UNITED STATES OF AMERICA

NATIONAL TRANSPORTATION SAFETY BOARD

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Investigation of: *
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MERRIMACK VALLEY RESIDENTIAL GAS *
FIRES AND EXPLOSIONS * Accident No.: PLD18MR003
SEPTEMBER 13, 2018 *
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Interview of: DAVID MUELLER

Courtyard Marriott
Andover, Massachusetts

Friday,
March 1, 2019

APPEARANCES:

ANNE GARCIA, Human Performance Investigator
National Transportation Safety Board

RACHAEL GUNARATNAM, Hazmat Investigator
National Transportation Safety Board

ROGER EVANS, Investigator in Charge
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I N T E R V I E W

(2:24 p.m.)

MS. GARCIA: Good afternoon. Today is March 1, 2019. It is now 2:24 p.m. My name is Anne Garcia, and I'm a human performance investigator with the National Transportation Safety Board in Washington, D.C. We are at the Courtyard Marriott in Andover, Massachusetts, and this interview is being conducted as part of the investigation into the Merrimack Valley incident that occurred on September 13, 2018.

This is NTSB case number DCA -- PLD18MR003. This interview is being recorded and will be transcribed at a later date. A copy of the transcript will be provided to the interviewee for review prior to being entered into the public docket.

Mr. Mueller, you are permitted to have one other person present during the interview. And this is a person of your choice. Please state for the record who you have selected to be present.

MR. MUELLER: I have Joe Savage, my attorney, representing me here as well.

MS. GARCIA: Thank you. Okay. Now we will go around the room, and each person will state their name, their title, their agency that they're representing, and spell their last name for the transcriptionist. I will start.

I am Anne Garcia, G-a-r-c-i-a. And I am one of the human performance investigators for this investigation for the National

Transportation Safety Board.

MS. GUNARATNAM: I'm Rachael Gunaratnam, hazmat investigator. R-a-c-h-a-e-l, G-u-n-a-r-a-t-n-a-m.

MR. MUELLER: I'm Dave Mueller, M-u-e-l-l-e-r. I'm the field engineering manager for Columbia Gas of Massachusetts.

MR. SAVAGE: Joseph Savage, S-a-v-a-g-e. Work at Goodwin Procter, and I'm here representing Mr. Mueller today.

MS. GARCIA: Okay, and on the phone?

MR. EVANS: This is Roger Evans with the NTSB. I'm the investigator in charge of this accident with the National Transportation Safety Board.

DR. JENNER: This is Stephen Jenner, S-t-e-p-h-e-n, J-e-n-n-e-r. I'm an investigator with the NTSB.

MS. GARCIA: Okay, thank you. And I understand, Mr. Mueller, that your attorney is also making a recording of this interview?

MR. MUELLER: That is correct.

MS. GARCIA: Okay. And we ask you if you would please not release your recording or any transcription from it to the public.

MR. MUELLER: I agree.

MR. SAVAGE: I agree.

MS. GARCIA: Okay. Thank you.

INTERVIEW OF DAVE MUELLER

BY MS. GARCIA:

Q. Okay. To get started, Mr. Mueller, can we call you by your first name?

A. Oh, absolutely. That's fine.
Q. Okay, is it Dave or --
A. Dave. Dave is fine.
Q. Okay, thank you, Dave. If you could first start out with your professional experience with this company?
A. So I have -- I started my career with NiSource, the parent company as an engineer. And I worked in various capacities throughout the course of my career, including some industrial -- I worked on the industrial commercial engineering group for a while. And then basically moved up into engineering leadership, and then eventually became operations leadership in -- both in Indiana and then also in Kentucky before I came here to Columbia Gas in Massachusetts as the engineering manager.
Q. Okay. And so what is your formal title?
A. Manager of field engineering.
Q. Okay. And the geographic area?
A. We cover three distinct areas within Massachusetts: in and around the Lawrence area; down in the southeastern part of the state around Brockton; and then over in Springfield.
Q. Okay, thank you. And what was the date that you first came to work for the company?
A. It was April 2012.
Q. Okay. And what work experience did you have prior to that?
A. Oh, I just -- yeah, so basically I have been an engineer, worked in engineering leadership in Indiana. And then I was in

operations leadership in Indiana and Kentucky.
Q. This was for NiSource?
A. For NiSource. Correct.
Q. So what year did you start with NiSource?
A. 1978.
Q. Thank you.
A. A while.
Q. Okay. And what is your education?
A. So I have a Bachelor's of Science in Engineering and a Master's in Business Administration from -- as well.
Q. And where'd you go to school?
A. Got my bachelor's degree from Purdue, and my graduate degree, my MBA, from Indiana University.
Q. Thank you. And your position as manager of field engineering for NiSource, what are your roles and responsibilities?
A. So essentially I oversee the operations of engineering. A big part of what I get involved in is the capital budgeting, planning and execution for the state of Massachusetts. And so with that comes, you know, our infrastructure replacement program, of which I'm also the principal witness for the Department of Public Utilities and rate proceedings. So I do a fair amount of that type of work as well. And then on top of that, you know, I also assist in, you know, compliance investigations and things of that nature, along with really just, you know, managing stakeholder relationships within our company. Not just

Massachusetts, but within NiSource. You know, provide whatever technical resources I -- we have, along with overseeing day-to-day operations of the engineering.

Q. Okay. Thank you. Let's go now to the day of the incident.

A. Okay.

Q. If you could walk us through with just some general things on what you did the start of your workday, and then be more specific as it came to how you were notified of the incident and what happened afterwards.

A. I don't, I don't remember too much about what was -- how I started the day on the 13th. I do know that I was in our Brockton operating center when I got the call later in the afternoon.

Q. About what time?

A. Probably be -- speculating, probably roughly between 4:30, 5 o'clock. Probably somewhere in there. And that's when I got, you know, the initial notification that there was some type of an event going on. And really did not have any detail at that point. And so I basically drove to -- up to Lawrence, you know, to basically be a part of -- just really try to start helping the operations group through the assistance with my team. You know, provide whatever emergency response support was necessary.

Q. Okay. Thank you. Who did you receive the call from?

A. Actually I received the initial call from Mike Kane, who was our director of governmental affairs. And shortly thereafter, I got a call from Dana Argo, who is -- at the time was the

operations center manager in Lawrence.
Q. Thank you. And it sounded like you referred to both of those people as those -- their former positions. Are they still in those positions?
A. Mike Kane is. Dana Argo is in a different position.
Q. What's his current position?
A. He's the manager of system operations.
Q. And why that change?
A. I don't know the answer to that question.
Q. Okay. Is he in your supervisory chain?
A. No.
Q. Okay. Thank you. Okay. So when you drove up to Lawrence, who did you talk to there? Or first, did you notify anybody after you got the call before you drove up to Lawrence?
A. I don't know who I, who I had spoken to initially. I do know that I had talked with -- I do know for a fact that I had talked with Mike Finissi, who was a senior vice president, and Danny Cote, who was the -- I don't know if he was still the vice president of compliance at that time or not. But those are the only two people that I remember talking with, you know, initially about that.
Q. Okay. Thank you.
MS. GARCIA: At this time, I'm going to turn the questioning over to my colleagues, and then we'll be doing a second round.
MR. MUELLER: Okay. All right.

MS. GARCIA: Rachael?

MS. GUNARATNAM: Thanks.

BY MS. GUNARATNAM:

Q. I just wanted to go back to your role that -- you spoke of the capital -- what you oversee in the engineering department is the capital budgeting and execution.

A. Right.

Q. So could you -- just because I'm not as familiar with what NiSource does specifically on how they do that, can you explain what that entails? Capital budgeting projects?

A. So the capital budgeting basically is based on input from the -- you know, from various stakeholders within the organization, you know, who have specific capital needs. And also is there to determine the funding for, you know, large projects like new construction, new business, I think we call it. Our tracker or infrastructure replacement programs. And so essentially I help to coordinate the development of that capital structure for recommendation to our, you know, corporate organization. And you know, which basically -- they'll go through and present that to senior management and the board for approval and such.

You know, along with that, I also get involved with, you know, developing the projects and deploying the engineering resources necessary to develop projects associated with executing on that capital plan for, you know, the various categories, whether it be new business, infrastructure replacement or

maintenance-type capital. And then I basically work within the organization, you know, to -- through my team, you know, to essentially, you know, plan and strategize on essentially how that work's going to get done.

Q. Okay. So when you -- for new construction -- and that can involve all kinds of things, like replacing pipe?

A. So new construction would be new business. So that would be new customers who --

Q. Oh, customers.

A. -- basically come to us and say, hey, you know, we want to buy your product.

Q. Okay. What about -- okay. So what if your -- what are maintenance projects?

A. So maintenance projects would be anything that's not new business or, you know, what we call tracker projects.

Q. Okay. Tracker projects?

A. Um-hum.

Q. And do you deal -- oversee those too?

A. Yes.

Q. Okay. So in the Lawrence area, do you -- you develop the maintenance tracker projects? Or the -- yeah.

MR. SAVAGE: It's maintenance projects and tracker projects.

BY MS. GUNARATNAM:

Q. Are they two different things or --

A. Yeah. Yeah, so maintenance is anything that's not associated

with a tracker project. So a tracker would be our infrastructure replacement, you know.

Q. And a -- what's a maintenance project?

A. Maintenance is really -- it's just a designation. I mean, it's -- it may be a bit of a misnomer. It's just -- you know, it's anything that would not fall into those other two categories.

Q. Okay. So if there was a leak, would that full under --

A. No, leaks are -- no, leak repairs are going to be an operations maintenance expense. And so that's really outside of my purview. I'm just dealing with capital replacement, which would be any type of investment, either in new assets or replacement of assets.

Q. Okay. Yeah. So do you work with the leaks operations group to help identify new infrastructure that needs to be replaced?

A. The leakage data that's collected is used for, you know, input into helping to determine, you know, project selection and those kinds of things. And so now in that sense, you know, there -- you know, we do have access to that information, yes.

Q. Because I'm just trying to see how you develop your infrastructure-type projects, how you determine -- so would you collect that data to help you make a decision on priorities?

A. Okay, so with -- all right, are we talking about replacement now?

Q. Yeah. Yeah.

A. Okay. So yeah, I try to make sure that I'm, you know, that

I'm speaking -- that we're speaking in common terms.

So we have -- there's multiple considerations that go into making a project selection for infrastructure replacement. Leakage information is collected and input into our -- we use a commercial software package called Optimain, which is a relative risk ranking model. And it utilizes leakage information along with other types of infrastructure considerations like, you know, the geography; you know, is our facilities in high-population density areas, as an example; is it under pavement, things of that nature. So really what you're -- what it does is it looks at the infrastructure that we have and says, all right, you know, what's the leakage history? What's the probability of future leakage? And then consequently, you know, if you do have another leak, what are -- what would be the consequences? And it just, you know, comes up with a scoring schema. So that becomes an input and consideration.

The other pieces that go into that are reliability types of decisions. So in other words, you know, do we have parts of our system that is, you know, within that target area? You know, that targeted material type for replacement that -- where we have some service issues, such as low pressure or things of that nature that would result in service outages to customers? You know, we use input from operations. So you know, we're going to basically take a look at, you know, findings that our operations folks find in the field such as, you know, water in the main. You know, because

we do have a lot of low-pressure facilities, so that's not uncommon. Dirt. You know, things like that that would impact, you know, serviceability. And anything else, you know, that they discover. You know, there's some soil subsidence or something to that nature that they discover that could create a risk to the, to the integrity of the pipe.

And then the last piece, you know, we kind of roll up into what I call regulatory compliance. So that's going to be anything that would be, you know, where we could consider replacement, you know, to comply with state and federal pipeline safety regulations. But it can also involve things like paving and infrastructure projects relative to what the municipality happens to be doing. And that's important. Because, you know, with cast iron and that kind of thing, we want to make sure that, you know, there's not been any excavation in and around the area that would affect the overall integrity.

Q. All right. So this is all that you just described, all the different inputs that goes into the (indiscernible) --

A. Right. And so those are all the considerations that are used to develop projects.

Q. Got it. Okay, great. So who does those inputs? Is that you, or is that --

A. No, that's -- that information is accumulated from multiple sources. You know, like the Optimain data that is accumulated through a corporate group that supports, you know, our engineering

staff. And then, you know, basically my engineering team would, you know, gather some of those other, you know, pieces of information through stakeholder interactions, things of that nature.

Q. Right. Okay. So then who puts together the -- is it corporate that puts together the risk model?

A. Yeah, they maintain it.

Q. They maintain it. Okay. All right. And then, so they -- do they do it for each, like, whatever state they're overseeing or -- like, for Massachusetts, they would do it for Massachusetts?

A. Yeah, there's a group that maintains the model for all states.

Q. Oh, okay. All right. And they work with all the local group, the local, like --

A. Yes.

Q. They would work with CMA engineering staff --

A. Yes.

Q. -- to get those inputs. Okay, yeah. Okay. So how often do these models get run? Is this, is this in the form of a risk assessment? Like, is this --

A. I'm not really certain how often the models are run. I truly don't know that.

Q. Oh, okay. All right. Do you perform risk assessments for --

A. No, I don't. No.

Q. Okay. All right. And I'm just curious if that's the same

thing as doing your risk model, but --
A. No, that's --
Q. That's different?
A. No, the risk assessments are -- no, they're not really.
Q. Okay. Who would do the risk assessment?
A. So that would be really -- you know, that's information -- that's all delegated to my engineering team.
Q. Okay. All right. And do you review those?
A. I generally do not. You know, we basically delegate the project development to my engineering team. And basically the, you know, the risk assessment is, you know, based on the protocol that we've developed, and it's part of our DIMP plan.
Q. Okay. Yeah. All right. Okay. So I just had a couple questions about the day of the incident. So you -- when you drove to Lawrence and you went to go help the operation, was that, was that at the 55 Marston building?
A. Yes.
Q. Okay. And that was where the central emergency response operations were being communicated from?
A. I don't know where they -- that was, as far as the incident command and all that. Honestly I was not part of that, you know, discussion. Or I -- I don't know. Yeah, I don't know where that was.
Q. So can you just detail what your responsibilities were that day when you -- you said you went to go help.

A. Yeah, so essentially I had met with the, with -- I'm trying to think here. Let me -- give me a minute. It's been too long since that's happened.
Q. Sure.
A. So I met with -- when I first got there, I met with Erich Schlitt, who is, who is the construction services leader for the area. And Seth Krueger, who is also a construction leader. And some of my engineering team.
So basically what we were really doing is looking at really what happened and starting to really gather information about -- you know, that would be helpful for us to determine what happened. That was really the first things that I did, and then basically just working with, you know, my engineering team and resources to make sure that they had what they needed to support the operations. You know, folks, for whatever technical support that they might need. And communicated with our corporate offices, and I already told you who those folks were. Yeah.
Q. Okay. And so who was your incident commander? If you, if you remember.
A. I don't know at that -- at the time, I honestly -- I just don't know. I really don't.
Q. So were these guys, your construction services leaders and your engineering teams that were planning to go out and do stuff, were they reporting to you?
A. The construction leaders were not. The engineers are. Yeah.

Q. So were the construction engineers the ones deciding what to do?
A. Construction leaders?
Q. Yeah, construction leaders. Sorry. Were they deciding what to do in response? And then --
A. No, the -- no, the construction leaders were there just to -- because they were doing work in the area. And so basically they were essentially helping us go through records and try to understand, you know -- start to put together a timeline and piece together what happened. The engineers work for me directly, and so we were just collaborating as a, as a team to share information and try to gather what information would be helpful in trying to understand what happened.
Q. Right. And then so at that point, what did -- how did -- after you spoke to them and said, okay, what happened, what was your understanding of what happened on that day?
A. So we had understood, and we had at that time, and I want to emphasize, a working theory. There was -- and we certainly did not conclude anything. That there was a possibility that when the cast iron main on South Union Street was abandoned and the pressure relieved that there -- the control lines reacted to a loss of -- at the Winthrop and South Union Street station had lost their control gas, at which point the regulator, you know, started to open and feed gas into the low-pressure system.
Q. And so after you understood that's what essentially -- that

was your working theory at the time, what were your actions then? What were you wanting to -- what was to be done after you guys were working off of that info?

A. So at that point, that's when I, that's when I contacted our senior management and -- to let them know what we thought, you know, this could have been. And at that point, they took the information and started, you know, developing action plans and that kind of thing. And actually -- and I'm not even sure that I -- just strike that. I'm not -- I can't even say for certain that that's what they were -- you know, that that's --

Q. Doing, yeah.

A. -- what they were doing. But basically, you know, there was so much going on at one time that, you know, I communicated that to them, and essentially that's -- they took it from there.

Q. Right, okay. And sorry, you told us the names of those senior managers?

A. Yeah, Mike Finissi was one of them, and Dan Cote. Dan Cote.

Q. Okay. Right, okay.

A. And I believe in addition to that Dave Monte and possibly -- I know for a fact Tim Dehring. Yeah.

Q. At any point were you in -- were you working with the fire department to relay any of that information?

A. I was not direct -- I was not working with any public officials in that capacity.

Q. Were you expected to?

A. No.
Q. Okay. Who is -- who at NiSource was -- in that kind of situation would be expected to be the liaison reporting information? Would it be local CMA or NiSource?
A. Under our emergency policies and procedures, the operating center manager fills that role.
Q. The operations center --
A. Manager. Right.
Q. -- manager. And who was that at the time?
A. Dana Argo.
Q. Dana Argo. Okay. Okay. Had you spoken to Dana Argo when you arrived at 55 Marston?
A. No, I didn't.
Q. Was he there?
A. I didn't -- I don't remember seeing him.
Q. Okay. All right. Okay. And so then after you contacted senior management on what happened, you know, and -- you know, what did you do after that?
A. Jeez.
Q. Yeah, I know. It's a while back, so you can take a minute to --
A. Oh my gosh.
Q. If you could just explain it because -- I guess from the point to when you left, when the -- when you felt you could leave the incident.

A. So I do recall that, through the conversations with senior management and whatnot, they were, you know, asking for additional information about the state -- you know, about the composition of the system and, you know, records relating to that, to the system. So part of what we had to establish was how big of an area did this impact. You know, what type of, you know, piping material was there, was impacted. And really just trying to get enough data together so that, so that an assessment could be made as to how to respond. By that -- by the time I got there, the gas was already off to the system. You know, so the immediate issue had been dealt with, but there was still the whole issue of -- associated with restoration.

Q. So had you ever in your time working at NiSource dealt -- seen something like this before?

A. Like what?

Q. This overpressure event? Prior to this September 13?

A. This event is certainly the most widespread that we had ever seen of -- I'd never seen anything like that.

Q. And have you seen -- so have you seen it on a smaller scale?

A. As far as overpressurizations?

Q. Yeah.

A. We've had encounters with some overpressurization, but nothing that created any type of damage to the system or anything like that.

Q. Sure. And so what kind of events were those like? Were they

single houses or were they businesses or smaller neighborhoods or --

A. Usually small neighborhoods. Yeah.

Q. And did those involve fires, explosions or -- as far --

A. None that I recall.

Q. Okay. So what usually was an indicator in those situations that an overpressure event happened in those smaller-scale --

A. Essentially the -- an indication on a chart or some operation of an overpressure protection device. And case where, you know, customers would call in and their -- with their equipment not operating correctly.

Q. Sorry, you said a safety valve? Is that what you said would not operate?

MR. SAVAGE: The equipment didn't operate.

MS. GUNARATNAM: Equipment.

MR. MUELLER: Equipment. Customer equipment. Yeah.

MR. SAVAGE: Customer equipment.

MS. GUNARATNAM: Customer equipment. Okay.

BY MS. GUNARATNAM:

Q. But you said right before that the operation something else?

A. Oh, overpressure protection equipment. Yeah.

Q. Overpressure protection. Protection. I got it. Okay. All right. And just lastly, when did you, like, leave 55 Marston? At what point did you, like, finish with emergency -- helping out?

A. I don't recall specifically the time, but I know that it was

more than 24 hours after I, after I had gotten there.
Q. So, like, Saturday sometime? Was that a Saturday? It was 13. Or a Friday? It was Thursday, I believe, afternoon. And then you must have gone Friday --
A. I don't, I don't --
MR. SAVAGE: You don't have to guess. This can be looked up.
MS. GUNARATNAM: Yeah.
MR. MUELLER: I have no idea.
MS. GUNARATNAM: Okay. All right.
MR. MUELLER: I really don't know.
MS. GUNARATNAM: Okay. All right. All right. Roger?
MR. EVANS: Yeah, this is Roger Evans. That's R-o-g-e-r, E-v-a-n-s. I'm the IIC for this incident.
BY MR. EVANS:
Q. So it's great to talk to you again, Dave. I remember you from the, from the org meeting and all that.
A. Right.
Q. And so we spent a good bit of time together and all that. Just a few questions. But I would like to just kind of get back to -- I know that you have -- in your role that you deal with a lot of budgeting and all that project work and all that. Can you describe the role that you have with regard to organizational funding, such as how many full-time employees a group may have, or if they have -- you know, they want to have maybe staff augmentation, bring people across from other departments or

whatever that would impact their work? Can you cover that for us?
A. Could you repeat that again, Roger? I'm sorry, I didn't understand what you wanted.
Q. Yeah, I'm trying to find out what your role is with regard to budgeting for a department like M&R or the plants, you know, for like full-time employees. If you have any part of that decision-making process.
A. Oh, I don't have any, I don't have any input into that at all.
Q. Okay, so if they were looking for additional people for the M&R department, or they were -- that would not be anything that you would ever deal with; is that correct?
A. That's correct.
Q. Okay. What about the -- we understand that the M&R and the plants group at one time, I guess, they worked together and then they were separated? Would something like that be what you would have something to do with?
A. No, I wasn't involved with that.
Q. Oh, okay, okay. So one of the things I'm just curious about, you know, most accidents we have a massive -- hundreds of millions of dollars are being expended for the neighborhood, to take the neighborhood and completely reconfigure it with meters and regulators at each home. Was that in the works previous to the accident? Was that going to be done one day on -- you know, was that in your budget for certain sections of neighborhoods that

that, that that would actually be -- those homes would be converted from, you know, the 14 central regulators to regulator meter at each home type system?

MR. SAVAGE: He's asking if that's in your budget.

MR. MUELLER: So the, so the replacement of that infrastructure would be a part of the capital plan. So I would be involved with that, yes.

BY MR. EVANS:

Q. But was it on the books to go ahead at some time soon to -- or not sometime soon, but I mean, was it planned that through the next decade or so that that neighborhood was going to go from the old-style gas distribution to the modern-style gas distribution?

A. So yes, it would have.

Q. And can you describe that whole process, how that project planning was going on and exactly how that was going to be implemented and how many years and all that?

A. So that infrastructure, which includes cast iron and bare steel, is that -- is the targeted pipe material that's included in our tracker program, as I described. And that is a part of a regulatory construct called the gas system enhancement plan. And the program under the current regulation is that utilities will target the replacement of its priority pipe infrastructure, which is in the cast iron/bare steel, within 20 years, starting in 2015. So by 2034, it will all be gone. Or I should say it will be out of service and replaced with something else. The program for --

or the area impacted in South Lawrence, Andover, North Andover are a part of that program.

Q. Okay. Were they on the plan to be -- I mean, do you know where they were on the plan as far as getting the piping replaced?

A. I don't know where they were within the plan, no.

Q. Oh, okay. Okay, just one --

A. Let me back up for a minute. Hey, Roger, just one thing I do want to -- I did want to mention is that the associated project, you know, on -- that was ongoing on South Union Street was a part of that program. And so, you know, that -- we had actually started to enter into the area. As far as the -- what I don't know specifically is for the remainder of it that basically entailed the -- you know, total area impacted, I don't know what the project plan was for the rest of that.

Q. Okay, but --

A. Other than it would be done, you know, within the guidance of the GSEP program.

Q. Okay. So the plastic main that was being put in on that day was part of this 2034 deadline, is what you're saying?

A. Right.

Q. Okay. Okay. Great. A different part of the -- different area of questioning now. So we have a -- you know, this 14 regulatory system at that area. And we have sensing lines on each of those regulators that go to the headers and all that. Were you part of the approval process or, let's say, the work planning

process for whenever this work was scoped out and they were going to do work with mains where sensing, their control lines would be impacted? Were you part of that process at all?

A. I'm sorry. Would you repeat that again?

Q. Yes. When work scopes are in place to modify mains where sensing lines are the scope -- you know, sensing lines could be impacted. Were you part of that project planning and execution and detail design and all that? Were you part of that whole process?

A. No, that part of the process was the responsibility of my engineering team and leadership team.

Q. Okay. So the people that report, that report that -- that report to you are the people that would manage that work; is that correct?

A. Correct.

Q. Okay, so --

MR. SAVAGE: What does he mean by manage?

MR. MUELLER: What do, what do you --

MR. EVANS: -- have you --

MS. GARCIA: Go ahead.

MR. SAVAGE: Do you understand the question?

MS. GARCIA: Yeah, go ahead.

MR. MUELLER: Yeah, let me ask a clarifying question, Roger. So when you say manage the -- what were you talking about specifically?

BY MR. EVANS:

Q. Well, if you're going to prepare a package, do some work on a main, those people that do that planning and execution and that work on the planning part, getting the materials all together, where the line is going to be tied in and all that, those people work for you, correct?

A. So the engineering group that does the project development design work for me. The folks that basically do the execution of the physical work, they work for a different part of the organization under our construction services group.

Q. Right. So what you're saying is the engineering side works for you and the construction side works for someone else.

A. That's correct, yes.

Q. Okay, okay. I just wanted to establish that on record.

A. Okay, very good.

Q. Okay, and so through the years have you had -- have you personally had input into tasks that would be involved with those work scopes, like constructability review or how that project flows? You know, work process flow charting type thing, or any sort of an input into, you know, at the task level, how this work would get executed? Were you part of the -- an overseer on how this work was to be executed?

A. I was not, no.

Q. Okay. Okay. As far as the sensing lines and the mains themselves, were you aware of any type of review that anyone in

your organization would do to verify when a cut was going to be made at a main that may have impacted the sensing line? Do you know of any process like that that's been formalized? That's that -- when that activity occurs, that there's a checklist, there's a, you know, paint-by-numbers set or something that says, this is what we're going to do whenever we do this work? Are you aware of any document like that in your organization?

A. So there's a -- the only document that was in place at the time was relative to damage prevention numbered Operational Notice 15-05, that really was associated with work done within a specific proximity to a, to a regulator station.

Q. Okay, and if I were to request that document, I could say 15-05 Operational Notice for damage prevention and I would get the document I need?

A. Yes. You may already have it, Roger. In the --

Q. That one doesn't --

A. I'm sorry?

Q. I said that one doesn't ring a bell, but I mean, I -- there's a lot of documents I received that I, you know, haven't -- there's so many that I don't have visibility of every single one.

A. Okay, that's fine. Yeah, that --

Q. But I will, I will look for that.

A. Okay. Do you still want us to send it to you?

Q. No, I'll make a request out of -- outside this meeting.

A. Okay.

Q. I'll first check to see if we have it.
A. Okay, very good.
Q. Okay. So do you recall or were you there when this particular 15-05 document was created? Were you part of that process at all?
A. No, I was not.
Q. Okay. Had you ever witnessed this 15-05 Operational Notice in action, like perhaps on -- walking through a -- some of the fieldwork that was going on?
A. I had not, no.
Q. Okay. Can you -- this is, this is a different topic that I would like to go into just quickly, if we can. We understand the way that this is set up, that there's an M&R gas controls group. Pressure control, I guess it's called. And then there's a plants group that's kind of separate from one another. Is that correct?
A. So there is -- the M&R group is part of system operations. And I'm not sure I understand what you meant by the plants group.
Q. The plants group, they have -- I just heard this recently. They have propane, LNG and customers?
A. Propane, LNG -- I'm sorry. Propane, LNG and?
Q. And customer.
MR. SAVAGE: Did he say customer?
MR. MULLER: Customers?
MS. GUNARATNAM: Are you talking about the plants? You guys have plants, right?

MR. MUELLER: Yeah, so we have LNG and LPG facilities.

MS. GUNARATNAM: Yeah. Those facilities.

MR. MUELLER: And those facilities at the time in -- or at the time in September was -- they were separate. So the M&R group was separate from the plants. Right.

BY MR. EVANS:

Q. At the time of the accident; is that correct?

A. That's correct.

Q. Okay, and since the accident, they have been combined; is that correct?

A. Yes, that's correct.

Q. Okay. And then -- but you have no -- as far as the headcount on any group and all that, you have nothing at all to do with that.

A. No, I do not.

Q. Okay.

MR. EVANS: That's all I have for right now. Thank you very much, David.

MR. MUELLER: Okay, thanks, Roger.

MS. GARCIA: Steve?

DR. JENNER: Right. Great. Thank you. This is Steve Jenner.

BY DR. JENNER:

Q. I want to piggyback on some of Roger's questions. And just so I understand that, during when a job order or work package is

developed -- I understand that goes through different levels of review, starting with the engineer. And there's a peer review and a constructability review, and the engineer supervisor is also part of the review process. And do I understand that you are not part of that ultimate process?

A. I don't get involved in the design review. Basically the review that I would have for a project is going to be more, you know, related to looking at the project's scope, you know, and looking at the, at -- you know, how it fits into the -- into our -- into the capital plan.

Q. Okay. So this never shows up on your desk and you never have to sign off on anything at your level?

MR. SAVAGE: What's "this"? What's "this"?

MR. MUELLER: Yes.

BY DR. JENNER:

Q. I'm sorry. The work package being developed. You're saying -- when you say you're not --

A. So the work --

Q. -- the design, that means it doesn't come across your desk. You don't have to have any personal review or sign off on the work?

A. No, I don't sign off on the design. I sign off on the work scope and, you know, I take a look at what does the project entail, and that's really about it. Other than -- and I, you know, approve it with respect to the budget level that I'm

authorized to approve.

And incidentally, I don't look at every job either. So you know, the work that I would look at is going to be based on dollar value.

Q. Okay. I understand that most reviews do not involve the M&R review; is that, is that correct? Is that a correct statement?

A. I don't know that to be true.

Q. Okay. Well, okay. When you described your background, your work history, you started off as an engineer. Were you in a position at that time where you had to develop job orders, work packages?

A. I did. As an engineer?

Q. Yes.

A. Yes, I did.

Q. Okay. And that was with NiSource or a subsidiary of them?

A. Correct. I was with, I was with a subsidiary. Well, actually I was -- yeah. Yeah. Leave it at that.

Q. Okay. The reason I'm asking is so -- we had talked to the engineer, Mr. DeRoxas, on scene. And from what we learned there, that he had very little experience or times where he had to deal with sensing lines, with sensor lines. And if I can just ask you and during your time as an engineer, did you come across sensor lines? You know, with what level of frequency?

A. Excuse me. I don't recall coming across sensor lines as an engineer. I was -- keep in mind that that was 37 years ago.

Q. Okay.

MR. SAVAGE: And where was it?

MR. MUELLER: In Indiana.

DR. JENNER: Okay. Okay. What I'm getting at is, from what we understand, it's a pretty low frequency event where a, where an engineer has to develop a work package that involves sensing lines. Is that your understanding?

MR. MUELLER: Yeah. I mean, I think that -- you know, that that would be, you know, really something that would probably be best verified, you know, from one of my direct leaders. I don't have any insights into how often or how infrequent they would encounter that kind of stuff.

DR. JENNER: Okay. Then I'll stop asking specific questions about that, then. Let me see what else. How long were -- did you operate as an engineer?

MR. MUELLER: I was an engineer for 3½ years, I believe.

DR. JENNER: Okay. Okay, I think that's all the questions I have right now. Thank you.

MR. MUELLER: Okay.

MS. GARCIA: Thank you. This is Anne Garcia again. I have a few follow-up questions.

MR. MUELLER: Okay.

BY MS. GARCIA:

Q. To jump back, who are your direct reports?

A. My direct reports are Nick Saccone. And I'll spell that for

you. S-a-c-c-o-n-e. At the time in September was Marty Kulig, K-u-l-i-g. And then I have a principal engineer, who is Gerry -- that's spelled G-e-r-r-y -- Gillmeister, G-i-l-l-m-e-i-s-t-e-r.

Q. Okay. So Mr. Gillmeister -- that's mister?

A. Yes. Yeah, yeah. Yes.

Q. His title is principal engineer.

A. Right.

Q. What are the titles for Mr. Saccone and Mr. Kulig?

A. Field engineering leader.

Q. Both of them?

A. Yes.

Q. Okay. And those are your only direct reports?

A. That is correct.

Q. And who took Mr. Kulig's place?

A. Veena -- that's V-e-e-n-a -- Kothapalli, K-o-t-h-a-p-a-l-l-i.

Q. Okay. And so just looking at, kind of, an organizational chart, trying to envision that. There are engineers that work for each of your field engineers? Or who works for them? Who worked for Mr. Kulig?

A. So the field -- for Mr. Kulig, he had the field engineers for the Springfield operating center and for Lawrence operating center.

Q. And do you know who worked for Mr. Kulig? Who the people were at the time?

A. Yeah. So I would probably want to make this subject to check

so I don't forget anybody, but --
Q. Understood.
A. Brian MacArello (ph.). Gene Giuliano. Richard Salvarezza. Jocelyn Forcier, I think, is how she pronounces her last name. Kyle Benoit. Ryan Barnes. At the time that was -- Veena actually worked for Martin Kulig. Keith Murray. And then Louie DeRoxas. How many is that?
Q. 1,2,3,4,5,6,7,8 -- nine.
A. I believe that's it.
Q. Okay. And were these titles -- were they all engineers?
A. Yeah, they were -- they had -- I'm sorry?
MR. SAVAGE: No, no, I'm just looking around. Nothing.
MR. MUELLER: Oh, I thought you --
MR. SAVAGE: I thought you needed (indiscernible) --
MR. MUELLER: Jeez. Yeah, they're engineers.
MS. GARCIA: Okay. Thank you. So --
MR. MUELLER: Jeez.
MR. SAVAGE: You're in the moment. Startled me.
MR. MUELLER: Yeah, like what?
BY MS. GARCIA:
Q. So that's nine engineers that work for Martin Kulig. Approximately the same number worked for Nick Saccone?
A. Let's see.
Q. Was it --
A. Yes.

Q. -- a parallel group?
A. It's pretty -- very, very -- within one or two, yeah. Yeah, it's roughly the same span.
Q. And the difference between the groups was the geographic area they're responsible for?
A. Correct.
Q. Okay, and what about for the principal engineer, Mr. Gillmeister?
A. He does not have any direct reports.
Q. No direct reports. Okay.
A. No.
Q. Okay, thank you. And I understand that Mr. Kulig is no longer with your company. Why did he leave?
A. He retired.
Q. He retired from your company.
A. Correct.
Q. Okay. All right. And so the process -- taking just a look at the process, so your field engineer would develop the work packet. And it would go through an approval process, which would include Mr. Kulig's review?
A. Correct.
Q. And he would sign off. What would he be looking at in his review of the packets?
A. I don't -- my expectation is that he'd be looking at the general design, looking at it for, looking at it for compliance

with standards and those kinds of things. You know, what he -- you know, but I -- you know, I don't know what -- specifically what he would typically look at or how he, how he did that. That was really left up to him.

Q. Okay, but your expectation after his review was what? That the packet -- if he, if he approved a packet, what would your expectation be?

A. So he -- that he would, he would review the design for basically compliance with our designing and construction standards. And look at the, you know, look at the packet development to make sure that, you know, all the elements that were part of the engineering checklist, you know, were developed and completed. And then take a look at the overall cost. You know, so it's really just the whole span of the project. That's what he would be, would be responsibility to -- that's what I would expect him to look at.

Q. Okay. And who would, in your opinion, have the final approval of a work packet before it was passed over to construction?

A. So once the project is -- receives the final approval, you know, as it relates to our capital governance policy, then it would be up to the engineers and the engineering leadership to release that work. So they would, they would have the authority to go ahead and release that work.

Q. Who do you mean by "engineering leadership?"

A. My two -- one of my leaders. You know, the --
Q. Mr. Kulig?
A. Yeah.
Q. Okay, so --
A. Or maybe an engineer that was working -- so once the project is approved, the engineering leader would have the ultimate authority to go ahead and release the work in -- you know, through -- you know, really through the delegation of those responsibilities to his team. You know, so if it's a project that we're going to do, and once it's got a -- once it's, once it's, you know, through the review process, then it would be, then it would be -- the engineer would release it.
Q. Okay. Would you happen to know -- now is this called the South Union Street Project?
A. I don't know what the original title was, truth --
Q. What are you calling it?
A. You know, I think everybody's referring to it as such: the South Union Street Project. Yeah, I don't know what the -- you know, if I were to look at the -- without looking at the packet, I don't, I don't -- I'm not sure that that's the exact title, but that's -- yeah.
Q. Okay, but that's a good way to identify --
A. That's a good way to identify it, yeah.
Q. Okay. So have you taken a look at the work packets and when the work in the South Union Street Project was planned and when it

was executed? Have you done a review of all this following the incident?
A. Well, I've certainly been -- I've certainly looked through the work packet to the extent that we were developing a response to various data requests and such. So yes, I've looked at it and familiarized myself with it to that, to that extent.
Q. Okay. So when were the sensing lines planned to be moved from the cast iron pipe to the plastic pipe?
A. I don't know.
Q. Okay. And you have -- have you asked anybody in -- who works for you when they were planned and scheduled to be moved?
A. I don't have any specific recall of asking that specific question, since this is all really, you know, part of a larger investigation being led through our organization. So I haven't had that direction discussion about when, you know, those sensing lines would be moved or anything like that.
Q. So following the incident, have you made any inquiries of any type to anyone working under you at any level about the sensing lines?
A. I don't recall any specific -- I'm sorry. Would you repeat that question again?
Q. Since the incident, have you had any conversation of any type with anyone who works under you at any level about the sensing lines?
A. I don't know of any specific discussions that I have had.

We've had conversations, you know, amongst the investigation team, you know, that basically I've been a part of, you know, with regard to the sensing lines. I've had conversations with -- well you know, the PHMSA folks, you know, as part of the investigation we had. You know, we had some conversations about that. You know, we've certainly had discussions about -- well really, the whole, the whole discussion, you know, around the sensing lines and what they may have -- how they may have, you know, contributed to the, to the accident. And then basically I was involved with investigations associated with establishing the connectivity of the sensing lines from the cast iron main back to the regulator station, as well as -- we did some integrity testing and those kinds of things. So that's the, you know, nature of the conversations and discussions that I recall relative to these, to these sensing lines.

Q. And were any of those conversations with people who worked for you at any level?

A. Yes.

Q. With who?

A. So with -- let's see. So basically with Louie. Because he was helping me develop the -- some of the testing protocol that we, that we went through. And so we had some conversations about that. You know, and those are -- that's the only, that's the only thing that really comes to my mind, truthfully, as far as, you know, people that I would have talked to about the sensing lines

out there on South Union Street.
Q. And that's the area of the incident.
A. Yeah, exactly.
Q. Okay, so what I'm hearing you say is that the only conversation you had with anyone working with you -- working for you was with Louie, who was the engineer who put together the work packet for this piece of work that the incident occurred at.
A. So yeah. I mean, we basically had -- yeah, that's -- I mean, I can only -- you know, as far as the -- you know, the only specific, you know, discussion that I had with regards to the sensing line was, you know, with Louie on -- as a part of that project was, you know, to kind of help understand the development of the -- some of the testing, that kind of thing. But I don't recall having any specific -- I don't recall having any, you know, specific discussions with regards to the sensing lines relative to the project leading up to that.
Q. And now we're talking about the period following the incident.
A. Following the -- oh, I'm sorry.
Q. So that's my question. Following the incident, did you have any conversations --
A. Oh, I'm sorry.
Q. -- with anyone working for you that involved the sensing lines?
A. I don't recall anything. I don't -- yeah, I just can't think

of any discussions that I had.
Q. Okay. So you didn't ask anybody, either Mr. Kulig or Mr. Kulig's replacement or Mr. DeRoxas, Louie --
A. So when you -- let me ask, let me ask a clarifying question. When you say "conversations" or "discussions," I guess I don't fully understand, you know, the scope of what you're asking me. I mean, any discussions is -- you know, I mean, that's, you know, extremely broad.
Q. Yes.
A. Yeah. And you know, so any discussions that I've had with regards to anything, I don't recall any specific discussions that I've had, you know, post the incident other than, you know, what I've already, what I've already told you.
Q. Okay. So I don't want to belabor this anymore. I want to move on. So my question was a very broad one. Following the incident, did you have questions with anyone who is -- works for you at any level, whether it be Mr. DeRoxas or his supervisor Marty Kulig or the replacement for Mr. Kulig? Did you at any point after the accident, after the incident, have any conversations with them or anyone else who reports to you that was about or mentioned the sensing lines?
A. I'd be guessing.
MR. SAVAGE: You don't recall.
MR. MUELLER: I don't know. I really don't. I'd be guessing.

MS. GARCIA: Okay. That's all for right now. Rachael?

MS. GUNARATNAM: Okay, thanks. Just a few follow-ups.

BY MS. GUNARATNAM:

Q. So just to kind of -- so when they're -- when your principal engineers were -- well not principal. Sorry. Your field engineers, Kulig and Saccone. So Kulig was in charge of the Lawrence one, and so his engineers would then develop the work packet that you approved for the budget. And so Louie -- like, someone like Louie would have been the one to develop the design and everything, and then he put it forward to Kulig, right, for approval.

A. Right.

Q. Okay. So you mentioned, you know, the expectation that, when Kulig is reviewing this, he's looking at the design, the compliance with construction and engineering standards. And you said there's an engineering checklist?

A. Yes, there is.

Q. Okay. So what does that -- what's the checklist?

A. The checklist is basically just all of the various components that essentially are included or -- if they're applicable, included within the development of a job packet.

Q. Okay. And those components, could you describe them briefly?

A. They're going to basically be, you know, the construction drawings, tie-in plans, material -- you know, building material, cost estimate, permits if they're required. Things of that

nature.
Q. Okay. And do they include historical records of that site? Of that specific --
A. Historical records of the site.
Q. When you say -- sorry, let me clarify.
A. Yeah, would you please? Yeah, I'm not really sure I understand.
Q. When you -- so when you're talking about construction drawings, are you -- what are those? Are those, like, the actual layout of the, of the system that they're going to --
A. So those would -- the construction drawings are the, are the plans that the, that the crews or the contractors would use to build the project.
Q. Right, okay. And so they would have to -- to be able to develop those construction drawings, they're looking at the pipe system.
A. Right.
Q. Yeah. So those records, that pipe system records, where are those?
A. So the record of the -- or the existing infrastructure is contained within our GIS system.
Q. Okay. And so they would work off of that for the up-to-date --
A. Correct.
Q. Okay. And now those updated -- how often are those updated?

A. I don't know. You know, I really don't know.
Q. Okay. Okay. And so when there is a delay in a project -- have you ever dealt with any delays with the Lawrence area with their construction projects? Delays that have occurred?
A. When you say "dealt with," can you be more specific?
Q. So like, when the city or -- there's a delay in a, in a construction project, does that affect you in any way? Like, when you've approved something and then they go ahead and start to execute it, but then there's a delay. Say the city does something to --
A. Right.
Q. Yeah. Does that -- how does that come back to you, factor into your plans, your capital budget plans?
A. So essentially the budgeting is -- you know, the -- you know, through our, through our monthly budgeting reviews, we would -- you know, if there's any projects that get delayed for any reason, you know, I may or may not know about it. And so I really leave that up to the engineering leadership, you know, through working with our planning and scheduling group and that kind of thing to essentially make sure that, for the purposes of our capital replacement program, that essentially we're going to be executing against the, you know -- executing to -- against the capital budget and also the -- you know, our targeted pipe replacement. So you know, I may, I may know about it, and I may not know about it.

Q. Okay. So did you know of any delays with the South Union Street Project? For the capital --
A. Yeah, that was, that was communicated to me. Correct.
Q. When was it communicated to you?
A. I think that might -- that was probably back in 2016. Towards the latter part of the year.
Q. Okay. And did you do anything? Like, did it affect your budgeting project plans, or how did -- what did you do with that information once it was communicated to you?
A. So essentially what we would do if --
MR. SAVAGE: She's asking what you did.
MR. MUELLER: Oh, what I did? I'm sorry. What I did. Basically just instructed the, you know, engineering group to, you know, essentially look at other projects that could fill the gap, and so that we would meet our capital plan and our pipe replacement targets.
MS. GUNARATNAM: Great. Okay.
BY MS. GUNARATNAM:
Q. So it just got rescheduled. The South Union project got rescheduled.
A. Yeah, the -- yeah, it did get rescheduled. Correct.
Q. Yeah. Okay. Okay. So just going back, when you were talking about the existing infrastructure of the pipe system is on a GIS system, would that infrastructure include -- that GIS information include, like, sensing lines in there?

A. No.
Q. No? Where would sensing lines appear in a development of a work packet?
A. The only place that I know that they appear is -- was in a -- I'm trying to think what it's called. There was the critical valve book, showed some of the, some of the stations. And they had sensing line information recorded on them.
MS. GARCIA: What was that called? A critical --
MR. MUELLER: Valve book.
MS. GARCIA: Thank you.
BY MS. GUNARATNAM:
Q. Who would -- would that -- who would have that book? Which department?
A. The engineering department, you know, kept that book.
Q. And when would they consult that book?
A. I don't know. Yeah, that's really part of the design that -- you would have to talk to them about that.
Q. Okay. All right, thank you. Okay. And so -- just back to the checklist, engineering checklist. Was that -- did we request to the operations group?
A. Yeah, you have a --
Q. Operations has it? Okay.
A. Yes, you do. Correct.
Q. Okay, great. And did we request the critical valve book? Did Roger --

MR. EVANS: We did not request the critical valve book. I think that's -- those are the books that are in the vaults; is that right? This is Roger Evans, by the way. David, those critical valve books, aren't they the ones that are in the vaults themselves? Or are you speaking of something else?

MR. MUELLER: I'm not sure what you're referring to, "in the vault."

MR. EVANS: Well, they have documentation in the vault that shows, you know, quite a bit of information about that whole -- all the components within the vault. I was wondering if that was part of what you were speaking about. But I have not requested this critical valve document from a global perspective, I can tell you that.

MR. MUELLER: Okay.

MS. GUNARATNAM: Okay. So we'll --

MR. SAVAGE: Company has it.

MR. MUELLER: Yeah.

MS. GUNARATNAM: Yeah. We'll request that. Okay. And so engineering -- but that's within the engineering department.

MR. MUELLER: Right.

MS. GUNARATNAM: Okay, great. I think that is all I have. Yeah.

Okay, so Roger and Steve? Do you guys have follow-ups?

MR. EVANS: Yes, I do. This is Roger Evans.

BY MR. EVANS:

Q. Dave, I have, I have in front of me a plain piece of paper. And I have at the top your name in a box. And at the very bottom of that box, I have a box that has -- bottom of that page, I have a box that has Louie's name in it, okay?
A. Okay.
Q. And then above Louie, above Louie, I have a name that is Mr. Kulig.
A. Right.
Q. Okay? Between Mr. Kulig and yourself, are there other boxes that need to be filled in?
A. No.
Q. Okay, so Kulig reports directly to you. Louie reports directly to Mr. Kulig at the time.
A. Right. That's correct.
Q. Okay. Okay, great. Okay, so just to -- I wanted, I wanted to make that clear before I ask a lot more questions. One of the things I did want to find out, if someone is doing a budget for full-time employees and, you know, you're trying to get more employees into a department, who is the person in NiSource or Columbia Gas that we would have to speak with who's going to approve that full-time person budget increase? Who would that be? For, like, in the M&R department?
MR. SAVAGE: If you know.
MR. MUELLER: I don't know the, I don't know the exact person that would -- honestly, Roger, I don't know the exact person that

would, that would approve that budget.

MR. EVANS: Okay, I'll make, I'll make out a doc request, because I want to, I want to at least get that name.

MR. MUELLER: Okay. Is that --

MR. SAVAGE: No, we'll follow up. Yeah.

MR. MUELLER: Okay, that's fine. We can, we can follow up with that. Sure.

BY MR. EVANS:

Q. Okay, okay. In all of your work that's gone on between you and Mr. Kulig and Louie, do you recall any scopes at all that were -- the brunt of the scope was to relocate sensing lines from one header to another header?

A. I'm sorry, would you repeat that again?

Q. Yes, I'm trying to find out, when -- with all the work that you saw come across your desk for work scopes and all that, did you ever see a work package that was to relocate sensing lines from one header to another header?

A. No, that would have been an operations and maintenance expense, and I wouldn't have seen that.

Q. So sensing line relocates would be done by operations and maintenance, not by engineering?

A. No, I'm just saying that's an operations and maintenance expense. You know, you ask me if I would have seen a project like that. I would not have, because those -- I mean, that's an, that's an accounting distinction.

MR. SAVAGE: It's not a capital project.

MR. MUELLER: It's not a capital project, right.

BY MR. EVANS:

Q. So let me, let me make sure that I have this right for the record. If someone's going to relocate sensing lines from the regulators to the headers, those are not going to come through engineering. Is that a correct statement?

A. I don't know that that is a correct statement.

Q. But in your, in your tenure as -- and in your, and in your position now, you've never seen sensing line relocate work packages come across your desk?

A. No.

Q. Okay. So the other question I have has to do with the -- post-accident, okay?

A. Okay.

Q. So post-accident, now we have a situation where we absolutely know that the system was overpressurized. There's no doubt about that. The system was overpressurized. When you started looking into, as a company, the sequence of events that led to this overpressurization, did you not look at sensing line work orders where there may have been a relocation of sensing lines that would have encompassed the needs of this project, of the, of the Union Street project?

MR. SAVAGE: I don't think you can answer as a company. You're not the company.

MR. MUELLER: Yeah.
MR. SAVAGE: Tell him what you did, if anything.
MR. EVANS: Are you -- what you did. I'm sorry.
MR. SAVAGE: If anything.
MR. MUELLER: I'm sorry. Yeah, would you -- I'm sorry. Would you please repeat that again so -- I'm not sure that I fully understand what you're asking me.
BY MR. EVANS:
Q. Okay, post-accident, right?
A. Right.
Q. You understand that everyone knows that we had overpressurization. That's a fact.
A. Right. Yeah.
Q. That's absolutely a fact. We know that the overpressurization was caused because the sensing line was a header that was cut. Basically caused the system to demand more pressure into the system.
A. Right.
Q. So my question is, when you started looking at this process, did you not go back and look at any work orders that would have relocated those sensing lines to their correct position?
A. We didn't go back to -- and look at historical work in that regard. What we --
Q. What I'm trying to figure out is I'm -- if I'm a multibillion-dollar entity and I have an accident that cost me a

billion dollars, I'm going to go back and look at everything I can possibly look at to get to the root of the sensing line -- it's a sensing line issue. Are you telling us that you never looked at sensing lines after this accident?

A. No --

MR. SAVAGE: He's asking what you personally did. The company can answer for what they did. What did you do about sensing lines after the accident? Did you look at them?

MR. MUELLER: I did not personally.

MR. EVANS: Did you assign that task to anyone within your organization?

MR. MUELLER: That was not assigned to -- I did not assign that, I did not assign that responsibility to anybody in my organization.

MR. EVANS: Do you have knowledge of anyone else in the corporation that looked at this issue and determined that there was a work order out there that should have been done to relocate these sensing lines?

MR. MUELLER: So the only thing that I would be able to respond to that I know of is that that's part of the ongoing investigation to try to understand why it happened. We don't -- I do not have any knowledge of any facts that would suggest that we, that we fully understand that. You know, that -- the investigation for our company, you know, is led by, you know, Rob Mooney. And so I think he'd probably be in a better position to

answer that question specifically.

MR. EVANS: Okay, that's all I have.

MS. GUNARATNAM: Steve?

DR. JENNER: Yeah.

BY DR. JENNER:

Q. Dave, can you just tell us the scope of your involvement in the post-accident investigation?

A. So basically I worked for Rob Mooney. I was involved in the field investigation associated with the -- as I, as I said earlier, you know, the investigation of the location of the sensing lines at -- on South Union Street. We did some integrity testing to make sure that there was some communication or connectivity from the main back to the regulator station. Also was involved in going around with the representatives from PHMSA to the 14 regulator stations to look at the -- in conjunction with our M&R folks to look at the lock-up and the operation of the, of the regulators to the extent that we could determine that. And then basically provided a lot of, you know, research of records and things of that nature in response to the record request that we got from the NTSB.

Q. Okay. And I won't ask -- I will not re-ask the questions about the sensing line investigation, other than it's certainly a point of interest for, you know, our investigation. So we're just trying to get an understanding of what part of your investigation that either you're involved in or someone else is involved in

that's really looking at this sensing line relocation issue. So can you --

A. I'm sorry, go ahead. Let me -- finish your question, please.

Q. No, go ahead. Sure. No, so the question is, can -- who would be the person that we'd like to talk to who can best address the investigation of the relocation of the sensing line?

A. With respect to this project, I would say -- I would start with Rob as the, as the lead, the lead, you know -- yeah.

Q. I heard, I heard Rob?

A. Rob Mooney. I'm sorry.

Q. Okay. Okay, then that helps us direct our questions to the right person.

DR. JENNER: Okay, thank you. That's all I have.

MR. MUELLER: Okay.

MS. GARCIA: Okay. Thank you, Steve. This is Anne. One question. Who do you report to?

MR. MUELLER: I report to Kevin Swiger, S-w-i-g-e-r.

MS. GARCIA: Okay. And has anyone in the company instructed you to not ask the people who work for you about the sensing lines?

MR. MUELLER: No.

MS. GARCIA: Okay. Thank you. And Rachael, I believe you had --

MS. GUNARATNAM: Just one more question.

MS. GARCIA: One more?

MS. GUNARATNAM: Yeah.

BY MS. GUNARATNAM:

Q. Sorry. Kevin Swiger, what's his title?

A. Director of engineering.

Q. Director of engineering. And sorry to -- I just remembered this follow-up question.

A. Sure.

Q. So when your engineers develop a work packet and they give it to Kulig or the field engineer for approval, do they consult other departments when they're developing this packet?

Q. I would expect so.

A. Who would they consult?

Q. It's, you know, really my expectation for an engineer to use really all of the resources available to them, you know, to come up -- to develop the best design. That would include, you know, the operations group. It could be the M&R group. Could be the construction group. Anybody that would be able to provide some useful information, that's who they would, that's who they would ask.

Q. Is it in your standards to have work packets approved by different departments?

A. It's the -- the work packet approval is a part of our capital governance policy.

Q. Capital governance policy.

A. Right.

Q. Okay. And that -- can you briefly summarize that policy?
A. It's really -- sets forth the requirements for developing a capital project. And it's, and it's used to determine level of approval within the organization based on the type of project and the amount of -- and the cost. Or the -- yeah, the value of that project.
Q. Okay, so the South Union project would have gone through what process of approval, specifically?
A. It would have gone through -- it went through -- you know, it would have gone through Marty to me to Kevin. And I -- without looking at the, at the total cost of the project, I don't know if it went any further than that.
Q. Okay. So you looked at DeRoxas' work packet design.
A. I would have looked at the budget, the project budget request. Yeah.
Q. Just the requests.
A. Um-hum.
Q. Okay, and Swiger would have only looked at the requests --
A. You know, I can't speak for what, you know, Kevin would have -- or would or would not have done. Yeah.
Q. Oh, all right. So that's fine. Okay, so only -- so the review of the design, though, stops at Kulig?
A. Yeah.
Q. Okay. All right.
MR. SAVAGE: It's past 4:00. We're trespassing now.

MR. MUELLER: What?

MR. SAVAGE: We're trespassing. The room expires at 4:00.

MS. GUNARATNAM: That's all. That's all for now.

MS. GARCIA: Okay. Roger or Steve, did you have any other questions?

MR. EVANS: No, I appreciate it. Thanks a lot, Dave. Been very helpful for this, and I -- it was great talking to you.

MR. MUELLER: Okay, good enough. Thanks, Roger.

DR. JENNER: Great. Nothing else from me, and thank you, Dave, for --

MR. MUELLER: You bet. Thank you, Stephen. Nice to meet you. You bet.

MS. GARCIA: Okay, good. Well, thank you very much. And this --

MR. EVANS: Can we --

MS. GARCIA: Yes, go ahead.

MR. EVANS: Can we wait on the line for a bit?

MS. GARCIA: Yeah, we'll --

MR. EVANS: Five minutes?

MS. GARCIA: Yes.

MS. GUNARATNAM: Yeah.

MR. EVANS: Thank you.

MS. GARCIA: Okay, so at this point, we are going to stop the recording.

(Whereupon, the interview was concluded.)

CERTIFICATE

This is to certify that the attached proceeding before the

NATIONAL TRANSPORTATION SAFETY BOARD

IN THE MATTER OF:	MERRIMACK VALLEY RESIDENTIAL GAS FIRES AND EXPLOSIONS SEPTEMBER 13, 2018 Interview of Dave Mueller
ACCIDENT NUMBER:	PLD18MR003
PLACE:	Andover, Massachusetts
DATE:	March 1, 2019

was held according to the record, and that this is the original, complete, true and accurate transcript which has been transcribed to the best of my skill and ability.

[redacted]

Eileen Gonzalez
Transcriber