



# *Panel 1: DIMP Plan*

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# *Master Meters, LP and Small Operators*

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- Are small operators less risky?
  - What is the basis for the answer?
  - Do we know their performance or assume it?
  - If so, what do they do that makes them better?
- Are large operators more risky?
  - Why would that be the case?



# EFVs

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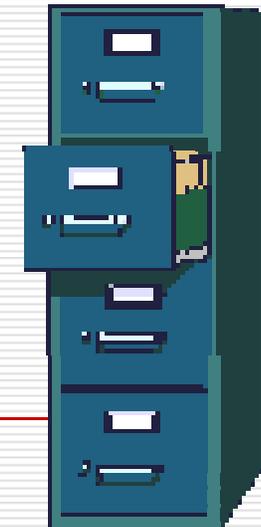
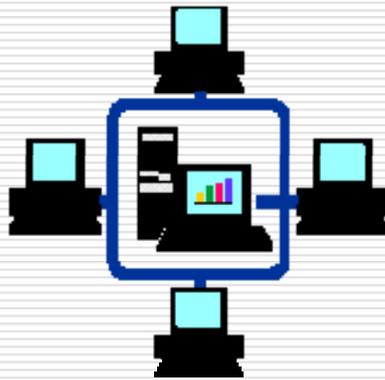
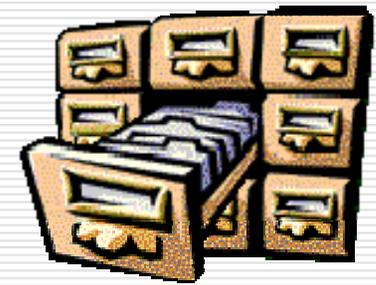
- Were they considered for LP systems?
  - Why or why not?
  - Is LP potentially riskier than natural gas?
  - What is the basis for believing LP operators have control over excavation activity near their lines?



# Knowledge Level

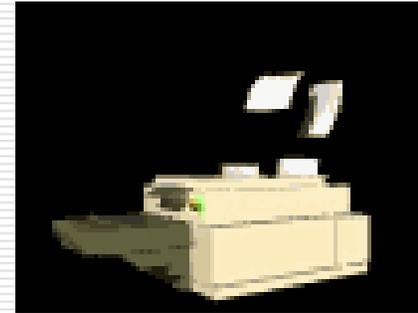
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“An operator must assemble as complete an understanding of its infrastructure as possible”



# Documentation

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- ❑ “Documents to support any decision, analysis, or process developed and used to implement and evaluate each element of the IM program” -1015(d)
- ❑ Detail of procedures?
- ❑ “Producing meaningful improvement in safety is more important than producing reams of procedures, detailed flow charts and statistical analyses”

# Records

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- “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 and material of all pipe and appurtenances that were existing on the effective date of the operator’s program.”

## *Corporate vs. State Level*

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- Are priorities set across State lines?
- Are priorities set within each State?
- What is the corporate structure?
- Should ratepayers in one State subsidize ratepayers in an other State?



