

Gas Distribution Integrity Management and Excess Flow Valves**Advisory Committee Action: *VOTE on NPRM and cost-benefit***

The Pipeline and Hazardous Materials Safety Administration (PHMSA) proposes to add requirements to Part 192 implementing the integrity management concept for gas distribution pipelines. This rule would also implement the statutory mandate to require installation of excess flow valves on new and replaced service lines serving single-family residences.

Work began in 2004 with a study by the American Gas Foundation (AGF) and an analysis of past distribution incidents performed by Allegro Energy Consulting (Allegro) for PHMSA. The AGF study concluded that the per-mile rate of serious incidents (i.e., those involving death or serious injury) for distribution systems was similar to that for gas transmission lines prior to implementation of Gas IMP. Allegro's analysis indicated that an EFV might have helped mitigate approximately 1 of 6 distribution incidents over five years.

Throughout 2005, PHMSA worked with an Executive Steering Group of State Commissioners, industry executives, and public representatives. The work/study groups they oversaw decided on an approach for developing appropriate requirements, standards, or guidelines to improve the integrity of gas distribution infrastructure. The findings and conclusions from the work/study groups' report provide the information base from which PHMSA developed the approach to improving distribution integrity management.

It is not practical to detail specific requirements that will be equally applicable to all distribution operators. Instead, PHMSA has developed a high-level, performance-based rule. Guidance, providing options for operators to use to implement the rule, thus becomes an important element of the overall package. The Gas Piping Technology Committee (GPTC), responding to a request from PHMSA and the National Association of Pipeline Safety Representatives (NAPSR), developed such guidance. The GPTC guide was available in draft during the comment period. PHMSA expects that GPTC will finalize their guidance soon after the final rule is issued.

NTSB recommended that PHMSA mandate installation of EFVs in all new and replaced gas service lines when operating conditions are compatible with readily available valves as a result of its investigation into a 1998 incident in South Riding, VA. The Pipeline Improvement, Protection, Enforcement and Safety (PIPES) Act of 2006 required that PHMSA issue requirements to install EFVs in new and replaced service lines.

The proposed rule responds to the PIPES mandate concerning EFVs and to a PIPES requirement that PHMSA prescribe minimum standards for integrity management programs for distribution pipelines.