



Time Frame Deviations

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Phase 1 Report

“The significant *diversity* among gas distribution pipeline operators ... makes it *impractical to establish prescriptive requirements* that would be appropriate for all circumstances.”¹

¹ Integrity Management for Gas Distribution Pipelines, Report of Phase 1 Investigations, December 2005, p. 1, (emphasis added)



Phase 1 Report

“It is important that any new requirements that are developed allow sufficient flexibility for the operators of distribution pipeline systems, and the ... regulators who oversee their operations, to *customize* their integrity management efforts to address their *specific systems, threats, and issues*.”¹

¹ Ibid., p. 10 , (emphasis added)

NAPSR Position



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Local Conditions

Because of the need to customize the distribution integrity management efforts, Distribution Integrity Management Programs must be tailored to meet the **local conditions** that exist within those distribution systems.



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Local System Risks

With the development of the Distribution Integrity Management Program regulations, operators will be evaluating the risks in their *individual, local systems* and developing programs to address those risks.



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A & A Activity Results

These A/A activities should produce *improved safety* and lower the occurrence of significant leaks, failures and incidents. As a result of certain A/A activities, it might be appropriate to *adjust the periodicity* of certain of the time-specific operating and maintenance activities listed above.



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Application

An operator who wishes alternative time frames that deviate from the existing regulations must apply to the *governmental organization which has jurisdiction over the safety of the facility.*



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Application Content

- a) the *safety benefits* achieved by certain A&A activities, and
- b) how that produces an *equivalent or improved level of safety* for the individual *local system* for which the deviation is being requested.



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Application Evaluation

Based upon the data specific to the local conditions, the governmental organization with safety jurisdiction would evaluate the request and take those *actions appropriate to the localized situation.*



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Level of Safety

The net result of any deviation authorization coupled with appropriate A/A actions should produce an ***equivalent or superior level of safety*** compared to the level of safety resulting from direct compliance with all applicable minimum federal safety standards.



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Monitoring

Appropriate **performance measures** need to be identified and monitored to demonstrate the outcome of the Time Frame Deviations



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Issues

Different States

1. Some States think this is a good way to allocate scarce resources and risk manage the distribution system
 2. Some States think this is not good because operators may look to decrease current safety levels
 3. Since the data to support a variance will be based on the local system, the local authority would be the one to decide
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Different States

- Can I rely on a State to grant a time variation?

NARUC – cost effective

- Distribution IMP should produce significant safety benefit and value for the ratepayer dollars

Level of Safety

1. *“equivalent or superior level of safety”* - NAPSR
2. “Only where they [operators] can demonstrate that the reduced frequency *will not significantly increase risk.*” - § 192.1017

