

*AGA Perspective on
Distribution Integrity
Management*

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Principles For DIMP Approach

- **AGA members support responsible course of action for distribution integrity management programs (DIMP)**
- **Enhancements in distribution infrastructure must achieve balance between:**
 - *Public safety*
 - *Reliability of service, and*
 - *Reasonable cost for gas consumers.*

Principles For DIMP Approach (continued)

- **Integrity approach should take into account existing strengths in:**
 - *Current regulations;*
 - *Recent mandates & initiatives; and*
 - *State distribution safety programs.*
- **Any process for distribution integrity must be risk-based, technically defensible & cost-beneficial**

Developing The Elements in DIMP

- **High-level requirements**
- **Diversity**
- **Constraints / limitations**
- **Level of specificity needed:**
 - *Guidelines: only where needed*
 - *Needs of small operators*

Excess Flow Valves

- **AGA actively engaged in educational exchanges for our members to consider EFVs**
- **EFVs should not be federally mandated**
- **EFV installation should be a potential risk control consideration**

Cost Recovery for DIMP

- **One-size-fits-all solution not feasible**
- **Approaches and philosophies vary**
 - *States*
 - *Operators*
- **Look forward to further discussion**

Focus Resources Where It Will Make A Measurable Difference

- **Excellent opportunity to reduce excavation damage to underground facilities**
- **All other resource requirements should be considered in the context of measurable safety performance improvement**
 - *Data gathering/recordkeeping requirements?*
 - *Additional operator maintenance requirements?*
 - *Additional regulator and operator inspection and administration?*