



VALLEY ENERGY

523 S. Keystone Avenue, P.O. Box 340, Sayre, PA 18840
800/998-4427 • 570/888-9664 • FAX 570/888-6199

December 1, 2011

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2ND Floor
P.O. Box 3265
Harrisburg, PA 17105-3265

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2011 DEC -5 AM 11:05
SECRETARY'S BUREAU

**RE: Natural Gas Pipeline Replacement and Performance Plans
Order of November 10, 2011
M-2011-2271982
Subsequent correspondence and order dated November 21, 2011 regarding
Frost Patrols**

Dear Secretary Rosemary Chiavetta:

This is in response to the above referenced order and correspondence regarding frost patrols.

Valley Energy currently has 2.1 miles of bare steel main of which .9 miles has cathodic protection applied. There are 50 bare steel services in the distribution system of which 25 have cathodic protection applied. There are no cast iron mains or services in the distribution system.

The company's Frost Patrol Program has not changed in many years. A mobile leak survey of all bare steel mains commences when it is determined through excavation activities that frost exists. The survey is conducted monthly until it is determined that frost no longer exists.

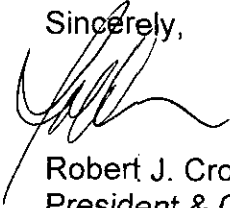
The company proposes that the current frost survey should continue to be implemented as outlined above; however, a monthly walking leak survey of bare steel services up to the building wall would be added to the program.

Rosemary Chiavetta, Secretary
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The company also believes that the frost patrol standards should be based on a utility-by-utility basis.

If you have any questions regarding this response, please contact Mr. Edward Rogers, Vice President of Operations at 570-888-9664 or erogers@ctenterprises.org. Thank you.

Sincerely,



Robert J. Crocker
President & CEO

RJC/ss

cc: E. Rogers, Valley Energy
P. Metro, Chief, Gas Safety Division (pmetro@pa.gov) (via Email)
Deputy Chief Counsel – Energy (rfyoung@pa.gov) (via Email)



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523 S. Keystone Avenue, P.O. Box 340
Sayre, Pennsylvania 18840-0340

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