Committee on Gas

PHMSA Nuts and Bolts Part II-Stakeholder Engagement Discussion
NARUC
Summer Committee Meetings

Committee On Gas

PHMSA Nuts and Bolts Part II-Stakeholder Engagement Discussion
PHMSA Nuts and Bolts Part Two – Stakeholder Engagement Discussion

NARUC’s Committee on Gas

July 26, 2016
Agenda

• Company Overview
• Integrity Management Program Highlights
• NPRM Impacts/Concerns
• Service Territory Specific Challenges
• Moving Forward
Overview

Con Edison

Con Edison of New York (CECONY)
• 3.4 million electric customers
• 1.1 million gas customers
• 1,700 steam customers

Orange and Rockland (O&R)
• 303,000 electric customers
• 131,000 gas customers
Overview

Con Edison – Generation & Interconnects
Overview

Con Edison Gas System Load

Distribution Load

Electric & Steam Generation Load

Integrity Management Highlights

• Transmission
  – Patrol system daily in Manhattan & entire service territory weekly
  – Conduct three leak surveys of entire transmission system per year
  – Establish preventative & mitigative measures for all pipe operating >125 psig
  – Conduct material verification for all pipe operating >125 psig
  – 20 new ROV’s installed since 2006

• Distribution
  – Accelerated main replacement program
    • 20-Year cast iron & unprotected steel pipe replacement plan
  – Monthly leakage surveys of 100% of distribution system
NPRM Impacts/Concerns

• Pre-1970 Construction (1948 – 1950)
  – Cannot comply with proposed requirements for MAOP verification (192.624) and material verification (192.607)
    • Hydro testing not feasible
    • Material verification of pipe components not feasible

  – Only viable option is pipe replacement
    • 15 Year replacement time frame challenging:
      – Dense urban operating environment
      – Service disruptions to electric and steam generators
      – Superimposed on replacement of ~2,000 miles of cast iron and unprotected steel distribution system pipe
NPRM Impacts/Concerns (Cont.)

• Burdensome Administrative Requirements
  – Retroactive documentation requirements
  – Very prescriptive
  – Expands requirements to distribution system
    • Management of change
  – New record keeping requirements- 192.67, 192.127 and Appendix A
Service Territory Specific Challenges

Urban Underground Infrastructure
Service Territory Specific Challenges

Urban Underground Infrastructure

- Power
- Communications
- Water
- STEAM
- Gas
- Sewer
- Transportation
Service Territory Specific Challenges - Hydro Testing in a Dense Urban Environment
Service Territory Specific Challenges -
Aerial Photography for Pipeline Threat Analysis
Moving Forward

• Provide LDCs the opportunity to develop company specific implementation time frames by working with state regulators

• Allow for service territory specific considerations in applying new rules - risk based versus prescriptive

• Minimize administrative requirements that divert resources and do not have a tangible impact on safety
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