

400 North Fourth Street  
Bismarck, ND 58501  
(701) 222-7900

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December 20, 2022

JAN - 5 2023

North Dakota Public Service Commission  
Attn: Caleb Simburger  
600 East Boulevard, Dept. 408  
Bismarck, ND 58505-0480

NORTH DAKOTA  
PUBLIC SERVICE COMMISSION

RE: Case No. GS-22-406

Montana-Dakota Utilities Co. (MDU) electronically submits this response to the notice of probable violation.

**49 CFR 192.743 Pressure limiting and regulating stations: Capacity of relief devices -**

*Pressure relief devices at pressure limiting stations and pressure regulating stations must have sufficient capacity to protect the facilities to which they are connected. Except as provided in § 192.739(b), the capacity must be consistent with the pressure limits of § 192.201(a). This capacity must be determined at intervals not exceeding 15 months, but at least once each calendar year, by testing the devices in place or by review and calculations.*

**Finding(s):**

As operator of the system, MDU is responsible for complying with gas pipeline safety regulations. MDU failed to determine the capacity of pressure relief devices at pressure limiting stations and pressure regulation stations on their regulator distribution system at the frequency required by §192.743(a).

Proposed Civil Penalty: \$500.00

**MDU Response**

MDU does not dispute the proposed Civil Penalty. A check for the proposed amount of \$500.00 has been requested and will be sent when it has been processed through our accounting department.

The relief capacities of the regulator stations are determined using review and calculations per §192.743(b). The Engineering Services department of Montana Dakota Utilities Group (MDUG) is currently working on a process to have the relief capacities of the regulator stations reviewed within our asset management program. As they are working to get this process online, the relief capacities of the regulator stations are documented in a master excel spreadsheet that compares the capacity of the regulators and the reliefs and flags any issues between the two capacities. Any changes made to the regulator stations are submitted on Form 23016 and the changes are added to the excel spreadsheet. Capacities of the stations are then re-calculated and compared to ensure adequate relief capacity exists. Any issues with the regulator stations are noted on a cover sheet and orders are created to address the issues.

To better document the annual review of the regulator stations, for the 2022 review of the regulator stations, MDUG has added a "Review Date" and a "Reviewed By" columns and a column to more clearly document the changes made to the regulator station during the previous year. This will be the process used by MDUG until the review process within our asset management process is online.

Please contact Josh Sanders at 701-222-7773 with questions or comments.

Respectfully Submitted,

A handwritten signature in black ink that reads "Pat Darras". The signature is written in a cursive style with a large, prominent initial "P".

Pat Darras  
Vice President, Engineering & Operations Services  
Montana-Dakota Utilities Co.

Attachment