

Gas Operations and Maintenance Manual

Purpose

The purpose of this Management of Change (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 them to their immediate supervisor for review and approval.

Immediate Supervisor: 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. This notification will be documented on WTG-Attendance form or equivalent and stored at the local field office.

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

VP of Operations, Associate VP of Operations, North Director, South Director, Technical Field Operations Director, Compliance Director: During the Senior Management monthly staff meeting All requests will be reviewed 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 the MOC log.

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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.

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 will be made on WTG PO-MOC Request Form or equivalent. The 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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