

2019



Pipeline Safety Advocacy Efforts

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ND/SD Pipeline Operator Training
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The American Gas Association, founded in 1918, represents more than 200 local energy companies that deliver clean natural gas throughout the United States. There are more than 74 million residential, commercial and industrial natural gas customers in the U.S., of which 94 percent — more than 70 million customers — receive their gas from AGA members. Today, natural gas meets more than one-fourth of the United States' energy needs.

2019 Advocacy Focus

Pipeline Reauthorization

- Meaningful legislation which is effective and enhances public safety

Continuous Improvement

- Learning from incidents
- Improving practices and communication

Rulemakings

- Transmission Rule
- Plastic Pipe Rule
- Regulatory Reform



Pipeline Reauthorization

Pipeline Safety Reauthorization

- Every 3 years PHMSA's pipeline safety program is reauthorized by congress
- Includes congressional mandates based on areas where congress believes additional oversight, research, or regulation is needed
 - Often response to pipeline incidents

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graph LR; A[CONGRESS] --> B[PHMSA]; B --> C[PIPELINE ADVISORY COMMITTEE (PAC)]; C --> D[FINAL RULE]
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CONGRESS

PHMSA

PIPELINE
ADVISORY
COMMITTEE
(PAC)

FINAL
RULE

Pipeline Safety Reauthorization

Anticipate:

- **Questions regarding open mandates and state oversight**
- **NTSB recommendations for Merrimack Valley to be reviewed**

Timing for final reauthorization: Late 2019

U.S. House of Representatives

- Transportation and Infrastructure's Pipeline Subcommittee
- Energy and Commerce's Energy Subcommittee

Committees and Subcommittees

- Commerce, Science, and Transportation Committee – Subcommittee on Surface Transportation

U.S. Senate



Continuous Improvement

MA Over-Pressurization Incident

- Columbia Gas was conducting cast iron replacement work
- Main was disconnected but the sensing line was still connected
- Sensing line detected a loss of pressure and opened the regulator, which led to an over-pressurization downstream.
- Work was performed in accordance with steps laid out in work package
- Work package did not account for location of sensing lines or require their relocation to ensure regulators were sensing actual system pressure

MA Over-Pressurization Incident

NTSB released 5 recommendations; 1 for Massachusetts, and 4 for NiSource as a result of the Merrimack Valley Incident. Below is a link to the recommendations

To the Commonwealth of Massachusetts:

- 1. Eliminate the professional engineer licensure exemption** for public utility work and require a professional engineer's seal on public utility engineering drawings. (P-18-005)

To NiSource, Inc.:

- 1. Revise the engineering plan and constructability review process** across all of your subsidiaries to ensure that all applicable departments **review construction documents for accuracy, completeness, and correctness**, and that **the documents or plans be sealed by a professional engineer prior to commencing work**. (P-18-006) (Urgent)

MA Over-Pressurization Incident

To NiSource, Inc. (*cont.*):

2. Review and **ensure that all records** and documentation of your natural gas systems **are traceable, reliable, and complete.** (P-18-007) (Urgent)
3. Apply **management of change process** to all changes to adequately identify **system threats that could result in a common mode failure.** (P-18-008) (Urgent)
4. Develop and **implement control procedures during modifications to gas mains to mitigate the risks** identified during management of change operations. **Gas main pressures should be continually monitored** during these modifications and assets should be placed at critical locations to immediately shut down the system if abnormal operations are detected. (P-18-009) (Urgent)

Actions AGA has Taken

1. Supported Mutual Aid Assistance to Columbia Gas (NGA & SGA)
2. Updated FAQ's to improve public education about gas pipelines
3. Developed leading practices in place to prevent over-pressurization
4. Openly communicated with Hill staff on pipelines and over-pressurization

Next Steps

1. White Papers to help members engage with regulators
 - i. Distribution Records
 - ii. Skills and Experience to Effectively Design Natural Gas Systems
2. Crisis Leadership Summit [April 8-9, Washington DC](#)
 - Incident response:
 - How to mobilize quickly
 - How to obtain crews that are not part of industry
 - Crisis communication:
 - 1st hr/day, following weeks/month, anniversaries
 - When the NTSB launches
 - Long term: Rebuilding trust

Next Steps (cont.)

3. Mutual Aid Lessons Learned June 17-18
workshop
4. Management of Change
 - i. Reviewing approvals and communication
 - ii. How teams are communicating
 - iii. How work is being documented
5. Safety, Resilience, Reliability and Security Task Force
6. Pipeline Safety Management Systems
 - I. Applying concepts of API 1173



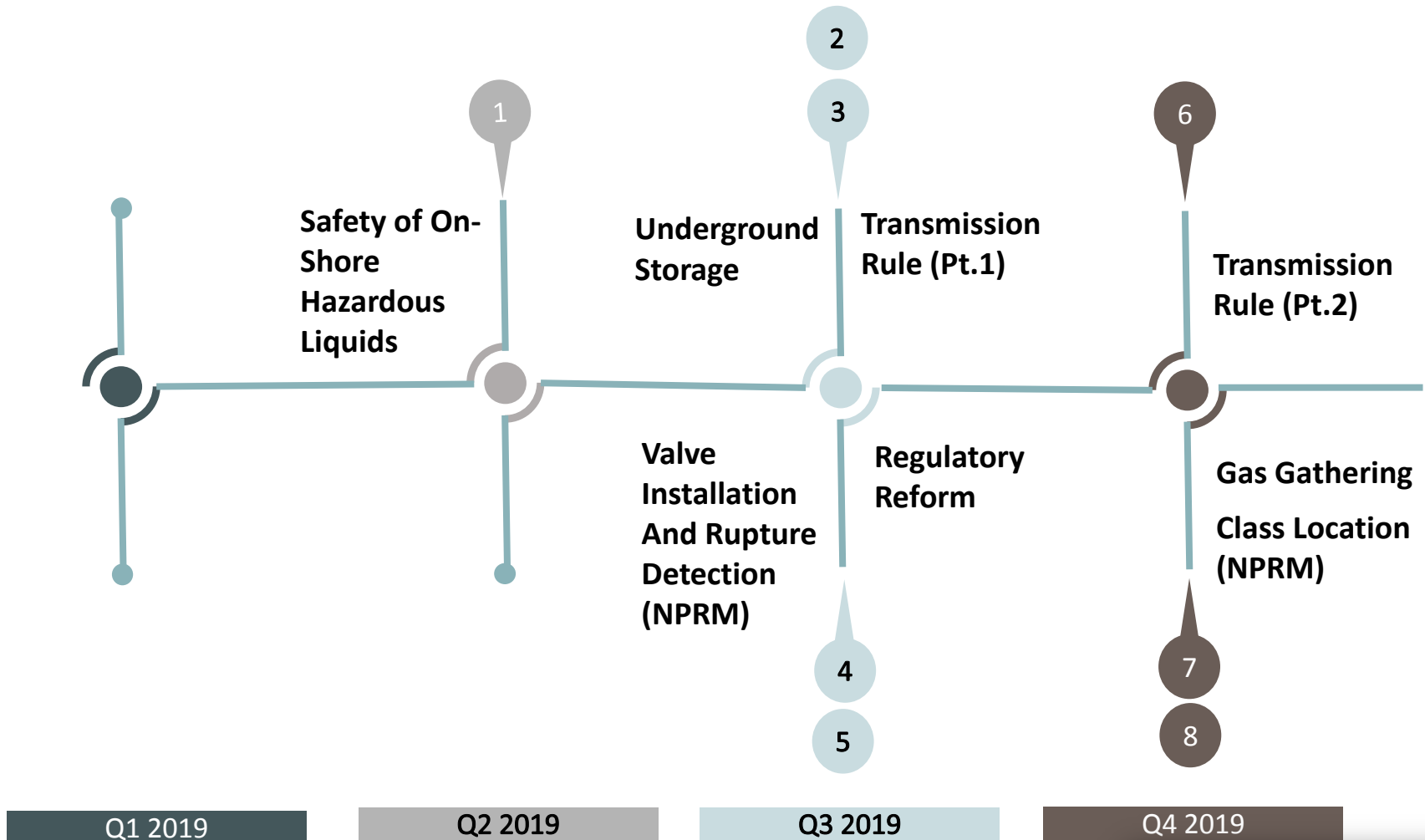
Other AGA Actions to Elevate Safety

- Commitment to Enhancing Pipeline Safety
- Safety Resource Center for safety procedures, lessons learned, training materials and safety videos
- Best Practices Program
- Peer Review Program
- Plastic Pipe Data Collection Committee
- Emergency Planning, including national Mutual Assistance Program & annual mock drill
- Employee and vehicular safety awards
- International Gas Union Representation

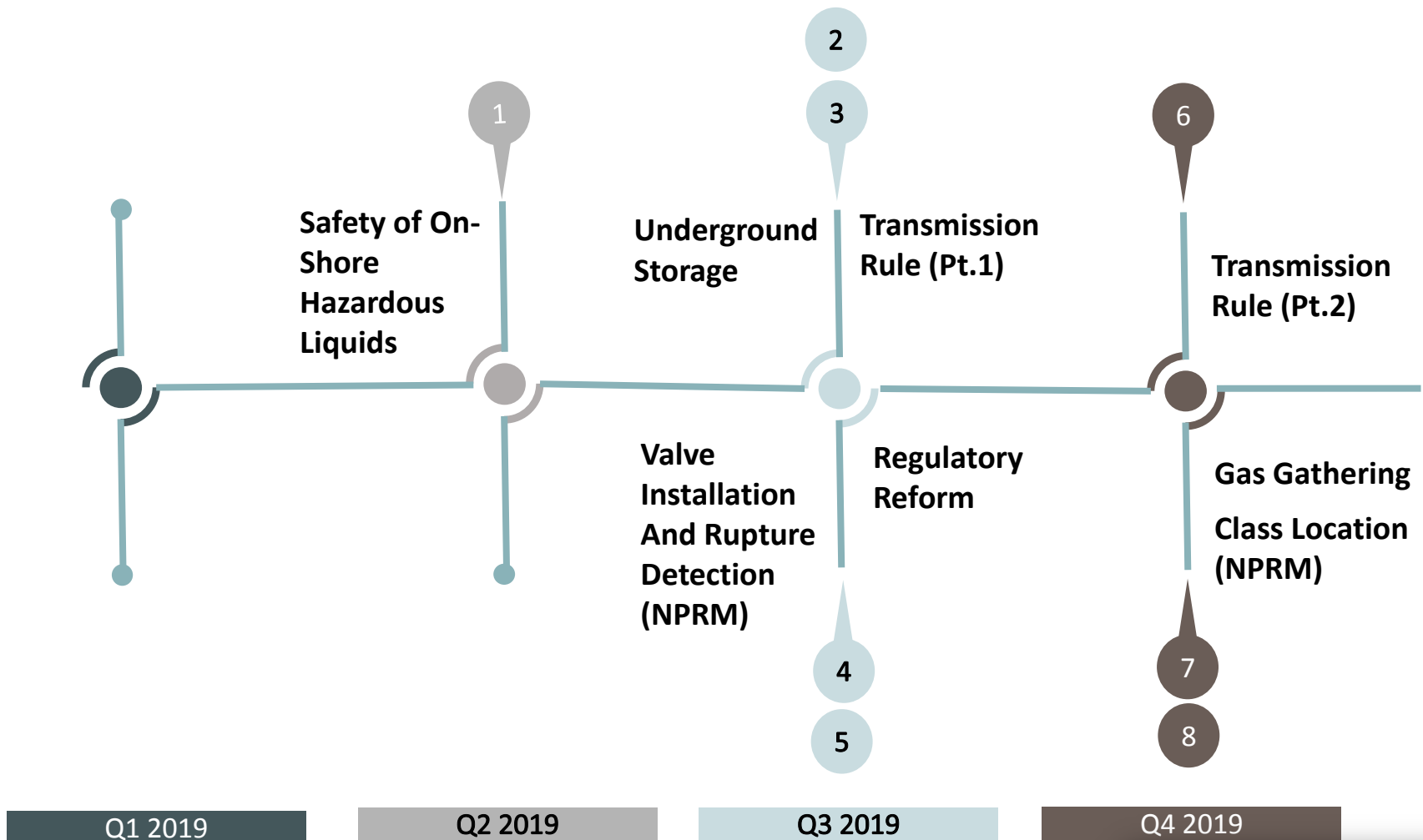


Rulemakings

Timeline for Pending Rulemakings



Timeline for Pending Rulemakings



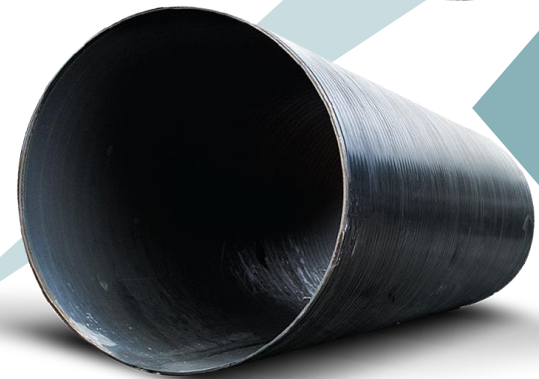
TRANSMISSION AND GATHERING LINES RULEMAKING

Scope

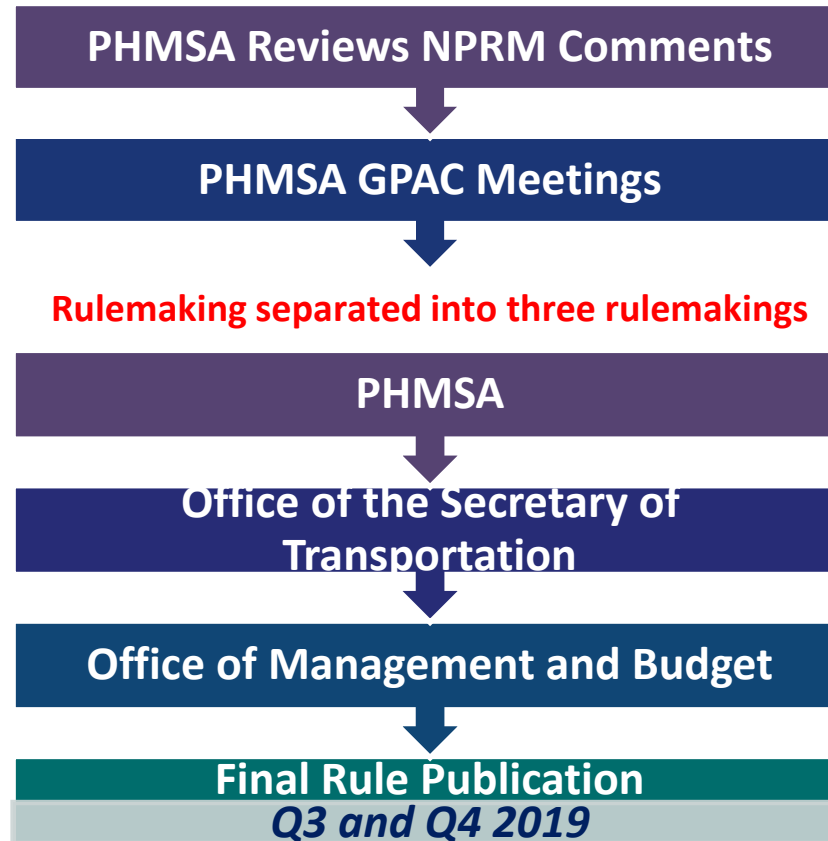
Directive from Congress in the 2011 Act

Strengthens protocols for Integrity Management (IM), including protocols for inspections and repairs, and improves information collection to help drive risk-based identification

Extends IM outside of HCA's



Transmission and Gathering Lines Rulemaking



Rulemaking #1 - Safety of Gas Transmission Pipelines: MAOP Reconfirmation, Expansion of Assessment Requirements, and Other Related Amendments

Rulemaking #2 - Safety of Gas Transmission Pipelines: Repair Criteria, Integrity Management Improvements, Cathodic Protection, Management of Change, and Other Related Amendments

Rulemaking #3 – Safety of Gas Gathering Pipelines

Transmission and Gathering Lines Rulemaking

Rule #1 - Regulatory Mandate Scope

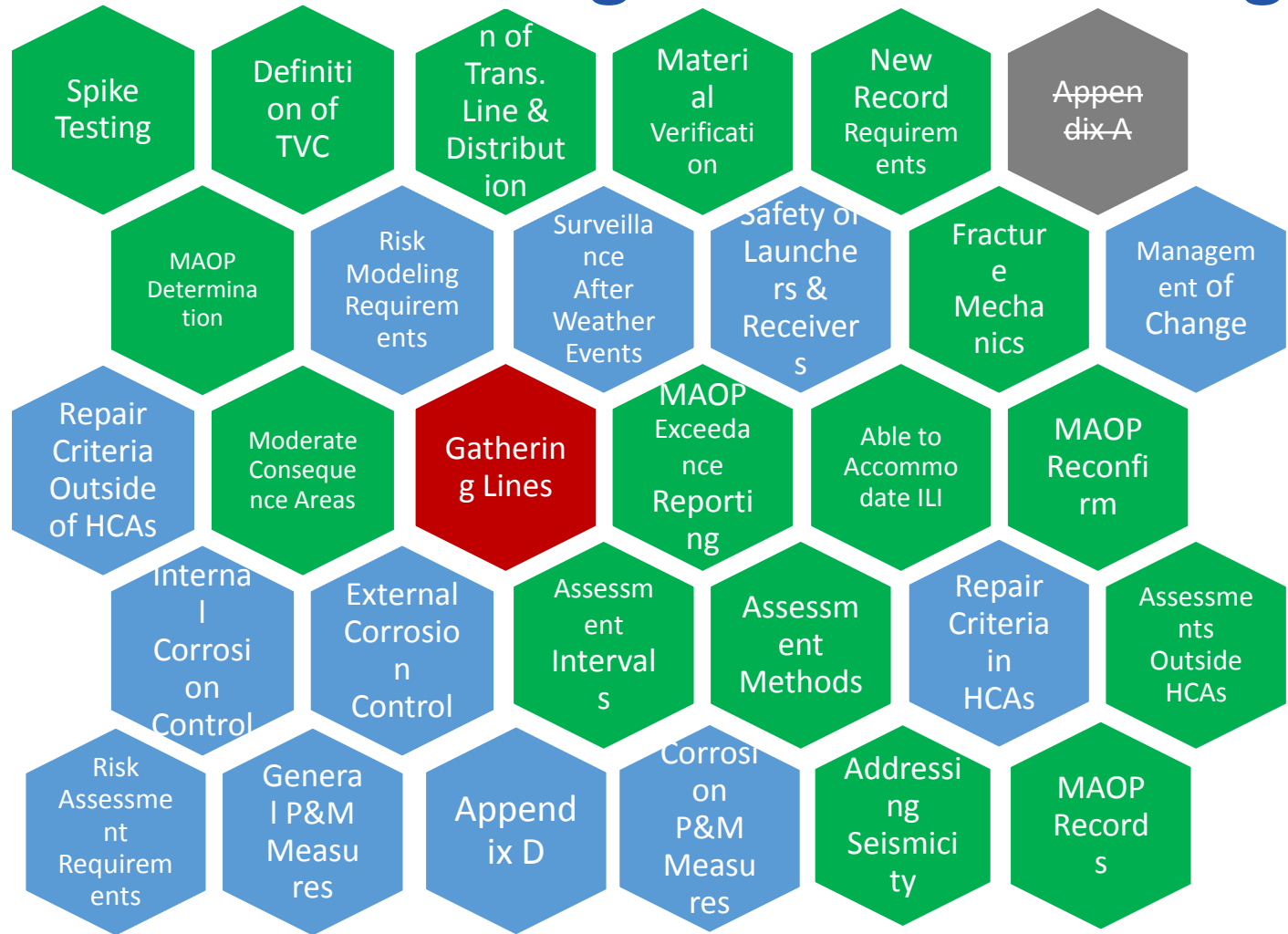
- What is likely in scope (including Industry proposed)

Rule #2 – Non-Mandate Scope

- What is likely in scope

Rule #3 – Safety of Gas Gathering Pipelines

- What is likely in scope



Plastic Pipe Rule

This Final Rule expands the use of plastic pipe products and incorporates updated pipe standards. The Final Rule will only apply to new, repaired, and replaced pipelines. The Final Rule goes into effect on **January 22, 2019**.

Rulemaking Topics

- ❖ Expanded use of PA-11 and PA-12
- ❖ Design of plastic pipelines
- ❖ Installation of plastic mains and services
- ❖ Tracking and Traceability
- ❖ Joining Plastic Pipes
- ❖ Plastic Pipe Storage and Handling

AGA filed a petition to modify Dec. 2018:

- revise the language referencing technologies that are not readily available
- Allow additional time to update existing procedures, train and qualify personnel, and revise purchasing specifications and material installation instructions.

Plastic Pipe Rule

On March 1, 2019 PHMSA responded to AGA's petition to reconsider and granted operators additional time to implement training and operator qualification programs for the new requirements, an additional 90 days to work with equipment suppliers, and an additional six months to comply with certain provisions that require the development of new programs.

PHMSA also delayed the compliance deadline for category 1 requirements in § 192.281(e)(4) until January 22, 2020.

AGA is hosting a webinar with PHMSA to discuss the implementation of this rule

April 24, 1:30 – 3:00 EST

Regulatory Reform

Only Applicable for significant rulemakings

1 new regulation → At least 2 rules pulled back

Does not apply to Congressional mandates

1. Transmission line/distribution center definition
2. Definition of an incident
3. Modifications to anomaly response regs
4. Integrity assessment alternate to class location change
5. Plus highlighted actions underway:
Underground storage, gathering lines,
post construction inspections pressure
vessel testing
6. Farm taps
7. Atmospheric corrosion monitoring
8. Mechanical fitting failure reporting
9. MAOP (where P test exists, don't need to verify MAOP through design formula)
10. EFVs as a form of meter protection

Regulatory Reform

Farm Taps

OQ, Cost Recovery, etc. final rule moved farm taps from risk based approach – no longer under DIMP, rather a 3yr inspection cycle

On March 26, PHMSA published a stay of enforcement

“PHMSA will not take enforcement action against operators who forego the new maintenance and inspection requirements established in March 2017 and instead mitigate any future risk associated with farm taps through compliance with the existing Distribution Integrity Management Program (DIMP) regulations.”

Questions?

 AGA.org

 TrueBlueNaturalGas.org

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