

Assuring Gas Distribution Pipeline Safety

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NARUC Meeting

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Motivation, Approach & Options

- n Motivation for Pursuing Distribution Safety Improvements
- n How DOT has Proceeded
- n Candidate Improvement Options

Major Issues

- Excess Flow Valves (EFVs)
- Use of Guidance
- Leak Management
- Performance Measures
 - Reportable, national
 - Operator specific

Excess Flow Valves (EFVs)

- EFVs are one mitigation option
- When properly specified & installed, EFVs function as designed
- Guidance needed on conditions impeding EFV functioning
- Criteria (Risk Factors) needed supporting decision to install EFVs
- Fire fighters support mandatory installation of EFVs on new services
- NARUC Resolution GA-4 emphasizes caution in promulgating new requirements

Use of Guidance

- Implementing a high-level, flexible Federal Rule requires clear guidance
- Larger operators want choices; Smaller operators require clarity- not choices
- PHMSA will develop Rule in parallel to guidance development
- States will exercise judgment in use of guidance for compliance
- Inconsistent interpretation is likely
- PHMSA protocols, inspection guidance & FAQs have been used successfully to promote consistent interpretation

Leak Management

- Require process for managing leaks
 - Locate the leak
 - Evaluate its severity
 - Act appropriately to mitigate the leak,
 - KeeP records
 - Self-assess to determine if additional actions are necessary to keep the system safe
- Require better national data reporting & expansive analysis by operator
 - National reporting changed to focus on hazardous leaks removed & pipe materials
 - Guidance to be developed on operator-specific measures and analysis

Performance Measures

- Both reportable, national measures & operator-specific measures
- National-level
 - Incidents & normalized incidents
 - Excavation damages per 1000 tickets
 - Hazardous leaks removed and normalized
- Operator-specific
 - Tailored to operator circumstances
 - Guidance to be developed
 - Measures to clarify management effectiveness in addressing key threats

Where does the Effort Stand?

- Four working group reports completed
- Coordinating group preparing summary report & resolving inconsistencies
- Draft final report due to steering group by November 22
- Steering group meeting on December 14