



AGA DIMP Workshop
August 13, 2008

Panel 1: Development of DIMP Plan



The 7 Key Elements as noted in § 192.1007

- 1) Know your system
- 2) Identify threats to integrity of system, including a section titled “Assuring Individual Performance” to evaluate the contribution of human error and the intervention to risk (PTP-theme)
- 3) Evaluate and prioritize risk
- 4) Identify and implement measures to address risks
- 5) Measure performance, monitor results, and evaluate effectiveness
- 6) Periodic evaluation and improvement
- 7) Periodically report a limited set of performance



AGA Position on “What Records Must an Operator Keep”

- Under 192.1015(c), AGA suggests the Rule require a description of how threats are ranked and not a “*written procedure for ranking the threats*”.
- Level of documentation is taken from Transmission IMP and unduly burdensome and labor-intensive. Distribution systems are far more intricate and diverse than transmission systems.
- Regulatory impact analysis estimated six additional hours per year by an office clerk to satisfy the proposed recordkeeping requirement.
- Operators would be producing mountains of paperwork and information that would be required to be inspected by state regulators.
- AGA suggests only significant changes or additions made to the DIMP program be documented by operators. Examples of what must be kept would be helpful.



DIMP Performance Measures

- NOPR includes a definition for “*damage*” but actually seeks operators to submit excavation damages as a performance measure.
- A definition for “*excavation tickets*” as used in 192.1007 may be needed.
- Four measures to be reported to PHMSA and State regulator, three measures to be maintained internally by DIMP operator



Other Key Areas

- NOPR requires operator to develop a process so it would know if problems existed with compression couplings.
- Plastic pipe failure reporting (to be addressed in Panel 2)
- Seeks a comprehensive leak management program (“LEAKS”)
- Operator to consider enhanced damage prevention practices
- In risk analysis, operator to consider the threat of inappropriate actions by individuals (PTP to be addressed in Panel 3)