources, customer demographics, and communication capabilities. Therefore, the final rule should establish performance objectives rather than prescriptive requirements, allow flexibility in communication methods (e.g., text messages, email, phone calls, customer portals, mobile apps, and social media), and encourage innovation as communication technologies and customer preferences evolve much more rapidly than regulatory frameworks.

**Summary:**

In summary, NGA supports the Associations' Comments on Pipeline Safety: Meeting of the Gas Pipeline Advisory Committee (Safety of Gas Distribution Pipelines).

NGA appreciates the opportunity to provide comments on this matter.

Respectfully submitted,



By: Jose Costa  
President & CEO  
Northeast Gas Association  
1800 West Park Drive,  
Ste 340, Westborough, MA, 01581  
[jcosta@northeastgas.org](mailto:jcosta@northeastgas.org)

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For further information please contact:

Paul Armstrong  
Vice President of Operations  
Northeast Gas Association  
(781) 455-6800 ext. 1130  
[parmstrong@northeastgas.org](mailto:parmstrong@northeastgas.org)

or

Robert Wilson  
Vice President Special Projects  
Northeast Gas Association  
(607) 643-5111  
[bwilson@northeastgas.org](mailto:bwilson@northeastgas.org)