



Answer: Navigator is evaluating various locations in the Midwest for the Operations Control Center and a backup OCC. Navigator is likely to use an existing building with suitable space that can be outfitted with the necessary equipment to support the OCC. The locations should be determined by the end of 2023.

**5. What is the status of Navigator’s development of its Emergency Response Plan?**

Answer: Under PHMSA’s regulations, the Emergency Response Plan must be submitted to PHMSA before operation, which is anticipated in the fourth quarter of 2024. As indicated in the Exceedance Table provided with the Application as Exhibit D, Navigator expects to have the plan completed and vetted 90-180 days before pipeline inservice. Ongoing work includes the training discussed below in response to question 7; drafting the preliminary Emergency Response Plan; identifying and obtaining necessary resources to execute the preliminary plan after local and regional plans are compiled in the first half of 2024; developing and training on use of the NAV911 system; hiring and training operations personnel and/or a third-party response to team to supplement regional first responders; performing drills to measure the effectiveness of the plan and make necessary adjustments before inservice; and making plans to conduct annual drills after the pipeline is operational. PHMSA requires that response drills be performed once each calendar year and no more than 15 months apart. Navigator will perform each type of drill at least once per year.

**6. Has Navigator met with local emergency first responders to discuss training and equipment?**

Answer: Yes. Navigator met with local emergency first responders in South Dakota in January 2023 as part of its outreach and training. The participating departments are identified in Navigator’s response to Staff’s Data Request 3-12(b), a copy of which is attached as Exhibit A.

These meetings included proctored CO2 training, which included the following information: general properties of CO2, transportation, and risks; system design and operations; release indicators and hazards; and an overview of emergency response plan development. In follow up to these meetings, Navigator recently provided a CO2 training overview document to EMS and first responders that Navigator met with in South Dakota, a copy of which is attached as Exhibit B. As part of its work with local first responders, Applicant also gathered information to start developing drafts of the emergency response plans. Additionally, Navigator is planning to deploy an online tool where EMS departments can communicate about equipment they feel they need to respond to an emergency of our system.

**7. What is the status of Navigator’s development of the NAV911 system discussed in the Application?**

Answer: Navigator is still developing the NAV911 system to provide notice through an automatic, almost instantaneous, telephone call to local government authorities and first responders in the event of an emergency. Navigator is evaluating ways this system could include alerts to the public or area landowners. Navigator intends to implement it in some form and will provide updated information at the hearing.

**8. Does this conclude your supplemental testimony?**

Answer: Yes.

Dated this 25th day of May, 2023.

/s/Vidal Rosa  
Vidal Rosa