

the voice and choice of public gas



# Industry View on DIMP Regulation and Implementation

*June 27, 2012*

*John Erickson, APGA*



Natural Gas™  
Comfortable. Responsible.



# What Is APGA?

the voice and choice of public gas



- The National Trade Association for Publicly-Owned Gas Utilities
- ~ 700 member utilities in 36 states
- Created in 1961

# DIMP Regulation

the voice and choice of public gas



- APGA has no concerns about the DIMP regulation itself
- The process to develop the rule – Phase 1 report developed by all stakeholders – should be a model for all major rulemakings

# DIMP Implementation

the voice and choice of public gas



- APGA believes the implementation of the rule is often contrary to the framework laid out in the Phase 1 report and the rule
- Only a few regulators and operators were involved throughout the DIMP development process
- As a result, not all operators and regulators understand the underlying principles of DIMP

# OPERATORS

the voice and choice of public gas



- Ideally, DIMP should elicit critical thinking about problem areas on the system and actions to address those problems
- Operators have used DIMP as an opportunity to step back and look at the big picture rather than just do what's in the regulations
- Some operators have not given enough thought to DIMP plans and/or been too quick to accept the output of model plans



Natural Gas  
Comfortable. Responsible.

# REGULATORS

the voice and choice of public gas



- Auditing DIMP compliance requires a different approach than auditing rectifier inspections
- The DIMP Inspection Form focuses on minutia in the language of the rule rather than the big picture
- More questions deal with documenting processes than whether the operator has developed a plan appropriate for the unique circumstances of the system

# Dancing SHRIMP!

the voice and choice of public gas

