

Management of Change

Purpose

The purpose of this MOC process is to ensure a consistent and documented process for notification of any improvements or significant changes.

Responsibility

<u>All Employees:</u> To understand their operational area and the necessity of improvements or significant changes as defined below. Document these suggestions and provide to their immediate supervisor for review and approval.

<u>Immediate Supervisor:</u> Review all MOC suggested improvements and evaluate for need. If benefit is gained, forward to the Compliance Department for review and completion process. Once they receive notification of a MOC change, the supervisor will notify their employes of the change.

<u>Compliance Department:</u> Document MOC requests on the MOC log. Review process to determine that the request is needed, complies with all gas pipeline regulations, is useful company wide and makes good business sense. If compliance department deems change necessary, forward to VP of Operations for final approval. Upon VP of Operations approval, the changes will be implemented by WTG. All MOC requests will be documented on F-192.605(a) and provided to personnel making initial request. The approved changes will be communicated to all immediate supervisors via email. Documents will be updated on web if required. If applicable, notification will be made to federal and state regulatory agencies of such significant changes by the Compliance Department.

<u>VP of Operations:</u> Review all requests and provide status of approval or denial to Compliance Department.

Determination Process

Low Impact Changes — These changes require informal communication such as an email to the affected employee or districts. These may include, but are not limited to, minor wording changes / corrections, changes in procedure or form numbers, field personnel changes, minor administrative program changes, etc. No additional approval is needed to complete these changes and may not be documented in MOC log.

Significant Changes — These changes can include; technical, design, physical, environmental, operational, procedural, maintenance, and organizational changes to the pipeline or processes, whether permanent or temporary. These requests must be documented and followed as defined in the responsibility section above.

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Gas Operations and Maintenance Manual

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In the event a significant change is required to a transmission pipeline, WTG will evaluate and mitigate, as necessary, any potential risk to safety or the environment through the MOC process. Request must be made on WTG PO-MOC Request Form. Documentation required for this change will include the following.

- Reason for change
- Authority for approving changes
- Analysis of implications
- Acquisition of required work permits (if applicable)
- Documentation
- Communication of change to affected parties
- Time limitations (if applicable)
- Qualification of staff

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