

AGA DIMP WORKSHOP

State Perspective: Indiana

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- Overall – Phase 1 Report reflected
 - Seven expected elements included
 - Provides for flexibility
 - Recognizes the diversity, localized conditions that exist in the world of gas distribution



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Clarification needed in several sections...some examples:

- Ex. 192.1007(b) – data gathering for threat assessment: “one call” experience, “human error” contribution. Also many “musts”.
- Ex. 192.1015(d) – documentation for any decision, analysis or process
- Ex. 192.1007 (e) --Performance measures collected = 6, but required to report 4? What does vii mean – “any additional measures...”

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- “Unanticipated” Provisions:
 - Assuring Individual Performance
 - Plastic Pipe failure data
 - Deviation from periodic inspection intervals
 - Also 192.1007(d) ?– addressing risk: “must” enhance DP program.

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- Master meter operators, small LP operators
 - Requirements should be limited
 - But....
 - Should not receive dispensation from EFV requirements

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- **NAPSR:**
 - Encouraging comments from all states
 - Revisions to NPRM should be largely driven by those most affected by rule: states and operators, both large and small

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- **NAPSR:**
- **Inspection/enforcement tools should be developed with states as lead**
- **Agree that joint stakeholder group should conduct annual review of national performance metrics**

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- NAPSIR looks forward to continued discussion as we review our position on DIMP in light of NPRM
- NAPSIR has been involved from the beginning and continues to be involved
 - DIMP Team, NAPSIR leadership

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Questions?

A faint, stylized image of two hands shaking is visible in the background, rendered in a lighter shade of blue against the dark blue background. The hands are positioned in the lower half of the slide, with one hand on the left and one on the right, palms facing each other.