

148 FERC ¶ 61,008
UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Before Commissioners: Cheryl A. LaFleur, Acting Chairman;
Philip D. Moeller, John R. Norris,
and Tony Clark.

UGI LNG, Inc.

Docket No. CP13-504-000

ORDER ISSUING CERTIFICATE

(Issued July 3, 2014)

1. On June 17, 2013, UGI LNG, Inc. (UGI LNG) filed an application under section 7(c) of the Natural Gas Act (NGA)¹ and Part 157 of the Commission's regulations² for a certificate of public convenience and necessity authorizing it to construct and operate a nitrogen-driven liquefied natural gas (LNG) subcooler system that will add refrigeration capacity at its Temple LNG storage facility located in Ontelaunee Township, Berks County, Pennsylvania. The construction will increase the liquefaction capability at the facility from 4,000 dekatherms per day (Dth/day) to a new maximum of up to 10,000 Dth/day. For the reasons discussed below, the Commission will authorize UGI LNG's proposals.

I. Background

2. UGI LNG, a Delaware Corporation, is an indirect, wholly owned subsidiary of UGI Corporation. UGI LNG is a "natural gas company" within the meaning of section 2(6) of the NGA. UGI LNG has blanket certificate authority under Subpart G of Part 284 of the regulations to provide LNG storage services in interstate commerce.³

3. UGI LNG owns and operates the Temple Facility, which consists of two storage tanks with a combined 1,250 MMcf of storage capacity, a liquefier designed to liquefy approximately 4,000 Dth/day of natural gas, a vaporization system with a maximum daily vaporization capability and delivery rate of 205,200 Dth/day, and a truck loading rack and scale that enables the delivery of LNG into trucks. UGI LNG receives gas at the Temple Facility from Texas Eastern Transmission L.P. (Texas Eastern) and delivers

¹ 15 U.S.C. § 717f(c) (2012).

² 18 C.F.R. pt. 157, subpt. A (2013).

³ *UGI LNG, Inc.*, 119 FERC ¶ 61,056 (2007) (2007 Order).

vaporized LNG to customers on Texas Eastern and to the UGI Utilities distribution system. UGI LNG provides firm and interruptible liquefaction and storage services at market-based rates.⁴

II. Proposal

4. UGI LNG requests certificate authority to construct and operate a nitrogen-driven LNG subcooler system. The proposed facilities will include a 2,000 horsepower nitrogen recycle compressor, vacuum-insulated cold box, nitrogen compander, and associated auxiliary equipment. These facilities will increase the liquefaction capability of the Temple Facility from 4,000 Dth/day up to 10,000 Dth/day. According to UGI LNG, the upgrade, which will cost an estimated \$10 million, will improve the efficiency and flexibility of UGI LNG's service from the Temple Facility. UGI LNG asserts that its upgrade will not change or affect the Temple Facility's storage capacity, vaporization capacity, or result in any changes to the services UGI LNG offers. Thus, UGI LNG asserts there is no need to reexamine UGI LNG's market-base rate authority.

5. UGI LNG explains that currently its liquefaction system must be operated on a year-round basis to completely fill the storage tanks and cover daily boil-off, but that the additional capability provided by the upgraded facilities will allow downtime, better accommodating maintenance activities and enhancing operational reliability in the event of unanticipated outages. UGI LNG states that UGI Energy, its sole existing firm customer, will not subsidize the costs of the upgrades because UGI Energy receives service at market-based rates under a long-term service agreement that will not change. UGI LNG states it will continue to offer service to new customers on an interruptible basis⁵ at prices that reflect prevailing market conditions and will continue to bear the economic risk associated with the Temple Facility. UGI LNG states that all the proposed facilities will be located entirely within the existing footprint of the Temple Facility and will be confined to an area less than one-half acre in size.

⁴ In the 2007 Order, the Commission authorized UGI LNG to acquire and operate the Temple Facility and to charge market-based rates for its proposed LNG storage, liquefaction, and vaporization services. In *UGI LNG, Inc.*, 127 FERC ¶ 61,257 (2009) (2009 Order), the Commission authorized UGI LNG to expand the Temple Facility and to use the capacity made available by the expanded facilities to continue to offer firm and interruptible storage and liquefaction services at market-based rates.

⁵ All of UGI LNG's firm capacity is currently subscribed by UGI Energy.

III. Notice, Interventions, and Comments

6. Notice of UGI LNG's application was published in the *Federal Register* on July 9, 2013.⁶ Mr. Dennis Baylor filed a timely, unopposed motion to intervene with comments. Timely, unopposed motions to intervene are granted by operation of Rule 214(c) of the Commission's Rules of Practice and Procedure.⁷

7. Mr. Baylor, who lives within 10 miles of the Temple Facility, expresses concern that the proposal could impact fire service, environmental response units, and ambulance services, mentioning a leak that occurred at the Bernsville Compressor Station. He also asserts that the proposals will increase the throughput of the infrastructure by 250 percent. Mr. Baylor further questions whether UGI LNG has properly notified affected landowners.

8. UGI LNG, while not opposing Mr. Baylor's motion to intervene, responds to Mr. Baylor's allegations by stating that UGI LNG and its corporate predecessors have operated the Temple Facility for over 40 years without a mishap. UGI LNG states that the Bernsville Compressor Station is not part of the Temple Facility. Rather, the Bernsville Compressor Station is owned and operated by Texas Eastern and is located approximately 12 miles from the Temple Facility. UGI LNG asserts that it does not propose any increase in the existing storage capacity of the Temple Facility. Finally, UGI LNG stated that it fully complied with the Commission's landowner notification requirements set forth at 18 C.F.R. § 157.6 (2013).

IV. Discussion

9. Since the proposed facilities will be used to provide natural gas services in interstate commerce subject to the jurisdiction of the Commission, the construction and operation of the facilities are subject to the requirements of subsections (c) and (e) of section 7 of the NGA.

A. Certificate Policy Statement

10. The Certificate Policy Statement provides guidance for evaluating proposals to certificate new construction.⁸ The Certificate Policy Statement established criteria for

⁶ 78 Fed. Reg. 41,047 (July 9, 2013).

⁷ 18 C.F.R. § 385.214(c) (2013).

⁸ *Certification of New Interstate Natural Gas Pipeline Facilities*, 88 FERC ¶ 61,227 (1999), *order on clarification*, 90 FERC ¶ 61,128, *order on clarification*, 92 FERC ¶ 61,094 (2000) (Certificate Policy Statement).

determining whether there is a need for a proposed project and whether the proposed project will serve the public interest. The Certificate Policy Statement explained that in deciding whether to authorize the construction of major new natural gas facilities, the Commission balances the public benefits against the potential adverse consequences. The Commission's goal is to give appropriate consideration to the enhancement of competitive transportation alternatives, the possibility of overbuilding, subsidization by existing customers, the applicant's responsibility for unsubscribed capacity, the avoidance of unnecessary disruptions of the environment, and the unneeded exercise of eminent domain in evaluating new natural gas construction.

11. Under this policy, the threshold requirement for an applicant proposing a new project is that the applicant must be prepared to financially support the project without relying on subsidization from its existing customers. The next step is to determine whether the applicant has made efforts to eliminate or minimize any adverse effects the project might have on the applicant's existing customers, existing pipelines in the market and their captive customers, or landowners and communities affected by the construction. If residual adverse effects on these interest groups are identified after efforts have been made to minimize them, the Commission will evaluate the project by balancing the evidence of public benefits to be achieved against the residual adverse effects. This is essentially an economic test. Only when the benefits outweigh the adverse effects on economic interests will the Commission proceed to complete the environmental analysis where other interests are considered.

12. As noted above, the threshold requirement is that the applicant must be prepared to financially support the project without relying on subsidization from its existing customers. UGI LNG will continue to charge market-based rates and will bear the economic risk associated with the additional costs associated with the proposal. As such, UGI LNG's existing customer will not subsidize the new construction. Accordingly, UGI LNG has satisfied the threshold no-subsidy requirement.

13. There will be no negative impacts on UGI LNG's existing customers. In fact, UGI LNG's proposed upgrade will improve the liquefaction capability and operational efficiency of the Temple Facility. The Commission is also satisfied that there should be no negative impacts on other existing storage providers or their captive customers. In addition, no other pipelines or their captive customers filed protests in this proceeding.

14. The Commission finds that the proposal will not result in any negative impacts on landowners and surrounding communities. The proposed upgrades will take place entirely within the boundaries of UGI LNG's existing Temple Facility footprint on land that has previously been disturbed, graded, and graveled. UGI LNG owns or controls all of the surface property necessary for the proposed upgrades and no eminent domain will be necessary.

15. We find no support for Mr. Baylor's concern that the proposed facilities can affect fire service, environmental response units, and ambulance service of the community. UGI states that it conducts its operations with safety and environmental as top priorities, and that it maintains a strong relationship with the emergency response community in the area, including participation in frequent emergency drills. UGI LNG adds that the proposed facilities will not add any new potential hazards to the existing Temple Facility operations and will have no effect on the existing access routes currently used by emergency response personnel. UGI LNG's emergency contingency systems and plans mitigate the potential for an event that could impact the safety of the public.⁹ Finally, UGI LNG's existing Emergency Response Plan, which includes leak detection and fire response procedures for neighboring emergency response agencies,¹⁰ will remain in place.

16. Mr. Baylor contends that the proposals will increase the throughput of the infrastructure 250 percent. The existing capacity (both working gas capacity and peak day deliverability) will be unaffected by the proposed project. However, the liquefaction rate will increase from 4,000 Dth/day to 10,000 Dth/day, a 250 percent increase. The hazards posed by this increased liquefaction were addressed as part of the application, and potential releases from the increased rate were evaluated as part of the siting analysis required to meet the Department of Transportation's regulation in 49 C.F.R. pt. 193 subpt. B.

17. Mr. Baylor expresses concern that UGI LNG has not complied with the Commission's landowner notification requirements. However, we are satisfied that UGI LNG has complied with the Commission's landowner notification requirements by notifying landowners required to be notified by 18 C.F.R. § 157.6(d)(2) (2013).¹¹

18. By increasing the liquefaction capability of the Temple Facility, UGI LNG's proposal will allow operational downtime, better accommodating maintenance activities and enhancing operational reliability in the event of unanticipated outages. Based on the benefits the proposal will provide and the minimal adverse effects on existing shippers,

⁹ See EA at 15.

¹⁰ See UGI LNG Application, Resource Report 11, Reliability and Safety at 11-2; UGI LNG August 8, 2008 Application, Resource Report 11, Reliability and Safety, Docket No. CP08-458-000, at 6-9 (filed August 8, 2008). UGI LNG has in place final emergency procedure manuals as required by 49 C.F.R. § 193.3509 (2003) that require coordination and cooperation with appropriate local officials. See Environmental Assessment, Docket No. CP08-458-000, at 73 (issued April 10, 2009) (environmental assessment issued prior to the 2009 Order).

¹¹ See UGI LNG August 9, 2013 Filing (updated list of affected landowners).

other pipelines and their captive customers, and landowners and surrounding communities, we find, consistent with the criteria discussed in the Certificate Policy Statement and section 7 of the NGA, that the public convenience and necessity requires approval of UGI LNG's proposals, subject to the conditions discussed below.

B. Rates

19. UGI LNG's proposed construction does not change the Commission's finding in the 2009 Order that UGI LNG will lack market power.¹² In that order, the Commission reviewed UGI LNG's market power analysis, which utilized two measures of natural gas storage capacity to analyze market concentration: working gas capacity and peak day deliverability. UGI LNG's proposed upgrade will not affect the Temple Facility's working gas capacity or peak day deliverability. In light of the foregoing, the Commission finds that reexamination of UGI LNG's market power is unnecessary. UGI LNG remains under the obligation set forth in the 2009 Order to notify the Commission if future changes in circumstances significantly affect its present market power status.¹³

V. Environmental Review.

20. On July 30, 2013, the Commission issued a *Notice of Intent to Prepare an Environmental Assessment* (NOI). This notice was published in the Federal Register on August 6, 2013,¹⁴ and mailed to affected landowners; federal, state, and local government agencies; elected officials; environmental and public interest groups; other interested parties; and local libraries and newspapers. In response to the NOI, the Commission received comments from the Berks County Planning Commission, the Pennsylvania Department of Environmental Protection, and Mr. Dennis Baylor. The primary issues raised by the commentors concern geologic and seismic issues, safety, and stormwater management.

21. To satisfy the requirements of the National Environmental Policy Act of 1969 (NEPA),¹⁵ our staff prepared an environmental assessment (EA) for UGI LNG's proposed facilities. The EA was prepared with the cooperation of the U.S Department of Transportation. The EA was placed into the public record on June 6, 2014. The analysis in the EA addresses geology, soils, water resources, wetlands, vegetation, fisheries,

¹² 2009 Order, 127 FERC ¶ 61,257 at P 20.

¹³ *See id.* P 21.

¹⁴ 78 Fed. Reg. 47,691 (August 6, 2013).

¹⁵ 42 U.S.C. §§ 4321 *et seq.* (2006). *See* 18 C.F.R. pt. 380 (2013) for the Commission's NEPA-implementing regulations.

wildlife, threatened and endangered species, land use, recreation, visual resources, cultural resources, air quality, noise, safety, cumulative impacts, and alternatives. All substantive comments received in response to the NOI were addressed in the EA.

22. Based on the analysis in the EA, we conclude that if constructed in accordance with UGI LNG's application and supplements, and in compliance with the environmental conditions in the appendix to this Order, our approval of this proposal would not constitute a major federal action significantly affecting the quality of the human environment.

23. Any state or local permits issued with respect to the jurisdictional facilities authorized herein must be consistent with the conditions of this authorization. The Commission encourages cooperation between interstate pipelines and local authorities. However, this does not mean that state or local agencies, through application of state or local laws, may prohibit or unreasonably delay the construction of facilities approved by this Commission.¹⁶

24. The Commission on its own motion received and made a part of the record in this proceeding all evidence and comments submitted herein, and upon consideration of the record,

The Commission orders:

(A) A certificate of public convenience and necessity is issued to UGI LNG under section 7 of the NGA to construct and operate a nitrogen-driven LNG subcooler system for its Temple Facility, as described more fully in the application and in the body of this order.

(B) The authorization in the above paragraph is conditioned on UGI LNG's:

(1) complying with the environmental conditions set forth in the appendix to this order and all regulations under the NGA including, but not limited to, Parts 154, 157, and 284, and paragraphs (a), (c)(1), (c)(2), (e), and (f) of section 157.20 of the Commission's regulations; and

(2) constructing and making available for service the facilities described herein, within one year from the date this order was issued.

¹⁶See, e.g., *Schneidewind v. ANR Pipeline Co.*, 485 U.S. 293 (1988); *National Fuel Gas Supply Corp. v. Public Service Commission*, 894 F.2d 571 (2d Cir. 1990); and *Iroquois Gas Transmission System, L.P., et al.*, 52 FERC ¶ 61,091 (1990), and 59 FERC ¶ 61,094 (1992).

(C) UGI LNG shall notify the Commission's environmental staff by telephone, e-mail, and/or facsimile of any environmental noncompliance identified by other federal, state, or local agencies on the same day that such agency notifies UGI LNG. UGI LNG shall file written confirmation of such notification with the Secretary of the Commission (Secretary) within 24 hours.

By the Commission.

(S E A L)

Nathaniel J. Davis, Sr.,
Deputy Secretary.

Appendix
Environmental Conditions

As recommended in the EA, this authorization includes the following conditions:

1. UGI LNG shall follow the construction procedures and mitigation measures described in its application and supplements (including responses to staff data requests) and as identified in the EA, unless modified by the Order. UGI LNG must:
 - a. request any modification to these procedures, measures, or conditions in a filing with the Secretary;
 - b. justify each modification relative to site-specific conditions;
 - c. explain how that modification provides an equal or greater level of environmental protection than the original measure; and
 - d. receive approval in writing from the Director of the Office of Energy Projects (OEP) **before using that modification.**
2. The Director of OEP has delegated authority to take all steps necessary to ensure the protection of life, health, property and the environment during construction and operation of the project. This authority shall include:
 - a. stop-work authority and authority to cease operation; and
 - b. the design and implementation of any additional measures deemed necessary to assure continued compliance with the intent of the conditions of the Order.
3. **Prior to any construction**, UGI LNG shall file an affirmative statement with the Secretary, certified by a senior company official, that all company personnel, environmental inspectors (EI), and contractor personnel will be informed of the EI's authority and have been or will be trained on the implementation of the environmental mitigation measures appropriate to their jobs **before** becoming involved with construction and restoration activities.
4. The authorized facility locations shall be as shown in the EA. **As soon as they are available, and before the start of construction**, UGI LNG shall file with the Secretary any revised detailed survey alignment maps/sheets at a scale not smaller than 1:6,000 with station positions for all facilities approved by the Order. All requests for modifications of environmental conditions of the Order or site-specific clearances must be written and must reference locations designated on these alignment maps/sheets.

5. UGI LNG shall file with the Secretary detailed alignment maps/sheets and aerial photographs at a scale not smaller than 1:6,000 identifying all route realignments or facility relocations, and staging areas, pipe storage yards, new access roads, and other areas that would be used or disturbed and have not been previously identified in filings with the Secretary. Approval for each of these areas must be explicitly requested in writing. For each area, the request must include a description of the existing land use/cover type, documentation of landowner approval, whether any cultural resources or federally listed threatened or endangered species would be affected, and whether any other environmentally sensitive areas are within or abutting the area. All areas shall be clearly identified on the maps/sheets/aerial photographs. Each area must be approved in writing by the Director of OEP **before construction in or near that area.**

Examples of alterations requiring approval include all route realignments and facility location changes resulting from:

- a. implementation of cultural resources mitigation measures;
 - b. implementation of endangered, threatened, or special concern species mitigation measures;
 - c. recommendations by state regulatory authorities; and
 - d. agreements with individual landowners that affect other landowners or could affect sensitive environmental areas.
6. **Within 60 days of the acceptance of the certificate and before construction begins,** UGI LNG shall file an Implementation Plan with the Secretary for review and written approval by the Director of OEP. UGI LNG must file revisions to the plan as schedules change. The plan shall identify:
 - a. how UGI LNG will implement the construction procedures and mitigation measures described in its application and supplements (including responses to staff data requests), identified in the EA, and required by the Order;
 - b. how UGI LNG will incorporate these requirements into the contract bid documents, construction contracts (especially penalty clauses and specifications), and construction drawings so that the mitigation required at each site is clear to onsite construction and inspection personnel;
 - c. the number of EIs assigned, and how the company will ensure that sufficient personnel are available to implement the environmental mitigation;
 - d. company personnel, including EIs and contractors, who will receive copies of the appropriate material;
 - e. the location and dates of the environmental compliance training and instructions UGI LNG will give to all personnel involved with construction and restoration, and refresher training as the project progresses and

- personnel change, with the opportunity for OEP staff to participate in the training sessions;
- f. the company personnel (if known) and specific portion of UGI LNG's organization having responsibility for compliance;
 - g. the procedures (including use of contract penalties) UGI LNG will follow if noncompliance occurs; and
 - h. for each discrete facility, a Gantt or PERT chart (or similar project scheduling diagram), and dates for:
 - (1) the completion of all required surveys and reports;
 - (2) the environmental compliance training of onsite personnel;
 - (3) the start of construction; and
 - (4) the start and completion of restoration
7. UGI LNG shall employ at least one EI during construction of the project. The EI shall be:
- a. responsible for monitoring and ensuring compliance with all mitigation measures required by the Order and other grants, permits, certificates, or other authorizing documents;
 - b. responsible for evaluating the construction contractor's implementation of the environmental mitigation measures required in the contract (see condition 6 above) and any other authorizing document;
 - c. empowered to order correction of acts that violate the environmental conditions of the Order, and any other authorizing document;
 - d. responsible for documenting compliance with the environmental conditions of the Order, as well as any environmental conditions/permit requirements imposed by other federal, state, or local agencies; and
 - e. responsible for maintaining status reports.
8. Beginning with the filing of its Implementation Plan, UGI LNG shall file updated status reports with the Secretary on a **monthly** basis until all construction and restoration activities are complete. On request, these status reports will also be provided to other federal and state agencies with permitting responsibilities. Status reports shall include:
- a. an update on UGI LNG's efforts to obtain the necessary federal authorizations;
 - b. the construction status of the project, work planned for the following reporting period;
 - c. a listing of all problems encountered and each instance of noncompliance observed by the EI during the reporting period (both for the conditions

- imposed by the Commission and any environmental conditions/permit requirements imposed by other federal, state, or local agencies);
- d. a description of the corrective actions implemented in response to all instances of noncompliance, and their cost;
 - e. the effectiveness of all corrective actions implemented;
 - f. a description of any landowner/resident complaints which may relate to compliance with the requirements of the Order, and the measures taken to satisfy their concerns; and
 - g. copies of any correspondence received by UGI LNG from other federal, state, or local permitting agencies concerning instances of noncompliance, and UGI LNG's response.
9. **Prior to receiving written authorization from the Director of OEP to commence construction of any project facilities**, UGI LNG shall file with the Secretary documentation that it has received all applicable authorizations required under federal law (or evidence of waiver thereof).
10. UGI LNG must receive written authorization from the Director of OEP **before placing the project into service**.
11. **Within 30 days of placing the authorized facilities in service**, UGI LNG shall file an affirmative statement with the Secretary, certified by a senior company official:
- a. that the facilities have been constructed and installed in compliance with all applicable conditions, and that continuing activities will be consistent with all applicable conditions; or
 - b. identifying which of the Order conditions UGI LNG has complied with or will comply with. This statement shall also identify any areas affected by the project where compliance measures were not properly implemented, if not previously identified in filed status reports, and the reason for noncompliance.
12. UGI LNG shall file the following information, stamped and sealed by the professional engineer-of-record, with the Secretary:
- a. site preparation design drawings;
 - b. project facility structure and foundation design calculations and drawings; and
 - c. quality control procedures to be used for design and construction.

In addition, UGI LNG shall file, in its Implementation Plan, the schedule for producing this information.

13. UGI LNG shall make all reasonable efforts to ensure its predicted noise levels from the project are not exceeded at the nearby NSAs and file noise surveys showing this with the Secretary **no later than 60 days** after placing the new facilities at the Temple Facility in service. If the noise attributable to the operation of all the equipment at the Temple Facility at full load exceeds an L_{dn} of 55 dBA at the nearby NSAs, UGI LNG shall install additional noise controls to meet the level **within one year** of the in-service date. UGI LNG shall confirm compliance with the above requirement by filing a second noise survey with the Secretary **no later than 60 days** after it installs any additional noise controls.

Information pertaining to recommendations 14-25 shall be filed with the Secretary for review and written approval by the Director of OEP either: prior to construction of final design or prior to commissioning, as indicated by each specific condition. Specific engineering, vulnerability, or detailed design information meeting the criteria specified in Order No. 683, including security information, shall be submitted as critical energy infrastructure information pursuant to 18 C.F.R. § 388.112 (2013). See *Critical Energy Infrastructure Information*, Order No. 683, FERC Stats. & Regs. ¶ 31,228 (2006). Information pertaining to items such as off-site emergency response, procedures for public notification and evacuation, and construction and operating reporting requirements would be subject to public disclosure. All information shall be filed a minimum of 30 days before approval to proceed is requested.

14. UGI LNG shall certify that the final design is consistent with the information provided to the Department of Transportation (DOT) as described in the design spill determination letter dated March 26, 2014 (Accession Number 20140425-4006). In the event that any modifications to the design alters the candidate design spills on which the Title 49 C.F.R. Part 193 (2013) siting analysis was based, UGI LNG shall consult with DOT on any actions necessary to comply with Part 193.
15. The **final design** shall provide issued for construction piping and instrumentation diagrams (P&IDs). A change log shall be included to list and explain changes made to the approved design.
16. The **final design** shall provide P&IDs, specifications, and procedures that clearly show and specify the tie-in details required to safely connect the existing facilities.
17. The **final design** shall include the steps taken to resolve the action items identified in the hazard and operability review of the completed design. A copy of the actions taken on the recommendations shall be filed.

18. The **final design** shall include details of the shutdown logic, including cause-and-effect matrices for alarms and shutdowns.
19. The **final design** shall include a resistance temperature detector located on the common LNG relief valve discharge header.
20. The **final design** shall include a high gas alarm that would shut down the regeneration gas heater (HE-22).
21. The **final design** shall evaluate the ventilation system for the flash gas compressor building including activation of fan units upon gas detection to provide proper air exchange within the building.
22. The **final design** shall include a drawing showing the location of the emergency shutdown (ESD) buttons. ESD buttons shall be easily accessible, conspicuously labeled and located in an area which would be accessible during an emergency.
23. **Prior to commissioning**, UGI LNG shall tag all instrumentation and valves in the field, including drain valves, vent valves, main valves, and car-sealed or locked valves.
24. **Prior to commissioning**, UGI LNG shall file updates to the operation and maintenance procedure and safety manuals to include the LNG subcooler system.
25. **Prior to commissioning**, UGI LNG shall maintain a detailed training log to demonstrate that operating staff has completed the required training.

The following measure shall apply throughout the life of the project:

26. The facilities authorized herein shall be subject to the same reporting and inspection requirements as stated in Environmental Conditions 7, 8, and 10 of the Commission's 2007 Order in Docket No. CP06-442-000.