



The Road to Compliance: DIMP & Ohio Small Utility DIMP Plan Status

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Part 192, Subpart P: Gas Distribution Pipeline Integrity

- Gas distribution operators must develop and implement an integrity management program that includes a written plan
- Written plan must address 7 elements
- Program must be implemented by August 2, 2011



DIMP Development Status

- Dominion
- NiSource
- Ohio Small Utility DIMP (OSUDIMP)

DIMP Development Status

Dominion (NGA/SGA Framework)- *6/15 Final Draft*

CHAPTER	DRAFT COMPLETE	CHAPTER	DRAFT COMPLETE
Section 0 - Executive Signature		<i>Section 8 - Identification and Implementation of Measures to Address Risks</i>	
Section 1 - Company Overview	<input checked="" type="checkbox"/>	<i>Section 9 - Measurement of Performance, Monitoring Results, and Evaluating Effectiveness</i>	<input checked="" type="checkbox"/>
Section 2 - Scope	<input checked="" type="checkbox"/>	<i>Section 10 - Periodic Evaluation and Improvement</i>	
Section 3 - Purpose and Objectives		<i>Section 11 - Reporting Results</i>	<input checked="" type="checkbox"/>
Section 4 - Definitions	<input checked="" type="checkbox"/>	<i>Section 12 - Document and Record Retention</i>	<input checked="" type="checkbox"/>
<i>Section 5 - Knowledge of Facilities</i>	<input checked="" type="checkbox"/>	<i>Section 13 - Exception Process</i>	<input checked="" type="checkbox"/>
<i>Section 6 - Threat Identification</i>	<input checked="" type="checkbox"/>	Section 14- Quick reference reverse table	
<i>Section 7 - Evaluation and Ranking of Risk</i>	<input checked="" type="checkbox"/>	Section 15 - Revision Log	<input checked="" type="checkbox"/>



DIMP Development Status

- NiSource
 - Used as references: NGA/SGA, MEA, GPTC
 - Common plan template for 6 states
 - Template completed and approved by management
 - Created by SMEs from all states
 - Template to be customized by each state before June
 - Customization performed by state-level SME group (corrosion, M&R, engineering, compliance, damage prevention, leakage)



DIMP Development Status

- Ohio Small Utility DIMP (OSUDIMP)
 - Developed by a sub-committee of the OGA
 - Provides the base plan without the need to develop the plan individually
 - Each operator will customize the plan to meet their individual needs
 - Provides consistency for the smaller operators



DIMP Development Status

- PUCO review of the plan by Pete Chace
- Provides balance of prescriptive and subjective instruction
- Recommended adding more examples
- Believes that operators using OSUDIMP will have a well documented and auditable process



Elements of DIMP Plan

1. Knowledge

- Demonstrate an understanding of its system developed from reasonably available information
- Consider information gained from design, operations, maintenance, and relevant environmental factors
- Identify where additional information is to be acquired through normal activities, including capturing data for new pipelines



Elements of DIMP Plan

2. Identify Threats

- Operators must consider the following threats: Corrosion, Excavation Damage, Outside Force Damage, Material or Welds, Natural Forces, Equipment Failure, Incorrect Operation, Other
- Consider reasonably available information
- Sources of data may include: incident and leak history, corrosion control records, continuing surveillance records, patrolling records, maintenance history, and excavation damage experience



Elements of DIMP Plan

3. Evaluate and Prioritize Risk

- Determine the relative importance of each threat and estimate and rank the risk posed
- An operator may subdivide its system into regions with similar characteristics and for which similar risk-reduction actions would be effective



Elements of DIMP Plan

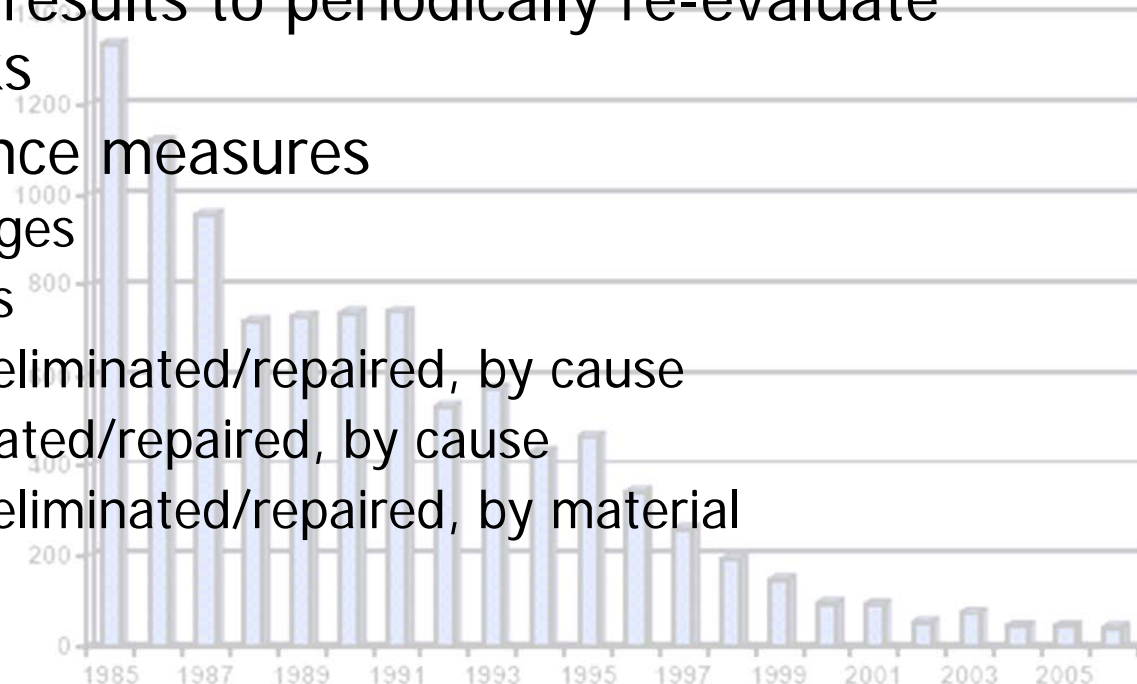
4. Identify and Implement Measures to Address Risk

- Implement measures designed to reduce the risk of failure, including an effective leak management program

Elements of DIMP Plan

5. Measure Performance, Monitor Results, and Evaluate Effectiveness

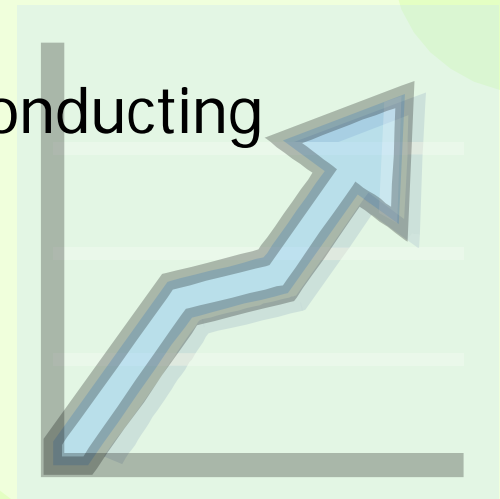
- Monitor performance measures from an established baseline, using the results to periodically re-evaluate the threats and risks
- Required performance measures
 - # excavation damages
 - # excavation tickets
 - # hazardous leaks eliminated/repaired, by cause
 - # total leaks eliminated/repaired, by cause
 - # hazardous leaks eliminated/repaired, by material



Elements of DIMP Plan

6. Periodic Evaluation and Improvement

- Re-evaluate threats and risks on entire system and consider relevance of threats in one location to other areas
- Determine appropriate period for conducting complete program re-evaluation
 - At least every 5 years



Elements of DIMP Plan

7. Report Results

- Include certain performance metrics on DOT Report:
 - # excavation damages
 - # excavation tickets
 - # hazardous leaks eliminated/repaired, by cause
 - # total leaks eliminated/repaired, by cause

PART C - TOTAL LEAKS AND HAZARDOUS LEAKS ELIMINATED/REPAIRED DURING YEAR					
CAUSE OF LEAK	Mains			Services	
	Total	Hazardous		Total	Hazardous
CORROSION					
NATURAL FORCES					
EXCAVATION DAMAGE					
OTHER OUTSIDE FORCE DAMAGE					
MATERIAL OR WELDS					
EQUIPMENT					
INCORRECT OPERATIONS					
OTHER					
NUMBER OF KNOWN SYSTEM LEAKS AT END OF YEAR SCHEDULED FOR REPAIR _____					

PART D – EXCAVATION DAMAGE	PART E – EXCESS FLOW VALVE (EFV) DATA
Number of Excavation Damages _____	Total Number Of EFVs on Single-family Residential Services Installed During Year _____
Number of Excavation Tickets _____	Estimated Number of EFVs In System At End Of Year _____



Other Rulemaking Requirements

- Reporting failures of mechanical fittings
 - Submitted via new PHMSA report
 - 2011 calendar year failures reported by March 15, 2012
- Alternate inspection cycles
 - Operator may propose to reduce the frequency of O&M inspections
 - Subject to regulatory approval
- Recordkeeping
 - Maintain records demonstrating DIMP compliance for 10 years
 - These records must include superseded written plans
- Revised EFV requirements within Part 192.383
 - Same installation criterion
 - Eliminated the option to send letter to property owner in lieu of EFV installation
 - Report “Number of EFVs Installed” on Annual DOT Report



Integrity Management for Master Meter and LPG Operators

- Must develop and implement an IM Program no later than August 2, 2011
- Knowledge
 - Operator must demonstrate knowledge of its pipeline
 - Does not have to research or reconstruct past records
 - Provide plan for gaining knowledge over time through normal activities
- Identify Threats
 - Must consider threats to the pipeline
- Rank Risks
 - Must evaluate and rank the risks to the pipeline and estimate the relative importance of each threat



Integrity Management for Master Meter and LPG Operators

- Identify and Implement Measures to mitigate risks
 - Must determine and implement measures designed to reduce the risks from pipeline failures
- Measure performance, monitor results and evaluate effectiveness
 - Only performance measure is the number of leaks eliminated or repaired on the system and their causes.
- Periodic Evaluation and Improvement
 - Must determine the appropriate period for conducting IM program evaluations
 - Must re-evaluate its entire program at least every five years
 - Must consider the results of performance monitoring in these evaluations



Integrity Management for Master Meter and LPG Operators

■ Records

- Must maintain records for a period of ten years, which includes;
- A written IM plan including superseded IM plans
- Documents supporting threat identification
- Documents showing the location and material of all piping and appurtenances that are installed after the effective date of the operator's IM program and to the extent known the location of all pipe and appurtenances that were existing on the effective date of the operator's program

■ Exclusions

- Knowledge of the pipeline is forward looking
- Excluded from risk analysis
- Excluded from performance measure reporting with the exception of the number of leaks eliminated or repaired
- Not required to develop a leak management program

QUESTIONS?

