

U.S. DEPARTMENT OF TRANSPORTATION

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PIPELINE AND HAZARDOUS MATERIALS
SAFETY ADMINISTRATION

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GAS PIPELINE ADVISORY COMMITTEE MEETING

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FRIDAY
MARCH 2, 2018

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The Advisory Committee met via
teleconference at 10:10 a.m., Hon. Diane Burman,
Acting Chair, presiding.

MEMBERS PRESENT

HON. DAVID W. DANNER, Washington Utilities and
Transportation Commission; Chair

STEPHEN E. ALLEN, Indiana Utility Regulatory
Commission

RONALD A. BRADLEY, PECO Energy

HON. DIANE BURMAN, New York State Public Service
Commission

CHERYL F. CAMPBELL, Xcel Energy Incorporated

ANDREW J. DRAKE, Enbridge Gas Transmission

SARA ROLLET GOSMAN, Pipeline Safety Trust;
University of Arkansas School of Law

RICHARD F. PEVARSKI, Virginia Utility Protection
Services LLC/Virginia 811

RICHARD H. WORSINGER, Public Utilities, City of
Rocky Mount, North Carolina

CHAD J. ZAMARIN, Williams Companies

PHMSA STAFF PRESENT**HOWARD ELLIOTT, Administrator****ALAN MAYBERRY, Associate Administrator for
Pipeline Safety; Designated Federal
Official****DRUE PEARCE, Deputy Administrator****JOHN GALE, Director, Office of Standards and
Rulemaking****AMAL DERIA, Attorney Advisor****ROBERT JAGGER****CHRIS McLAREN, Transportation Specialist****STEVE NANNEY****CAMERON SATTERTHWAITE****STEVE STOUT****CHERYL WHETSEL, Advisory Committee Manager****ALSO PRESENT****PAT CAREY, Kinder Morgan****MARK CLAYTON, CenterPoint Energy****CHUCK KANOY, NiSource****HEIDI KELLER, API****MARK KERNS, EQT****RICK KIVELA, Enbridge****ERIN KURILLA, APGA****KEVIN LANG, Southwest Gas Corporation****WADE MILLER, PSE&G****BRIAN MOIDEL, Dominion Energy Ohio****CJ OSMAN, INGAA****JIM SHAFER, Dominion Transmission****WEN TU, AGA****DARRAL WARD, Boardwalk Pipeline****CARL WEIMER, Public Participant****PAUL WOLVEN, Consumers Energy**

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P-R-O-C-E-E-D-I-N-G-S

10:10 a.m.

MR. MAYBERRY: Okay. We'll go ahead and get started. I'm Alan Mayberry, Associate Administrator for Pipeline Safety.

I'd like to welcome you and also thank you for your participation in today's Gas Pipeline Advisory Committee meeting that we're doing by phone today, or by conference call.

Under the Federal Advisory Committee Act, I serve as the Designated Federal Official, the presiding official.

We'll cover the agenda in a moment, but first off, I'd like to -- and if you're not aware, the federal government in the Washington, D.C. area is shut down today.

And I thank the PHMSA staff that did come in today to conduct this meeting, I think it's a strong testament to the passion for the mission that we have here at PHMSA and the desire, I think this will speak well as we move forward, the desire to move this major action,

1 this major policy that we're working on, forward
2 through the process to completion.

3 We've had a lot of good success so far
4 and can see the light at the end of the tunnel.
5 So, it's much appreciated for people coming in,
6 in spite of being shut down today.

7 Along with myself, we have, in the
8 room here in Washington, D.C., at PHMSA
9 Headquarters, we have John Gale, Amal Deria,
10 Steve Stout, Cameron Satterthwaite, Bobbie
11 Jagger, Chris McLaren, and Steve Nanney.

12 I'd like to also introduce the
13 Chairman, Diane Burman, who will chair today's
14 meeting. We're giving Chairman David Danner a
15 break today.

16 And I'd like to also express my
17 appreciation for the progress we've made up to
18 this point under Chairman Danner's leadership.
19 We've just made tremendous progress and giving
20 him a break today and we'll have Diane Burman,
21 who's Commissioner with the New York State Public
22 Service Commission, will chair today's meeting.

1 Again, in a moment, I'll turn it over
2 to the Chairman. First, I'll cover a couple of
3 housekeeping items.

4 Normally, I would be covering some of
5 the logistical items here related to just our
6 facilities. Of course, we are not open to the
7 public today.

8 If you would, to the extent you can, I
9 guess this really applies to the members, if you
10 could mute your mobile devices, that would be
11 appreciated.

12 And let me say this too, this will be
13 important as we go through the day, for our
14 members who are used to this, but especially for
15 those who will be making statements or asking
16 questions, it will be very important, since
17 you're not here for us to see, that you state
18 your name and affiliation. So, we'll be
19 reminding you of that as we go forward today.

20 In order to complete the business of
21 the Advisory Committee, we ask that all parties
22 hold their comments until we open the floor. I

1 don't think that's a problem, because we've
2 handed control to our great operators of the call
3 today.

4 During the public comments sections,
5 the Chair will first call on individuals who
6 registered in advance, and then open the floor to
7 others. Please, as you do provide comments,
8 please keep them brief to two minutes or less.

9 And also, much appreciated if you
10 would not repeat, if an issue or a point has
11 already been made, please don't repeat that, just
12 in the interest of proceeding through, for
13 efficiency here.

14 And the presiding official, myself, I
15 may ask you or the Chair may ask you to cut your
16 comments short, if necessary, to keep the agenda
17 moving.

18 As always, we have a docket that's
19 available for you to submit written comments to
20 as needed. And that docket number is PHMSA-2016-
21 0136. Again, I don't think this is needed, but I
22 will state it anyway.

1 This is a Federal Advisory Committee
2 meeting. Committee members and members of the
3 public are asked to preserve order and decorum
4 during this meeting.

5 At this point, I will hand it off to
6 our Chair, Diane Burman, who will get us kicked
7 off today. But, again, thank you for your
8 participation.

9 And by the way, I might add that we
10 may be joined momentarily by our Administrator,
11 Skip Elliott, and our Deputy Administrator, Drue
12 Pearce. But they are in the building today, but
13 they may be showing up here momentarily.

14 And with that, I will turn it over to
15 Chairman-for-today Diane Burman. Thanks, Diane.

16 MS. BURMAN: Thank you so much. Can
17 everyone hear me?

18 MR. MAYBERRY: Yes.

19 MS. BURMAN: Okay. I want to call this
20 meeting of the Gas Pipeline Advisory Committee to
21 order. I'm going to take a roll call right now.
22 I will call your name and go through it, if you

1 can just acknowledge that you're on the line.

2 Mr. Stephen Allen, Director of
3 Pipeline Safety from the Indiana Utility
4 Regulatory Commission?

5 MR. ALLEN: Here.

6 MS. BURMAN: Diane Burman, here, with
7 the New York State Public Service Commission.

8 David Danner, Chair of the Washington
9 Utilities and Transportation Commission?

10 CHAIR DANNER: Yes, I'm here.

11 MS. BURMAN: Terry Turpin, Deputy
12 Director for FERC? Okay.

13 Ron Bradley, Vice President, Gas, from
14 PECO?

15 MR. BRADLEY: I'm present.

16 MS. BURMAN: Cheryl Campbell, from Xcel
17 Energy?

18 MS. CAMPBELL: Present.

19 MS. BURMAN: Andrew Drake from Spectra
20 Energy?

21 MR. DRAKE: Present.

22 MS. BURMAN: Richard Worsinger from

1 City of Rocky Mount?

2 MR. WORSINGER: Present.

3 MS. BURMAN: Chad Zamarin from
4 Cheniere?

5 MR. ZAMARIN: Here.

6 MS. BURMAN: Mark Brownstein from
7 Environmental Defense Fund?

8 Sarah Gosman from the University of
9 Arkansas?

10 MS. GOSMAN: Here.

11 MS. BURMAN: Robert Hill from Brookings
12 County Zoning and Drainage?

13 Richard Pevarski from Virginia Utility
14 Protection Service?

15 MR. PEVARSKI: Present.

16 MS. BURMAN: Okay. And I believe that
17 is all from the Gas Pipeline Advisory Committee,
18 is that correct, Cheryl? Not, Cheryl Campbell,
19 Cheryl Whetsel? And I believe we have a quorum,
20 so we can begin.

21 This meeting is being recorded. A
22 transcript will be produced for the record. The

1 transcript and the presentations will be
2 available on the PHMSA website, Meeting Number
3 131, and on the e-Gov docket at
4 www.regulations.gov. The docket number for this
5 meeting is PHMSA-2016-0136.

6 I'd like to ask folks, just a reminder
7 to introduce yourself each time you speak, so
8 your comments can be acknowledged in the meeting
9 transcript.

10 For the members, please use the Raise
11 Your Hand feature in the Adobe Connect link when
12 you wish to make a comment and we will call on
13 you.

14 For the public, we will call on
15 preregistered commenters, and then open the floor
16 to others, and you have to do *1. The telephone
17 operator will assist all commenters.

18 We have done the roll call. We also,
19 for -- we have a full agenda. We will be meeting
20 from 10:00 to 5:00 today on the call. We will be
21 breaking for lunch for one hour.

22 Today, we will be doing in segments of

1 four. The first segment will be on strengthening
2 IM assessment methods. The second will be on
3 assessments outside of HCAs.

4 The third will be on record retention
5 requirements. And the fourth will be on repair
6 criteria, inside and outside of HCAs.

7 The presentations are available on our
8 meeting website, on the website for all to see.
9 I do realize it's a teleconference, that it may
10 be a bit clunky and hard.

11 I will ask that folks understand that
12 we are working through this and that I am
13 cognizant, as the Chair, of the need to make sure
14 that everyone has an opportunity to be heard and
15 that I may be calling on folks directly to make
16 sure that you are -- your silence is -- you are
17 feeling comfortable in where things are and
18 feeling very comfortable in sharing your
19 thoughts.

20 So, don't think if I single you out
21 and ask for you to share your thoughts that -- I
22 really want you to feel comfortable to speak up,

1 as we move forward and have a discussion, because
2 we're not seeing each other in person. So, thank
3 you for that.

4 We also will be -- the other thing I
5 want to remind people is to mute your phone. And
6 also, if you go on hold and you have music
7 playing, we will be taking care of that. So, you
8 may wind up getting disconnected.

9 So, please be very cognizant of the
10 fact that, if you are on hold and there is music,
11 you may wind up getting dropped from the call.
12 So, please be cognizant of that.

13 The other thing is, just from a safety
14 perspective, from a safety moment, I just do,
15 especially in light of the storm here in the
16 Northeast, I do want to take a moment for a
17 safety moment. If you see downed electric wires,
18 do not go near them.

19 Treat all downed wires as if they are
20 live. Never attempt to move them or touch them
21 with any object. Be mindful that downed wires
22 can be hidden from view by snow, tree limbs,

1 leaves, or water.

2 Report all downed wires to your
3 utility or your local police immediately. If a
4 power line falls on your car while you're in it,
5 stay inside the vehicle and wait for emergency
6 personnel.

7 If your power goes out, disconnect or
8 turn off appliance that would otherwise turn on
9 automatically when service is restored. If
10 several appliances start up at once, the
11 electrical circuits may overload.

12 Check to make sure your flashlights
13 and any battery operated radios or televisions
14 are in working order. Make sure you have a
15 supply of extra batteries.

16 Weather updates and news and
17 restorations of electrical service can be heard
18 on most local radio and television stations.

19 Gas customers should keep vents and
20 meters clear of snow and ice safely to prevent
21 carbon monoxide buildup or gas leak.

22 I do thank those working in the

1 utility service, whether at the utility or the
2 commissions, and all emergency personnel who are
3 monitoring the efforts right now and helping to
4 respond to any power disruptions throughout this
5 storm. Thank you very much.

6 Right now, I'm going to turn it over
7 to PHMSA for our discussion, briefing on the NPRM
8 Safety of Gas Transmission and Gathering
9 Pipelines, and discussion of relevant topics.

10 Steve Nanney and Chris McLaren will
11 review the detailed proposal, relevant comments,
12 PHMSA initial take, and will accept public
13 comments, Committee discussion, and Q&A.

14 So, we're going to continue right now.
15 Thank you so much.

16 MR. MAYBERRY: Thank you, Diane. We
17 will turn it over to John Gale, who will kick off
18 the briefing to start the day.

19 MR. GALE: Thank you, Alan. Again, my
20 name is John Gale. I'm the Director of Standards
21 and Rulemaking in the Office of Pipeline Safety.

22 For those public participants, if

1 you're by chance having a problem connecting to
2 Adobe Connect and cannot see the presentation, if
3 you go to our meeting page, you can actually
4 download a copy of the presentation and follow
5 along during our discussion. And if you are
6 having any difficulties, we surely do apologize
7 for that.

8 What we'd like to do real quick is
9 give you a recap of where we've been and give you
10 an idea of kind of where we're going.

11 I feel like I need to apologize to
12 some of my friends who have traveled with me
13 lately, I seem to bring bad weather with me. So,
14 if you've been to Houston or Oklahoma or now,
15 D.C. with me over the last about month and a
16 half, you'll understand that.

17 But this is the fourth meeting to
18 discuss the gas transmission role, and we are
19 planning a fifth meeting, as we'll discuss in a
20 minute, later this month.

21 But in the previous meetings, we have
22 made a lot of progress, as Alan said, but we have

1 a little bit still to go. We've already covered
2 and had a positive vote on a variety of areas.

3 In the meeting back in January of
4 2017, our first meeting, we already passed the
5 issue on the six-month grace period for seven
6 calendar year reassessment intervals.

7 We were able to pass the proposal
8 related to ILI launchers and receivers,
9 seismicity, and also passed the requirements
10 related to inspections following extreme events,
11 and of course, management of change.

12 We then deferred, though we had a
13 discussion on a variety of areas, and it kind of
14 started to set the stage for how the meetings
15 were going to then kind of commence as we went
16 through this very challenging role.

17 We had a discussion on corrosion
18 control. We also had a discussion, a very active
19 discussion, on records and a discussion on IM
20 clarifications.

21 We then had our next meeting in June
22 of 2017, where we were able to finalize some of

1 those items that we had tabled at the prior
2 meeting.

3 And we were able to finalize many of
4 the requirements on corrosion control, begin to
5 have a discussion or finalize some of the issues
6 related to records, but not all, and finalize
7 some of the IM clarification requirements, and
8 proposals related to MAOP exceedance.

9 We then, again, had a discussion on a
10 variety of areas, but did not have a vote, but
11 just a discussion, on some additional record
12 requirements, some IM clarifications, and the
13 material documentation, which is one of the
14 cornerstones of this rulemaking.

15 At our just recent meeting in
16 December, we made a lot of great progress and
17 were able to get a vote passed on material
18 documentation, which has really set us on a good
19 path to get to the end of this rulemaking. And
20 finalized some of the requirements related to
21 strengthened IM assessments, but not all.

22 We were able to have a vote passed on

1 the ICDA requirements, the strengthened
2 assessment requirements for SCCDA, and pass the
3 requirements related to guided wave ultrasonics
4 that is in Appendix F. And also, regarding the
5 passage of ILI requirements in 192.150 was also
6 passed.

7 We also began the discussion on the
8 MAOP reconfirmation process in 624, but did not
9 get a vote. And we had again some additional
10 discussion on some of the other IM assessment
11 requirements, like for the spike test and 192.493
12 and 192.921(a).

13 And that kind of sets the stage now
14 for what we're here today to talk about. And
15 we're focusing on four areas, four areas that we
16 thought we could either have a good discussion
17 that could set us up for getting us to a really
18 good point with this rule come March 26, and also
19 those areas we thought we could actually get to a
20 positive vote on.

21 And those are the remaining
22 requirements related to strengthening assessment

1 requirements, like the spike test and 192.921(a)
2 and 493.

3 We also believe that we could have a
4 discussion and possibly a vote today on the
5 proposals related to assessing areas outside of
6 HCAs, which is one of our mandates we're looking
7 at, looking at expansion of IM principles outside
8 of HCA.

9 We were also looking at course --
10 which brings into context or to the discussion,
11 the definition of an MCA.

12 We also believe we can finalize most
13 of the issues related to records and the
14 discussions related to 192.13(e), 192.67,
15 192.127, and 192.205, and of course, then,
16 Appendix A.

17 We would then like to just begin and
18 have a discussion on repair criteria, not really
19 -- we don't believe we would be ready to have a
20 vote yet, and we would kind of hold off a vote on
21 that to the next meeting.

22 Now, of course, if the members believe

1 that's where we're at, of course we'll transition
2 and pivot to that, but the plan right now at
3 today's meeting it to have a vote, a discussion
4 and a vote on those first three areas, and simply
5 have a discussion on repair criteria that will
6 set us up for our next meeting.

7 And our next meeting right now is
8 planned for March 26-28. We've actually just
9 recently sent to the Federal Register a meeting
10 notice on that, that should be published in the
11 next couple of days.

12 So, the topics that will be discussed
13 at the March meeting and our right now planned
14 meeting in June would be basically what we have
15 left at that point.

16 So, any of the items that we don't
17 finish today, which most likely will include
18 repair criteria. MAOP verification, including
19 the MAOP record requirements in 192.619(f) and
20 624(f).

21 Any other outstanding issues, we of
22 course have a couple of definitional issues to

1 discuss and a couple of miscellaneous items that
2 we'll bring up accordingly.

3 And then, of course, we still have the
4 issues related to gather that we still have to
5 address related to the reporting requirements and
6 the change in definitions and the proposal
7 related to regulating additional lines that we
8 proposed at eight inches or greater.

9 So, we think we're on a very good path
10 right now, to at least set the stage for being
11 through most of the transmission issues by the
12 second March meeting, and maybe be able then to
13 pivot and move toward the gathering issues, more
14 toward that June meeting.

15 Or at least, that's where we'll have
16 our most significant discussions. So, in a
17 nutshell, that's kind of where we're at, where
18 we've been, and where we're headed.

19 And with that, I'm going to turn it
20 over to Steve Nanney, who will begin the
21 discussion of the strengthening of the assessment
22 requirements. Steve?

1 MR. NANNEY: Good morning. We're now
2 on Slide 7. And by the way, just to give you a
3 little detail, here in Washington, coming into
4 the DOT building this morning, I know last night
5 they were predicting winds of 60-70 miles an hour
6 and going into the main lobby, the glass was
7 shattered going in.

8 So, there were things flying around
9 that would shatter glass, because it definitely
10 did it in the DOT building. And I live in
11 Houston and where I live, we seen 110 mile an
12 hour winds and I've never had a window at the
13 house blown out. So, they had good winds last
14 night.

15 Looking at Slide 7, again, today, in
16 the first part of this on strengthening the
17 assessment requirements, as we discussed at the
18 last meeting, today we will recap 192.493,
19 192.506, and 192.921(a), as part of the
20 assessment requirements.

21 I'm going to Slide 8. The first part
22 of that, that we will be discussing, again, as

1 you see at the top, the issue was to recap the
2 current regulations on a number of issues that
3 impact the quality and effectiveness of integrity
4 assessments.

5 And what we proposed to do was
6 incorporate three industry standards in 493.
7 That was API STD 1163, ANSI/ASNT ILI-PQ, and also
8 NACE SP0102. And we would incorporate them by
9 reference into 192.7.

10 Going over to Slide 9. This part of
11 it, again, would be -- some other items we would
12 propose would be to clarify that operators must
13 consider uncertainties in identifying and
14 characterizing anomalies.

15 Also, to limit the use of Direct
16 Assessment only to segments that cannot be
17 inspected by ILI tools. To add a new section,
18 506, that establishes a minimum standard for
19 spike hydrostatic tests.

20 And then, add definitions for "inline
21 inspection" and "inline inspection tool or
22 instrumented internal inspection device". And,

1 again, the basis for that are some petitions that
2 we got from NTSB and NACE.

3 Going to Slide 10. And Slide 10 is
4 some of the Committee comments that we
5 acknowledged, which was to delete the
6 "requirements and recommendations" language in
7 493 and other places where the standards are
8 incorporated by reference to avoid the
9 consequence of non-mandatory recommendations in
10 the standards becoming the regulatory
11 requirements.

12 Going to Slide 11. Again, this is
13 493, and we're looking there, based upon the
14 Committee discussion, PHMSA proposes for the
15 Committee to consider the following.

16 One is to revise proposed 493 to
17 strike the phrase "the requirements and
18 recommendations" to read as follows. And you can
19 see there on the slide what we're striking as far
20 as "the requirements and recommendations".

21 Also, the last bullet is to make
22 comparable change at other locations, and that

1 would be in 150, 927, and 929, where the
2 standards are incorporated by reference. Going
3 to Slide 12. That's going to Section 921(a).

4 Some of the Committee comments we had
5 there were, the members to allow Direct
6 Assessment whenever appropriate. In other words,
7 do not restrict the use of Direct Assessment to
8 un-piggable segments or when other methods are
9 impractical.

10 Incorporate better language to clarify
11 use of Direct Assessment where it is appropriate
12 to do so.

13 Also, another comment we heard was, in
14 921(a) that tools must be selected based upon the
15 applicable threats. In other words, avoid the
16 implication that every tool must always be used
17 to assess every threat.

18 Going to Slide 13. On Slide 13, some
19 Committee comments we had there was, in 921(a),
20 delete the requirement to review ILI results by
21 knowledgeable individuals, since it is
22 duplicative to Section 915.

1 And also, there was concern that all
2 tools cannot meet the 90 percent tool tolerance
3 specified in the industry standard.

4 And PHMSA's comment there, as you'll
5 see, is that the rule would not require every
6 tool to perform to a 90 percent specification,
7 but that actual tool performance should be
8 verified and applied when interpreting ILI data.
9 That was their intent.

10 Slide 14 is Section 921(a)(3), to
11 simply reference Section 506, don't list the
12 threats for which a spike pressure test is
13 appropriate.

14 PHMSA's comment there was that the
15 list of threats is not a requirement, but it does
16 serve to communicate to everyone that a spike
17 pressure test has limited applicability. PHMSA
18 would not expect the use of a spike test other
19 than to address time dependent cracking threats.

20 And with respect to notifications,
21 adopt same "no objection letter" language the
22 Committee approved for Section 607.

1 Going to Slide 15. Here's what PHMSA
2 proposes the Committee to consider. In Section
3 921(a)(1), to clarify that the assessment methods
4 are selected based on threats to which the
5 pipeline is susceptible.

6 And also, we would remove the
7 duplicative language in Section 921(a) that is
8 duplicative to existing Section 915.

9 Also, we would revise Section
10 921(a)(6) to clarify that Direct Assessment is
11 allowed where appropriate, but may not be used to
12 assess threats for which Direct Assessment method
13 is not suitable.

14 And then, lastly, in Section
15 921(a)(7), we would incorporate the same "no
16 objection" language that the Committee approved
17 in Section 607, which would be the 90 days for
18 PHMSA to review and to provide a "no objection".
19 If you'll remember, in some of the integrity
20 management type rules, there was 180 days, so we
21 were halving that to 90 days.

22 Going to Slide 16. And this is on

1 spike pressure test standard, which would be
2 Section 506.

3 Some of the Committee comments there
4 was to use for spike pressure test 100 percent of
5 the specified minimum yield strength of the pipe,
6 to address dealing with the elevation and test
7 segment length, instead of using 105 percent of
8 SMYS.

9 Also, the -- some comments we got was
10 that the 30-minute hold time was too long, but
11 recognized the need to stabilize the test to
12 minimize the spike duration to avoid growing
13 subcritical cracks.

14 And then, lastly, is to clarify "time
15 dependent cracking" as a threat to be managed by
16 spike testing.

17 Going to Slide 17. Another industry
18 comment that we had was, limit the applicability
19 of the spike test to environmentally-related
20 cracking, such as SCC.

21 And PHMSA's comment there was, spike
22 testing is appropriate for manufacturing and

1 construction defects, such as seam flaws or
2 selective seam corrosion, and they are time
3 dependent threats which manifest as cracks or
4 fail in a manner comparable to cracks.

5 Going to Slide 18. Some other
6 comments we had was to allow spike tests to use
7 gas as a test medium, since it is allowed under
8 503(c).

9 PHMSA's comment there was that the
10 test under Section 503 is for new or replaced
11 pipe being placed into service, it's not for the
12 discovery of defects on pipe with known or
13 suspected threats.

14 Testing pipe with defects using gas
15 would be much more likely than new pipe to
16 experience failures, including fire/explosion.
17 And operators desiring to pressure test with gas
18 could notify PHMSA on a case-by-case basis under
19 "other technology" notifications or apply for a
20 special permit.

21 Slide 19. Again, this is Section 506
22 on the spike testing. Based upon Committee

1 discussions, PHMSA proposes the Committee
2 consider the following. Revise the spike test
3 requirements in Section 506 to the follow.

4 And this is PHMSA's recommendations to
5 the Committee. Change spike pressure to a
6 minimum of the lessor of 100 percent SMYS or 1.5
7 times MAOP.

8 Number two is to reduce spike hold
9 time to a minimum of 15 minutes after the spike
10 pressure stabilizes. Number three is to revise
11 language to refer to time dependent cracking.

12 And then, lastly, is in 506(g),
13 incorporate the same "no objection" language, the
14 90-day language, that the Committee approved in
15 Section 607.

16 With that, we'll turn it over to our
17 moderators for the public comments on Slide 20.

18 OPERATOR: Okay. And if you have a
19 comment, it's *1, *1.

20 MS. BURMAN: And I do -- this is
21 Commissioner Burman. I do know that we have
22 several commenters, first -- this is just --

1 Alan, are we opening up first to the public or
2 are we going to the Committee first?

3 MR. MAYBERRY: Yes, Diane, we'll go
4 first to the public. And that will allow the
5 Committee to consider the input from the public -
6 -

7 MS. BURMAN: Okay.

8 MR. MAYBERRY: -- as they deliberate.
9 So, yes. We'll follow the same pattern.

10 MS. BURMAN: Are we going to go first
11 to the folks who are preregistered for comments?

12 MR. MAYBERRY: Yes.

13 OPERATOR: Yes, please. Yes.

14 MR. MAYBERRY: Yes.

15 MS. BURMAN: So, Chuck Kanoy, I believe
16 you had a comment. If you want to dial *1. I
17 don't know if anybody's raised their hands
18 electronically.

19 OPERATOR: Okay. And Chuck Kanoy's
20 line is open.

21 MR. KANOY: All right. Good morning.
22 Yes, this is Chuck Kanoy, with NiSource. We

1 wanted to just comment on Slide 18, relative to
2 the testing.

3 We are looking at opportunities for a
4 COD, especially station piping, where we have
5 some issues where we've had some transfer of
6 assets. We would like to just be able to do some
7 level of testing with gas, not necessarily
8 natural gas, but certainly like a nitrogen.

9 And really, when you start looking at
10 the susceptibilities to threats, I mean, at
11 stations, they are typically more controlled
12 environments or areas that we oversee.

13 But we can certainly do a conditional
14 evaluation before we would -- the records around
15 the MAOPs. But we can do a conditional
16 evaluation of that setting prior to conducting
17 the pneumatic test.

18 And then, sort of do that in a very
19 safe environment and approach, potentially
20 without having to do all the submittals.

21 We understand the proposal by PHMSA
22 for doing it with "other technology"

1 notification, but we're just saying that I think
2 there's some opportunity there that we could do
3 some of that testing very safely. That's all I
4 have, thanks.

5 MS. BURMAN: Okay, thank you. And
6 then, I do believe Wen Tu had a comment. Wen Tu?

7 OPERATOR: Wen Tu, your line is open.

8 MR. TU: Good morning, everyone. This
9 is Wen Tu from AGA. First of all, I want to say
10 that AGA and our members are very supportive of
11 many of the changes that PHMSA is proposing today
12 to strengthen IM test methods.

13 We appreciate PHMSA's efforts to
14 establish regulatory sections that detail the
15 process to be undertaken to meet specific
16 regulatory requirements, such as the process
17 already established for material verification in
18 Section 607. This allows other regulatory
19 sections to focus on when the process must be
20 implemented.

21 And so, in reviewing Section 506,
22 which covers spike test, it covers both the

1 process and the applicability of when a spike
2 test would be required.

3 However, 506 is already referenced in
4 subparts M and O, which have clear applicability
5 identifying when a spike test would be required.

6 Therefore, we would like to recommend
7 that 506 paragraph A be rewritten to remove the
8 applicability criteria and clarify that it is the
9 section that establishes the process for spike
10 testing when it's required by other sections.

11 And just to remind everyone, this
12 approach would be consistent with how GPAC noted
13 to move forward with material verification in
14 December. Thank you.

15 MS. BURMAN: Thank you. Are there any
16 other public comments?

17 OPERATOR: Again, if you have other
18 comments, it's *1. One moment.

19 MS. BURMAN: Andy Drake?

20 MR. DRAKE: This is Andy Drake with
21 Enbridge. Steve, I think you've done a lot of
22 good things here. I think some of the comments

1 that we might be getting --

2 MR. MAYBERRY: Andy?

3 MR. DRAKE: Yes?

4 MR. MAYBERRY: One second, I'm sorry.

5 The logistics sometimes are a bit of a challenge

6 here. This is just right now for the public,

7 we're going to open up to the Committee members

8 in just a minute.

9 MR. DRAKE: All right.

10 MR. MAYBERRY: All right, thank you.

11 MS. BURMAN: Sorry, that was my bad, I

12 approved him.

13 MR. MAYBERRY: We'll let that one go.

14 MS. BURMAN: All right, thank you.

15 OPERATOR: Okay. And it looks as

16 though there are no public queuing up.

17 MS. BURMAN: Okay. So, now, we'll go

18 to the Committee, is that correct?

19 MR. MAYBERRY: Yes.

20 MS. BURMAN: All right. Now, I'm not

21 sure if I want to accept Andy.

22 (Laughter.)

1 MR. DRAKE: I'm moving forward with a
2 little trepidation, here.

3 MS. BURMAN: Me too, Andy.

4 (Laughter.)

5 MS. BURMAN: Okay. Andy, you can
6 please go forward, thank you.

7 MR. DRAKE: All right. Thank you.
8 Steve, I think part of what we might be having
9 here is the regulation is kind of in evolution.
10 So, there's pieces of it that I think maybe we've
11 already addressed that maybe some of the comments
12 are coming out because there's some concerns that
13 they could still be in place.

14 If the spike testing was being used
15 for MAOP confirmation, then I think there's a
16 legitimate concern about needing to preserve
17 spike testing in stations and places like that,
18 which obviously that's where the piping is very
19 challenged, you might want to have some pneumatic
20 testing flexibility, because of the ability to
21 get water out of some of those configurations.

22 But I'm with you, we should be very

1 conscious about using spike testing with
2 pneumatic if we're looking for cracks. I think
3 if that's where we are, we should be very, very
4 conscious of that.

5 And I think that may be part of the
6 issue here. But if we're not using the spike
7 test for MAOP confirmation, I think then the
8 spike test just becomes an issue about looking
9 for cracks.

10 One thing that I did want to bring up
11 here, I kind of just want to put this on the
12 record, and that is, the issue about the spike
13 test, I'm reading between the lines here, Steve,
14 and I kind of get the impression, not the
15 impression, I know, technically, where you're
16 going is manufacturing flaws can grow with time
17 in a fatigue environment.

18 And so, obviously, the spike test
19 needs to be preserved for those kind of
20 situations.

21 I think that in the absence of
22 fatigue, or in the presence of a fatigue study,

1 where the fatigue life cycle is shown to be 100
2 years, fatigue growth of manufacturing flaws,
3 typically in a gas environment is very, very
4 rare.

5 And we are looking mostly for the use
6 of this tool for environmental cracking. Or this
7 testing vehicle for environmental type cracking.

8 And I just want to put that out there,
9 because I think it's actually a very significant
10 issue that we need to talk through at some point,
11 about how do we differentiate between fatigue
12 regimes that gas pipes and other kind of piping,
13 like liquid piping, experience.

14 Because it is actually very
15 fundamentally important about how we manage some
16 of those flaws. Thank you.

17 MS. BURMAN: Thank you. Does anyone
18 else on the Committee have any questions,
19 concerns, thoughts that they want to talk about
20 on this section? Folks are comfortable with the
21 proposed path forward?

22 MR. MAYBERRY: And, Diane, if there is

1 no more questions, just to help the Committee a
2 little bit, we're going to be putting up some
3 language that, if acceptable to the Committee,
4 could lead us in a positive direction in this
5 matter.

6 MS. BURMAN: Yes, that will be helpful,
7 because I think a lot -- I know my concern is not
8 seeing and reading the body language, I think
9 it's difficult on the teleconference.

10 MR. MAYBERRY: Right.

11 MS. BURMAN: So, that language would be
12 helpful for people.

13 MR. MAYBERRY: Yes, well, this will be
14 really some recommended vote language. We're
15 going to have it up in just a second.

16 MR. GALE: I think, Diane, Steve can
17 address some of the comments and questions.

18 MS. BURMAN: All right. That's
19 perfect. And obviously, people are going to need
20 a little time to process and read it.

21 MR. GALE: Yes, so if it's okay, we'll
22 have Steve address some of the questions that

1 came up.

2 MS. BURMAN: Absolutely. Thank you,
3 Steve.

4 MR. NANNEY: Just first of all, the
5 public comment on the station test, hearing that
6 snippet, I guess, of information is -- PHMSA
7 would hope that if you were needing to use a
8 spike test for cracking issues in a station,
9 where you have higher pressures, you have more
10 fluctuating pressures, you probably have higher
11 heat, that you would not be needing a spike
12 pressure test, because you have cracking type
13 issues with your pipe.

14 We would expect you to be using a
15 normal type pressure test. And also, if there is
16 something going on there, we would hope that the
17 other technology and coming to us with that
18 situation would be what you would do.

19 If you were wanting to use nitrogen or
20 maybe even air, whatever you were trying to use,
21 inert gas there, it would be the reply there.

22 As far as the other reply that was

1 made by Andy Drake, the Committee member is, we
2 were expecting the spike test to be used for
3 anything that was a time dependent cracking
4 issue, whether that was stress corrosion cracking
5 or whether that was seam type issues.

6 We see both of those being failures on
7 both natural gas pipelines and liquid pipelines.
8 So, we would expect that to be used
9 appropriately.

10 And then, we'll have language in any
11 proposed rule as such, when we vote on it.
12 That's what PHMSA's plans were. And, again, we -
13 - if someone -- in the language, we would have an
14 out to where if you have particular situation,
15 you could come to us with "other technology".

16 MR. MAYBERRY: The members right now,
17 Diane, should be able to see a recommended vote
18 language for --

19 MS. BURMAN: Yes. Firstly, I see it.
20 If any member does not see it, please let us know
21 by raising your hand or, I don't know, if we can
22 hear you directly. I do see that we do have one

1 raised hand, I'd like to call on Andy Drake now.

2 MR. DRAKE: Thank you. This is Andy
3 Drake with Enbridge. Steve, I think, the only
4 caveat that I'm trying to offer is that if the
5 company does a fatigue study and defines what
6 time dependent means, then they shouldn't be
7 automatically encumbered to do spike testing
8 everywhere where they might have manufacturing
9 flaws.

10 Because the manufacturing flaws, as
11 long as it's been hydrostatically tested over one
12 and a half or 1.25 times when it was installed,
13 that should be stable, unless it has been
14 experiencing fatigue. The operator has to make
15 that determination.

16 And just would like to preserve that
17 filter, because I think that's actually a
18 diligence that you would expect us to do, but to
19 just automatically throw everything into that all
20 manufacturing flaws are now time dependent
21 without a fatigue study seems -- that seems like
22 a lot of material is going to end up in that

1 bucket, which I don't think is where it should be
2 going. That's really all my point was.

3 MR. NANNEY: Just a reply, there, is
4 the spike test is spelled out for when you use it
5 in 506. And then, it would be actually
6 referenced in other sections, like 624 would have
7 the language that would reference back to it.

8 MS. BURMAN: Okay. I'm going to call
9 on, in a minute, the next two people. The one
10 question I would ask though, as we go to 192.493
11 and the slide number for the voting language, is
12 there for the public, where they revised proposed
13 192.493 by striking the phrase "requirements and
14 recommendations of" from the paragraph.

15 In the PowerPoint that we have up on
16 the website, is there a page number that you can
17 refer to easily so people can look at that to see
18 and compare to put that in?

19 MR. GALE: Diane, are you referring to
20 the PowerPoint presentation or actually from the
21 --

22 MS. BURMAN: Well, either one. I know

1 people can look at it there, but I just wondered
2 if it's also referenced. I'm just trying to make
3 it easier for the public as well.

4 MR. GALE: Yes, I think we'll have to
5 rely on them just being able to cite the section
6 --

7 MS. BURMAN: Okay.

8 MR. GALE: -- and then -- and just to
9 be clear, this is an issue that was discussed at
10 the last meeting, it had a lot of discussion.
11 And based on some of the comments made, we
12 believe this is the proper course of action at
13 this time.

14 MS. BURMAN: Okay. All right. I'm
15 going to now call upon the two people who have
16 raised their hand. I think there was a third
17 person, who has dropped off. Sara Gosman is on
18 now. Sara, you're approved to speak. Thank you.

19 MS. GOSMAN: Hi, thank you. So, I just
20 wanted to make sure that, in this change, that
21 PHMSA feels that these standards are still
22 enforceable, with the language that's actually in

1 the standards.

2 MR. NANNEY: Sara, this is Steve
3 Nanney. Just to reply back, you're talking about
4 the standards API 1163 and NACE SP0102 and the
5 ANSI/ASNT ILI-PQ, those three standards?

6 And just to reply there, in those
7 standards, there are some "shalls", there will be
8 some "shoulds" and some "mays". And all of the
9 "shall" language would be enforceable. The
10 "mays" and the "shoulds" would be dependent upon
11 if it's applicable or not.

12 So, I think -- I can't say 100
13 percent, but I would say we would expect the
14 things that should be "shalls", should be and the
15 things that are not, would not be.

16 MS. BURMAN: This is the Chair. Sara,
17 does that answer your question?

18 MS. GOSMAN: It does, yes.

19 MS. BURMAN: Okay.

20 MS. GOSMAN: I just -- any time we
21 incorporate a standard like this, I want to make
22 sure that it's clear to the operators, as well as

1 to the public, what's being required.

2 And I think it's just a problem with
3 the language inherent in the standards
4 themselves, that it's written as a regulation,
5 but it's also written as a set of recommended
6 practices.

7 So, I think, I'm fine with this
8 change, I think it's just important to recognize
9 that what we're doing, I think, is enforcing the
10 "shalls" and then, leaving the "shoulds" to
11 individual factual context, as I understand it.

12 MS. BURMAN: Thank you for that. I do
13 want to recognize that there were two people who
14 did have their hands raised and I want to make
15 sure that if they still want to have an
16 opportunity to speak, Ron Bradley, you had your
17 hand raised, do you still want to talk?

18 MR. BRADLEY: Hi, yes, this is Ron
19 Bradley. I took my hand down. I was getting
20 ahead of myself with one of the comments from a
21 different standard.

22 MS. BURMAN: Okay, great. And then,

1 also, Steve Allen -- oh, your hand is back up.
2 Thank you. You want to talk?

3 MR. ALLEN: Yes, thank you. Steve
4 Allen, IURC. You had made a comment earlier,
5 wanted to know where the section was that we
6 could cross-reference. On the PDF that was sent
7 out in the portfolio of the Federal Register,
8 it's Page 110 of 136.

9 MS. BURMAN: Thanks. Yes, I'm just
10 trying to make it easy for those folks calling
11 in, and the public as well. So, that's helpful.

12 MR. GALE: I'm sorry, Diane, this is
13 John Gale again. Just real quick, also, to help
14 for the public. If they want to look at Slide
15 11, for the discussion on 192.493. They can also
16 look at Slide 19, for the discussion on 192.506.
17 And the public can take a look at Slide 15, for a
18 discussion on 192.921.

19 MS. BURMAN: With that, I do know -- if
20 people want to just take a moment or two to look
21 at the proposed striking language and if anyone
22 has any thoughts, positive, negative, or neutral,

1 it would be helpful to share at this time, from
2 the Committee.

3 MR. GALE: Also, Diane, what our
4 recommendation is, is that we have three separate
5 votes in this area. One to discuss 493, one to
6 discuss 192.921, and one to discuss 192.506. And
7 that's -- what you see in the language up on the
8 screen right now is just simply to have a vote on
9 the proposal related to 192.493.

10 MS. BURMAN: Okay. And if the
11 Committee has any thoughts on the three separate
12 votes, taking them, that would be great too.

13 MR. GALE: And so, all we would need
14 now is if a member could make a motion on 493 and
15 we get a second, we can get that process moving.

16 MS. BURMAN: I'm going to call upon
17 Dave Danner. Dave?

18 CHAIR DANNER: Yes, hi. So, I will
19 move adoption of the PHMSA staff recommendation
20 for Section 192.493.

21 MR. GALE: Chairman Danner, can you
22 read that slide and the vote language you see

1 there on the slide? And if we can get a second,
2 we can move to a roll call vote.

3 CHAIR DANNER: Oh, so you -- all right.
4 You need me to read this language?

5 MR. GALE: If you could, sir, yes.

6 Thank you.

7 CHAIR DANNER: Okay. So, I move the
8 adoption of the proposed rule as published in the
9 Federal Register and the draft regulatory
10 evaluation, with regard to provisions for
11 strengthening standards for inline inspection are
12 technically feasible, reasonable, cost-effective,
13 and practicable if the following changes are
14 made.

15 Revise proposed Section 192.493 by
16 striking the phrase "the requirements and
17 recommendations of" from the paragraph.

18 MR. GALE: And, Chairman Burman, we
19 need a second there.

20 MS. BURMAN: Okay. And then, I would
21 also like to remind folks that the court reporter
22 needs to have folks identify themselves. So, I'm

1 going to call upon Cheryl Campbell. Cheryl?

2 MS. CAMPBELL: This is Cheryl Campbell
3 with Xcel Energy. I second that motion.

4 MS. BURMAN: Okay. And I also see we
5 have a raised hand from Andy Drake. Is there any
6 discussion?

7 MR. DRAKE: No, I was willing to second
8 it as well.

9 MS. BURMAN: Okay. Is there any
10 discussion?

11 MR. GALE: Chairman Burman, with that,
12 if you're okay, we'll go ahead and move to a roll
13 call vote.

14 MS. BURMAN: We'll move to a vote.

15 MR. GALE: Very good. Okay.
16 Basically, I will just go through each name and
17 just say aye or nay or abstain. Steven Allen?

18 MR. ALLEN: Aye.

19 MR. GALE: Diane Burman?

20 MS. BURMAN: Aye.

21 MR. GALE: David Danner?

22 CHAIR DANNER: Yes.

1 MR. GALE: Say that again?

2 CHAIR DANNER: Aye.

3 MR. GALE: Ron Bradley?

4 MR. BRADLEY: Aye.

5 MR. GALE: Cheryl Campbell?

6 MS. CAMPBELL: Aye.

7 MR. GALE: Andy Drake?

8 MR. DRAKE: Aye.

9 MR. GALE: Richard Worsinger?

10 MR. WORSINGER: Aye.

11 MR. GALE: Chad Zamarin?

12 MR. ZAMARIN: Aye.

13 MR. GALE: Sara --

14 MR. ZAMARIN: Did you hear me?

15 MR. GALE: Yes, I got you. Thank you.

16 MS. GOSMAN: Aye.

17 MR. GALE: Bob Hill? He's not here,

18 I'm skipping over him. Richard Pevarski?

19 MR. PEVARSKI: Aye.

20 MR. GALE: And I don't think we have

21 any other members. Did I miss any other members?

22 I just want to make sure somebody didn't just

1 join us that I missed. Okay. With that -- say
2 that one more time?

3 MS. BURMAN: No, there's no one else
4 here.

5 MR. GALE: Okay. With that, it's
6 unanimous and that vote passes.

7 MS. BURMAN: Great. Okay. So, this is
8 Diane Burman. Now, we can move on to the second
9 part of our agenda, which is assessments outside
10 of HCAs.

11 MR. GALE: No, Chairman Burman --

12 MS. BURMAN: Oh, I'm sorry. No, I'm
13 sorry. We have three other parts of the
14 strengthening IM assessment methods.

15 MR. GALE: Yes, it's actually two, but
16 yes. So, we have on the screen again language to
17 address the proposal related to 192.921. If we
18 can get a member to make a motion, we can move to
19 a vote on this as well.

20 MS. BURMAN: Before we make a motion,
21 does anyone have any comments or questions? I'm
22 going to call upon Andy. Andy Drake?

1 MR. DRAKE: This is Andy Drake. I was
2 willing to make a motion, but if you're opening
3 for questions, I didn't have a question.

4 MS. BURMAN: Yes. I just always want
5 to make sure since the language is up there. I
6 just want to -- in case anyone had any comments
7 or questions beforehand.

8 Since we're not together, it's hard to
9 get a read, in case anyone has any thoughts or
10 concerns. All right. Hearing none, I think we
11 can go to Andy right now. Andy?

12 MR. DRAKE: Okay. I'd like to propose
13 a motion that the proposed rule as published in
14 the Federal Register and the draft regulatory
15 evaluation, with regard to provisions for
16 strengthening standards for the selection of
17 assessment methods are technically feasible,
18 reasonable, cost-effective, and practicable if
19 the following changes are made.

20 One, revise the language in proposed
21 paragraph 192.921(a)(1) to clarify that operators
22 select assessment methods based on the threats to

1 which the piping is susceptible and remove the
2 language in paragraph 192.921(a) that is
3 duplicative of existing 192.915.

4 Two, revise proposed paragraph
5 192.921(a)(6) to clarify that Direct Assessment
6 is allowed where appropriate, but may not be used
7 to assess threats for which the method is not
8 suitable.

9 And three, revise proposed paragraph
10 192.921(a)(7) to incorporate the same "no
11 objection" language the Committee approved for
12 paragraph 192.607 and with a time frame of 90
13 days.

14 MS. BURMAN: I'm going to call upon
15 Steve Allen now. Steve Allen?

16 MR. ALLEN: Yes, I second that.

17 MS. BURMAN: Any discussion? Hearing
18 no discussion, if we can do the roll call vote?

19 MR. GALE: Okay. Here we go.
20 Remember, it will be aye or nay or abstain.
21 Steven Allen?

22 MR. ALLEN: Aye.

1 MR. GALE: Diane Burman?

2 MS. BURMAN: Aye.

3 MR. GALE: David Danner?

4 CHAIR DANNER: Aye.

5 MR. GALE: Ron Bradley?

6 MR. BRADLEY: Aye.

7 MR. GALE: Cheryl Campbell?

8 MS. CAMPBELL: I'm sorry, did you say

9 Cheryl Campbell?

10 MR. GALE: Yes.

11 MS. CAMPBELL: Aye.

12 MR. GALE: Andy Drake?

13 MR. DRAKE: Aye.

14 MR. GALE: Richard Worsinger?

15 MR. WORSINGER: Aye.

16 MR. GALE: Chad Zamarin?

17 MR. ZAMARIN: Aye.

18 MR. GALE: Sara Gosman?

19 MS. GOSMAN: Aye.

20 MR. GALE: And Richard Pevarski?

21 MR. PEVARSKI: Aye.

22 MR. GALE: And with that, it pass

1 unanimous.

2 MS. BURMAN: Thank you very much. Now,
3 we can move on to the third prong of the
4 strengthening IM assessment methods for the vote,
5 if you want to look at this language. If anyone
6 has any questions on this?

7 MR. MAYBERRY: Diane, this is Alan,
8 we're going to let Steve offer some
9 clarification.

10 MS. BURMAN: Okay. Thank you, Steve.

11 MR. NANNEY: Just to make sure the
12 Committee is clear with the question Andy asked.
13 Again, we're laying 506 out as just being the
14 procedure, not the applicability.

15 And what you have to do in the matter
16 he brought up, that will be handled at our March
17 meeting, when we talk about 624. Our March 26
18 meeting. So, I really was not wanting to get
19 ahead of ourselves on that, because we thought
20 that was a discussion for that meeting and not
21 for this one.

22 So, as far as the type items he

1 brought up, that would be covered in 624. So, in
2 other words, here, we're essentially identifying
3 the procedure, but the applicability or where it
4 would be applied would be at our next meeting.

5 MS. BURMAN: Okay. I'm going to open
6 it up for comments or questions. Sara, and then,
7 Andy. Sara? And, Sara, if you could identify
8 yourself.

9 MS. GOSMAN: This is Sara Gosman. I
10 just had a quick question on the 100 percent
11 SMYS. So, I'm looking back at slides that you
12 presented back in November and it's Slide 54,
13 which shows long seam ERW failures and shows a
14 big difference between what I read as 100 and 105
15 percent SMYS.

16 So, I'm just wondering, first, if
17 that's relevant to this question, and if it is,
18 if I've got that right. If you could explain a
19 little bit about why you feel like the move from
20 105 to 100 percent is still justified in terms of
21 safety. Thanks.

22 MR. NANNEY: Just for the record, and

1 to answer your question, Sara, the reason that we
2 came back to the 100 percent instead of the 105,
3 we realized, number one, there are cracking,
4 whether it's stress corrosion cracking or seam
5 type cracking, that not all of them need to have
6 105 or 110 percent SMYS pressure test.

7 We also realized, due to practicality
8 of elevation differences and things such as that,
9 and also, the retest intervals and some other
10 things that you can make applicable, that you
11 might need to use a lower number.

12 So, what we tried to do in the
13 language is have the starting part at 100 percent
14 SMYS or the 1.5 times MAOP to cover that and
15 also, require the operator to look at their
16 situation and if they need to do 105 percent or
17 110 percent, for them to do that, not just to do
18 the minimum that's in the code. So, that would
19 be PHMSA's expectation.

20 As far as the 1.5 times MAOP, we've
21 had that in there. The thing there that we were
22 doing is, pipelines that operate at really low

1 stress levels, like at a .5 factor and that are
2 real low, first of all, do not have the same type
3 issues normally with cracking as the ones with
4 higher work -- that operate at the higher
5 pressures.

6 So, we did not think making them test
7 to 100 percent and some of the higher numbers
8 would be proper. So, we were trying to make it
9 also where it was practical to do this test. I
10 hope I answered your question there.

11 MS. GOSMAN: Yes, you did, thank you.
12 And then, I just wanted to support, again, the
13 language on time dependent cracking and applying
14 this, as I understand it, to that broader
15 category as opposed to the narrow one for the
16 environmental cracking.

17 So, I think that's, in terms of just
18 sort of the interest in safety, I'm glad that
19 PHMSA is continuing to focus on that broader
20 category. Thank you.

21 MR. NANNEY: Just -- can I just make
22 one reply? What we would -- Steve Nanney. What

1 we would do there is, the time dependent threats,
2 we would expect the operator to establish the
3 appropriate reassessment interval and to conduct
4 periodic reassessments if they were having to do
5 spike tests, based upon what that spike test
6 pressure was and what their evaluations told them
7 the next pressure test would be.

8 So, we would expect that to be part of
9 what they do in their methodology. And I think
10 that's what the vast majority of operators do
11 today, so I don't think we're proposing anything
12 different than what's being used today.

13 MS. BURMAN: Great. I'm going to open
14 it up now to Andy Drake. And if anyone else on
15 the Committee has any questions, feel free to
16 raise your hand.

17 MR. DRAKE: Andy Drake with Enbridge.
18 I just want to follow up. Steve, I appreciate
19 your clarification about 506 being the process,
20 that's exactly right. I really, just trying to
21 get some thoughts down there about how the next -
22 - how this fits together and the next

1 conversation.

2 And to Sara's comment, I just want to
3 be clear, I'm not advocating the elimination of
4 manufacturing defects. I'm actually asking for
5 folks to do some diligence in the next discussion
6 next month to distill where that is a problem,
7 not just automatically eliminating it either.

8 MR. NANNEY: And just to answer you,
9 Andy, that has been done.

10 MR. DRAKE: Thank you, Steve.

11 MS. BURMAN: Okay. Before we open it
12 up for a motion on this, does anybody else have
13 any comments or questions or concerns?

14 If not, if someone wants to raise
15 their hand to make the motion, and then someone
16 for a second? Okay. We'll call upon Ron Bradley
17 first and then, Cheryl. Ron, if you want to --

18 MR. BRADLEY: Yes. This is Ron Bradley
19 from PECO. I make a motion that the proposed
20 rule as published in the Federal Register and the
21 draft regulatory evaluation, with regard to the
22 provisions for the spike pressure test standard

1 are technically feasible, reasonable, cost-
2 effective, and practicable if the following
3 changes are made.

4 Revise the spike pressure test
5 requirements in proposed 192.506 to change the
6 minimum spike pressure to whichever is lessor,
7 100 percent SMYS or 1.5 times MAOP.

8 Reduce the spike hold time to a
9 minimum of 15 minutes after the spike pressure
10 stabilizes.

11 Revise language to refer to time
12 dependent cracking.

13 Revise proposed 192.506(g) to
14 incorporate the same "no objection" language the
15 Committee approved for 192.607 and with a time
16 frame of 90 days.

17 Revise proposed 192.506(g)(8) to
18 incorporate qualified technical subject matter
19 expert language in the SME requirements.

20 MS. BURMAN: Great, thank you. And
21 then, Cheryl Campbell?

22 MS. CAMPBELL: I second that motion.

1 MS. BURMAN: Thanks. Any discussion?
2 Hearing none, if you want to do the roll call?

3 MR. GALE: All right. We'll go right
4 in. Steven Allen?

5 MR. ALLEN: Aye.

6 MR. GALE: Diane Burman?

7 MS. BURMAN: Aye.

8 MR. GALE: David Danner?

9 CHAIR DANNER: Aye.

10 MR. GALE: Ron Bradley?

11 MR. BRADLEY: Aye.

12 MR. GALE: Cheryl Campbell?

13 MS. CAMPBELL: Aye.

14 MR. GALE: Andy Drake?

15 MR. DRAKE: Aye.

16 MR. GALE: Richard Worsinger?

17 MR. WORSINGER: Aye.

18 MR. GALE: Chad Zamarin?

19 MR. ZAMARIN: Aye.

20 MR. GALE: Sara Gosman?

21 MS. GOSMAN: Aye.

22 MR. GALE: And Richard Pevarski?

1 MR. PEVARSKI: Aye.

2 MR. GALE: And with that, it is
3 unanimous, motion passes.

4 MS. BURMAN: Thank you so much. So, I
5 believe we are done with strengthening IM
6 assessment methods section and now, we are on
7 assessments outside of HCAs, am I correct?

8 MR. MAYBERRY: That is correct,
9 Chairman Burman. And if you just give us a
10 second, we'll get the screen back up with the
11 presentation.

12 MS. BURMAN: Okay. And I just want to,
13 for folks, I just want to do a time check. It is
14 now 11:15, this means we got through the first
15 part, which was the introductions and the roll
16 call and call to order, et cetera, and the first
17 of four briefing segments in one hour.

18 So, I think we are making good time.
19 I do realize that, as we get further in, there
20 may be more discussion on other items. So, now,
21 we're on the assessments outside of HCAs. And
22 I'll turn it over to PHMSA staff. Thank you so

1 much.

2 MR. MCLAREN: Good morning. I'm Chris
3 McLaren with PHMSA Program and Policy side. And
4 item two is about assessments outside of HCAs.
5 And for this section, we'll be talking about the
6 Moderate Consequence Area definition in 192.3 and
7 the new section, 192.710 on pipeline assessments.

8 The issue is that currently, non-HCA
9 pipelines are not required to have an integrity
10 assessment. And the incident history has shown
11 that incidents with significant consequences have
12 occurred in non-HCA locations.

13 PHMSA proposed to, one, expand
14 integrity management requirements outside HCAs by
15 requiring integrity assessments for all Class 3/4
16 locations and the newly defined Moderate
17 Consequence Areas that are piggable.

18 And number two, the initial
19 assessments must be performed within 15 years and
20 operators can take credit for prior assessments
21 that were conducted in conjunction with an HCA.
22 In other words, if the integrity assessment to

1 assess an HCA had occurred, that data may be
2 previously available.

3 And number three, that reassessments
4 would occur every 20 years thereafter.

5 Slide 23. PHMSA proposed in the
6 Moderate Consequence Area definition that that
7 would include an area in a Potential Impact
8 Circle with five or more buildings intended for
9 human occupancy; an Occupied Site; or the right-
10 of-way of an interstate, freeway, expressway, or
11 other principal four-lane arterial roadway.

12 And that Occupied Site would be
13 defined as areas or buildings occupied by five or
14 more persons, and is the same as the Identified
15 Site for an HCA, with a reduction of the
16 threshold for identification from 20 persons to
17 five.

18 The basis for this proposal was the
19 Pipeline Act of 2011, Section 5, which mandated
20 that PHMSA evaluate whether integrity management
21 system requirements, or elements thereof, should
22 be expanded beyond HCAs and then, issue

1 regulations accordingly.

2 Number 24. We'll now look at the
3 comments that we received to the notice of
4 proposed rulemaking. It was widely supported by
5 the National Transportation Safety Board, public,
6 and safety advocates.

7 The NTSB commented that highways
8 should be included in the HCA definition, not the
9 Moderate Consequence Area.

10 PHMSA's response is that PHMSA
11 believes that highways are appropriate for the
12 Moderate Consequence Area definition and that it
13 would not be cost effective to amend the High
14 Consequence Area definition.

15 A comment from industry was to delete
16 the Occupied Sites from the MCA definition, based
17 on survey concerns, and that lower threshold of
18 identifying sites where there are five or more
19 people.

20 PHMSA proposes to remove Occupied
21 Sites with that lowered threshold of five persons
22 from the MCA definition.

1 Next, Slide 25. Another comment from
2 industry was that the highway portion of the MCA
3 definition should be tied to the paved surface
4 and not the right-of-way, and that arterial
5 roadways should be four or more lanes, not
6 restricted to only highways with that
7 nomenclature of four or more lanes.

8 PHMSA supports the MCA criteria with
9 respect to highways. We will specify four or
10 more lanes and eliminate the right-of-way
11 language and replace with the edge of paved
12 shoulders.

13 Slide 26. One comment was that a
14 definition is needed for pipelines that can
15 accommodate inline inspection tools.

16 PHMSA believes that line segments that
17 can accommodate inline inspection tools is widely
18 understood, without need for further definitions.

19 Slide 27. Due to cost concerns, AGA
20 and APGA urged PHMSA to exempt lines less than 30
21 percent specified minimum yield strength within
22 192.710 for those integrity assessments.

1 PHMSA proposes to revise the
2 applicability of 192.710 to include only lines
3 with MAOP greater than or equal to 30 percent
4 SMYS. Also, this will eliminate the need for the
5 low stress assessment method. And PHMSA proposes
6 to strike 192.710(c)(8).

7 Please note that the repair
8 requirements previously discussed in -- or to be
9 discussed in 192.711 and 13 would continue to
10 apply to all transmission lines, regardless of
11 SMYS.

12 Slide 28. A commenter disagreed with
13 restricting Direct Assessment methods to only
14 those pipelines that cannot be inspected by
15 inline inspection, since the NACE standards
16 provide clear guidelines for appropriate
17 application of Direct Assessment.

18 PHMSA's response is that, similar to
19 our response to the Committee comments on
20 192.921, PHMSA proposes to the Committee that the
21 Committee consider revisions to clarify that
22 Direct Assessment may be used wherever

1 appropriate, but that Direct Assessment may not
2 be used to assess threats for which Direct
3 Assessment is not suitable.

4 Slide 29. AGA commented to delete 710
5 in its entirety and move it into the new subpart
6 Q that was proposed in their comments. PHMSA
7 does not agree that a new subpart is appropriate.

8 Also, concerns were expressed in the
9 comments about adding tool tolerance when
10 evaluating repair criteria based solely on depth
11 of defect.

12 PHMSA believes tool performance should
13 always be accounted for in identifying and
14 characterizing anomalies, as available
15 information.

16 Slide 30. So, in light of these
17 public comments received, and PHMSA has provided
18 some responses, we propose that the Committee
19 consider the following.

20 Revise the definition of a Moderate
21 Consequence Area in 192.3, as indicated in our
22 responses to the public comments, as such.

1 One, change the highway description to
2 remove the reference to the right-of-way and
3 replace with reference to the edge of the paved
4 surface, including shoulders.

5 Clarify that it's applicable to
6 highways with four or more lanes, so that the
7 criteria is not so explicit that it would exclude
8 larger arterial highways.

9 And, three, remove Occupied Sites from
10 the definition of Moderate Consequence Area and
11 delete the definition of Occupied Sites, which
12 provided for that criteria reduction down to five
13 people or more.

14 Similar to the comments on 192.921,
15 PHMSA proposes the Committee consider revisions
16 to 192.710(c)(6) to clarify that Direct
17 Assessment may be used whenever appropriate, but
18 that Direct Assessment may not be used to assess
19 threats for which the Direct Assessment process
20 is not suitable.

21 Also, consider revising the proposed
22 192.710(a), in the applicability, to apply to

1 lines with an MAOP of greater than or equal to 30
2 percent specified minimum yield strength only.

3 And, as a result of that revision to
4 the applicability, number three, strike the
5 proposed 192.710(c)(8), low stress assessment
6 methodology.

7 And with that, thank you, I'll turn it
8 back over to Chairman Burman.

9 MS. BURMAN: Thank you. I think at
10 this time we're going to open it up for public
11 comment.

12 I just want to remind folks that we do
13 have some folks who have already registered for
14 making comments.

15 After the public talks, we then open
16 it up to the Committee so the Committee can
17 uphold their thoughts until after the public
18 speaks.

19 This is the opportunity for the public
20 to voice their comments, questions, or concerns.
21 Right now, I know we had Wade Miller who was
22 interested in speaking, Paul Wolven, and Erin

1 Kurilla.

2 So, also I see we have Carl Weimer.
3 While we're waiting for the others, I'm going to
4 call on Carl.

5 So Carl?

6 OPERATOR: Carl, if you could press
7 star 1? One moment please. Carl, your line is
8 open. Please go ahead.

9 MR. WEIMER: Good morning, thanks for
10 the opportunity to comment. We have a couple of
11 concerns about the section on the MCAs.

12 I think the first one is just the
13 periods for the initial assessment and the
14 ongoing assessment.

15 Our understanding, and correct me if
16 I'm incorrect, is this is really not a complete
17 integrity management program.

18 This is more of a pig-and-big program
19 because it doesn't include all the other
20 integrity management requirements for threat
21 assessment, threat mitigation, ongoing checking
22 of those threats to see what the differences are.

1 So, the initial period for the
2 assessment of 15 years and the ongoing of 20
3 years seems much too long to us.

4 Clearly there are both time-dependent
5 and other threats that can happen within a 20-
6 year period, and you will not catch them under
7 this type of regime.

8 So, we would recommend that the
9 initial assessment be reduced to a lower thing,
10 perhaps ten years, and that the ongoing
11 assessment either match the current IM
12 requirements of seven years or maybe ten years,
13 without all the other integrity management
14 components of this program.

15 Secondly, we opposed the idea that you
16 remove occupied sites, especially ones that are
17 exposed outdoors where people are most likely to
18 have harm from a pipeline rupture.

19 And removing them, we don't see any
20 reason for that.

21 I know it's difficult for the industry
22 to do that but they seem to be doing it fine

1 within the IM Program so I think occupied sites
2 should continue to be included.

3 And finally, regarding the direct
4 assessment, we don't really have a problem with
5 that, other than we don't understand what the
6 language, whenever appropriate, means.

7 We think PHMSA should be defining
8 where direct assessment is appropriate.

9 The whole reason this rule is being
10 considered is because there were operators who
11 clearly were using direct assessment where they
12 thought was appropriate, but clearly it was not
13 appropriate.

14 So, PHMSA needed to define what's
15 appropriate and not leave it up to the operators
16 to figure it out. Those are our comments, thank
17 you.

18 MS. BURMAN: Thank you so much. We
19 also have Wade Miller.

20 OPERATOR: Wade, your line is open,
21 please go ahead.

22 MR. MILLER: Hi, good morning. PSE&G

1 supports many of the revisions to the MCA
2 definition, as PHMSA presented today.

3 We'd like to call out that the
4 regulatory language that is currently proposed is
5 not explicit about what interstates, freeways,
6 expressways, and principal four-lane arterial
7 roadways, data to use to complete our MCA
8 assessments.

9 Without being explicit or providing
10 such publicly available data, there's significant
11 regulatory uncertainty that could lead to
12 inconsistent MCA assessments.

13 Being explicit about the data will
14 help both the interpretation of the regulation as
15 well as federal and state enforcement of the
16 rules.

17 We would like PHMSA to work with the
18 Federal Highway Administration to provide a
19 publicly available and accepted data source for
20 identification of the elevation for the selected
21 roadways.

22 And it would be especially beneficial

1 if the data could be available in the shape file
2 for use in a company's GIS system.

3 And then honestly, given the entire
4 difference between elevated roadways and
5 buildings, it's unclear if the potential impact
6 circle could be interpreted as expanding
7 vertically indefinitely, or if it should be
8 considered as a radial cylinder, if you will.

9 In New Jersey, there's a number of
10 elevated roadways and bridges that are of
11 significant height and some of those are over 100
12 feet in the air.

13 So when you add this vertical height
14 to the depth of the pipeline and account for any
15 horizontal offset that you might have, you could
16 have a case where the overall distance exceeds
17 the potential impact radius distance of the
18 pipeline.

19 And we'd like to receive clarification
20 on the treatment of the exceptional situation.

21 Thank you.

22 MS. BURMAN: Thank you, and then Paul

1 Wolven, if you could now open your line too, star
2 1?

3 OPERATOR: Oh, your line is open?
4 Please go ahead.

5 MR. WOLVEN: Good morning, this is
6 Paul Wolven from Consumers Energy Company.
7 Consumers energy operates just under 2500 miles
8 of transmission pipeline in the lower peninsula
9 of Michigan.

10 With respect to Section 1-92-710,
11 pipeline assessments outside of HCA, although
12 PHMSA provides operators with 15 years after the
13 effective date of the final rule, to perform the
14 initial assessment of pipelines applicable to
15 this new section.

16 As a transmission operator and from an
17 industry perspective, I encourage PHMSA to
18 provide regulatory text indicating a timeframe
19 for this initial assessment to be performed for
20 applicable pipelines that are installed after the
21 effective date of the rule.

22 This could be accomplished adding

1 language similar to what's found in Subpart 0-
2 192-905c, but that can be tailored to assessments
3 outside of HCAs within 1-92-710.

4 I appreciate the opportunity to
5 provide these comments. Thank you.

6 MS. BURMAN: Thank you. And then I do
7 know we have Erin Kurilla. I don't believe she's
8 on the line now, is that correct? I don't see
9 her.

10 OPERATOR: She is. I can certainly
11 open up her line.

12 MS. BURMAN: Okay, that would be
13 great, star 1, Erin?

14 OPERATOR: Erin, your line is open.
15 Please go ahead.

16 MS. KURILLA: Thank you so much. This
17 is Erin Kurilla with the American Public Gas
18 Association. APGA just wants to thank PHMSA for
19 the modifications they made to our 1-92-710.

20 It's clear that we have a risk-based
21 approach in mind so we thank PHMSA for the
22 changes and the clarifications that they made.

1 I just wanted to offer a public
2 comment on Slide 26 and this is the qualifier
3 that PHMSA introduced into MCAs, which says an
4 MCA that is able to accommodate in section by
5 means of an ILI device.

6 I would encourage, I guess, the
7 Committee to pick a moment on today's call to
8 just think about what exactly that means and what
9 the intent was in providing that qualifier into
10 the regulation.

11 I think clarity is really important to
12 discerning what pipelines are in the requirement
13 and what pipelines are out of the requirement.

14 And if I could, I'm sure the Committee
15 will discuss this and reply to Carl's comment,
16 but I just wanted to offer on behalf of APGA a
17 response to his concern about occupied sites.

18 And Carl, you know, there are
19 identified sites inside the scope for HCAs and
20 those identified sites, when you really lay those
21 down next to the proposed definition for occupied
22 sites, they overlap significantly.

1 For example, if you had 5 people at a
2 playground versus 20 people, I think it's safe to
3 say the industry would absolutely include that
4 playground in their HCA definition, regardless of
5 the number of children that were playing there.

6 So, I just want the public to be rest
7 assured that if there is a site that meets that
8 definition, these operators are including that
9 site into their HCA definition.

10 And that's why there was such a
11 pushback on occupied sites, it wasn't that they
12 didn't want to include those sites, it was just
13 that they felt like they were already being
14 covered inside of Subpart O for integrity
15 management.

16 So, thank you very much, that's my
17 comment.

18 MS. BURMAN: Before we open it to the
19 Committee for discussion and then possibly
20 voting, I do want to see if anyone else wants to
21 comment or want ask questions for later.

22 Just a reminder to the public, once we

1 close the public comments, they don't have
2 another opportunity on this call for putting in
3 any comments at this time on this call.

4 So, I just want to before I close this
5 public comment, I just want to make sure that
6 folks have an opportunity to speak if they choose
7 to. You have to do star 1 to register that you
8 want to speak.

9 I'm just checking with the moderator
10 that we don't have anyone who wants to speak?

11 OPERATOR: There are no further
12 questions.

13 MS. BURMAN: Okay, with that, now we
14 will go to the Committee and they'll open it up
15 for the Committee to speak.

16 We have a number of Committee Members
17 and we're going to go to Dave Danner.

18 Dave, if you can just introduce
19 yourself?

20 CHAIR DANNER: Dave Danner from the
21 Washington Utilities and Transportation
22 Commission.

1 I wanted to follow up on two things.

2 One, I was wondering if John or Steve
3 could explain how you got to the 15 years and 20-
4 year reassessment numbers.

5 What's the magic of those numbers and
6 how did you land on that?

7 The second question is I, too, am
8 concerned about having, in a situation where you
9 have elevator highways, do we need to have some
10 special language about what the proposed impact
11 radius is for those situations?

12 So, I was wondering if we could get
13 some feedback from PHMSA Staff on that?

14 MR. ALLEN: Just to answer your
15 comment, Dave, basically if you go look in the
16 integrals, they basically use a seven-year
17 integral and also a ten-year integral based upon
18 doing certain things.

19 And all we did when we looked at it,
20 we looked at giving twice the time for non-HCA
21 since we felt like they were in areas that had a
22 lot less risk and consequences based upon the

1 location and everything.

2 So, that's how we came up with the 15
3 and 20 years.

4 MS. BURMAN: Okay, now I'm going to go
5 to Richard Worsinger.

6 MR. WORSINGER: Hi, this is Rich
7 Worsinger with the City of Rocky Mount. Could
8 you go back to Slide 26, please? Great, thank
9 you.

10 Your census stated that you believed
11 that it's widely understood the definition of
12 which pipelines meet that qualifier line that can
13 accommodate ILI tools.

14 I'd like to make sure that I have the
15 same understanding and our Members have the same
16 understanding.

17 Does PHMS believe the qualifier
18 applies only to those pipelines that can be fully
19 assessed by a traditional, free-swimming ILI tool
20 without modifying the pipeline to accommodate the
21 tool?

22 MR. ALLEN: This is Steve Allen.

1 To answer that, the way we refine that
2 would be if there were no physical modifications
3 and no operational modifications.

4 So, the answer to your question would
5 be yes, and in fact, what we've looked at is if
6 you look at 1-92-710, one thing that we had in
7 there and we noticed it was on direct assessment,
8 based upon what we will be voting on and what we
9 will be recommending there is that the use of
10 direct assessment be allowed only if it's
11 appropriate for the threat being assessed, and
12 that you can use direct for threats -- you
13 cannot use direct assessments other than threats
14 for which the direct assessment method is
15 applicable to in the standards.

16 So, the questions that we're hearing,
17 we think in what we're proposing here and what
18 we're proposing to change in the notice addresses
19 that.

20 MR. WORSINGER: This is Rich Worsinger
21 of Rocky Mount again. Steve, I'm glad you
22 clarified that both PHMSA and GSI are on the same

1 page on this.

2 Is it possible that PHMSA could
3 incorporate that, maybe discuss it in the
4 preamble or something?

5 We want to make sure that when our
6 state inspectors are out there, they have the
7 same understanding that we do.

8 MR. ALLEN: So, the answer is, yes, we
9 would address that in the preamble. We also with
10 this question, we had internally visited about it
11 yesterday.

12 Because we will discuss with our legal
13 folks to see if we can add that in our definition
14 section. The problem we have is we want to take
15 a step back.

16 We didn't notice that in the original
17 notice so we'd have to take a step back to see if
18 we could include it without doing a re-noticing,
19 other than putting it in the preamble.

20 MR. WORSINGER: Great, thank you,
21 Steve.

22 MS. BURMAN: Now, we do have three

1 other people and I'm going to Sara Gosman first.
2 Thank you, Sara?

3 MS. GOSMAN: Thank you, so I'm
4 particularly concerned about the removal of the
5 occupied sites.

6 And I'm wondering if we have any data
7 on exactly what the impact of this is in terms of
8 number of sites that would be now out of the
9 assessment process or number of people?

10 Because I think that the issue about
11 the fact that we are now getting rid of the very
12 sites that are least able to deal with an
13 explosion, right?

14 Because, essentially, these are areas
15 where there are people not in buildings concerns
16 me, and it seems that either we should be making
17 this moderate consequence area, we should assess
18 on a shorter timeline and narrow applicability,
19 or we should assess on a longer timeline and
20 broaden out applicability.

21 But where we're moving right now is
22 we're assessing on a longer timeline and we're

1 narrowing the applicability to highways and these
2 areas with more than five buildings.

3 And I'm concerned about that
4 direction.

5 MR. ALLEN: This is Stephen. Give me
6 just one second, I was looking at something when
7 you came on.

8 Just to answer the question, let me
9 just go back to make sure everyone understands
10 what the definition of occupied site was, and
11 then I'll go from there.

12 It's an area that is an outside area,
13 an open structure that is occupied by five or
14 more persons on at least 50 days in any 12-month
15 period, and the days need not to be consecutive.

16 And examples would be designated bus
17 stops, parking areas, benches, playgrounds,
18 recreational facilities, camping grades, outside
19 theaters, stadiums, recreational areas near a
20 body of water or areas outside of a rural
21 building, such as a religious facility.

22 Also, it would be a building that is

1 occupied by 5 or more persons on at least 5 days
2 a week for any 10 weeks in any 12-month period.

3 And the days of the week need not be
4 consecutive, and examples would include and not
5 be limited to religious facilities, office
6 buildings, community centers, general stores,
7 storage facilities, or roller-skating rinks.

8 And I guess, you know, in hearing
9 everybody's thoughts at the last Meeting and
10 yours here today, we took a step back and we
11 looked at the 5 versus the 20 that is in the IMP
12 rule.

13 And if you look to determine if it's a
14 5 versus 20 -- because it's very hard to do, I'm
15 not going to say impossible but very hard to do.

16 And also many of these facilities, if
17 you look at what we've got listed, for them to be
18 viable and to be something that lasts over just a
19 very, very short period of time, that would
20 probably make it almost impractical to put it in
21 your database and to implement.

22 The 20 we felt like was probably more

1 reasonable than we had in IMP, and we felt like
2 it would cover the needs in everything.

3 That's why in listening to the
4 Committee at the last Meeting, we were applying
5 to recommend, just like Chris went over, just
6 taking a step back and eliminating that.

7 But we also know that for us, going
8 back and coming up with a mileage and an impact
9 becomes very different to do.

10 In fact, it's very hard. So, that's
11 why we felt like the 20 was more realistic.

12 We felt that it covered the needs of
13 the intent of what we were trying to do.

14 So that's why we backed off and went
15 back to the integrity management portion.

16 MS. BURMAN: Sara, do you have any
17 other questions before we move to the next
18 person?

19 MS. GOSMAN: No, I'll just respond. I
20 understand that response, I think I'm just
21 concerned here that we -- I think there are a lot
22 of assumptions happening right now about what

1 that 5 to 20 looks like.

2 And I'm concerned that we're making
3 this decision without knowing exactly what we're
4 excluding or including.

5 And I'm thinking about quals data, I'm
6 thinking about places where we could well have
7 more than five people, less than 20, in an
8 outside area, say, in a camping area.

9 And I think, again, given the fact
10 that we're broadening out so much the assessment
11 in terms of the 15 to 20, I feel like this is not
12 a huge burden on operators.

13 And we should be thinking more broadly
14 about the areas in which we should apply these
15 requirements.

16 MS. BURMAN: There are other people
17 who have their hands raised.

18 I can see the screen so I don't know
19 if you guys can see who has their hands raised so
20 that's why I'm sharing that with you. So, we're
21 going to go to those other people.

22 They may have some thoughts on this

1 too, and then we'll open it up for other
2 Committee Members and we'll come back to you,
3 Sara, if you still have questions or comments,
4 okay?

5 MS. GOSMAN: Great.

6 MS. BURMAN: Now I'll go to Steve
7 Allen.

8 Steve?

9 MR. ALLEN: Yes, thank you, Steve
10 Allen, IURC.

11 Listening to Carl Weimer's comments
12 regarding the assessment intervals in the 15
13 years for the initial assessment and 20 years for
14 reassessments, and Commissioner Danner's
15 comments, and then Steve Manning's response to
16 Commissioner Danner's question, it seems to me
17 that 15 and 20 is kind of an arbitrary number.

18 15 years seems to be about the wrong
19 time, it's almost like we'd be kicking the can
20 down the road a little bit further.

21 And I'm just curious if we could get
22 some dialog or some conversation?

1 I'd really like to hear from industry
2 about what they would think about reducing those
3 timeframes to, say, 10 years and 15 years, or 10
4 and 20.

5 But the 15 years is the one that give
6 me the most pause for concern. That's it, thank
7 you.

8 MS. BURMAN: Thank you.

9 We will open up for other people who
10 may have some comments to that as well.

11 Andy Drake?

12 MR. DRAKE: This is Andy Drake with
13 Enbridge.

14 I think I can offer some comments and
15 thoughts about the intervals and frankly, I do
16 think that 20's a little long. So, I'll pop that
17 bubble right away, but I'll come back to that.

18 And then I think, quickly, one thing
19 that I think would be helpful to help provide
20 some clarity is on these roads, the highways, I
21 think we're getting to a practical level here
22 where we're talking about elevation and things

1 like that.

2 I do think I would offer to PHMSA to
3 consider that they should be helping us clarify
4 what this part is. The Highway Department has a
5 list of highways.

6 If they could come up with a database
7 that would be definitive, similar to how they
8 have defined waterways with the liquid pipes, I
9 think that would help clarify and avoid a lot of
10 frustration on operators' parts and frustration
11 of regulators and even frustration of the public
12 about what is this that we're encompassing here?

13 It needs a clear roadway and develop a
14 database that operators can use. I think that's
15 just a practicality issue.

16 On occupied sites, I appreciate the
17 energy around the conversation.

18 I think, to me, we have to be very
19 deliberate to parse this into what's in the rule
20 and what's in other rules.

21 We have made significant strides when
22 we look at the MCA definition having five or more

1 buildings. That dropped the threshold down quite
2 significantly from ACA.

3 So, right out of the chute, we're
4 getting a lot more houses, a lot more people in
5 this rule.

6 If five homes in five circles is a
7 rural environment, occupied sites, Steve
8 mentioned earlier, at 20 is in Section O
9 currently, and I think Erin Kurilla mentioned
10 that as well.

11 That's currently an ACA definition
12 actually. But the problem when we drop an
13 occupied site down, as Steve was going through
14 it, it becomes just a matter of practicability.

15 You start talking about five people
16 that can be anywhere, a bench, a picnic table.

17 That could be every picnic table in
18 everybody's backyard anywhere every time, and an
19 operator is not going to be able to discern that,
20 if the picnic table has five people or four
21 people.

22 We would have had to know who is in

1 that house in every single house, and that's just
2 a practicability issue.

3 When you start to get these
4 unidentified sites that are kind of loose, where
5 people just scatter, it seems to make sense that
6 we need to make that something that's
7 practicable, that we can identify.

8 Five people can gather anywhere at any
9 time. And for now we're just saying the rule
10 really is ACAs are everywhere or MCAs are
11 everywhere, and that's not the point.

12 I think the point was try to explain
13 integrity management beyond ACAs.

14 The ACA definition of lowering the
15 threshold of the number of buildings is a huge
16 increase in the amount of mileage that's going
17 into the integrity program.

18 And that, I think, is the goal. At
19 sites like this, to me, it's really just a matter
20 of practicability.

21 The third piece that I have caught on
22 is the three-section interval. I have a comment

1 and I'm going to pop the bubble. I think I agree
2 20 is too long.

3 I do think that 15 is important.
4 You're talking about a significant increase in
5 the amount of mileage that's going into the
6 integrity management programs.

7 When we started the ACA program, it
8 was ten. This is significantly more mileage than
9 what you're talking about inside ACA. So, for
10 that first initial time, I think 15 years is
11 reasonable and appropriate.

12 But after that, I hear everybody, and
13 maybe this will help with some of the angst
14 around occupied sites and who's at the threshold.
15 Close that inspection frequency down from 20.

16 I think 15 is -- obviously, if we
17 could do it on the first round of 15, that's
18 going to be hard to argue that 15 can't be done.

19 I think, you know, there could be some
20 merits in looking at numbers even at 10 but I
21 think we would want to get more data to make a
22 good choice about that.

1 But I think the first 15 is really
2 just a matter of ramp-up time to get all these
3 other sites in.

4 Then, I think you need to close that
5 interval down below 20 for sure. So, those are
6 really my thoughts, thank you.

7 MS. BURMAN: Thank you. I'm going to
8 open it to Cheryl Campbell now.

9 Thank you, Cheryl?

10 MS. CAMPBELL: Thanks, it's Cheryl
11 Campbell with Xcel Energy. So, I'm going to add
12 speak to a couple of things here.

13 So, first of all, I want to add my
14 voice to the request about the highway data,
15 right, that this applies to.

16 And it's not because I don't think I
17 can figure it out, I think it's more a problem of
18 making sure we get some consistency, and the
19 states and the operators are all on the same
20 page.

21 And if the individual operators choose
22 to go beyond that definition because of their

1 risk assessment or their evaluation of their risk
2 profile for their company and their system, then
3 they can certainly do that.

4 But having that sort of common
5 framework, I think will help all of us in making
6 sure that we're having, you know, very positive
7 conversations with our states as we move through
8 this.

9 Second of all, I just want to throw
10 out a couple of statistics on the MCA and this
11 whole occupied site conversation. We did a
12 quickly analysis, hey, how much more mileage
13 would it add for us?

14 And it goes up about 150 percent for
15 us, it takes our assessable mileage up about 150
16 percent.

17 So, with that, I agree with Andy.

18 We had 12 years to implement
19 originally and, yes, there was some ramp-up time
20 in there for writing the plan and things of that
21 nature, but that 150 percent increase for us --
22 and we have about 2200, 2400 miles of

1 transmission lines.

2 It's a big increase for us, and so I'm
3 supportive of give me the time, right, give me
4 the time to do that initial assessment.

5 But then I'm also very supportive on
6 the tail end, right, lessening the reassessment.

7 I'm a big supporter of operators, if
8 they see something they don't like, they should
9 go in there and do it more frequently than, you
10 know, maybe a ten-year interval if they see
11 something they don't like on that pipeline.

12 But I agree, I think that 15 to 20
13 seems like too long and would be willing to say,
14 well, give me the time on a risk assessment basis
15 on the front end to get it done and then shrink
16 down the reassessment.

17 Regarding the occupied sites, Steve,
18 you shied away from saying impractical. It is
19 very, very difficult, right?

20 We tend to want to use our GIS system
21 to at least if you have one, to help you identify
22 these sites.

1 Unless I have a camera out there and
2 I'm watching all the time, I'm going to have a
3 hard time counting what we're talking about.

4 And I think we have enough people in
5 the country who already believe that Big
6 Brother's watching them all the time. I'm not
7 sure that's a really smart thing for us to be
8 doing.

9 So, I think when you overlay class
10 location and all the other things we're doing, I
11 actually am very confident we're going to get the
12 sites that we need to.

13 Even if we remove occupied sites from
14 the definition, there's just a ton of overlap.

15 And, Sara, I can appreciate your
16 concern because you're not down in it and you
17 haven't seen it so it's hard for you to envision
18 that.

19 But I will tell you with all the
20 overlap, I don't think it's that hard for us to
21 get everything when you start going around all
22 these other definitions around class location and

1 stuff.

2 So, with that, I'll turn the
3 microphone over to someone else.

4 MS. BURMAN: Thank you. With that,
5 does anyone on the Committee or PHMSA Staff want
6 to offer any other thoughts, comments responding
7 to what they've heard so far?

8 Some people have asked for folks to
9 respond.

10 We've heard that the 15 years and 20
11 years in the occupied sites was a big issue as
12 well, so I'm wondering if people want to respond
13 to that?

14 Ron Bradley?

15 MR. BRADLEY: Yes, Ron Bradley, PECO.

16 Just from the response to the
17 intervals, I can understand how people would feel
18 about the 15-year initial and I understand the
19 time to get that set up.

20 I would offer that as far as a
21 reassessment or there's some thoughts around the
22 20 years initially, when many companies will

1 practically apply that, they'll probably apply it
2 in multiples of time as in comparison to the HCA.

3 So, for example, in many cases, a
4 distribution company transmission pipeline
5 segment, it's all continuous so you're doing a
6 portion of pipeline based on your ACA interval.

7 And then you want to come back either
8 the next seven-year interval and then doing the
9 HCA and MCA.

10 And in many cases, that will be
11 practical, and that probably will be the way you
12 will implement in the number of companies that I
13 represent.

14 So, I would be okay with shortening
15 the 20-year interval on the outside because as I
16 think about it, when you think about things,
17 other standards that have interesting kind of
18 intervals, from an efficiency perspective, we try
19 to line them up so that it's much simpler to do.

20 And you can only exceed the minimum
21 standards that come about.

22 But just from a financial application

1 perspective, I'd be okay with moving the interval
2 on the back side in a little tighter, somewhere
3 around 15 years.

4 Thanks.

5 MS. BURMAN: Okay, does anybody else
6 have any comments, thoughts?

7 It seemed like there were some
8 collective agreement about the modification?

9 MR. GALE: Chairman Burman?

10 MS. BURMAN: Yes?

11 MR. GALE: John Gale here. I believe
12 Ms. Gosman has her hand raised?

13 MS. BURMAN: Oh, okay, I don't see
14 that. Sara?

15 MS. GOSMAN: Yes, sorry, I just wanted
16 to follow up and I think this is a great
17 discussion.

18 Cheryl, you had given data and that's
19 terrific because I'm just trying to conceptualize
20 this in my head. So, you said 150 percent
21 assessable mileage.

22 So, I've heard two things, one is that

1 we're overlapping a lot here and so the survey
2 cross perhaps aren't worth the safety benefit.

3 But I'm also hearing that there's just
4 a lot more mileage and the amount of mileage here
5 in terms of the assessment is too large, perhaps,
6 for the safety benefit. And I'm trying to figure
7 out which one of those things is right, or maybe
8 both.

9 But I'm wondering, in terms of the 150
10 percent you mentioned, you had 2200 and 2400
11 miles transmission so what the actual mileage is,
12 just so I can conceptualize that.

13 And a couple other thoughts, I agree
14 that I'd like to see the reassessment interval
15 pulled back.

16 I would like to see the initial
17 assessment interval pulled back as well, and I
18 think 10 years, for example, as a possibility
19 there.

20 I wonder whether somebody could
21 explain to me why we can't just identify areas?
22 I understand that problem, right, of the 5 people

1 over the 50 days and exactly how you might count
2 those folks.

3 But it seems to me what we're trying
4 to do here is protect particular areas like
5 beaches and playground and recreational areas.
6 And those are easier, I would assume, to actually
7 get the boundaries of and figure out.

8 So, if we moved away from the people
9 aspect of it, can we figure out a group of areas
10 that are important to protect that are not
11 protected now, I guess?

12 Thank you.

13 MS. BURMAN: Okay, and so the three
14 people that are next up are Dave Danner, Cheryl
15 Campbell, and Andy Drake.

16 Dave, I don't know if you want to
17 respond or have a further comment before Cheryl
18 and Andy, who I think are going to be offering
19 their thoughts in response to Sara.

20 So, I'm going to have you talk for the
21 moment, Dave, and then we'll go to Cheryl and
22 Andy.

1 CHAIR DANNER: All right, well, I'm
2 happy to hear what Cheryl and Andy have to say.

3 I do agree about pulling back and I
4 was going to offer, especially on the
5 reassessments, I think the period is way too long
6 and so I was going to offer something like 10 and
7 10 or 12 and 10 as the periods.

8 But I'll hear what Andy and Cheryl
9 have to say and I'll raise my hand again.

10 MS. BURMAN: Okay, great, thanks. So
11 then Cheryl and then Andy.

12 Cheryl?

13 MS. CAMPBELL: Sure, I was just going
14 to provide Sara a little bit more data.

15 We have probably, you know, it's in
16 excess of 200 miles ACM and 2200 miles, so I
17 think it's around 220 or so.

18 And I'm sure that people that work for
19 me on the phone are cringing. But 250, okay, 240
20 miles currently. So, you know, another 150
21 percent.

22 And Sara, to your point, the class

1 location stuff and the building count already
2 count a lot of that.

3 Much of our system extends into the
4 Colorado Rockies and so as you can imagine,
5 there's not a lot of people around one of those
6 pipelines. It's mostly trees and bears and
7 things of that nature.

8 So, what drives our mileage up
9 significantly under the MCA definition or is a
10 lot of the highway stuff.

11 So, having said that, again, I have no
12 problem saying on the record that our risk
13 assessment for a system tells us that we're
14 really not interested in having a pipeline
15 implemented in the Colorado Rockies and
16 potentially igniting the forest fire.

17 So, regardless of the fact that we do
18 not have a lot of HCAs and MCAs, on that 2200 to
19 2400 miles of pipeline, we are doing the vast
20 majority of it in an assessment because our
21 corporate risk analysis says we should, right?

22 I mean that's just not a risk that

1 we're interested in bearing.

2 So, to your point, yes, we count
3 buildings, we monitor class locations, we do all
4 of the things that the code requires us to do but
5 we're also very cognizant of what's around our
6 system and are considering those things when we
7 are analyzing whether or not we are doing ILI and
8 other types of assessment work on our system and
9 the consequences of doing that.

10 So, I mean, that's essentially how our
11 program is put together.

12 Again, I get we're not putting these
13 rules together for my company, we're putting it
14 together for everybody and the folks that aren't
15 around this table.

16 So, that gives you an idea of how we
17 have looked at it and the in particular person
18 implications that it has on our system.

19 I suspect we've already assessed a lot
20 of those MCA mileage, just with the work we've
21 done to date.

22 But it's really more around the

1 highway miles for us than it is around these
2 occupied sites. I think I already got most of
3 that.

4 That's all I wanted to add.

5 MS. BURMAN: Before we go to Andy, I'm
6 just making sure, Sara, does that answer your
7 question or do you have any other comments or
8 thoughts?

9 I know you were responding to Cheryl.

10 MS. GOSMAN: Thank you. Yes, so thank
11 you again for that mileage and I won't hold you
12 to it.

13 But I do appreciate just the number
14 here and I also appreciate the information about
15 the highway miles.

16 So, I'm left feeling that if the issue
17 is the counting, there might be a possibility
18 here to figure out a set of criteria that covers
19 these more rural areas where we have these open
20 structures that isn't about the five people as
21 much as it is about the area.

22 And if we're coverage those already,

1 then it seems to me that it shouldn't be a
2 problem to include them here because we're
3 already covering them.

4 And if we're not, then I think it's
5 important to think about how to do that.

6 So, anyway, thank you very much.

7 MS. BURMAN: Great, now I'm going to
8 go to Andy.

9 MR. DRAKE: This is Andy Drake with
10 Enbridge.

11 I went back and looked at the code,
12 Sara, and I think just to help provide some
13 context, inside an identified site, the code says
14 right now an outside area, open structure that is
15 occupied by 20 or more people on at least 50 days
16 in any 12-month period, the days need not be
17 consecutive.

18 Examples include but are not limited
19 to playgrounds, recreational facilities, camping
20 grounds, outdoor theaters, stadiums, recreational
21 areas, near bodies of water or outside a rural
22 building such as a religious building and then it

1 goes into what kind of buildings.

2 And I think you're right, we can see
3 places and 20 people is enough, so to speak, that
4 we can actually kind of see where they gather.

5 So, I think you're right, we're able
6 to see these facilities in these areas, but I
7 think the problem becomes when they drop the
8 threshold to five.

9 So, those sites are in, they're APAs
10 actually. They're not MCAs, they're already
11 being addressed. Actually, the practical aspect
12 of it is when the number drops to five.

13 And Steve kind of picked it up when he
14 said benches, picnic tables. There are benches
15 everywhere and I can't practicably keep track of
16 five people. That's just everywhere and I don't
17 think that's what the intent is.

18 And I think where we have really
19 picked up our mileage, for one, places where
20 people gather are addressed. They are very
21 clearly already in obligation.

22 I think we had a practical threshold

1 in there that we can do, we've been doing it.
2 The key I think where we're picking up a lot of
3 coverage is the number of houses inside the
4 bubble has dropped down significantly.

5 So, as we slide the impact going down
6 the pipe, that rate is much lower and we're
7 taking up a lot of MCAs just because it doesn't
8 pay for any housing to get inside that bubble to
9 trigger that.

10 And what I'm seeing, and I think this
11 actually PHMSA's number, and I'm kind of going
12 off the top of my head here, but increase, some
13 are between 25 and 50 percent of the entire
14 system.

15 So, if ACAs were -- you know, I've
16 heard numbers on national at five percent.

17 That INGA's mileage based on our
18 survey is now 25 to 50 percent of the operator's
19 mileage.

20 So, that's just mathematically five or
21 ten times more mileage coming into a covered
22 obligated integrity management oversight.

1 Of all the things we've talking about
2 today, not today but over the last couple of
3 months, is MAOP confirmation, anomaly criteria,
4 what tools to apply, how we would manage voting.

5 All the stuff we voted on would apply
6 to all of that. And I think that's now
7 connecting on to the reinspection interval.

8 I remember the integrity management
9 effort 15 years ago, 12 years ago when we started
10 this. There was a ramp-up period of a couple
11 years to get the programs built.

12 Well, the programs are largely there
13 so that helps. You've got a five-time increase
14 in the amount of mileage and a lot of these miles
15 are going to have to be made payable.

16 They're weird configurations and made
17 to be where they can accommodate the barrels and
18 things on them. There's a bit of work there.

19 So I think 15 is appropriate. 10, we
20 were at 10 last time and we got a lot more miles
21 so it's probably more than 10, and do we want to
22 quibble about 15?

1 Okay, but it would be a very
2 significant burden to go down to ten, just being
3 very pragmatic here.

4 I do think the reinspection interval
5 is in the area where we need to really look. I
6 think, like I said earlier, 20 years I think is
7 too long.

8 You've got defect growth and things
9 like that that are going to happen inside that
10 envelope. We need to bridle that better.

11 Copying down to 15 years is in my
12 opinion a minimum threshold that we should be
13 considering. I think ten is probably something
14 that we could stretch ourselves to consider.

15 I don't think we'd encumber an entire
16 industry here. We're having this conversation
17 on the fly with not of thoughts, but moving that
18 number down from 20 for sure makes sense to me.

19 I think ten seems to align with where
20 integrity management and continuous improvement
21 commissioned by INGA was headed.

22 I would say the reinspection interval

1 somewhere around 10 or 15 years seems to be
2 something that we should be talking about. But
3 those are my thoughts there.

4 I can hear your concern and I just
5 wanted to try to provide some data with the
6 current code about covered areas because the
7 things you're talking about are in there.

8 And really, the occupied sites just
9 comes down to a matter of practicability at that
10 threshold.

11 So, thank you very much.

12 MS. BURMAN: Thank you. The next
13 person is Dave Danner.

14 If anybody else has any comments or
15 questions, please feel free to do star 1 to raise
16 your hand, Committee Members.

17 Dave?

18 CHAIR DANNER: Thanks, Diane.

19 So, I guess I just wanted to weigh in,
20 and thank you, Andy, for that. You've answered
21 questions I had both about the occupied sites and
22 the intervals.

1 I'm still concerned. These are not
2 unoccupied areas and safety has still got to be
3 on our minds here.

4 I would like us to consider shorter
5 intervals and I was going to propose something
6 like 12 and 10 or I guess 15 and 10, and I'd like
7 to hear what others have to say about that.

8 But I would like to bring down both of
9 those and I certainly think the reassessment
10 could come down significantly.

11 So, I guess I would like to basically
12 have a Committee talk about where they want to
13 land on those interval numbers.

14 Thank you.

15 MS. BURMAN: Thank you. Now Steve
16 Allen?

17 MR. ALLEN: Steve Allen. Yes, I think
18 that from I guess the public's perspective, 12 is
19 certainly better than 15 and I think it has
20 better optics as well.

21 The ten-year reassessment interval
22 sounds right to me. I do understand that this is

1 probably going to be a Herculean task but, you
2 know, Congress's intention was to have this done.

3 It's been many years since they passed
4 the 2011 reauthorization and here we are kicking
5 it down the road 15 years.

6 So, I think 12 would be a good
7 compromise, that's just my two cents.

8 Thank you.

9 MS. BURMAN: Okay, thank you. Do we
10 have any comments or thoughts? Andy Drake?

11 MR. DRAKE: There are the others in
12 front of me but I think, to your point, where I
13 think we might go with the 15 years is I think
14 half of the mileage is going to have to be done
15 by 7 years.

16 I think that was the same way it was
17 handled in the ACA point and it's supposed to be
18 a risk-ranked 7, you know.

19 So, it's not like all the -- it's not
20 just childish taxes, it's actually a well-thought
21 out what needed to be done early and what needed
22 to be done later.

1 But that is very similar to the
2 platform we used with ACA, is requiring that so
3 that it can't be back-end loaded is my point.

4 You actually have to be making it in
5 even increments. So, there is progress that
6 happens very quickly, I just wanted to offer
7 that.

8 MR. GALE: Chairman Burman, this is
9 John here again. I think Ms. Gosman has another
10 question.

11 MS. BURMAN: Okay, I don't see her
12 hand for some reason but, yes, I'm sorry, Sara?

13 MS. GOSMAN: Oh, thank you, I'm sorry,
14 I'm probably not doing this correctly. Okay, so
15 --

16 MS. BURMAN: There, sorry.

17 MS. GOSMAN: Yes, I just wondered if I
18 could propose something, which is whether we
19 could, with PHMSA's help, identify areas, and I'm
20 looking at the specific list that we just talked
21 about on occupied sites, beaches, playgrounds,
22 recreational facilities, camping grounds, et

1 cetera, that are not included in the current
2 identified sites under HCA and find a way to wrap
3 those into this program without having people go
4 out and do the five-person bench analysis.

5 So, it seems to me that people have an
6 expectation about safety in certain facilities
7 and I think this list gives us a great list of
8 those places.

9 And if we do that by geography rather
10 than people, I think we get at the point here.

11 And maybe that list is nothing, right?
12 Maybe you have already captured all of those
13 things in your HCA program. Great, then you
14 don't have to add this onto your list.

15 But if we could do it by site, I think
16 that gets at more of the -- I understand the risk
17 basis of the people.

18 But I feel like in terms of
19 practicality here and in terms of what the public
20 expects out of pipelines and these particular
21 areas, I think that would match on better.

22 So, that's just a proposal for the

1 Committee.

2 MS. BURMAN: Thank you. Now, Steve
3 Allen?

4 MR. ALLEN: Yes, thank you, Steve
5 Allen, IURC. Andy, I think your response was
6 well thought-through.

7 It's not intended to be backloaded, I
8 think it was, and recognize that these initial
9 sessions will likely be done evenly throughout
10 the 15-year period.

11 And I don't know if it's such a good
12 idea to perhaps prescribe the percentages that
13 need to be done. I think that becomes a little
14 bit overly prescriptive.

15 But if there's some way to I think
16 satisfy the public's concerns about that initial
17 15-year period, I think it would be worthwhile.

18 So, I'm not quite sure exactly how to
19 put it but if the industry could somehow or
20 another show the public that this is being done,
21 we're not waiting to Year 14 to begin this and so
22 on a risk-based approach, I think scheduling-wise

1 that would be good.

2 And I'm not sure what the solution
3 there is, I just kind of wanted to throw that
4 out. But thank you for those comments, Andy.

5 MS. BURMAN: I'm going to call upon
6 Andy?

7 MR. DRAKE: Thank you. Steve, I
8 appreciate that. I know we're all -- these are
9 huge numbers we're dealing with on the fly here.

10 Madam Chairman, I'm trying to gauge
11 where PHMSA is actually in this carpet-bombing of
12 information that's going on here.

13 Do they need even heads to kind of
14 gauge what's happening here but I think that
15 PHMSA has a lot to say about what the current
16 regulations cover and don't cover, to Sara's
17 question.

18 And I'd like to hear from them
19 actually.

20 MR. MAYBERRY: Andy, this is Alan.

21 I think what I'm hearing on the
22 interval, say on that one alone, it looks like

1 I'm hearing 15 and 10. That seems to be where
2 we're zeroing in on, or perhaps 10 and 14.

3 But related to the identified site,
4 there's a bit of an arbitrariness to this and we
5 are extending the principles beyond the current
6 definition.

7 So, where we dial it in, you know, I'm
8 thinking in the back of my mind, we've got to be
9 able to demonstrate the cost benefits. And doing
10 so, where do we draw the line?

11 Obviously, if we change that
12 definition, it does lend itself to that. If we
13 need to tighten it up over the years, we can
14 certainly do that.

15 But we're kind of in this round to
16 start with and so maybe we can take the initial
17 approach of changing it, taking it out the
18 occupied site, and then we'll just see how it
19 goes down the road.

20 That's kind of what I'm thinking right
21 now.

22 It's the same thing related to, let's

1 see, I know we talked about the use of BCG, and
2 honestly, my expectation is we can probably --
3 well, I would expect that it's not used where you
4 have other threats.

5 That should not be an issue, I think
6 we're just clarifying that.

7 And I would expect even today I would
8 address if someone is using UCDA whether there's
9 a steam issue that that would not be appropriate
10 and, of course, the operator would be called to
11 task on that.

12 And then Steve I think has a couple
13 comments too.

14 MR. ALLEN: Just going through this,
15 just like what Alan said, whether it's 10 or 15
16 years or 10 initial and 14, and there's a lot of
17 reasons for the 10 and 14.

18 It's to try to get it on the seven-
19 year path interval like we're doing. 14 would be
20 every other 7-year interval there.

21 What I was looking at on the occupied
22 site is just taking a step back.

1 Because originally, in going through
2 the rule-making process and the various steps
3 PHMSA has to do to even get it out for a notice,
4 as you all know, we have to -- and I realize this
5 is a cost-benefit Meeting, but we have to go
6 through that, we have to go to R&D, we have to
7 get all of those clearances.

8 And based upon that, we get certain
9 words in here, some we like, some we don't. We
10 realize this is an overall public back and forth
11 process. It's a give and take is my point.

12 And looking at the definition, now,
13 this is pipeline assessments and when we came out
14 with this, a couple key points, this is for
15 transmission pipeline segments.

16 And in this would be all this plants 3
17 and 4 locations or a moderate area defined, if
18 the pipeline segment can accommodate inspection
19 by implemented in-line inspection tools, in other
20 words, smart rigs, this section does not apply to
21 a pipeline segment located in a high-consequence
22 area.

1 And just listening to everybody and
2 all of you on the phone talk back and forth,
3 we're looking at the five or more and so many
4 days a week.

5 And one thing, you know, Sara brought
6 up is -- I think it was Sara -- is looking at
7 some of these things, whether it's playgrounds,
8 campgrounds and some of that.

9 And I guess the question to the
10 industry folks on the phone is when you go
11 through your HCA classifications, are there any
12 of these that you knock out because there's not
13 enough people?

14 Or are you putting them all in because
15 really, from a practical standpoint, it's easier
16 to put in.

17 Because probably if you're outlining
18 all this part, if you are outside as being a
19 registered campground, or a beach, or a park, or
20 a skating rink, or at least facilities that are
21 going to stay there, that you don't really worry
22 about whether there's 20 or 5 or 10.

1 Because it's easier to put it in your
2 program, one, because it's easier to do, two,
3 because integrity and safety-wise, you don't want
4 to have to deal with it later.

5 So, I guess one of the questions I'm
6 asking is just taking a step back and looking at
7 what everybody's saying.

8 Is there some wording we can make that
9 if you identify it as being needed or not needed
10 in the HCA, could you just automatically put it
11 in this program because in these segments, you've
12 got to run AOI anyway, based upon the way the
13 regulation is written for 710 that everybody is
14 looking at.

15 And we were not looking at changing
16 that, so I guess that's just taking a step back.
17 Is there anything there we can do?

18 And again, that's different than what
19 I said earlier but it's also listening to what
20 everybody said, trying to get what I'd call a
21 middle ground, at least what Sara and some were
22 saying, but also what Andy and some of the

1 industry folks are saying.

2 We need to look back at 710A at what
3 we're actually doing, the applicability part.

4 MS. BURMAN: Thank you, that's very
5 helpful.

6 I'm going to call upon Cheryl and if
7 anyone else has any thoughts.

8 Cheryl?

9 MS. CAMPBELL: Thank you, Cheryl
10 Campbell with Xcel Energy. So, yes, Steve you
11 hit the nail exactly on the head.

12 If it's a campground playground, that
13 kind of stuff, we don't try to count people. We
14 just include it, right? We just identify it and
15 we just include it.

16 We really only worry about counting
17 people when you get more around some business
18 kind of structures, right, where we're not sure
19 exactly what the building is used for.

20 So, that was really -- I just wanted
21 to reinforce that. So, we don't spend a lot of
22 time trying to count people.

1 We really do look at the list of
2 facilities or the list of sites.

3 Regarding the timeline, I'm not going
4 to say that this is easy, I wouldn't presume to
5 say that.

6 I think that there's a lot that has to
7 be done, I think Andy talked about that, making
8 it more suitable.

9 A lot of things have to go into
10 getting it to where you can assess it for the
11 first time, you have enough tools and crews
12 available that know how to do the work, hence
13 that sort of longer up-front timeframe.

14 So, I'm still really supportive of
15 using that longer timeframe at the front end to
16 allow everybody to crank it up and get it going
17 and stepping it up another level.

18 I think that PHMSA and the public can
19 see the progress, right, on the reports that get
20 filed on a regular basis.

21 You can see that we are assessing more
22 pipelines and more mileage every day. So, it

1 seems like that's a good way to get that
2 information out.

3 And then there's a lot of chatter
4 going on around what's the right reassessment
5 number.

6 I think a lot of people can live with
7 sort of that 10 -- some are between that 10-to
8 15-year timeframe, they could set up a floor,
9 right? I mean, you should be paying attention
10 from a risk basis.

11 Stephen, I think you've talked about
12 that just because you've got a 10, 12, or 15-year
13 reassessment interval, I think Andy mentioned it
14 too, you get something in there that you should
15 be monitoring more frequently, then the prudent
16 operator does that, takes that action.

17 So, I guess I just wanted to reiterate
18 that I think that 15-year initial assessment,
19 again risk-based, to help us get our arms around
20 it and then that much shorter reassessment
21 interval from the 20 in that 10, 12, 15-year
22 range I think is doable.

1 And again, I hope that helps, that
2 perspective helps.

3 MS. BURMAN: Thank you, Cheryl.

4 We're going to have after Andy Drake,
5 Steve Allen is going to talk and then I don't
6 have anyone else in the queue. So, if you are
7 interested in speaking, please feel free.

8 Andy?

9 MR. DRAKE: This is Andy Drake with
10 Enbridge. I was just responding to Steve's
11 request. We basically are doing very similar
12 things.

13 We err very much on the side of
14 conservatism, we don't get into counting a lot of
15 people.

16 But I will raise the question back to
17 Steve in particular, when we get to actually
18 processing this, the inspection codes are
19 actually looking for records of how many people
20 are there.

21 So, we're going to go to a more
22 ambiguous sort of you recognize it when you see

1 it kind of thing. That's fine, but we need to
2 tune the inspection to go with that.

3 Because the only reason we have to
4 provide a count of 20 is it's in an audit to be
5 very honest.

6 They're actually asking did you have
7 any record of how many people are there, and we
8 actually have to have some sort of record of who
9 inspected this and counted this many people, we
10 talked to so-and-so-and-so-and-so and this is a
11 confirmation.

12 But, you're right, Steve, err on the
13 side of incorporating more than less, and I think
14 where my ears go off is if it goes to five, I
15 don't know how to create that compliance record
16 and it becomes impracticable.

17 So, if it's just directional, yes, I
18 think we can go that way. We have to a practical
19 enforcement vehicle that goes with it, which I
20 think we can work that out is the point.

21 I just don't know. Not to say it's
22 confirmed because of all of these constraints. I

1 think you can work through those things, I just
2 want to make sure we can see them.

3 I hear a lot of numbers, I thought,
4 Steve, you made a good point. I hadn't thought
5 about that.

6 If you try to get on a multiple of
7 seven, that probably would be good because it
8 does fit in with naturally-reoccurring sections
9 on the ACAs, which a lot of these interlock with
10 each other.

11 So, I think maybe the first
12 reinspection of 14 is probably a pretty good lock
13 for a lot of different directions when you look
14 at the giving space to get this volume of work
15 done and connecting it to the ACA inspections
16 which are happening obviously in application.

17 The reassessment interval, we've heard
18 a lot of good numbers.

19 I think there's a lot of material on
20 the record here but I think everybody seems to be
21 wrapping around the number of 15 or less and the
22 reinspection probably can't be much less than 10

1 or 12.

2 So, it's in that box I think, the
3 information that I've heard anyway from my
4 perspective.

5 But I did just want to comment respond
6 to your comment Steve and give you some insight
7 into where Enbridge is.

8 MS. BURMAN: Okay, great. This is
9 very helpful. I'm going to have Steve Allen go
10 now and then we'll open it up for more.

11 Thank you.

12 MR. ALLEN: Thank you, this is Steve
13 Allen, IURC.

14 All things considered, great
15 conversation, I think my opinion is probably
16 changed a little bit here. I think 15 is
17 probably the right number for the initial
18 assessment.

19 I'm hearing some things on 14 that
20 sort of make sense to me so I think anywhere from
21 10 to 14 I guess.

22 I just want to go on record as saying

1 that sounds reasonable and practicable so thank
2 you.

3 MS. BURMAN: Thank you. Does anybody
4 else have any thoughts, concerns, or comments,
5 even if it's to say we like the path forward?

6 I'm trying to get a sense from the
7 group on some of these potential modifications,
8 and changes are helpful in making these
9 modifications and taking a change before we take
10 a break later for lunch is better. Thanks.

11 Dave?

12 CHAIR DANNER: Thanks, Diane. So, I
13 guess I just leave you with this proposal.

14 I think I would be okay with 14 for
15 the initial. I would like to have something in
16 there as guidance about doing a risk-based
17 prioritization.

18 And then I would still stay with 10
19 for the reassessment. So that's where I would
20 leave it and ask you to consider that.

21 MS. BURMAN: Anybody else have any
22 thoughts?

1 I'd like to hear from some folks,
2 especially those who had raised initial concerns.
3 And then the PHMSA Staff, I know we threw a lot
4 at you. Sara?

5 MS. GOSMAN: So, I'm thinking that's
6 an invitation to me, maybe not.

7 All right, so I think, yes, I like the
8 direction we're going in the assessment, initial
9 assessment, and particularly on the risk basis,
10 and then moving to a 10-year reassessment.

11 I am just trying to figure out how we
12 might, coming up to vote language here, how we
13 could get at some of these issues that I've
14 raised about occupied sites.

15 And I think what I'm Hearing from the
16 industry is they think they're already doing this
17 and I think that's great. If we're getting these
18 sites already, that's terrific.

19 If we are getting those sites, I'm
20 wondering why we can't put that, I guess, in the
21 language here.

22 So that would be my question as we

1 move forward to a vote.

2 MR. MAYBERRY: Chairman Burman?

3 MS. BURMAN: Yes?

4 MR. MAYBERRY: This is Alan Mayberry.

5 In having a little internal talk with Sharon,
6 there's an option we wanted to try out and I just
7 want Steve to run that by the Committee.

8 MR. ALLEN: Just to start, it's what
9 you're looking at on the screen as far as MCA
10 definition.

11 MR. MAYBERRY: We'll get it up.

12 MR. ALLEN: Okay, just a couple of
13 things, and I'm going to just start at the top
14 end.

15 The comments we've heard as far as the
16 Federal Highway Administration Manual and things
17 like that is the first thing we'd like to talk
18 about is we would in the preamble give an
19 explanation and a reference to the Federal
20 Highway Administration Manual.

21 The comments about identifying
22 highways and things there, it's been several

1 months since I've looked at that manual but I'm
2 pretty sure it was not in there originally but
3 the definitions of the back roads and everything
4 are.

5 We would expect operators to know
6 their lines and if they cross the interstate or
7 freeway or a four-lane highway, that would be
8 part of this.

9 So, on that we would have that.

10 Going on down to the occupied site
11 part, looking at the definition there, listening
12 to what everyone said, what we would propose is
13 leaving the occupied site definition in there,
14 taking the five or more persons and the 50 days
15 out, and having it to be the areas that you
16 identify in the high-consequence-area-type
17 surveys for it that don't meet the 20 or more,
18 which would mean that you would not have to do
19 additional surveys to identify if it's five or
20 not.

21 But if you identify them there, and we
22 can add some language, whether it's in the rule-

1 making or the preamble.

2 But I think that hits what everyone's
3 saying they're doing and not doing to get this
4 spirit of what's favorable to them, plus the
5 spirit of what I've heard several others from the
6 industry say that they're doing.

7 And I would have proposed that we just
8 modify that definition, again taking the five or
9 more out and taking the 50 days and 12, and we
10 tie it into items that we would be looking at in
11 the end program for high-consequence areas for
12 the identified site.

13 And then I guess last, the comment
14 would be on the timing, is that we propose to go
15 initial to 10 years, and after that 14, realizing
16 that on the 10 years -- yes, initial 10 years,
17 and after that, every 14.

18 And then after that is what we already
19 have as far as the timing, is in the present rule
20 we've got the shorter reassessment interval.

21 In other words, if you're in the 10 or
22 if you're in the 14 year, you would use a shorter

1 reassessment interval based upon the type
2 anomaly, operational, material, or environmental
3 conditions, found on the background segment or is
4 otherwise necessary to ensure public safety.

5 Now, we could consider putting in the
6 50 percent of the mileage at Year 5 or Year 7 or
7 something like that, but when we originally wrote
8 this, we thought having this language in there
9 might make an operator even do it sooner than the
10 50 percent timing.

11 And we were trying to leave it up to
12 their judgment and knowledge of their system when
13 we wrote it.

14 So, that's what I would have proposed
15 for the Committee to consider and if you want to
16 consider what I just thought up, we can change
17 the slide in that manner.

18 MS. BURMAN: Okay, thank you, Sara?

19 MS. GOSMAN: So thank you, again, for
20 listening to me having concerns about occupied
21 sites. I'm very happy with that direction; I
22 feel that gets at my concern and I hope that it

1 also gets at the industry's concern in a sense
2 that they're not having to do a whole bunch of
3 surveying, that they're taking the data in front
4 of them, and to the extent that certain sites are
5 falling out. Those go back in, but again, the
6 public expects, I think, that they would be safe
7 in those congregated areas, whether they're 5 or
8 20. So, thank you.

9 MS. GOSMAN: Does anybody have any
10 other thoughts or comments, even if it's to say
11 they're happy, not happy with the path forward,
12 thinking this is a good thing? We have a couple
13 people up right now. Steve Allen?

14 MR. ALLEN: Yes, thank you. Steve
15 Allen, IURC. I'd just like to make sure that I
16 heard correctly what you were saying, Steve. Are
17 you saying the initial assessment should go from
18 15 to 10, and then reassess in intervals from 20
19 to 14, or is it 14 and then 10 as a reassessment?

20 MS. BURMAN: You want to respond?

21 MR. NANNEY: Yes, we're proposing
22 initial ten years, and originally we had 15

1 there. So the reassessment needs to be 14 where
2 originally we had 20 there. And if you go back
3 and you look at 192.939, we were trying to keep
4 it in line with some of that. Originally it was
5 seven years for confirmatory direct assessment,
6 and then it also had some 10 years, 15 and 20 as
7 being the intervals based upon the pressure that
8 you're operating your system. And the only
9 reason we're doing the 10, we think that would
10 give enough time and it'd be in light of moving
11 the 20 back from 20 to 14, and the 15 back to 10.
12 But if the committee wants the 10, 14 or 15 or
13 some other number, we would be open there, too.

14 MS. BURMAN: Thank you. I think, did
15 you want to respond to that, Steve, or give
16 thoughts or comments to that?

17 MR. ALLEN: Yes, I guess. Steve
18 Allen, IURC. I think the initial assessment, ten
19 years, is what I was originally kind of
20 suggesting. But some of the discussion from
21 industry about the magnitude of this task, I kind
22 of re-evaluated that position, that I'm okay with

1 the initial ten years, but I don't sense that
2 industry will be.

3 MS. BURMAN: You know, I think that's
4 where the -- this is Diane Burman -- Steve, I
5 think that was sort of a thoughtful discussion in
6 terms of where it was, to the explanation, the
7 analysis, to then your conversation or your input
8 in why you were moving toward or coming to, you
9 were okay with the industry's perspective or the
10 different perspective. So I'm just opening it
11 back up for that.

12 Andy Drake is up, so maybe he has some
13 thoughts on this as well. Andy?

14 MR. DRAKE: This is Andy Drake with
15 Enbridge. This has been quite a great
16 conversation; this is exactly what we hoped to
17 accomplish here to get this on the table. I
18 think in listening to Carl, I think the
19 reassessment interval is too long and I think
20 there has been a lot of alignment around that
21 that is too long, so we agree with Carl on that.
22 And I think we talked about going from 20 years

1 down to somewhere between 10 and 14, that's kind
2 of the last, that's all I heard as you were
3 talking through that. But the initial inspection
4 period is a unique concern, and that is a concern
5 about ramping up all this mileage. And I think
6 we're getting -- I know that in the original
7 assessment or the original proposal, we had 15
8 for the initial and 20 for the reassessment, and
9 we've kind of been, we test the initial
10 inspection near the 15. I think my proposal was
11 good at 14 because they found comments about
12 staying a seven-year interval -- multiples, which
13 I think is appropriate. And we moved the
14 reassessment, now we're bound actually tighter
15 than the initial assessment interval, which makes
16 sense frankly. That's very congruent with what
17 we do with ATA's, I think that's very congruent
18 with the level of work. The first go-around is
19 going to take more energy, it just is. I know
20 the INC efforts that we've been going through to
21 make all these miles, incorporate into tighter
22 management; that had taken a lot of effort and

1 that will be I think the fingerprint that most
2 operators experience in the first tranche.

3 The second tranche I think is logical
4 that you would tighten that in such an interval
5 bound. I think it seems backwards that we would
6 do the first tranche in a short time frame and
7 then open up the reinspection interval. I think
8 it needs to be flipped, quite frankly, from a
9 practicability standpoint and based on the number
10 of texts that I'm getting from operators around
11 the country, I think that seems to be aligning
12 with them, too. I just wanted to offer that out,
13 just my opinion, I'm getting a lot of messages
14 from folks.

15 MS. BURMAN: Okay, we have a number of
16 people that are raising their hands. I just want
17 to say, is people need to mute their lines
18 because there's a lot of background noise that
19 I'm hearing.

20 So Cheryl, you had your hand up, and
21 then went down. Do you still want to talk?

22 MS. CAMPBELL: Yes, if I could please.

1 MS. BURMAN: Yes.

2 MS. CAMPBELL: This is Cheryl Campbell
3 with Xcel Energy.

4 MS. BURMAN: So before you go, I just
5 want to let people know who is in the queue.

6 Then we have Steve, Steve Allen and then Ron
7 Bradley, and then Dave Danner, and I know others
8 will also want to chime in. So I just want to
9 let you know that I'm cognizant of the order.

10 Thank you. Cheryl?

11 MS. CAMPBELL: Sure. So first of all,
12 I just wanted to throw my voice behind Andy's and
13 support what he said and maybe flip those around.
14 I think that front-end piece is more challenging
15 than people realize. And then also wondering on
16 this list, maybe it's implied, but do we need to
17 make it clear that, again, these are the
18 pipelines that operate above 30 percent SMYS,
19 which is what my understanding was of what we
20 were talking about.

21 And then lastly, on these sites, we've
22 got to -- I'm assuming it's the same work that

1 was in the notice, but if there's something else
2 there, I'm wondering if PHMSA could provide that
3 list.

4 And that's really what I had to add,
5 Chairman. Thank you.

6 MS. BURMAN: Thank you. And then
7 Steve Allen, you want to go now? Thank you.

8 MR. ALLEN: Yes, thank you. Steve
9 Allen, IURC. That was raising from my initial
10 question to clarify is it 10 and 14 or 14 and 10;
11 I was really kind of leaning towards the 14 and
12 10. I thought that made a lot of sense, and I
13 think taking the reassessment interval from 20
14 all the way back down to 10, that's a good thing.
15 I think that is in line with what Carl Weimer had
16 to say about the reassessment of intervals.

17 So that's all I had, thank you.

18 MS. BURMAN: Thank you. And then, Ron
19 Bradley, you had your hand raised. Do you still
20 want to talk?

21 MR. BRADLEY: Quickly. I just took it
22 down because I agreed with the 14-10 and the

1 inclusion of 30 percent or less from a science
2 perspective, the language bits are recommended.
3 Thank you.

4 MS. BURMAN: I know some people take
5 their hands down because they agree, but because
6 people can't see that, that'll be helpful for us
7 to know because we're not in the room. So, thank
8 you.

9 MR. BRADLEY: I appreciate you calling
10 out, Diane, as well because that's very good,
11 very confirming.

12 MS. BURMAN: Okay, thank you. Dave
13 Danner? Thanks.

14 CHAIR DANNER: Thanks. So, I guess I
15 just wanted to say that I agree with Andy. I
16 think that the -- while I like the idea of having
17 a shorter interval in 14, I hear the industry's
18 concerns -- and again, as long as there's a risk-
19 based prioritization there, it might even be
20 great if we have some metrics to show progress
21 being made. But I think I'm okay with the 14 as
22 long as the reassessment period is dropped down

1 to 10, and it sounds like industry can
2 accommodate that.

3 So that's my comment.

4 MS. BURMAN: Okay. I'm going to open
5 it up now. Sara, thank you so much. You're
6 next.

7 MS. GOSMAN: Yes, so I think I'm
8 comfortable with 14-10; I would just be
9 interested in hearing about the risk
10 prioritization and how that would, maybe from the
11 industry or maybe from PHMSA, how that would work
12 based on what is the information that you are
13 going to be using for that risk prioritization
14 when we don't have a risk assessment that's
15 required.

16 MS. BURMAN: Okay, so Cheryl, I think
17 you want to answer that.

18 MR. NANNEY: Well, I'll take a stab at
19 it from my perspective, Chair Burman. I look at
20 it and if I'm going to do the assessment, I have
21 to do the risk assessment, and the risk
22 assessment that I know would be the integrity of

1 stuff since it's already there, right. And then
2 I'm going to fall back on the principles and the
3 things I already know to perform my risk
4 assessment and prioritize my pipeline.

5 So that's my opinion and how I would
6 interpret it. Interested in what others have to
7 say.

8 MS. BURMAN: Okay, thank you. And
9 then Andy Drake?

10 MR. DRAKE: Andy Drake with Enbridge.
11 Cheryl, that's how I did it.

12 MS. BURMAN: Okay.

13 MR. GALE: And Chairman Burman, just
14 for what's it worth, from PHMSA's perspective, we
15 would expect that. You know, these are maximum
16 intervals and risk needs to come into play, and
17 that's an expectation we have now. It shouldn't
18 just be pick and dig; it's got to be really a
19 thoughtful assessment of the risk and determine
20 the interval that's appropriate. And these are
21 maximum intervals. And now we just added --
22 perhaps you can see it, are we sharing this right

1 now -- we did change to 14 and 10, 14 for the
2 initial, 10 for the reassessment -- and just to
3 clarify, this is for 30 percent and above.

4 PARTICIPANT: Okay, we're going to
5 have -- yes, we're covering that in the next
6 slide.

7 MR. GALE: Yes, just to be clear for
8 the members; we have two different slides for
9 voting; we had a vote on the definition and we'll
10 have a vote on the definition of MTA, and then
11 we'll have a vote on the applicability and the
12 requirements of 192.710 and the requirement to
13 assess. And within that slide we'll discuss the
14 issue of 30 percent or more slide.

15 MS. BURMAN: Okay, so maybe if you
16 could show us the two slides and then we'll go
17 back to the first slide. I think that might be
18 helpful.

19 PARTICIPANT: Yes, the second slide is
20 now up.

21 Say your name.

22 MR. GALE: John Gale. This is who

1 you're hearing talking, sorry.

2 MS. BURMAN: Okay. And then we can go
3 back to the first slide. Is the way you have it
4 slide-by-slide, or no, is that too complicated?

5 PARTICIPANT: You're asking for a lot,
6 Ms. Burman.

7 MS. BURMAN: Yes, I'm sorry.

8 PARTICIPANT: It'd probably be too
9 small to read.

10 MS. BURMAN: Okay, and then I'm going
11 to go Andy Drake.

12 MR. DRAKE: This is Andy Drake with
13 Enbridge. I think when they look at the occupied
14 sites, just making a couple notes here; one, the
15 current code is for an ATA definition that
16 defines it as "such as," so if we're going to
17 switch off on that and we're going to lift the
18 number of people, I'm okay with that
19 dramatically. I just want to go back to the
20 comment earlier; the only reason that we get into
21 numbers is in enforcement proceedings, and I have
22 to have a record of how I determine that. So we

1 just need to make sure that on the enforcement
2 side, if we're in a spot from this language, we
3 know how this is going to play in reality.
4 They're going to switch it over to specific
5 types; it's going to be if you have a playground,
6 they're going to, "Well, is that a slide or is
7 that a playground for a lot of people?" I'm not
8 against it; I'm just warning we got to think
9 through that. This is really a note to PHMSA
10 because it will become an enforcement
11 practicability issue and I just want to think
12 ahead of it. I'm not at code for this; I just
13 want to make sure we think about it so we made it
14 practical. Thank you.

15 MS. BURMAN: Anyone have any thoughts,
16 comments?

17 MR. DRAKE: Yes, I just think -- Andy
18 -- to that point it's going to be important that
19 we develop good guidance, of course we'll address
20 it in the preamble, too, and that'll probably be
21 a good setting of that guidance as well.

22 MS. BURMAN: Sara Gosman?

1 MS. GOSMAN: Yes, Andy, I take that
2 concern and I -- I mean, I think it is important
3 to be clear about what the sites are. But again,
4 just from my perspective, I'm glad that you agree
5 that in general or as a principle, and I think
6 what I'm trying to do, and I think what I hear
7 PHMSA's trying to do is to get at those sites
8 that you are already working at for ATA purposes
9 and pulling in any that are coming out because of
10 that 20-person threshold than just putting in the
11 site itself. So I think that's my interest in
12 it; if there's a way to do that that's practical
13 on your side, that's more enforceable for PHMSA,
14 I think we should actually go that direction.
15 And I leave it to the industry that that was
16 board-up information they're gathering in PHMSA
17 in terms of enforceability to make that happen,
18 but I think that concept is really good and I'm
19 glad that we're where we are on this.

20 MS. BURMAN: Okay, and we have Andy
21 and Ronald. Andy?

22 MR. DRAKE: This is Andy Drake with

1 Enbridge. I think that's very practical; we can
2 work with without. I really do; I think it's
3 something that we have enough on record here and
4 kind of directional line and I think we can kind
5 of work through this.

6 MR. BURMAN: Ronald?

7 MR. BRADLEY: Yes, Ron Bradley from
8 PECO. Yes, I was just a little bit more curious
9 about what the group of -- the list of what would
10 be on an occupied site, just to try to make that
11 clear since it seems like we're getting close to
12 a vote. It seems like there's some ambiguity on
13 where the vote would go; for me anyways. Is
14 there anything you can add to that request?

15 MR. NANNEY: Yes, you're saying what
16 would be on an occupied site?

17 MR. BRADLEY: Yes, or the group or the
18 list of items that would be, that would make up
19 what an occupied site is. I know you've done
20 some recommendations; it looks like the language
21 is coming together with recommendations on what
22 to pull out of some of the language, but that

1 occupied site in quotes, I'm just a little bit
2 curious.

3 MR. NANNEY: Well, I think the, what
4 we probably would do is, if you look in 192.093,
5 which is the definition sections for the
6 identified site. We would make sure that the
7 examples which is basically what we've got now
8 would mimic in this occupied site the same areas,
9 and that be not limited to beaches, playgrounds,
10 recreational facilities, camping grounds, outdoor
11 theaters, stadiums, recreational areas near a
12 body of water or areas outside of a rule-building
13 such as a religious facility, or our buildings
14 such as religious facilities, office buildings,
15 community centers, general stores, 4H facilities,
16 roller skating rinks. And we would be specific
17 to those type areas of the definition. And then
18 that's 90/80 percent of what we have now in the
19 definition for occupied site.

20 I read from the HCA identified site,
21 what I just read. And if you look at what we had
22 proposed in this occupied site, it's the same

1 with the exception of the five persons and noting
2 the 50 days and 12 months per year language.

3 Does that help on what you're looking
4 at?

5 MR. BRADLEY: Yes, this is Ron. I
6 think it does; I'm just scratching my head on
7 areas outside

8 MS. BURMAN: I wonder if there's some
9 way of adding clarifying language to that last
10 bullet in the modifying return occupied site,
11 because as it leads at the end where it says, "As
12 discussed by members in PHMSA at the meeting," it
13 doesn't necessarily capture that there was some
14 agreement on what it's trying to establish and
15 the fact that it does sound like both some of the
16 issues that were raised, we're trying to come
17 together on why we're focused on what the
18 agreements are. I'm just wondering -- I just
19 want to make sure that it's captured a little
20 bit, Cheryl and then Andy.

21 MS. CAMPBELL: Yes, thank you. Cheryl
22 Campbell, Xcel Energy. I agree that we need to

1 get some clarification around what we're doing
2 with occupied sites so that we got some
3 consistency and some -- well, consistency of
4 understanding, right, while we're working with
5 our regulatory partners.

6 The other thing I would ask, probably
7 Steve Nanne, just to clarify; I thought I read
8 somewhere that in this rule that prior
9 assessments capped for these MCA's, and I just
10 wanted to make sure I wasn't dreaming that, given
11 how much I've already done it. It sure would be
12 nice if it counted.

13 MR. ALLEN: Well, I've been dreaming,
14 but you're not.

15 (Laughter.)

16 MS. CAMPBELL: Okay.

17 MR. ALLEN: So you're correct.

18 MS. CAMPBELL: Okay. Thank you,
19 Steve.

20 MS. BURMAN: Okay. Andy?

21 MR. DRAKE: This is Andy Drake with
22 Enbridge. Now, I don't want to get into

1 wordsmithing, but I think I might pair something
2 up as I've made, that may be helpful to Steve, a
3 new language. And I think you might want to add
4 here that there's criteria that it's identifiable
5 through a publicly available database. I think
6 that also is good forum for us to correct this
7 information because it actually is something that
8 we can use as operators. I think all of us
9 around the table can agree if that's available,
10 we should be using that as a vehicle to identify
11 these sites.

12 MS. BURMAN: Sara Gosman?

13 MS. GOSMAN: Yes, it sounds fine to
14 me. I just want to make sure; so is that way
15 that you're currently doing the ATA analysis,
16 you're looking at the publicly available data and
17 assessing it from there?

18 MS. BURMAN: Andy?

19 MR. DRAKE: This is Andy Drake. That
20 is how we do it now. I have a tool that we use,
21 and that's really why I was kind of throwing it
22 back out there because I think there's a point of

1 continuity with how we are searching for ATA's,
2 we would end that here and use that. I think
3 that will actually and hopefully get a little bit
4 more momentum with some of these databases that
5 we're actually using them on a bigger scale.

6 MS. BURMAN: Sara, do you have any
7 comments?

8 MS. GOSMAN: No, just that I -- again,
9 I want to make this practical for the industry
10 and enforceable, to the extent that a certain
11 database is being used in the ATA process to
12 identify those sites are ready with the 20-person
13 minimum. That set of data I would want to use
14 for this particular approach.

15 MS. BURMAN: Thank you. And Dave
16 Danner?

17 CHAIR DANNER: Yes, thanks. I just
18 had a question; publicly available database, will
19 that include just Google Maps, for example? I
20 mean, I'm trying to look at this from the point
21 of view of our pipeline inspectors who are going
22 to be going out on the sea and deciding whether

1 or not they have to write something up or not.
2 And I just want to make sure that we have
3 clarity; Andy, does that really get to -- do you
4 think it helps narrow this down?

5 MS. BURMAN: Andy?

6 MR. DRAKE: This is Andy Drake.

7 Sorry, I'm trying to follow Robert's Rules of
8 Order and get my hand up.

9 (Laughter.)

10 MR. DRAKE: It is a tool; it is not
11 the only way. Obviously, we're doing
12 assessments, we use aerial photography and other
13 things to help us, we use our field folks out
14 there doing a lot of field visits with local
15 folks. But it is one of the vehicles that we
16 have used, it's been pretty successful. I don't
17 know that I -- we do use Google Maps to
18 supplement our aerial photography, but that's not
19 actually the database that we're going to. But
20 we use a lot of tools is the point, and I think
21 you want all of them in here.

22 MS. BURMAN: Steve, does that answer

1 your question? This is Diane Burman; does that
2 answer your question?

3 MR. ALLEN: Yes, again, I'm trying to
4 think about how much ambiguity to remove because
5 I just feel inspectors are out in the field and
6 they have a question about whether something is a
7 violation or not, they might just go ahead and
8 say, "I'm going to write this one up because I'm
9 not sure." And I just want to get as much
10 clarity as I can into the system.

11 MS. BURMAN: Sara?

12 MS. GOSMAN: I wonder if we could just
13 direct PHMSA prior to the vote to consider the
14 necessary sites and also consider that in light
15 of enforceability. And that way we can -- I
16 think we're in agreement on principle here and
17 I'm just wondering if that gives us enough then
18 to move to a vote. And defer to PHMSA on the
19 wordsmithing on things like enforceability.

20 MS. BURMAN: Andy?

21 MR. DRAKE: This is Andy Drake. I
22 totally agree with you, Sara.

1 MS. BURMAN: I like that; this is
2 Diane. PHMSA, do you have any thoughts on that
3 and anybody else?

4 CHAIR DANNER: Yes, I just want to say
5 I agree with Sara and Andy.

6 MS. BURMAN: Okay, it does sound like
7 Ron Bradley.

8 MR. BRADLEY: This is Ron from PECO.
9 Just affirming I agree with the adjustments made
10 and I'm ready to go to a vote.

11 MS. BURMAN: Okay, thank you. It
12 sounds like the path forward is one that the
13 majority of people are rallying around. Does
14 anybody have any thoughts or comments or further
15 discussion before we move for a vote on the first
16 part, and then we go to the second part? Because
17 there will be two votes, I believe, unless staff
18 tells me I'm wrong.

19 MR. ALLEN: Can I just say something?

20 MS. BURMAN: Yes. Steve?

21 MR. ALLEN: How we set up such an
22 indemnification can be made through publicly

1 available databases. Can we add a couple words
2 that we would put in and class location surveys?
3 Because I think as an operator keeps up their
4 class location along the pipeline, most of the
5 data that we're talking about should be available
6 through those class location surveys, which are
7 present code in the requirement.

8 MS. BURMAN: Does anyone have any
9 concerns with that? And I'll take your silence
10 to mean you don't.

11 Okay, so I see no hands raised. So I
12 take the silence to mean that there is no issue
13 identified. I hope that is okay.

14 All right, if someone wants to make a
15 motion. I know you have a lot to make, lots of
16 words to read, so I apologize to the person.
17 Cheryl, thank you for that. Cheryl, if you want?

18 MS. CAMPBELL: Yes, I'll jump in and
19 do it. No worries. This is Cheryl Campbell with
20 Xcel Energy. I make a motion, the proposed rule
21 is published in the Federal Register and the
22 draft regulatory evaluation with regard to the

1 definition of Moderate Consequence Area is
2 technically feasible, reasonable, class-effective
3 and practicable if the following changes are
4 made; revise the definition of Moderate
5 Consequence Area Section 192.3 by changing the
6 highway description to remove reference to rights
7 of way and adding language so that the highway
8 consists of any portion of paved surface
9 including shoulders, clarifying that highways
10 with four or more lanes are secluded, working
11 with Federal Highway Administration to provide
12 operators with clear information relative to the
13 proposal and discussing in preamble, discussing
14 in the preamble what the definition of pitable
15 is, and modifying the term "occupied sites" and
16 the MTA definition in Section 192.3 by removing
17 five or more persons and the time frame of 50
18 days and tying the requirement into the HCA
19 surveys for identified sites as discussed by
20 members at PHMSA at the meeting. Such
21 identification can be made through publicly
22 available databases and class location surveys.

1 PHMSA will consider the necessary sites and
2 enforceability for direction by the numbers.

3 MS. BURMAN: Dave Danner?

4 CHAIR DANNER: So just before I second
5 anything, can I just clarify did we have language
6 about the interval?

7 MR. SATTERTHWAITE: That's the next up
8 slide shown there.

9 CHAIR DANNER: So we're doing this one
10 slide at a time?

11 MR. SATTERTHWAITE: Yes, one is the
12 definition and one is the applicability.

13 CHAIR DANNER: Thank you, I second
14 this.

15 MS. BURMAN: Any discussion?

16 Hearing no discussion, if we can do
17 the roll call vote.

18 MR. SATTERTHWAITE: Hi, this is
19 Cameron and we'll go right in.

20 Steve Allen?

21 MR. ALLEN: Aye.

22 MR. SATTERTHWAITE: Diane Burman?

1 MS. BURMAN: Aye.

2 MR. SATTERTHWAITE: David Danner?

3 MS. DANNER: Aye.

4 MR. SATTERTHWAITE: Ron Bradley?

5 MR. BRADLEY: Aye.

6 MR. SATTERTHWAITE: Cheryl Campbell?

7 MS. CAMPBELL: Aye.

8 MR. SATTERTHWAITE: Andy Drake?

9 MR. DRAKE: Aye.

10 MR. SATTERTHWAITE: Richard Worsinger?

11 MR. WORSINGER: Aye.

12 MR. SATTERTHWAITE: Chad Zamarin?

13 PARTICIPANT: Chad had to step out.

14 MR. SATTERTHWAITE: All right, we'll

15 skip forward. Sara Gosman?

16 MS. GOSMAN: Aye.

17 MR. SATTERTHWAITE: Richard Pevarski?

18 MR. PEVARSKI: Aye.

19 MR. SATTERTHWAITE: Did any other

20 member join that I have not announced or asked

21 for?

22 Okay, at this time the vote is

1 unanimous and the motion carries.

2 MS. BURMAN: Thank you. Now we're
3 going to go to Part 2 vote for acceptance outside
4 of HCA's, if someone wants to make a motion and
5 then we have someone second it. There was
6 discussion beforehand and you can also do that,
7 too, but I don't think there's any discussion so
8 we'll go right into the motion. If someone wants
9 to raise their hand to make a motion. Andy
10 Drake?

11 MR. DRAKE: This is Andy Drake with
12 Enbridge. I'm going to take a shot at this, I'll
13 make a proposal I published in the Federal
14 Register; draft for evaluation with regard to
15 provisions for assessments outside of high
16 content areas are technically feasible,
17 reasonable and cost-efficient and practical if
18 the following changes are made; one, clarify
19 Paragraph 192.710(c)(6) by stating that direct
20 assessment may be used only if appropriate for
21 the threatening assessment, cannot be used to
22 assess threats for which direct testament is not

1 suitable; two, revise the initial assessment and
2 reassess intervals from 15 and 20 respectively to
3 14 and 10 years respectively based on risk-based
4 prioritization; three, revise proposed Paragraph
5 192.710(a) to apply the lines with MAOP's greater
6 than or equal to 30 percent SMYS; and four,
7 remove proposed paragraph 192.710(c)(8) dealing
8 with low stress assessments.

9 MS. BURMAN: Does anyone want to make
10 a second?

11 I don't see any hand raised. Dave
12 Danner?

13 CHAIR DANNER: I second.

14 MS. BURMAN: Okay, thank you. Any
15 discussion?

16 Hearing no discussion, do you want to
17 do the roll call vote, please?

18 MR. SATTERTHWAITTE: All right, this is
19 Cameron. We'll just go in. Steve Allen?

20 MR. ALLEN: Aye.

21 MR. SATTERTHWAITTE: Diane Burman?

22 MS. BURMAN: Aye.

1 MR. SATTERTHWAITE: David Danner?

2 CHAIR DANNER: Aye.

3 MR. SATTERTHWAITE: Ron Bradley?

4 MR. BRADLEY: Aye.

5 MR. SATTERTHWAITE: Cheryl Campbell?

6 MS. CAMPBELL: Aye.

7 MR. SATTERTHWAITE: Andy Drake?

8 MR. DRAKE: Aye.

9 MR. SATTERTHWAITE: Richard Worsinger?

10 MR. WORSINGER: Aye.

11 MR. SATTERTHWAITE: Is Ed back?

12 PARTICIPANT: Ed's not back yet.

13 MR. SATTERTHWAITE: All right. Sara
14 Gosman?

15 MS. GOSMAN: Aye.

16 MR. SATTERTHWAITE: Richard Pevarski?

17 MR. PEVARSKI: Aye.

18 MR. SATTERTHWAITE: All right, it is
19 unanimous, the motion carries.

20 MS. BURMAN: Thank you very much. But
21 now we've done two out of the four sections for
22 our agenda today. Andy, did you have a comment?

1 I see you have your hand raised.

2 MR. DRAKE: Yes, just a practical
3 matter; John, can you put this last slide up?
4 I'm just trying to write some notes down about
5 what it said.

6 MR. GALE: We'll get it right up,
7 Andy. One second.

8 MS. BURMAN: And what we're going to
9 do now from a practical process matter, we are
10 going to break for lunch. I'm sorry it's not
11 going to be a full hour. PHMSA has overridden
12 me, I wanted to only do 15 minutes but they said
13 you need to do 1:19:47, so we're going to go to,
14 we're going to start right at 2:00 p.m. sharp.
15 We have a hard stop at 5:00 p.m., hopefully we
16 can get through all that we have on our agenda
17 within three hours and maybe even earlier.
18 However, we don't want to chill the conversation
19 and discussion because there is a lot on there.
20 So let us start back at 2:00 p.m.

21 For purposes of our moderator, Laurie,
22 thank you so much. You've been great. Should we

1 keep our phones on and audio on except for mute?
2 I just don't want us getting disconnected getting
3 back on. How do we do that, just for practical
4 perspective?

5 OPERATOR: It's certainly a good
6 question, Diane. I think that I'm going to go
7 ahead and transfer all the speakers in the house
8 back into the private room while you're on your
9 lunch break. And if all the participants could
10 stay on the line. Your lines are already muted,
11 so they don't have to mute their lines. If they
12 could just stay on the line and not disconnect,
13 that would be great.

14 MS. BURMAN: Okay, so no one should
15 disconnect. Just mute your lines. And we'll
16 start right back up at 2:00 p.m. Thank you,
17 everyone. I appreciate it.

18 Again, all those who are working
19 through the storm both at the Commission, the
20 utilities and the emergency personnel folks,
21 thank you all, much appreciated.

22 PARTICIPANT: Thanks and we'll see you

1 in a bit.

2 (Whereupon, the above-entitled matter
3 went off the record at 1:21 p.m. and resumed at
4 2:00 p.m.)

5 MR. MAYBERRY: Welcome back, everyone.
6 This is Alan Mayberry and I'll turn it back over
7 to our chair today, Diane Burman.

8 MS. BURMAN: We're back now for the
9 afternoon session of the GPAC meeting. Right now
10 we're back on our agenda for retention
11 requirements. We have two agenda items, the
12 record retention requirements and the repair
13 criteria. We'll start with the record retention
14 requirements and PHMSA presentation on that.
15 Thank you.

16 MR. NANNEY: This is Steve Nanney with
17 PHMSA. Good afternoon, everyone. We'll be
18 starting on record, so you should have slide 534.
19 We'll be discussing Section 13(e) 67, 127, 205
20 and Appendix A. And again, the issue there, just
21 to recap, is during the NTSB investigation of the
22 PG&E accident at San Bruno, California that

1 identified missing records, especially records
2 documenting MAOP. And PG&E has conducted an
3 immediate search for missing records in response
4 to the NTSB recommendation and determined that
5 many records could not be found. And PHMSA
6 received a congressional mandate that required
7 all operators to report the pipeline mileage.
8 They did not have adequate records for MAOP and
9 HCA's in Class 3 and 4 Stations.

10 Going to Slide 35. Again, the basis
11 of the PG&E accident in San Bruno, California;
12 the operators in response to the congressional
13 mandate reported approximately 5,000 miles of
14 pipe in Class 3 and 4 locations and HCA's that
15 did not have adequate records to confirm MAOP.

16 Slide 36. Again, PHMSA proposed to
17 clarify the records requirement. The committee
18 voted positively on the record requirements in
19 Section 5(b), Sections 227(c), 285(e), here in
20 the June 6th and 7th, 2017 meeting. We will take
21 up the records requirement, again as I said
22 earlier in 13(e), 67, 127, 205 and Appendix A.

1 And the MAOP requirements specific to MAOP
2 records are proposed in 619 and 624, will be
3 taken up the next meeting; in other words, the
4 March 26th meeting.

5 Now onto Slide 37. Again, we proposed
6 to require each operator to make and retain
7 records that demonstrate compliance in 13(e), to
8 summarize the records required and the retention
9 theories in Appendix A, and to require each
10 operator of gas transmission pipelines to make
11 and retain records of materials by design and
12 pipeline components.

13 Going to Slide 38; some of the
14 committee comments we had, had to do with
15 concerning have a general records requirement; in
16 other words a general duty clause in Section
17 13(e) that by doing so the requirement will be
18 retroactively applied and create some intended
19 consequences we'll expect to have it rectify non-
20 compliances.

21 We'll go onto Slide 39. Some other
22 comments we had. Exempt small components from

1 the requirement to have material records for the
2 components. Also, to clarify applicability to
3 gathering and distribution operators.

4 Going onto Slide 40; based upon the
5 discussion that we have in the June 2017 and the
6 December 2017 meetings, PHMSA proposes committee
7 to consider the following; number one is to
8 withdraw the proposed addition to 13(e) and the
9 summary of the Part 192 record requirements in
10 Appendix A. In other words, the recommendation
11 from June 6th, 2017. Neither is essential,
12 specific record requirements are in the
13 regulatory tax specific sections within 192, some
14 of them which have already been approved by the
15 committee. And PHMSA will support a committee
16 recommendation to publish a summary of records
17 requirements comparable to Appendix A outside of
18 the regulatory requirements, such as on an
19 advisory board or other guidance document, to
20 assist stakeholders and understanding the records
21 requirements contained in Part 192, and also the
22 assembling in one area so that there's a one-stop

1 area to go look to tell you where to go in the
2 code, to find the exact specifics.

3 All right, going to Slide 41. Also,
4 based upon this discussion PHMSA proposes the
5 committee consider the following; to modify
6 Section 205 for components, to clarify that it
7 applies to components greater than 2 inches and
8 normal diameter. And that was a recommendation
9 from the June 2017 meeting.

10 Going to Slide 42. We also proposed
11 for the committee to consider to revise the
12 proposed Section 67 for materials, 127 for pipe
13 design, and 205 for components to clarify that
14 the proposed requirements for these sections are
15 not retroactive. Existing records on the pre-
16 existing pipeline must be retained for the life
17 of the pipeline. For new pipelines you must make
18 and retain records for the life of the pipeline,
19 and that other sections such as 713, 619, 624,
20 917, 933 would require when and for which
21 pipeline segments, attributes with missing
22 records must be verified in accordance with 67.

1 And as a reminder, records
2 requirements, specifically MAOP records proposed
3 for 619(f) and 624(f) would be taken up in the
4 March the 26th, the 28th meeting in the context
5 of the MAOP conversation requirements.

6 With that, I'll go into Slide 43.
7 Again. we open for public comments and I'm free
8 to turn it back over to the chairman.

9 MS. BURMAN: Thank you very much. I
10 do want to open it up for a couple comments now
11 on the records retention requirements. We don't
12 have any comments that anyone had wanted
13 originally to make on these from the public, but
14 if there are any comments now that folks, from
15 the public, not from the committee but from the
16 public, that wants to weigh in at this time,
17 please do Star 1 and you will be identified.

18 I'll give you a moment to find your
19 Star 1.

20 OPERATOR: We do have a couple
21 questions in the queue already.

22 MS. BURMAN: Okay, if you can identify

1 yourself and who you're with, you can let us know
2 and we can do that.

3 OPERATOR: And the first question
4 comes from Thomas Correll with Northern Natural
5 Gas. Your line is open, please go ahead.

6 Thomas, your line is open. Please go
7 ahead.

8 MS. BURMAN: Thomas, I think you may
9 have to unmute.

10 Not hearing from him, we want to go to
11 someone else. We can come back to Thomas.

12 OPERATOR: Sure, the next question
13 comes from Heidi Keller from API. Please go
14 ahead.

15 MS. KELLER: Hi, this is Heidi Keller
16 with API. Just wanted to make a few comments.
17 Thank you, PHMSA, for all of your work on this
18 role and this opportunity to provide comment
19 here. We support, API and its members support
20 new proposal you set forward and the elimination
21 of the general duty clause as well as the
22 elimination of Appendix A. Also, just like to

1 highlight here, we're still looking for a
2 definition of TVC, it has not been defined and we
3 would recommend that PHMSA take a look at that
4 base or definition on TVC from the 2012 advisory
5 bulletin that was released. And also, make sure
6 that TVC means that every single record or a
7 combination of records.

8 Additionally, I just would like to
9 comment that we would prefer to see the record
10 requirements remain within the section of the --
11 remain within a specific section and we would not
12 support influence of the subsequent advisory
13 bulletin, as we feel that that might create some
14 more confusion as Appendix A. The regulatory
15 text will provide clear and good record-keeping
16 requirements. Thank you.

17 MS. BURMAN: Thank you. Next public
18 comment there, if you want to identify them.

19 OPERATOR: There are no further
20 questions at this time.

21 MS. BURMAN: So why don't we go back
22 to Tom from -- I forget who you had?

1 OPERATOR: He's no longer queued up.

2 MS. BURMAN: He's no longer queued up.
3 Tom, if you still want to, you can do Star 1. If
4 not, we'll move on.

5 It does appear that we have another
6 public commenter. Matt Hite? Can we recognize,
7 Matt?

8 OPERATOR: Matt, please press Star 1
9 if you would still like to ask a question.

10 One moment, please.

11 MR. HITE: Yes, I'm from GPA Midstream
12 Association. Thank you, again PHMSA, for putting
13 this meeting together. We have one question,
14 actually, or one concern we just wanted to raise
15 in regards to the fact that PHMSA hasn't properly
16 considered the necessity and the potential
17 adverse economic impacts for new record-keeping
18 requirements to regulate gathering lines which
19 are subject to the pipeline materials and design
20 requirements for transmission lines. And we feel
21 that PHMSA should make clear that the proposed
22 record-keeping requirements do not apply to

1 regulated gathering lines. If that's not
2 possible, we would hope that PHMSA would have a
3 discussion of whether the proposed record-keeping
4 requirements should apply to regulated gathering
5 lines either June or this month GPAC meeting.

6 Thank you.

7 MS. BURMAN: Thanks. Any other public
8 comments before we go to the committee and PHMSA
9 discussion?

10 OPERATOR: There are no further
11 questions at this time.

12 MS. BURMAN: Okay, so now we're going
13 to go, we're going to open it up to the committee
14 discussion. If anyone who wants to talk at the
15 committee level, please raise your hand, do a
16 Star 1. Andy Drake?

17 MR. DRAKE: This is Andy Drake with
18 Enbridge. I just want to make a comment -- I
19 think Heidi hit something that resonated with me
20 -- is when we talk about removing the records
21 requirements, taking Appendix A and getting rid
22 of Appendix A, I understand that and we had a

1 little bit of conversation about that. But I
2 think what sounds is an advisory bulletin will
3 come out after the rulemaking as a separate
4 deliverable with more guidance and clarity.
5 We've had a lot of conversations about how TVC's
6 look like in these meetings. Our recommendation
7 is to try to get as much clarity as possible into
8 the sections of the code for this rulemaking. It
9 helps everybody. If we issue a separate
10 deliverable after the rulemaking with guidance in
11 it, the operators are going to try to start
12 fashioning compliance solutions and plans around
13 the rules. And then from later day out comes
14 more material; it's hard to kind of move. And I
15 think what you're going to create is a lot of
16 tentativeness about people investing energy into
17 the rulemaking until all its guidance is turned
18 out and you get clarity.

19 So my recommendation is just to
20 concentrate on getting the language in the rule
21 and not having appendices and advisory bulletins
22 and all these other things that help provide

1 clarity. I think we can clarify that in each
2 section, and that would be my recommendation
3 here.

4 MS. BURMAN: Any thoughts from
5 committee members on that?

6 Cheryl Campbell, and then Ron Bradley.

7 MS. CAMPBELL: Cheryl Campbell, Xcel
8 Energy. I absolutely agree with Andy, if we can
9 provide a lot of clarity in the code, I think
10 that would benefit all the operators. Thanks.

11 MS. BURMAN: Bradley?

12 MR. BRADLEY: Yes, this is Ron Bradley
13 from PECO. Just voicing my agreement that the
14 code clarity helps everybody. Often when the
15 good work of PHMSA to get an advisory bulletin
16 out to help folks stay tied back to the code,
17 often that gets confused and cases where you lose
18 one word in there and you just say something like
19 "pipeline," it'll start to steer some regulatory
20 groups back to distribution as well as
21 transmission, and who knows, maybe even gathering
22 when the attention for the advisory could very

1 much shift the transmission.

2 I think the clarity in the code is
3 always great and sometimes the advisory bulletin
4 just could create some challenges, although well-
5 intended. Okay, thanks.

6 MS. BURMAN: Okay, thank you. Anyone
7 have any thoughts or comments on that part before
8 we move to other parts of the record?

9 I wonder if PHMSA has any thoughts on
10 this?

11 As to the other public comments,
12 especially on the part that Matt Hite raised as
13 to the gathering line, I wonder if there's any
14 comments or thoughts from those?

15 Okay, is there any further discussion?
16 Are folks comfortable with the path forward here?

17 It's been relatively quiet.

18 Andy Drake?

19 MR. DRAKE: I'm going to make a motion
20 here. I think PHMSA's done a good job of getting
21 this cleared up. I think we have something
22 that's pretty actionable here.

1 CHAIR DANNER: Dave Danner, just one
2 second, my wi-fi just popped up here.

3 MS. BURMAN: Okay, thank you.

4 MR. DRAKE: Okay? Let me read this
5 for a second.

6 MS. BURMAN: I just want to clarify;
7 is this the only language or will we be seeing
8 other slides for voting on, or is this the only
9 one where you're voting on?

10 MR. MAYBERRY: We only have one slide,
11 and just to be clear for any point, this still
12 has a bullet in here regarding the AB, so again,
13 this is our recommendation but it starts with the
14 committee vote.

15 MS. BURMAN: Okay, I think people need
16 a moment to just look at it.

17 Andy?

18 MR. DRAKE: I'm good to make a motion.
19 If there's any -- I'll kind of throw that out
20 there, if there's any comments about that before
21 I do that. I think that would help expedite
22 these discussions, but I'm good with it.

1 MR. MAYBERRY: Andy, this is Alan.
2 What -- I heard Ron and others talk about
3 clarity; what would be the clarity that others
4 would be looking for that. I think this was
5 intended to address, so is the advisory in -- by
6 the way, we would notice and comment that as
7 well.

8 MS. BURMAN: Andy?

9 MR. DRAKE: This is Andy Drake with
10 Enbridge. Alan, I mean, my recommendation is
11 keep doing what you're doing. I think you're
12 doing a very good job of clarifying TVC section
13 by section; I just didn't put those conversations
14 into the rule. That's really it. I just
15 wouldn't want to see us kind of holding back.
16 This is the forum to get that clarity; you're
17 getting it here. You're doing a great job of
18 capturing it, just inspection as we go along.

19 MR. MAYBERRY: All right, thank you.

20 MS. BURMAN: Okay.

21 (Simultaneous speaking.)

22 MS. BURMAN: No, go on, Alan. You

1 were about to say something.

2 MR. MAYBERRY: Chairman Burman, I was
3 just saying we're good with this. I mean, if
4 this is the will of the committee, you know,
5 we're ready to move if you are.

6 MS. BURMAN: Okay. Does anyone have
7 any thoughts or comments? Is everyone
8 comfortable moving forward with discussion before
9 we take a vote on this?

10 Sara Gosman?

11 MS. GOSMAN: Yes. I mean, I feel this
12 is an issue of one that's about regulatory
13 compliance on the industry side. I feel like
14 they have the information they need, and PHMSA
15 feel like they have the information they need to
16 comply with the records requirements, I think
17 that's fine.

18 MR. MAYBERRY: Yes, this is Alan. We
19 think we've got enough clarity on the rule, just
20 what TVC is, and we're good with it.

21 MS. BURMAN: Andy Drake?

22 MR. DRAKE: Okay, I'm ready to pose a

1 motion that the proposed rule is published in the
2 Federal Register and the draft regulatory
3 evaluation with regard to the provisions for
4 records or technically feasible, reasonable,
5 cost-effective and practical if the following
6 changes are made; one, withdraw the proposed
7 addition of paragraph 192.3(e) and the proposed
8 Appendix A; two, modify paragraph 192.205 to
9 clarify that it applies to components greater
10 than 2 inches in diameter; and three, revise
11 proposed Paragraph 192.67 materials, 192.71
12 pipeline, and 192.205 components to clarify the
13 effective date of the requirement.

14 MS. BURMAN: Okay, thank you. Cheryl?

15 MS. CAMPBELL: I'll second that
16 motion.

17 MS. BURMAN: Any discussion on the
18 motion? If there's no discussion, if you want to
19 do a roll call vote at this time.

20 MR. SATTERTHWAITE: Okay, this is
21 Cameron. We'll go through the list. Stephen
22 Allen?

1 MR. ALLEN: Aye.

2 MR. SATTERTHWAITE: Diane Burman?

3 MS. BURMAN: Aye.

4 MR. SATTERTHWAITE: David Danner?

5 CHAIR DANNER: Aye.

6 MR. SATTERTHWAITE: Ron Bradley?

7 MR. BRADLEY: Aye.

8 MR. SATTERTHWAITE: Cheryl Campbell?

9 MS. CAMPBELL: Aye.

10 MR. SATTERTHWAITE: Andy Drake?

11 MR. DRAKE: Aye.

12 MR. SATTERTHWAITE: Rich Worsinger?

13 MR. WORSINGER: Aye.

14 MR. SATTERTHWAITE: Chad Zamarin?

15 PARTICIPANT: He's not back yet.

16 MR. SATTERTHWAITE: All right. Sara

17 Gosman?

18 MS. GOSMAN: Aye.

19 MR. SATTERTHWAITE: Richard Pevarski?

20 MR. PEVARSKI: Aye.

21 MR. SATTERTHWAITE: It's unanimous,

22 the motion carries.

1 MS. BURMAN: Thank you. We are going
2 to go now -- so we got through the records
3 retention requirement. The next section is the
4 repair criteria inside and outside of HCA's. I
5 don't believe that we're going to be taking a
6 vote on this section, except the section I do
7 understand there is a lot here to unpack, and
8 that's we would be looking at the next meeting
9 which is in person in March. Just for full
10 disclosure, I won't be at that in-person meeting.
11 I will be at it via teleconference, but I won't
12 be at it in person. So this is an important
13 conversation for us to listen to today and to be
14 participating in discussion so that we can all be
15 prepared for voting at the next in-person
16 meeting.

17 We do have a lot of people who have,
18 will be making public comments today, who have
19 already identified that they want to make public
20 comments. So we'll be hearing from them during
21 the public comment section. And also I do have
22 one person who has a general comment overall, so

1 we'll allow time for that general comment to be
2 made also. But at this time we have 2:23, we
3 have until 5:00 for this section. We may not go
4 the full time, but we do have until 5:00 if we
5 need that. So now I'm going to turn it over to
6 PHMSA for that. Thank you.

7 MR. MCLAREN: Well, good afternoon.
8 This is Chris McLaren with PHMSA. Section 4 is a
9 discussion of the repair criteria revisions of
10 those Notice of Proposed Rulemaking comments as
11 well as PHMSA's proposals to lead to a healthy
12 discussion. The issue is that greater assurance
13 is needed that injurious anomalies are repaired
14 before that can grow leading to leaks or
15 ruptures. PHMSA proposed in the NPRM to modify
16 the repair criteria to include additional
17 anomalies under both the immediate and the one-
18 year conditions for HCA and include a criteria
19 for cracks in response to NTSB recommendation
20 P2012-3. This was made for hazardous liquid
21 lines. Also to apply the HCA criteria to non-
22 HCA's with a tiered response time for non-

1 immediate conditions. For instance, in the
2 repair criteria for non-HCA's defects requiring a
3 one-year response in HCA's would require two-year
4 response, PHMSA's non-HCA areas.

5 Also, add definitions for significant
6 stress corrosion cracking, significant theme
7 cracking, wrinkle, bend and hard spots. And the
8 basis was inspection experience identified
9 weaknesses in repair decisions in response to ILI
10 data and some of our investigations and
11 inspections. And some injurious anomalies and
12 defects were not identified and remediated in a
13 timely manner commensurate with their
14 seriousness.

15 Slide 46, the NPRM comments
16 received/shared widespread support by the
17 National Transportation Safety Board, Pipeline
18 Safety Trust, public and safety advocates as
19 well. In calculating safe pressure, the listed
20 methods, for example RSTRENG only apply to
21 corrosion metal loss and other methods should be
22 allowed for cracks and defects. That was another

1 comment. And PHMSA's response was that predicted
2 failure pressure, PF method such RSTRENG only
3 applied to corrosion metal loss and we support
4 revising the proposed rule to include other
5 methods appropriate for cracks and other defects.
6 The comment was that the proposed rule should
7 prioritize immediate conditions discovered within
8 high consequence areas, but with those found
9 within moderate consequence areas request three
10 and four locations when discovered
11 simultaneously. PHMSA's response was that all
12 immediate conditions were those where failure is
13 imminent, indiscriminately requiring HCA's to be
14 prioritized ahead of non-HCA's would not always
15 serve safety. Both 933HCA and 713 non-HCA
16 repairs says repair criteria specify that
17 operators reduce pressure until immediate
18 condition can be repaired as a safety measure to
19 prevent failure before repairs are made.
20 Operators should make prioritization decisions
21 among multiple, immediate conditions based on the
22 circumstances and specifics of each case. And

1 there's always the ability to ensure safety by
2 reducing pressure.

3 Another comment was that PHMSA should
4 clarify the discovery of the condition and
5 cracked defect as called by the ILI tool vendors.
6 Our response is that the discovery of anomalies
7 is addressed in 192.933(b) and 192.710(b) and
8 it's based on the operator having adequate
9 information regardless of the type of defect;
10 this is unchanged from the existing 192.933(b)
11 requirements that have been in effect since 2003.

12 Slide 49, the comments were that for
13 discovery of conditions per 192.133, commenter
14 requested that PHMSA include additional time for
15 operators to submit a notification if the
16 discovery cannot be completed within 180 days of
17 the integrity assessment. For example, submit
18 the notification 30 days after the 180 day
19 discovery deadline. PHMSA believes that
20 operators should submit notifications of delays
21 and identify conditions on or before the 180-day
22 deadline.

1 Slide 50, a commenter requested the
2 effective date of 192.713 be clarified, concerns
3 with the repair criteria proposed in 192.713 in
4 the retroactive section of the regulation,
5 operators will be required to go through previous
6 ILI assessments and apply these new criteria
7 retroactively to pipelines that have already been
8 assessed that met the code requirements of that
9 time. PHMSA's response was that we do not intend
10 that 192.713 apply retroactively and we would
11 support clarifying the proposed rule accordingly.

12 On Slide 51, another commenter said
13 that for remaining strength calculations should
14 address data gaps as follows; until such time
15 that the requirements within 192.607 have been
16 met or if the segment under evaluation is not
17 subject to the requirements under 192.607,
18 supportable sound engineering judgement may be
19 used.

20 Our response is on Slide 52, and it
21 reads as follows; for remaining strength
22 calculations, material specify yield strength and

1 high properties, diameter and thickness must be
2 known to calculate the predicted failure
3 pressure. Operators are allowed 180 days to
4 declare discovery of a condition. In some cases
5 it may be necessary to acquire information needed
6 to verify the properties that they are unknown in
7 order to determine the predictive failure
8 pressure. The acquisition of data needed for
9 performing PFP calculations has been a
10 requirement in Sub-Part O for consequence areas
11 since the inception of the integrity management
12 rule. 192.917(b) references B31.8S Section 4
13 showing Table 1 that is required data elements
14 for a prescriptive pipeline integrity program.

15 And the continuation on Slide 53 of
16 this response; in cases where the operator does
17 not know information needed to perform strength
18 calculations, previously showed as diameter
19 thickness as specified in yield strength. The
20 operators may use the procedure in 192.607 to
21 establish the missing information. This process
22 may be used in HCA's as well as non-HCA

1 locations. Further, operators may assume Grade A
2 pipe using a SMYS of 30,000 PSI in cases where
3 SMYS is not known.

4 Slide 54, another comment was industry
5 provided numerous details and comments on the
6 technical aspects of the proposed repair
7 criteria. Industry commented on many of the
8 additional repair criteria and desires to retain
9 existing ASME B31.8 Figure 4 response timelines.

10 We will summarize and go over these
11 comments. If I were to facilitate discussion,
12 the existing and modified repair criterias are
13 compared in the table on the following three
14 slides.

15 We'll go to Slide 55 now and Steve
16 Nanney will take over.

17 MR. NANNEY: Okay, we're looking at
18 the repair revisions here in this table. Just to
19 give everybody an overview of what's here; if you
20 look over on the left-hand side in the dark blue
21 content, existing anomaly HCA only, existing
22 timing for the HCA only, and then over in the

1 orange color, again, this is proposed for whether
2 to apply HCA's and non-HCA's and then the timing
3 of both. And starting out, the first three rows,
4 the predicted failure pressure show PFB of 1.1
5 times MAOP; that is for immediate repairs for
6 HCA's only. And you can see we're also proposing
7 that to be for non-HCA's also, the 1.1 times
8 MAOP.

9 Going down a line to the next row;
10 metal loss, cracking or stress riser, again,
11 that's presently immediate on a HCA. And we're
12 proposing that to be immediate on both a HCA and
13 a non-HCA.

14 Going to the third row, any other
15 anomaly requiring immediate action, again that is
16 wording that is presently in the code and it's
17 immediate for a HCA. And again, over to the
18 right we're proposing that to remain the same for
19 HCA, but also to make it a requirement for a non-
20 HCA.

21 Going on down to the last row where
22 we've got no current requirements, again the

1 first line there is metal loss greater than 80
2 percent. One thing, the evaluation equations you
3 use B31 or RSTRENG, they go a limit that if
4 you're over 80 percent you cannot use them. All
5 this is, is clarification language to make sure
6 that everyone knows that, that it doesn't get
7 forgotten as time goes on, and that would be
8 immediate for both HCA's and non-HCA's.

9 The next row there would be metal loss
10 affecting various weld types, and that would be
11 immediate for HCA and non-HCA's. Significant
12 stress corrosion cracking and weld corrosion
13 would be immediates for both HCA's and non-HCA's.
14 That's what the proposal is.

15 Going to Slide 56; again, we've got
16 over on the left-hand side in the dark blue, a
17 smoothed dent greater than 60 percent, that's a
18 top-side dent, presently the existing timing for
19 it on a HCA is one year.

20 Going over to the right-hand side to
21 the orange, which would be a new proposed
22 language, a smooth dent greater than 60 percent

1 or top-side dent would be the same for a HCA, one
2 year, and then for non-HCA this would be new,
3 would be two years. A dent greater than 2
4 percent on a weld, going to the second row, would
5 be one year is the present timing. And again, as
6 you can see going over to the right-hand side, it
7 would be the same for a HCA, but would also give
8 it a two-year period which would be new for a
9 non-HCA.

10 Going down to the area now, the row
11 that's got no current requirement, and as you go
12 over into the orange part which would be, given a
13 classification that would add a pressure failure
14 ratio content to both of a 1.25 for Class 1, a
15 1.39 for Class 2, a 1.67 for Class 3, and a 2.0
16 for Class 4, and that would be both for a one-
17 year for HCA's, two years for non-HCA's.

18 And again, going down to the next row
19 would be general corrosion greater than 50
20 percent would be new for HCA's for one year, two
21 years for non-HCA's. And the 50 percent general
22 corrosion is something that's been in the liquid

1 rule since liquid F started.

2 Going down to the next one would be,
3 again, would be 50 percent corrosion at a
4 crossing, circumferential girth weld, one year
5 for HCA's, two years for non-HCA's. A gouge or a
6 groove would be greater than 12-1/2 percent of
7 the wall thickness, would be one year for HCA's,
8 two years for non-HCA. At any indication of a
9 crack or crack rock defect that is not an
10 immediate condition, would be one year new for a
11 HCA, two years for non-HCA.

12 Going to the next slide, Slide 57,
13 again looking on the left-hand slide, the dark
14 blue and light blue, would be bottom side dent
15 greater than 6 percent presently as a monitored
16 condition for HCA's and it would be the same
17 going over for new in the orange. The top-side
18 dent greater than 6 percent, an analysis
19 demonstrate that it has critical strain levels,
20 not exceeded it would be a monitored condition,
21 and that would be the same for HCA's and non-
22 HCA's.

1 Going down to the last or the third
2 line, a dent greater than 2 percent on a weld, an
3 analysis demonstrated critical strain levels not
4 exceeded would be a monitored condition, that'd
5 be the same for HCA's and applicable for non-
6 HCA's.

7 Going to Slide 58, if the repair
8 criteria revisions are in Section 711, 713 and
9 913, some of the comments we got on the Notice of
10 Proposed Rulemaking; one was revised Paragraph
11 933(d)(1)(b) to allow for fitness for service
12 evaluation and clarify that this is specific to
13 selective seam corrosion rather than general
14 corrosion crossing the weld seam. High frequency
15 electric resistance welded type is considered
16 structural, and thus should not be included in
17 this category. PHMSA's response is based on
18 incident investigation, experience and data.
19 PHMSA believes that the proposed repair criteria
20 is appropriate.

21 In conclusion, high frequency RW pipe
22 seam welds in 933(d)(1)(b) is appropriate. See

1 the seam failure incident slide that's next.

2 Again, going to Slide 59, based upon
3 the PHMSA database, this is just type seam
4 failures from 2010 through November of 2017, and
5 you can see the seam pipes there that it varies,
6 flash welded pipe 17, light-welded pipe 4,
7 longitudinal high-frequency ERW pipe 10, low
8 frequency ERW seam pipe 15, and unknown frequency
9 10. So you can see the number of failures during
10 this seven-year time period.

11 Going to Slide 60, some of the
12 additional comments in blue that we received has
13 little improvement in pipeline safety by
14 requiring dig space solely on the proposed depth,
15 the metal loss 50 percent in paragraph
16 713(b)(2)(i)(v). Also, remove paragraph
17 (b)(2)(v) as it appears and the criteria is
18 already captured in paragraph (i)(v). PHMSA's
19 comment there is these criteria are not duplicate
20 but address two types of defects and locations.
21 The intent of (i)(v) is to address areas of
22 general corrosion that is reduced the wall

1 thickness to less than required by MAOP. PHMSA
2 will verify (i)(v) to occur to general corrosion
3 to consist of what the liquid rule the
4 10452(h)(4)(iii)(e).

5 Going to Slide 61, some additional
6 comments that we received, is clarify what is
7 significant stress corrosion cracking in Section
8 933(d)(1)(vi). PHMSA's response there is the
9 notice included the definition of significant FCC
10 in the definition sections in Section 3.

11 The next comment we received was
12 remove paragraph (b)(2)(vi) from the proposed
13 language; it is unlikely any operator will be
14 able to comply with this requirement. Again,
15 7134(b)(2)(vi) relates to gauges or grooves
16 greater than 12-1/2 percent of the pipe wall
17 thickness. Liquid operators have been complying
18 with this repair criteria since the inception of
19 the Liquid IM Program. It started before the gas
20 problem.

21 All right, going to Slide 62, the
22 comments we received there was in blue,

1 ASME.B31.8S should be applied for remediation
2 based decisions. PHMSA proposes contradictory
3 approaches by also requiring depth-based
4 criteria, in other words a percent of wall
5 thickness and proposed revisions to regulation.
6 PHMSA should only reference B31.8S which is
7 considered the best acceptance practice. PHMSA's
8 comment there is the use of B31.G and RSTRENG is
9 not applicable to metal losses greater than 80
10 percent of the wall thickness, which is stated in
11 the research document. The use of B31.G and
12 RSTRENG with B31.8S Figure 4 does not assure that
13 the limitation is observed. PHMSA explicitly
14 added 80 percent wall loss criteria to ensure
15 that all such defects are repaired immediately.
16 PHMSA also added criteria for cracking. The
17 current repair criteria are silent for cracks and
18 crack-like defects.

19 Going to Slide 63, pressure
20 calculations for corrosion. Again, B31.G and
21 RSTRENG are the two main ones that are referenced
22 in the repair section of the code. And as B31.G

1 uses what is termed a slow-stress as a specified
2 minimum yield strength of the pipe which would be
3 the grade of the pipe, whether it was Grade B or
4 X52 -- if it was X52, that'd be 52,000 times 1.1,
5 so you would be increasing the strength of the
6 pipe to that amount to use in this formula. The
7 same thing on RSTRENG, it uses a low stress and
8 it's based on not 10 percent but adding 10,000
9 pounds to the yield strength of the pipe. And
10 provisions have been included for safety factors
11 in those equations, too. Again, B31.G and
12 RSTRENG limit accepting corrosion fits to no more
13 than 80 percent through wall.

14 Onto slide 64, again just to point out
15 and let everybody know that there is a timing,
16 B31.8S which is referenced in the code, this
17 Figure 4 has a timing response. And if you look
18 at it, it'll give you a response time based upon
19 -- if you look at the arrow that's highlighted in
20 yellow, about 50 percent SMYS, that would be your
21 Class 1 and 2 locations. That time would be
22 applicable. And you look at the light blue that

1 says above 30 percent but not exceeding 50
2 percent SMYS, that would be your Class 3 and 4
3 pipes. And this would be the sliding scale that
4 could be used as far as determining when to make
5 a repair down to 1.1 times MAOP. And again, we
6 just wanted to give everybody a chance to look on
7 the committee at this ground.

8 Going to Slide 65, again, PHMSA's
9 noted that the trend and immediate repairs has
10 not decreased commensurate with the conclusion of
11 the baseline assessment at the end of 2010, and
12 that's what we have here is a slide showing that.

13 Going to the next, Slide 66, again on
14 immediate repairs, just to give everyone an idea
15 what the immediate repairs has been since -- if
16 you look since the rules came into play, the IM
17 Rule, in 2004 through 2016 as you can see here,
18 is that immediate repairs have stayed in a range
19 of about 150 to 250 depending upon the years.

20 Going to Slide 67, some other comments
21 that we received was proposed adding additional
22 criterion to 933.(b)(2) to address significant

1 seam weld corrosion and PHMSA will propose
2 criteria for this.

3 And also a comment on Section 933(b)
4 that recommends eliminating all places with any
5 indication language so that the present and the
6 condition not just the repairs, not just an
7 indication; they recommend aligning the
8 provisions of 933(d) with the provisions of
9 713(3). And PHMSA proposes to revise 933 and 713
10 to eliminate the phrase, "any indication from the
11 repair criteria language for a significant FEC
12 and selected seam weld corrosion and seam
13 cracking."

14 All right, going to Slide 68, a
15 comment we got here was requirement for sub-
16 section 933(d)(2)(vii) to classify all cracks or
17 crack-like defects as two-year repair of
18 conditions if overly conservative. PHMSA
19 proposed to consider an alternate approach with
20 specific crack depth criteria.

21 The next comment we have was proposed
22 adding language in 933(b)(1)(ii) a dent that has

1 any indication of metal loss with a predicted
2 failure pressure of less than 1.5 times MAOP.
3 PHMSA, this is out of the scope of the proposed
4 rule; PHMSA is not proposing to make changes to
5 current code requiring criteria for dents.

6 Going to Slide 69, some other comments
7 that we received. In Section 933(b)(2)(vi) the
8 current in-line inspection tools did not have the
9 capability of differentiating a 12-1/2 percent
10 gouge or groove metal loss from a 12-1/2 percent
11 external corrosion metal loss given the current
12 in-line inspection tool technology, operators
13 would be required to investigate all metal loss
14 indications greater than 12-1/2 percent to
15 determine if the metal loss is a gouge or groove.
16 Recommend that this proposed section be deleted.
17 PHMSA's comment there is regardless of the type
18 of assessment conducted, such defects are
19 injurious and when discovered must be repaired in
20 a timely manner. The liquid industry has been
21 successfully implementing this repair criteria
22 since the inception of the Liquid IM Rule.

1 Going to Slide 70, and this is a
2 comment on Section 711 and 711(b)(1), they would
3 require pressure reduction to 80 percent of
4 operating pressure. This requirement is not
5 consistent for Section 713(b)(2)(i) which does
6 allow for analysis to determine a different
7 pressure reduction. Also recommend the operator
8 be required to document the analysis assumptions
9 used in conclusion if the pressure reduction is
10 something other than 80 percent. PHMSA's comment
11 there is we propose that 711 refer to 713(b)(2)
12 for determination of pressure reduction and
13 require that the pressure reduction basis
14 calculations be documented.

15 Going to Slide 71, and this would be
16 Section 711(a); the comment would suggest that
17 temporary pressure reductions be revised under
18 Section 711(a) revise the section to temporary
19 managers as opposed to temporary repairs, to be
20 consistent with the text of the rule. PHMSA's
21 comment there on Section 711(a) is not in the
22 scope of the proposed rule. The temporary

1 measures included in proposed 711(b) are measures
2 such as temporary pressure reduction to hear
3 safety while awaiting completion or a permanent
4 repair, not a temporary repair.

5 Going to Slide 72, the comment there
6 was PHMSA should consider applicable
7 manufacturing and tool detection tolerances and
8 establishment of criteria that requires response
9 to any indication of metal loss. PHMSA there
10 proposed to delete any indication terminology.

11 Going to the next bullet, the comment
12 there was PHMSA should establish reasonable risk-
13 based time frames for operators to implement
14 repairs of anomalies that were historically
15 identified or repaired in accordance with the
16 code requirement for the time. And again, PHMSA
17 believes that this proposed rule accomplishes
18 this goal. The repair criteria would not become
19 effective until the next assessment discovery
20 active effective date of the rule.

21 Going to Slide 73, the comment there
22 we received was annual report data indicates that

1 only one repair is required for every three
2 anomaly investigations conducted. This
3 demonstrates existing anomaly response criteria
4 operators have implemented as already
5 conservative. PHMSA was unable to validate this
6 assertion. In 2016 the operator annual report
7 data indicated that 84 percent of anomalies
8 excavated were repaired. In 2015, 82 percent
9 were.

10 Going to Slide 74, the comment we
11 received there, the commenter supports AGA's
12 proposal that PHMSA create a new sub-part, Sub-
13 Part Q for the additional assessment
14 requirements, creating its own sub-part PHMSA
15 would lessen concern that confusion related to
16 applicability of the additional integrity
17 management requirements, the locations within and
18 outside the HCA. PHMSA's comment there is we
19 believe a new sub-part is not needed. The
20 sections applicable to repair for related HCA's
21 are all located in Sub-Part O. The sections
22 applicable to repairs of non-HCA's are located in

1 Section 711 and 713. Section 711 explicitly
2 points to Sub-Part O for HCA requirements.

3 MR. MCLAREN: This is Chris McLaren,
4 Thank you Steve. On Slide 75, a commenter
5 recommended that SMYS confirmed by pressure test
6 or a conservative default value such as 30 KSI be
7 approved for use as SMYS is unknown. PHMSA's
8 response is the proposed 92713 and 933 by
9 reference to 192.624(b) already allows operators
10 to assume a maximum, Grade A or 30,000 PSI for
11 SMYS if the pipe is unknown. Presently,
12 192.107(d) only allows an assumption of 24 KSI if
13 the pipe is untested.

14 On Slide 76, a commenter recommended
15 revising requirements in the 713(b)(1)(ii) repair
16 criteria for dents with any indication of metal
17 loss, cracking or stress riser to differentiate
18 between dents with associated metal loss from
19 corrosion versus dents with mechanical damage.
20 Proposed the addition of a new monitoring
21 condition to 192.933(b)(3)(iv), a dent that has
22 any indication of metal loss with a predicated

1 failure pressure greater than or equal to 1.5
2 times MAOP. PHMSA's response is that
3 713(b)(1)(ii) has been successfully implemented
4 for HCA's with the exception of the gas and
5 hazardous Liquid IM Rules. Repair criteria in
6 B(1)(ii), a dent that has any indication of metal
7 loss, cracking or a stress riser, would apply to
8 dents with metal loss, distinguishing the type of
9 metal loss in the dent, corrosion, gaps, gathers,
10 et cetera. It's not reliable enough using ILI
11 results and existing technology evaluation
12 methodologies at this time.

13 Slide 77, a commenter requested
14 concern about the requirements of 713(d)(2)(i)
15 that would require the operator to use the design
16 factor for the class location, in which the
17 affected pipeline is located when calculating the
18 necessary pressure reduction, commenting that
19 this requirement is overly conservative or un-
20 warranted. PHMSA's response is that we retain
21 the long-standing practice of reducing pressure
22 to 80 percent of the actual operating pressure or

1 the calculated safe pressure using B31.G,
2 RSTRENG. This is consistent with the IM
3 requirement in 192.933(a)(1). PHMSA would
4 propose to clarify the language, not to imply
5 that the lower of the two must be used.

6 Slide 78, the commenter suggests that
7 PHMSA 933(a)(1) and (2) and either 713, or the
8 industry proposed Sub-Part Q, commenting that
9 this would provide regular clarity for operators
10 that are unable to respond within the time limits
11 for certain conditions described in the section
12 or operators that need to take long-term pressure
13 reductions on a pipeline. PHMSA's response is
14 that you consider that additional notification
15 reporting requirements for non-HCA repairs were
16 not necessary, bending the scope of the rules to
17 include additional reporting requirements for
18 non-HCA's would have to be analyzed and
19 justified.

20 Slide 79, for PSP calculations a
21 commenter recommended that an absent TVC
22 material, operators should be allowed to use the

1 material properties of the record until material
2 properties are determined and documented per
3 192.607, commenting that operators should be able
4 to utilize their knowledge of the system for
5 establishing pipe grade, rather than
6 automatically having to assume Grade A pipe
7 properties. PHMSA's response is that it
8 demonstrated at San Bruno operator knowledge, TVC
9 records is not completely reliable. The proposed
10 rule would allow operators to establish material
11 properties using 192.607 or conservatively assume
12 Grade A or the lower pipe.

13 And Slide 80, for 192.485 which adds
14 requirements for those pressure reductions and
15 pipe replacement calculations when corrosion has
16 been identified on gas transmission pipelines, a
17 commenter said that material attributes should be
18 limited to those pipe parameters that are
19 required to be known in order to establish the
20 MAOP of a pipeline. For instance, diameter,
21 thickness and grade, and longitudinal joint
22 factor. PHMSA's response is that the proposed

1 rule clearly requires pipe and material property
2 to be used in the remaining strength calculations
3 and if pressure calculations made under this
4 paragraph must be documented. No other material
5 attributes are specified other than those needed
6 for this purpose.

7 On Slide 81, still within the 192.485
8 area, a commenter suggested that remaining
9 strength calculations should not be limited to
10 defects of 80 percent or less of wall thickness.
11 PHMSA's response is it already stated in the
12 existing regulations that 485 the procedures for
13 estimating remaining strength for pipelines with
14 metal loss defects are subject to the limitations
15 prescribed in the procedures, the 80 percent wall
16 loss limitation is already enforced and affect in
17 the existing regulations is because of the
18 limitations prescribed in B31.G and RSTRENG.
19 PHMSA proposes to explicitly lift that limitation
20 in Part 192 because operators are not observing
21 that limitation.

22 Slide 82, a commenter recommended that

1 the specified minimal yield strength confirmed by
2 pressure test or a conservative default value
3 such as 30,000 PSI be approved for use is SMYS is
4 unknown. Others have proposed a value of 24,000
5 PSI. PHMSA's response is that it is our intent
6 and is consistent with the proposed repair
7 criteria in 192.713 in engineering critical
8 assessment under proposed 192.624. PHMSA
9 proposes to be more explicit and verify that a
10 default value for its specified minimal yield
11 strength get a Grade A may be used when not
12 known.

13 Slide 83, a commenter expressed
14 concerns with time frames for compliance.
15 PHMSA's response was that we believe operators
16 should perform credible analysis to determine a
17 reliable predicted failure pressure for defects
18 consistent with other provisions of the proposed
19 rule.

20 A commenter also requested that they
21 be provided additional, established analytical
22 methods consistent with other Part 192 allowances

1 for equivalent methodologies, such as those
2 existing in Part 192.112, 907 and the NPRM
3 proposed 192.713(b)(1)(i). And PHMSA tends to
4 include reference to the new proposed rule
5 language on friction mechanics processes to allow
6 for that.

7 Slide 84, and we're still within the
8 192.485 code section; a commenter commented to
9 recognize that gouges and scrapes are metal loss
10 defects that can be smoothed by grinding to
11 eliminate stress concentrations. PHMSA's
12 response is that Part 192 does not address repair
13 techniques for processing and that existing
14 192.711 requires that operators make permanent
15 repairs as you'd be in accordance with their
16 operations and maintenance manual.

17 Another commenter recommended the gas
18 gathering should be excluded from this
19 requirement. PHMSA's response is that it is not
20 our intent that this requirement applied to gas
21 gathering lines and will ensure that point is
22 clarified in the final rule.

1 On Slide 85 a commenter said that
2 until traceable, verifiable and complete records
3 are available, PHMSA should permit sound
4 engineering judgement. PHMSA's response is that
5 required parameters may be verified in accordance
6 with the proposed 192.607 which provides a
7 process to acquire missing information during
8 repairs and excavations. As mentioned
9 previously, operators may use calculations of
10 specified minimum yield strength by using Grade A
11 pipe if SMYS is unknown.

12 Slide 86, we're talking about 192.711,
13 713 and 933. In light of the public comments
14 received PHMSA proposes the committee consider
15 revised 192.711(b) to, one, avoid duplication
16 refer to 713(b)(2) to determine the amount of
17 pressure reductions; and two, require that
18 operators document and keep records of
19 calculations or decisions used to determine the
20 reduced operating pressure and the implementation
21 of the actual reduced operating pressure for
22 three to five years after the pipeline has been

1 repaired. For example, five years after the need
2 for the pressure reduction has been remediated.

3 Also PHMSA proposed adding
4 requirements for determining predictive failure
5 pressure or crack-like defects using the fracture
6 mechanics procedures developed for engineering
7 critical assessments which is applicable to
8 perhaps another nine corrosion defects.

9 Also, add an effective date to
10 192.711(b)(1) that the 192.713 is not
11 retroactive. Also, clarify that
12 192.713(d)(2)(iv) to refer to general corrosion;
13 this is consistent with the Hazardous Liquid Rule
14 in 195.452(h)(4)(iii)(d).

15 On Slide 88 PHMSA requires the
16 committee consider adding a definition for
17 significant seam weld corrosion comparable to the
18 significant stress corrosion cracking definition.
19 In this definition significant selective seam
20 weld corrosion would mean a selective seam weld
21 corrosion anomaly in which the deepest selected
22 corroded area is no greater than 10 percent of

1 the wall thickness -- and the total length of the
2 anomaly is greater than 10 percent of the wall
3 thickness and the total length of the anomaly is
4 equal to or greater than 75 percent of the
5 critical length of a 50 percent through-wall flaw
6 that could fail at a failure pressure less than
7 or equal to 110 percent of the specified minimum
8 yield strength, as determined in accordance with
9 the fracture mechanics failure pressure
10 evaluation method for the failure mode using
11 conservative energy values of the crack related
12 condition.

13 Okay, Slide 89, since PHMSA also
14 proposes the committee consider to add
15 significant selected welds in corrosion to the
16 repair criteria. Also, delete the phrase "any
17 indication of" from the repair criteria related
18 to, so significant stress corrosion, cracking,
19 significant selective seam weld corrosion, and
20 also significant seam cracking. And that the
21 committee consider combining the repair criteria
22 for these three conditions into one more general

1 repair criterion for time dependent cracking.

2 On Slide 90 PHMSA proposed that the
3 committee consider the significant stress
4 corrosion cracking, significant selective seam
5 weld corrosion, and significant seam cracking,
6 that we should add an alternative criterion which
7 operators may use to repair these types of
8 defects. A proposed alternative is provided in
9 the next slide.

10 And on that next slide, on Slide 91 an
11 alternative cracking criterion be composed of the
12 following, A, cracked depth plus corrosion
13 greater than 50 percent of the pipe wall
14 thickness, or B, cracked depth plus any corrosion
15 that is greater than the inspection tool's
16 maximum measurable depth, or C, the crack anomaly
17 is determined to have or will have prior to the
18 next assessment when the predictive failure
19 pressure determined in accordance with the ECA
20 correction mechanics procedure that is less than
21 125 percent of the MAOP for the immediate
22 conditions and less than 139 percent of the MAOP

1 for one and two-year conditions.

2 Operators would be allowed to use
3 either the definition contained in 192.3 for
4 significant cracking or the above alternative.

5 Okay, so with the repair criterias in
6 slide 92, PHMSA considers the committee consider
7 to accept the definition of "hard spot" with
8 minor edits per the MPR comments, that a hard
9 spot means an area on steel pipe material with a
10 minimum dimension greater than 2 inches in any
11 direction and a hardness greater or equal to
12 Rockwell C35. Those equivalents are a Brinell
13 hardness of 327 or Vickers hardness of 345 micro
14 Vickers on a micro hardness test.

15 Thank you and I'll now turn it over to
16 the chairman.

17 MS. BURMAN: Thank you very much. I
18 appreciate that presentation. We have a number
19 of public comments and then we're also going to
20 open it up to other public comments who haven't
21 told us yet.

22 Again, Star 1 if you want to be in the

1 queue. I am going to read out some names so that
2 you can make sure you do Star 1 and our moderator
3 will let me know. Mark Clayton.

4 OPERATOR: Mark, please press Star 1
5 to ask a question. Okay, he is not queued up.

6 MS. BURMAN: Okay.

7 OPERATOR: Oh, I'm sorry, he just did.

8 MS. BURMAN: Thanks.

9 OPERATOR: Mark Clayton, your line is
10 open, please go ahead. Mark, please check your
11 mute button on your phone. Your line is open.

12 MR. CLAYTON: Yes, thank you. I
13 appreciate the opportunity to talk. My comments
14 are directed to the slides that were just gone
15 through by Steve and Chris, and specifically I
16 believe it was Slide 76.

17 Yes, I believe it was Slide 76, but it
18 goes to the idea of an immediate repair for
19 indication that has a dent with some metal loss.
20 And I think I may have failed to introduce
21 myself, Mark Clayton, CenterPoint Energy. I am
22 the Manager of Pipeline Integrity for CenterPoint

1 in the six states that we operate in.

2 So what I wanted to share with you was
3 a project that we did in Arkansas on a pipeline.
4 They had it divided into probably what were one-
5 mile segments and we looked at five of them and
6 in the process of doing it we discovered 43
7 indications with our tools of dents with metal
8 loss.

9 The vast majority of them were very
10 mild dents and metal loss that was at the
11 threshold of the tool detection but by the code
12 they would all be considered immediate repairs,
13 and certainly we have treated them in that
14 fashion.

15 In this particular project though, it
16 was kind of unusual, we were using water to drive
17 our tools, so our repair schedule basically was
18 to get these things repaired before we put the
19 pipeline back in service.

20 We decided, and we have a lot of
21 equipment and things onsite, tools that we wanted
22 to keep there and finish the project, so we

1 thought as we began to see the number of these
2 flaws appear that we would go ahead and try to
3 conduct an inhering critical flaw analysis on
4 each of these dents that had metal loss and that
5 we would remove, to keep the project moving we
6 would at first remove only the flaws that were
7 critical enough to fail our hydro test and pipe
8 tests.

9 So of the 43 detected flaws only one
10 was critical by our analysis and we did remove
11 that from that section before we did the hydro
12 test.

13 I guess the point would be though that
14 none of the flaws with minor dents and metal loss
15 failed during the hydro test providing some
16 evidence that maybe they really aren't immediate
17 repair situations.

18 Of course, CenterPoint complied with
19 the code and we treated all of these things as
20 though they are immediate repairs and have
21 followed up and done, and complied with the code
22 in that manner.

1 But we believe our experience supports
2 the idea that perhaps there is a more focused
3 approach to scheduling repairs for these type of
4 flaws.

5 I certainly wouldn't argue that this
6 type of a flaw shouldn't be addressed, I am
7 simply indicating that it would seem that there
8 is the opportunity anyways to have a more focused
9 analysis and that way we can keep our resources
10 primarily focused on immediate safety threats.

11 I appreciate the time today to speak
12 with you this afternoon and thank you for all of
13 your hard work. I am really impressed with the
14 way the Rule is shaping up and I very much
15 appreciate the difficulty of the process. Thank
16 you.

17 MS. BURMAN: Thank you for that, Mark.
18 Next up we have Pat Carey. Pat, if you can do
19 Star 1.

20 OPERATOR: Pat Carey, your line is
21 open, please go ahead.

22 MR. CAREY: Okay, thank you. As the

1 Chairman has indicated this is Patrick Carey. I
2 am with Kinder Morgan and I want to talk some
3 comments relative to the cracking criteria and
4 specifically we feel that the reference within
5 the definitions of significant cracking should be
6 removed.

7 What such thing is proposed in the
8 alternative cracking criteria for metal loss is a
9 much better criteria and is sufficient for the
10 designation of the stress corrosion, crack and
11 selective seam weld corrosion, and seam cracking.

12 And the other criteria that we have
13 with the significant cracks is not really
14 reflective or representative of the severity of
15 the anomaly, which would be in those cases
16 described by the maximum depth or failure
17 pressure ratios that the operators wouldn't
18 schedule responses for these anomalies based on
19 the alternative criteria for these cracks in
20 accordance with the ASME B31.8S, Section 7.2-4
21 for volumetric anomalies like we do for selective
22 seam and weld corrosion.

1 In addition to that, in the
2 alternative cracking criteria which was detailed
3 in Slide 91, specifically on Item C, we feel that
4 the assessment models have a lot of conservative
5 built into them already and that if a crack is
6 predicted to grow to less than 125 percent of
7 MAOP it being an immediate is really overly
8 conservative.

9 A more appropriate threshold for this
10 immediate response criteria should be the 1.1.
11 We're already growing these cracks to the point
12 where if we hit the 139 percent that we are going
13 to be scheduling in the one to two year timeframe
14 and growing in that period between the
15 determination of the anomaly in the next
16 assessment to 125 percent is really going to be,
17 again, overly conservative and redundant. That's
18 all I have for comment.

19 MS. BURMAN: Thank you, Pat. Next up
20 is Jim Shafer. Jim, if you can do Star 1.

21 OPERATOR: Jim, your line is open,
22 please go ahead.

1 MR. SHAFER: Thank you. Good
2 afternoon, this is Jim Shafer with Dominion
3 Energy. First I would like to thank you for the
4 opportunity to address the Committee as I have
5 found this process to be very efficient and
6 effective towards vetting out the NPRM.

7 Having said that, I would like to
8 speak to the importance of separating response
9 from repair requirements. More specifically, I
10 believe that PHMSA should clarify the terminology
11 used in Section 192.713 and 192.933 that the
12 timelines prescribed are for the operator's
13 response and not for remediation.

14 Both existing and proposed regulations
15 do not recognize the important differences
16 between the actions that operators take when
17 evaluating the results of integrity assessments
18 versus the actions that operators take following
19 the infield examination of potential anomalies.

20 The criteria in proposed sections
21 192.713(d) and 192.933(d) should be applied as
22 response criteria and, for example, when to

1 schedule an infield examination to evaluate the
2 condition and remaining strength of the pipeline.

3 Repairs are made after the operator
4 has physically examined and evaluated the
5 pipeline in the field, so consistent with this we
6 would ask that PHMSA add a separate paragraph
7 addressing repair criteria within Sections
8 192.713 and 192.933. Thank you.

9 MS. BURMAN: Thank you so much. Next
10 up is Rick Kivela. Rick, Star 1.

11 OPERATOR: Rick, Your line is open,
12 please go ahead.

13 MR. KIVELA: Thank you. This is Rick
14 Kivela with Enbridge. My comment relates to the
15 proposal for the calculation of pressure
16 reductions that was shown on Slide 77.

17 PHMSA proposes 20 include a Class
18 location design factor in determining the amount
19 of pressure reduction an operator would have to
20 take following discovery of an immediate metal
21 loss indication and my concern is that this is
22 overly prescriptive and would result in pressure

1 reductions that are excessive and unwarranted.

2 The immediate anomalies are defined as
3 1.1 times MAOP and that is the appropriate way to
4 determine that. However, taking an 80 percent
5 pressure reduction or application of the Class
6 design factors would result in operators having
7 to take significant pressure reductions that
8 would impact their customers.

9 The current language in 192.933 does
10 not use the Class location design factors, that
11 is not located in the current wording in the
12 regulation and it appears to me that the current
13 wording has worked very well for HCA since the
14 integrity rule went into effect in 2004.

15 So it would be my recommendation that
16 PHMSA eliminate the language referencing Class
17 location design factors when calculating a short-
18 term pressure reduction outside of HCAs and
19 likewise in the proposed revisions in 192.933.

20 For long-term pressure reductions
21 application of a Class location design factors is
22 appropriate but not for the short-term pressure

1 reductions where an operator just needs a few
2 days or a few weeks to get out and investigate
3 and repair anomalies. Thanks very much.

4 MS. BURMAN: Thank you so much. Next
5 up is Mark Kerns. Again, Star 1, Mark.

6 OPERATOR: Mark, if you would still
7 like to ask a question please press Star 1 at
8 this time.

9 MS. BURMAN: And if not we'll move on
10 and, Mark, if you want to come back you can.
11 We'll go to Brian Moidel from Dominion Energy of
12 Ohio.

13 OPERATOR: Brian, your line is open,
14 please go ahead.

15 MR. MOIDEL: Good afternoon. My name
16 is Brian Moidel, Principal Engineer with Dominion
17 Energy Ohio.

18 Dominion Energy Ohio supports the
19 comments filed by industry regarding when
20 operators can use available records, conservative
21 values based on sound engineering judgements, or
22 the proposed material verification process under

1 192.607 to establish material properties for
2 anomaly response calculations used in remaining
3 strength calculations.

4 PHMSA states the following verbiage in
5 their Notice of Proposed Rulemaking with regard
6 to immediate repair conditions that references
7 calculations of remaining strength of the
8 pipeline.

9 They state that pipe and material
10 properties in remaining strength calculations
11 must be documented in reliable, traceable,
12 verifiable, and complete records.

13 If such records are not available pipe
14 and material properties used in remaining
15 strength calculations must be based on properties
16 determined and documented in accordance with
17 192.607.

18 Dominion Energy Ohio believes that the
19 proposed prescriptive steps that PHMSA requires
20 an operator to take in order to prospectively
21 document material properties lack sufficient
22 justification and are so burdensome that it will

1 be nearly impossible for an operator to complete
2 the proposed material verification process in the
3 timeframe prescribed especially for an immediate
4 repair condition.

5 Dominion Energy Ohio believes that
6 unknown material records can be supported with
7 sound engineering judgements or conservative
8 values based on similar pipe by the operator that
9 functionally serve as safety factors when there
10 are specific record gaps and we believe that
11 these sound engineering judgements are sufficient
12 to make conservative calculations.

13 We also believe that conducting
14 destructive or non-destructive testing to verify
15 properties takes time and this may not always be
16 appropriate for making anomaly response decisions
17 especially when we are required by code for an
18 immediate condition to be examined within five
19 days and then promptly remediated.

20 Operators should be able to leverage
21 data from comparable pipe with known properties
22 and make conservative and sound engineering

1 judgements for anomaly response calculations as
2 an alternative to the material verification
3 process outline in 192.607.

4 Thank you for the opportunity to
5 provide our comments.

6 MS. BURMAN: Thank you so much. And
7 then Darral Ward from Boardwalk Pipeline, and
8 then if anybody else from the public wants to
9 have any questions or comments at this time, and,
10 Mark Kerns, also, if you still want to ask a
11 question.

12 OPERATOR: Darral, your line is open,
13 please go ahead.

14 MR. WARD: Thank you. I want to thank
15 the GPAC Committee for the time. Another
16 operator had a lot of our common thoughts as
17 well. I will reiterate a couple of points here.

18 PHMSA, you know, we do support, we are
19 moving the definition of references to
20 significant cracking. Our comment, really
21 concerns that 10 percent crack depth threshold
22 for a crack seems overly conservative.

1 For new welded pipe many operators
2 employ manufacturing and construction procedures
3 which have an exception limit of the 10 percent
4 depth for cracked-like weld seam anomalies.

5 The significant seam cracking
6 definition as proposed would therefore require
7 these operators to respond to like-new pipe as an
8 immediate condition.

9 These anomalies certainly do not meet
10 the intent of the immediate response threshold in
11 ASME B31.8S where assessment indications that
12 warrants an immediate response is one that shows
13 that the defect is at the failure point and might
14 be expected to cause immediate and near-term
15 leaks or ruptures based on their known or
16 perceived effects of the strength of the
17 pipeline. Thank you.

18 MS. BURMAN: Thank you so much. So
19 right now there are no other -- actually we have
20 one more other comment. The last comment at this
21 time, public comment, I believe, is from C.J.
22 Osman.

1 MR. OSMAN: Yes. Thank you, Chairman
2 Burman. I just have a few what I would classify
3 as pretty technical comments related to some of
4 the very specific anomaly response and repair
5 criteria.

6 I am not sure that the GPAC will get
7 to all of it today, but on behalf of INGAA we
8 wanted to get some of these things on the record.

9 First is we believe that dents with
10 metal loss on top of the pipeline should be
11 prioritized as immediate response conditions as
12 opposed to dents on the bottom of the pipeline.

13 Dents due to mechanical damage are
14 most likely to occur on the top of the pipeline,
15 again with indication of metal loss, cracking, or
16 stress should be treated as a monitored condition
17 if an engineering analysis demonstrates that the
18 dent is non-injurious.

19 Additionally, we believe that the new
20 ratios proposed PHMSA related to Class locations
21 were predicted pressure calculations based on the
22 remaining strength are contrary to those ratios

1 that require a one or two year response in ASME
2 B31.8S and are different than what was currently
3 required in Subpart O.

4 The addition of the Class location
5 factor adds a redundant safety margin in addition
6 to that already provided by B31.8S and will
7 result in unnecessary excavation of small metal
8 loss anomalies, particularly in cross areas which
9 we just did from PHMSA and understanding more
10 data about where this proposal is coming from.

11 Additionally, with respect to metal
12 loss affecting the long seam we believe that for
13 high frequency ERW pipe this requires immediate
14 response requirement should be removed.

15 In our analysis from 2010 to 2017
16 there have been zero corrosion or environmental
17 corrosion cracking, which are metal loss
18 incidents affecting the long seam of high
19 frequency ERW pipe.

20 Additionally, we believe that specific
21 references to metal loss greater than 50 percent
22 are not necessary as a separate criterion. This

1 is because the proposed rule already requires
2 operators to calculate failure pressure based on
3 metal loss and respond accordingly consistent
4 with the schedule in ASME B31.8S.

5 And, also, we believe that gouge and
6 groove indications are already being evaluated
7 against, so PHMSA has proposed separate response
8 requirements to respond to gouge and grooves
9 greater than 12.5 percent is redundant and should
10 be removed.

11 Importantly, existing ROI technology
12 cannot accurately determine if metal loss is a
13 result of mechanical damage or discriminate
14 between gouges and non-injurious metal loss that
15 Timothy acknowledged in the slides, therefore, it
16 is unclear how an operator could comply with this
17 proposed requirement.

18 And there was a comment that you have
19 been successfully implemented for liquid
20 pipelines may be problematic here because all our
21 performance is notably different in liquid
22 mediums relative to gas mediums.

1 And, lastly, we believe it is
2 important that PHMSA recognize that
3 manufacturing-related features should only
4 require response if the segment has not been
5 tested in accordance with Subpart J test levels
6 consistent with the longstanding process for
7 determining stability of manufacturing-related
8 features.

9 Thanks to the GPAC for the opportunity
10 to provide these comments today.

11 MS. BURMAN: Thank you so much. Right
12 now I believe we have no other public comments.
13 Hearing none, seeing no hands raised
14 electronically, we're going to move to the
15 Committee discussion portion of the day.

16 If folks want to start you just have
17 to raise your hand electronically, Star 1, and we
18 will start to recognize you, and also if PHMSA
19 staff wants to also weigh in they can.

20 And just from a time check perspective
21 it is 3:30, or actually it's 3:29 right now. We
22 have a hard stop at 5 o'clock. We are not taking

1 a vote at this time but all that we are
2 discussing now will be incorporated into when we
3 meet in person at the end of March and we will at
4 that time envision that we may be voting on some
5 of this at that time.

6 I see no one has any comments, any
7 thoughts? Andy Drake?

8 MR. DRAKE: Thank you. This is Andy
9 Drake with Enbridge. Wow, that's a lot of
10 material here. You know, I think there are a lot
11 of good comments made from the audience.

12 I am trying to get maybe at a higher
13 level. I think there is a lot of very technical
14 issues here. I think those are good issues for
15 us to vet out.

16 Certainly we don't have the time to do
17 all of those, but I'll pick a couple and then
18 maybe I'll spur some more conversation here.

19 I think one thing that I think Jim
20 Shafer brought up it was about response versus
21 repair criteria, I think it's important for us to
22 differentiate that this is about response

1 timeframes not repair timeframes.

2 You know, the response timeframe is
3 for us based on what we see from the tool log to
4 go out, dig it up, and then evaluate it. Once we
5 are in the ditch a repair decision is made right
6 then and then that's sort of a much more
7 physical, much more tangible event.

8 But the timeframes we are talking
9 about, just to be clear, is about time to go
10 investigate or respond. I think that's important
11 just for all of us to get on the same, you know,
12 the same language.

13 I think the other thing that sort of
14 strikes me and it sort of permeates a lot of the
15 conversations here is, and I actually want to
16 comment on that, I heard a difference between
17 Chris and Steve and I don't know if that was on
18 purpose or my imagination or what, but the
19 difference between material records, you know,
20 some sort of an information needed to perform
21 remaining strength calculations versus TVC.

22 And I think there is actually, I mean

1 that may sound really nitty-gritty detail, but I
2 think that's actually quite important.

3 TVC is the term that we have used to
4 come up with of validating of p and there is a
5 lot in there and we have gone to great lengths to
6 try to clarify that and the importance of that is
7 very clear, and certainly issues like San Bruno
8 illustrate the importance of that because a lot
9 of risk assessments ride on that.

10 What we are talking about here is very
11 specific. It's a corrosion and, you know, and
12 metal loss evaluations. I think there is a, and
13 I don't want to say a different standard, but
14 certainly a different set of information and some
15 different assumptions that we should use.

16 I think a point here is mostly you are
17 responding to an end line inspection tool run and
18 you are looking for continuity in that tool run
19 and you should be able to use information across
20 that pipeline.

21 As long as the log run is showing
22 continuity that is a logical assumption that if

1 you don't have "TVC records" that's the wrong
2 standard to apply here.

3 I think the standard we want to be
4 applying is do we have a reasonable information
5 about the strength of this pipe and can we, you
6 know, and if we can't use that standard dropping
7 to 30,000 pounds is basically everything is now
8 an immediate, which is not, that's not really
9 practicable either.

10 So we're going to have to find some
11 way to talk with one another about a standard,
12 particularly in the first, you know, this first
13 go-round, 14 years or whatever, you know, that's
14 practicable.

15 I think that really will help folks
16 land with something that is reasonable and
17 appropriate.

18 My last comment is really about dents
19 with metal loss. I see that PHMSA has noted that
20 we are not talking about revisiting that
21 criteria. I would challenge that.

22 I think industry should put together

1 some facts and technical data about dents with
2 metal loss. Steve made a comment, I think it was
3 on slide, I can't remember, maybe 65. I got my
4 notes here.

5 Sixty-five where they were showing
6 this trend where the immediate anomalies are
7 staying way up there. Well, in 2010 you see it
8 jump back up.

9 A lot of what we are finding with
10 immediate anomalies is that the tools, high
11 resolution tools in particular, are now capable
12 of seeing inside the deflection of a dent and
13 they can measure very accurately.

14 And when we say any metal loss in a
15 dent that means anything, and so those now,
16 anything that the tool sees inside of a dent,
17 which they can now, is now an immediate anomaly.

18 So all of a sudden we've got a whole
19 new family that the tools can see that are
20 immediate that I think is skewing the data and I
21 think we need to really think out loud about, top
22 side, yes, I get it, those are unconstrained,

1 that's where, you know, third-party damage would
2 be occurring with some likelihood.

3 If you've got dents with metal loss up
4 in the top you should be very careful, but
5 constrained dents with metal loss on the bottom
6 of the pipe that to me is not the same animal.

7 And I know that we have seen failures
8 in liquid pipe and that's what we were talking
9 about earlier about the need to introduce fatigue
10 cycling analysis.

11 This has been something we have talked
12 around for a long time, we need to deal with this
13 because it is real and we need to figure out how
14 it fits in here.

15 But just because a high frequency, you
16 know, a high fatigue pipeline in a liquid service
17 had a failure of a bottom side dent does not mean
18 that every gas pipe in a load cycle environment
19 has the same risk and we need to at least
20 acknowledge that.

21 And I think that that will help us
22 start to differentiate what's really an immediate

1 here, but I do think looking differently at the
2 bottom side dents with metal loss is absolutely
3 technically appropriate.

4 And that's -- Maybe I'll just sort of
5 throw that out there and if someone wants to
6 comment on that and we can use some air time for
7 others to talk, but there is a lot of material
8 there, obviously. Thank you.

9 MS. BURMAN: Thank you very much. If
10 anybody else has a -- I don't see anyone else
11 with their hand electronically raised. Cheryl
12 Campbell?

13 MS. CAMPBELL: Hey, thanks. This is
14 Cheryl Campbell with Xcel Energy and I -- This is
15 a lot of material and I am struggling, I am
16 frankly struggling processing a lot of it and
17 deciding how to kind of parse it out.

18 I like Andy's comment about, you know,
19 can we think differently about, you know, some of
20 these issues on the bottom of the pipe versus the
21 top of the pipe.

22 I also would like to explore with

1 PHMSA a little bit more maybe this whole idea
2 about the differences between the electric, or,
3 I'm sorry, the liquid pipes and the gas pipes.

4 It does seem like there is some real
5 differences in just, you know, frequency of
6 failure, how they fail. I don't know what the
7 right terminology is.

8 I know Andy and Chad have got the
9 material sciences background, but it seems like
10 there is some real differences on the fatigue
11 factors and the way things failed or what kind of
12 time period.

13 So I mean I would like to explore that
14 with PHMSA a little bit and, you know, is there a
15 way to differentiate some of that data and some
16 of that information.

17 I don't think -- As I general rule, I
18 mean operators are not going to have a problem,
19 right, repairing things that need to be repaired
20 to keep the system safe.

21 I think it's a real challenge
22 sometimes and I've seen us make some repairs that

1 you just kind of shake your head about and say,
2 all right, it just doesn't seem like that would
3 have been a, you know, something that was going
4 to fail any time soon.

5 Also I am curious a little bit, and we
6 kind of talk about these immediates, right, this
7 term "immediate," yes, it tends to get
8 interpreted inside my company as well as imminent
9 failure and while I think that's probably true of
10 some of these anomalies I would question if it's
11 true of all of them.

12 And I am not advocating that we slow
13 down the repair having made, I don't know, 4000
14 or so over the last ten years, we've made quite a
15 few, and about 300 of them or more were in that
16 immediate category.

17 So I mean I am a big part of your
18 numbers, Steve and John, on your calcs there, but
19 I don't know that if we went back and said how
20 many of these in hindsight, right, did we really
21 think were imminent failure items.

22 I don't know that that number would be

1 anywhere near that. So I mean I would just like
2 to explore some of those things with PHMSA a
3 little bit if we could.

4 You know, we've got a little bit finer
5 detail on some of the data and make sure we've
6 got good, solid, technical support for the
7 requirements.

8 And then, yes, I am all for a safety
9 factor, make sure we get enough States in there
10 and people are responding accordingly. Thank
11 you.

12 MS. BURMAN: Thanks. And I think --
13 This is Diane Burman, the Chair, Vice Chair. A
14 PowerPoint is 95 pages but out of the 95 pages 49
15 of them are dedicated to the repair criteria
16 section, so to the extent that I think it's a
17 little hard for us to unpack it I think that's
18 also what folks have a little hard time
19 struggling with the discussion piece of it, so
20 part of it for us to unpack sort of the top
21 sections, one, I think wrapping around what are
22 the areas that are easy sort of layouts that we

1 have agreement on that we can, out of these 49
2 pages what can we say, yes, those are ones that
3 are good, and then wrap around those that we need
4 to have further discussion on.

5 So I think we'll turn it over to PHMSA
6 to discuss a little bit and maybe give some
7 feedback to what they have heard not only from
8 the public comments but so far the first two
9 brave ones to tackle, Andy and Cheryl, tackle
10 talking, so I don't know if the staff has any
11 thoughts on that.

12 Okay. And I do think that we are
13 also, you know, I know that all of us are
14 struggling with watching, especially in the
15 northeast, myself included, dealing with also
16 following the storm and the weather issues, and
17 so I think it is also difficult for us, you know,
18 it is challenging, a lot of this.

19 Andy, I do see you have your hand
20 raised so why don't we look to you right now.

21 MR. DRAKE: All right. Yes, the
22 silence was kind of noticeable there. So I

1 actually thought I might take a moment just to
2 ask PHMSA to help us gather some more insights
3 about some of the recommendations that they have,
4 and particular asking maybe for a little bit more
5 data.

6 I think that I would like to really
7 ask a little bit about the dents with metal loss,
8 if there is top side stuff that they are seeing
9 that are causing incidents, I mean if they can
10 get some more information there and if they can
11 look at the relevance of fatigue in any of those
12 events.

13 And I think that starts to help shape
14 a filter that we can use and apply if we can get
15 a little bit more data on how that is behaving
16 and if the fatigue is a contributant that really
17 helps us fingerprint the bad guy, which is what
18 we really want to do, is focus where to put our
19 energy.

20 The other one that I would ask a
21 little bit of help for is when we start talking
22 about predicted failure pressure rating, B31.8

1 has a lot of conservatism built into how we
2 respond, evaluate in a set timeframe to respond
3 to anomalies based on a lot of research and a lot
4 of effort ten years ago.

5 Now we are talking about adding Class
6 location criteria on top of that. That seems
7 duplicative to me. It is duplicative by
8 definition.

9 What I would like to see is can we get
10 some data of anywhere where the criteria was
11 applied that was not conservative enough and that
12 there was some need to add this more margin, or
13 double up on our safety factors.

14 I think when we put in tool
15 tolerances, which Steve has advocated for and I
16 think that's appropriate, and we've got B31.8S
17 with its tolerances in there and conservatism,
18 you're starting to get a lot of conservatism in
19 how to respond and evaluate anomalies.

20 To add another layer, I would like at
21 least a little bit of data what's driving that,
22 you know what I mean. I think the other one that

1 I would ask for is, I think it was on Page 52 if
2 I remember right, it was a table that Steve had.

3 Sorry, I'm flipping through my charts.
4 Maybe it's 59. Yes, 59, sorry. We talked about
5 longitudinal ERW pipe that's high frequency and
6 we have ten anomalies there. I'd really like to
7 break that down.

8 And maybe I am the metallurgist
9 skeptic here, but I think high frequency
10 longitudinal ERW pipe I would like a little bit
11 more insight into that data because I think a lot
12 of those materials, a lot of what we are showing
13 there is everything that's underneath that
14 category, including construction and
15 manufacturing.

16 It's not really indicative of metal
17 loss events in the seam and if we're going to
18 start declaring metal loss in high frequency
19 seams a critical immediate anomaly I would just
20 like to know is there any data that would warrant
21 such a thing?

22 I really, I think that's fair. It's

1 just showing me the table, well that's
2 interesting, but what's relevant is is this
3 everything or is this the relevant things,
4 because we're relevant, we're physically talking
5 about dents having metal loss in the seam, we're
6 not just talking about everything that happens to
7 these seams.

8 And that one in particular, all the
9 other ones I get it, those seams are particularly
10 susceptible, but the high frequency seam I think
11 we should really look at.

12 I think the other comment I had was
13 maybe related to the gouge and groove comment.
14 You know, when we talk about the hazards of
15 liquid pipes I understand that, we had hazardous
16 liquid pipes, quite a few of them actually, and
17 the tool that I can run in those pipes are a
18 little different.

19 I can use the ultrasonic tools. MY
20 resolution, you know, evaluation is much higher.
21 I would like to get a little bit of data about
22 the applicability of that, of the tools that are

1 effective in gas to differentiate grooves and
2 corrosion.

3 I do think, whoever made that comment,
4 that's relevant. You know, that if we are going
5 to just hit anything 12.5 percent that could
6 possibly be a groove but the tool can't
7 differentiate it it then becomes anything that is
8 12.5 percent.

9 So that's pretty onerous all of a
10 sudden and I am not making light of those
11 indications, I'm just trying to figure out how to
12 manage them.

13 I think the other thing about
14 manufacturing flaws is, you know, back to this
15 fatigue discussion, if the pipe has been tested,
16 and that's a big if, because San Bruno was not
17 tested and that's a big deal, it's very relevant
18 in the outcome there.

19 If the pipe has been tested to 1.25,
20 okay, manufacturing threats not exposed to
21 significant fatigue environments are going to be
22 very stable or very, very slow growth rates.

1 That is relevant here and I think that
2 boasting, like propelling all of those
3 manufacturing flaws into immediate categories, if
4 we're not in a fatigue environment, I'd just like
5 some data there.

6 What's driving that? You know, I get
7 liquids. Well a lot of liquid pipes are in a lot
8 higher fatigue regime environments and I think we
9 need to have a conversation about how does
10 fatigue fit into some of these assessments,
11 because I think that's the parody that the public
12 is probably looking for is why is this a problem
13 here and not here.

14 Well, okay, there should be a logical
15 conversation around what is that differentiator.
16 It should not be trust me or it's just different,
17 don't worry about it.

18 It needs to be understood because
19 there may be some gas environments that are high
20 fatigue and they need to be declared. I think
21 those are kind of some key thoughts that I have
22 around that.

1 I don't, and I don't know if that's
2 just a little carpet-bombing there, but I do
3 think a little bit as we, you know, the purpose
4 of this session was really to just start thinking
5 out loud.

6 You know, so we can all kind of go
7 back and marinade on this a little bit and I
8 guess my point is if PHMSA could collect some
9 more information or, you know, at least create
10 some transparency into that information I think
11 it would help me anyway with what's driving some
12 of these decisions and the value we would get out
13 of it. Thank you very much.

14 MR. MAYBERRY: Chairman Burman, if I
15 might. This is Alan Mayberry. I apologize for
16 that pregnant pause a bit ago. We did not lose
17 power, we were just doing a little multitasking
18 here and it timed out on us.

19 But, you know, this input has been
20 good. So, you know, we listened, we're going to
21 take that back and, you know, go from here. I
22 think we're close to -- It looks like we are

1 probably going to be losing some members soon I
2 understand, but we'll take this back.

3 I might ask Steve if there is any
4 initial thoughts he had to cover, but we'll, you
5 know, a lot of good comments and we'll come back
6 and, you know, consider the input and then come
7 back to you at the end of the month.

8 But, Steve, I don't know if you wanted
9 to add anything that really jumped out at you,
10 feel free to.

11 MR. ALLEN: I guess just a couple of
12 comments. You know, listening to the comments,
13 you know, just for the full membership on the
14 Committee to be aware of, there has been in the
15 past several years several studies on dents and
16 there is four or so approaches as far as
17 evaluating dents as far as the strain and what
18 you actually do with them.

19 Well what we have looked at is in in
20 looking at them if you look at the four different
21 approaches is to get them to where they are safe
22 you've got to, they vary across the board on the

1 outcome of what you get and dependent upon the
2 exact type of dent, the properties of the pipe,
3 you have to do different safety factors on those
4 approaches to be able to use them.

5 In my opinion there is one of the
6 approaches that is probably better than the
7 others, and I'm not going to get into which one
8 that is, and we had looked at that for the
9 liquids and we elected to pull back because we
10 felt like those four approaches that you would
11 need to use two of them to get an answer that
12 would be applicable for going forward and we
13 elected at that point not to bring it up to the
14 Committee when we were looking at it.

15 We are aware of the functions. We
16 have looked at them and we know that no, a little
17 bit about them, so that's one thing is -- and so
18 when we wrote this we were trying to use language
19 that was already in the code on dents.

20 If the Committee is asking us to look
21 we will come prepared to visit about it at the
22 next meeting and likely on all the comments that

1 we have heard like this is, well we'll go back
2 and consider and we will accept any comments we
3 get.

4 With no malice or ill intent or
5 anything else we'll look at them straightforward
6 and come back with hopefully a good approach that
7 we can get agreement like we have done on other
8 things.

9 As far as repairs and what's an
10 immediate and a safe pressure and the 80 percent,
11 I think we heard some wording that we didn't
12 think was in 713.

13 I am not going to sit and say that it
14 was or it wasn't at this point. We'll go back
15 and look and if it was are there some language we
16 need to add to make it clear, we'll do that.

17 And some of the other things we've all
18 heard, and like I said we'll take the approach we
19 have done throughout this and that's how we have
20 been able to get, you know, just going back and
21 looking we have had I think 100 percent approval
22 on what we have come up with to date, maybe one

1 person has abstained, so I think all we have all
2 done working together has been very good to date.

3 And we'll take that and go back and
4 put it in our mixer and see what we can come up
5 with. And, again, thank you all for the
6 comments.

7 MS. BURMAN: Okay, thank you. Does
8 anyone else have any other comments or thoughts?
9 I know there is a lot to unpack. We do have,
10 again, we'll say we do have a lot to take away at
11 the end of March.

12 We have these -- We can take the
13 discussions that we will be looking at
14 everything. I know that the hour is late and
15 there is a lot for people to do.

16 My thoughts really are now to end
17 early and give people the opportunity to get back
18 to things that are pressing. My thoughts are
19 really with those folks who are struggling with
20 the nor'easter storm.

21 My thoughts are with the customers and
22 those on the front line on the utilities and the

1 other industry folks and condition staff and
2 emergency personnel working to keep the power on
3 and when power is off working to get it back up
4 and on as quickly as possible and as safely as
5 possible.

6 And I just want to thank everyone for
7 their commitment to all that we do. It is
8 important, so thank you.

9 CHAIR DANNER: Great. And, Diane,
10 thank you for chairing today's meeting and also
11 thanks to the staff, you know, a lot of work goes
12 into preparing these meetings and getting ready
13 for today and I think we've got a good rhythm
14 going with how we have been able to do that.

15 And, you know, I think it's, you know,
16 in addition to the leadership provided to steer
17 the Committee, you know, both by Chairman Danner
18 and then Commissioner Burman, we've made good
19 success.

20 I would like to congratulate you on,
21 you know, the three sections that were voted on
22 positively. You know, we'll declare we have

1 achieved the mission for today and getting votes
2 on those, and unanimous votes for that matter.

3 You know, the input of the Committee
4 is very important to us. You know, that helps us
5 guide, you know, policy making that's important
6 to a lot of people out there, so thank you for
7 your, you know, your hard work and your
8 dedication and, you know, thoughtful comments and
9 guidance, you know, for us.

10 We'll take it from here. We'll come
11 back at the end of March and we'll, you know,
12 pick up where we left off with anomaly repairs
13 and then we have a couple of other topics we'll
14 get into as you know as well.

15 With that, is there anything else I
16 need to mention, John? I think we --

17 (Simultaneous speaking)

18 PARTICIPANT: -- announcing the
19 meeting and setting the agenda.

20 CHAIR DANNER: Right. Just sign that.
21 So that will coming out. You will see a Federal
22 Register notice here in the next week for the end

1 of March meeting.

2 MS. BURMAN: And if people can't
3 attend in person will there be an opportunity for
4 a teleconference for those Committee members?

5 CHAIR DANNER: No, that one will be in
6 person. Okay, with special dispensation given in
7 extenuating circumstances for certain members, -
8 I think we have made arrangements for that. And
9 then I understand that John guaranteed that he
10 will not jinx us anymore related to the weather,
11 but you will be here.

12 MS. BURMAN: So I think we are done
13 and thank you very much, I appreciate it, and
14 everyone please stay safe and thank you.

15 CHAIR DANNER: Take care.

16 OPERATOR: That does conclude our
17 conference for today. Thank you for your
18 participation and for using the AT&T Executive
19 Teleconference Service. You may now disconnect.

20 (Whereupon, the above-entitled matter
21 went off the record at 3:58 p.m.)

22

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C E R T I F I C A T E

This is to certify that the foregoing transcript

In the matter of: Gas Pipeline Advisory Committee
Meeting

Before: Pipeline and Hazardous Materials Safety
Administration

Date: 03-02-18

Place: Teleconference

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