



Liberty UtilitiesSM

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JUN 23 2014

**Illinois Commerce Commission
GAS PIPELINE SAFETY**

June 20, 2014

Mr. Darin R. Burk
Manager – Pipeline Safety
527 East Capitol Avenue
Springfield, Illinois 62701

Re: Notice of Amendments (NOA #'s 2014-A001-00047 through 2014-A001-00056)

Dear Mr. Burk:

The information provided below is in response to the review of the Liberty Utilities Drug and Alcohol Plan conducted by your staff in Jackson Missouri on April 22nd thru April 25th of 2014.

NOA # 2014-A001-00047 – At this time the Liberty Utilities D&A plan does not differentiate the procedures used for DOT and Non-DOT testing.

Company Response: Liberty Utilities will indicate in the plan that separate forms and procedures will be used when testing Non-DOT personnel.

NOA # 2014-A001-00048 – The D&A plan shall be revised to define the training to be received by employees on Drug and Alcohol procedures.

Company Response: Liberty Utilities will revise the D&A plan to define the training received by employees on Drug and Alcohol procedures.

NOA # 2014-A001-00049 – Liberty Utilities shall include the process or procedure utilized by the MRO when verifying negative test results.

Company Response: Liberty Utilities will revise the D&A plan to include the process utilized by the MRO when verifying negative test results.

NOA # 2014-A001-00050 – The plan does not currently define the job titles covered by the D&A plan.

Company Response: Liberty Utilities will revise the plan to define the job titles covered by the D&A plan.

NOA # 2014-A001-00051 – The lab currently listed in the D&A plan is not the current Certified Lab that Liberty Utilities is using.

Company Response: Liberty Utilities will revise the current plan to include LabCorp of America, 1904 Alexander Road, Triangle Park NC 27709, as the Certified Lab that is being used as our drug testing laboratory.

NOA # 2014-A001-00052 – The D&A plan does not state that Liberty Utilities has no Stand-Down Waiver that allows for removal of an employee from a covered position prior to receiving the results from the MRO.

Company Response: Liberty Utilities will revise the D&A plan to include the following statement: “The Company does not currently hold a stand-down waiver as required under Part 40, and has not applied for one”. Should this status change, Liberty Utilities will notify all covered employees and Company officials in accordance with Part 40 requirements.

NOA # 2014-A001-00053 – Currently, Liberty Utilities does not have a Public Interest Exclusion clause in the D&A plan.

Company Response: Liberty Utilities will add the necessary process to the D&A plan to cover this requirement as required by 40.409 (b).

NOA # 2014-A001-00054 – Liberty Utilities shall add a procedure to indicate what is to occur when an alcohol test determines a concentration level of less than 0.02.

Company Response: Liberty Utilities will revise the D&A plan to include a procedure that indicates what is to occur when an alcohol test determines a concentration level of less than 0.02.

NOA # 2014-A001-00055 – The lab currently listed in the D&A plan is not the current certified lab that Liberty Utilities is using.

Company Response: Liberty Utilities will revise the current plan to include LabCorp of America, 1904 Alexander Road, Triangle Park, NC 27709, as the certified lab that is being used as our drug testing laboratory.

NOA # 2014-A001-00056 – Currently, the D&A plan does not list the current Substance Abuse Officials in the contacts section of the plan.

Company Response: Liberty Utilities will revise the D&A plan to include the current Substance Abuse Officials.

Response Summary: Liberty Utilities will make the updates and revisions stated in the responses above and provide an updated version of our Drug & Alcohol Plan to your office no later than August 27th of 2014. Should you have any questions or concerns, please feel free to contact me at 573-755-0113 or Laura Hovis at 573-755-0109.

Sincerely,

A handwritten signature in cursive script that reads "Donna Loop".

Donna Loop
Manager, Human Resources
Liberty Utilities
Donna.Loop@libertyutilities.com