



Park Place Corporate Center 2
2000 Commerce Drive
Pittsburgh, PA, PA 15275

5/5/2020


Pennsylvania Public Utility Commission
Gas Pipeline Safety Division
PO Box 3265
Harrisburg, PA 17105-3265

**Re: Act 127 Pennsylvania Pipeline Operator Annual Registration Form
Docket A-2012-2292302**

Pennsylvania Public Utility Commission,

On April 27, 2020 we received a data request (The Notice) regarding our Act 127 Report Operator Annual Report Form. The Notice requested explanations of differences of class 1 and 2 between 2018 and 2019 calendar years in Beaver County.

For the 2019 Act 127 report, 17 pipelines were identified as production lines (flow lines) that were reported as gathering lines on the 2018 report. These pipelines were reclassified from gathering to production. The total length of class 1 and 2 on these production lines amounted to approximately 10.6 miles which matches the mileages in the Notice. This this reclassification resulted in the reduced mileage on the report.

I, , hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

If you have any additional requests regarding this notice, please do not hesitate to contact me by phone, mail, or email.

Troy Stahle
Pipeline Safety Engineer
2000 Commerce Drive
Pittsburgh, PA 15275
(412) 787-5290



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
400 NORTH STREET, HARRISBURG, PA 17120

IN REPLY PLEASE
REFER TO OUR FILE

April 27, 2020

Docket No. A-2012-2292302
Utility Code: 1714340

TROY STAHL
WILLIAMS MLP OPERATING LLC
200 COMMERCE DRIVE PARK PLACE #2
PITTSBURGH PA 15275

RE: Act 127 Pennsylvania Pipeline Operator Annual Registration Form

Dear Mr. Stahl:

On March 30, 2020, Williams MLP Operating, LLC's registration for renewal of the Act 127 Pennsylvania Pipeline Operator Annual Registration in the Commonwealth of Pennsylvania was accepted for filing with the Public Utility Commission. The registration form was incomplete. In order for us to complete our analysis of your registration renewal, the Energy Industry Group requires answers to the attached question.

Please be advised that you are directed to forward the requested information to the Commission within **10** days of receipt of this letter. Pipeline operators who fail to respond may be referred to the Commission's Bureau of Investigation and Enforcement and may be subject to civil penalties of up to \$10,000 a day that the violation persists. If Williams MLP Operating, LLC no longer owns or operates equipment or facilities within the Commonwealth for the transportation of gas or hazardous liquids by pipeline or pipeline facility regulated under federal pipeline safety laws, it should notify the Commission along with necessary proof. For guidance with Act 127 compliance, please refer to the Commission's website link at: http://www.puc.pa.gov/utility_industry/natural_gas/pipeline_safety.aspx.

Please forward the information to the Secretary of the Commission at the address listed below. When submitting documents, all documents requiring notary stamps must have original signatures. Please note that some responses may be e-filed to your case, <http://www.puc.pa.gov/efiling/default.aspx>. A list of document types allowed to be e-filed can be found at <http://www.puc.pa.gov/efiling/DocTypes.aspx>.

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120

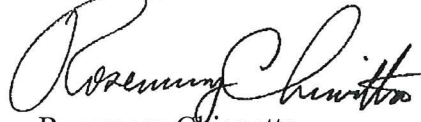
Your answers should be verified per 52 Pa Code § 1.36. Accordingly, you must provide the following statement with your responses:

I, _____, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

The blank should be filled in with the name of the appropriate company representative, and the signature of that representative should follow the statement.

In addition, to expedite completion of the registration renewal, please also e-mail the information to Lee Yalcin at lyalcin@pa.gov. Please direct any questions to Lee Yalcin, Bureau of Technical Utility Services, at lyalcin@pa.gov (preferred) or (717) 787-6723.

Sincerely,

A handwritten signature in cursive script that reads "Rosemary Chiavetta". The signature is written in black ink and is positioned above the printed name and title.

Rosemary Chiavetta
Secretary

Enclosure

Williams MLP Operating, LLC
Docket No. A-2012-2292302
Data Request

1. Reference attachment B, Beaver County- the reported mileages for class 1 unconventional and class 2 transmission and distribution facilities for the reporting year 2018 were 29 and 9 miles respectively, in contrast, the reported mileages for the reporting year which was due March 2020, indicated a reduction in mileages for the same 2 pipeline classifications to 23.4 and 4 miles respectively. Please explain the reduction in reported mileages. If the pipeline facilities were sold, the pipeline facilities should be accounted for in section 12 of the Act 127 registration form and the operator buying the pipeline facilities is expected to report them. If the pipeline facilities were decommissioned Williams MLP Operating, LLC is expected to indicate this change under section 12 of the Act 127 registration form.