

BGE DIMP Rule Issues (Draft)

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BGE Issues with DIMP NOPR

- Operating company reporting discontinuities
 - Leak reporting
 - Damage prevention
- Evaluating individual performance/OQ impact, overlap(?)
- Basis for performance measurement
- Additional reporting requirements logistics

Leak Reporting

- GPTC guidance
- BGE Grade 1 criteria more conservative than GPTC – more hazardous leaks
- Increased survey frequency for specific segments identified through risk analysis program – find more leaks
- Business focus on leak backlog/repair timeframes – repair more leaks
- What is/will be the basis for performance measurement with wide reporting possibilities?

Damage Prevention

- Baseline Damage Prevention guidelines
- Enhanced Damage Prevention guidelines
- What will the regulator look for during an audit?
- Statistics – ticket process
- Locate/limits vary
- Outside participation – areas
- Definition of damage – caused a leak ?

Individual Performance

- What is the framework for Individual Performance?
 - GPTC Guidance (?)
 - OQ (?)
 - Outside Certifications

Additional Reporting (192.1007 & 192.1013)

- Four National Performance Measures (how & when to report?)
 - Report with Annual DOT Report
 - Separate filing
 - Form for filling
 - Date(s) for filing
- Data definitions, i.e. hazardous leaks, damages, location limits, etc.