



NARUC

Summer Committee Meetings

Committee On Gas

**PHMSA Nuts and Bolts Part II-Stakeholder Engagement
Discussion**







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PHMSA Nuts and Bolts Part Two – Stakeholder Engagement Discussion

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July 26, 2016



Agenda

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

Overview

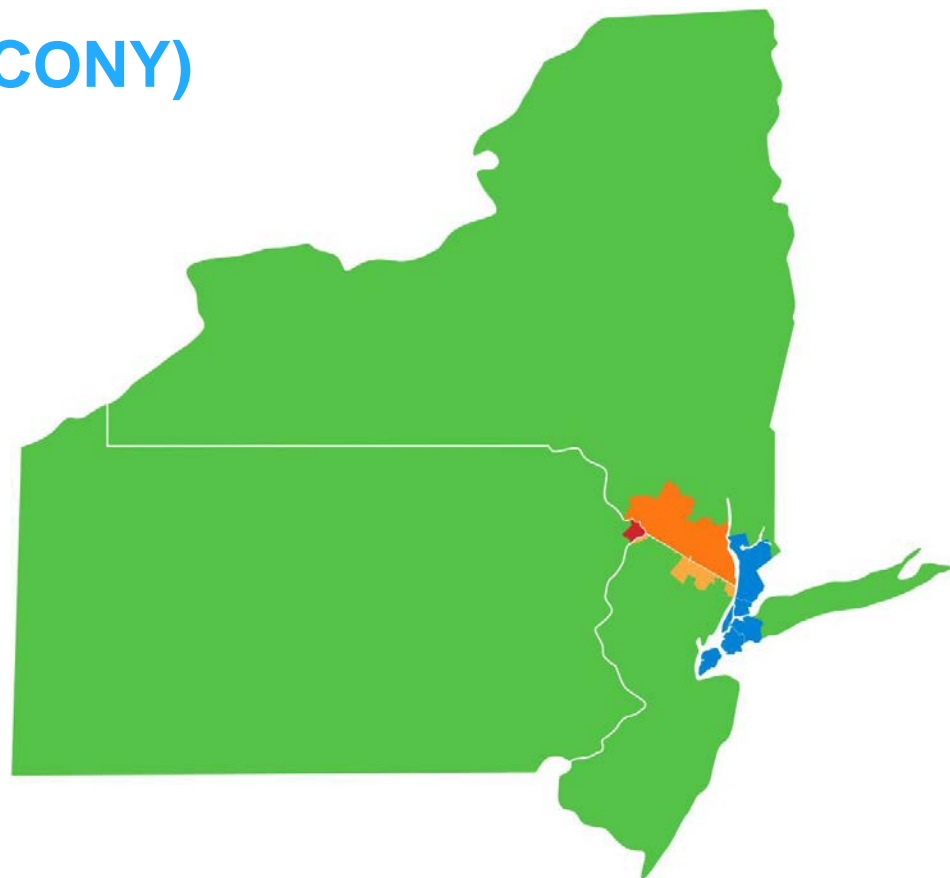
Con Edison

Con Edison of New York (CECONY)

- 3.4 million electric customers
- 1.1 million gas customers
- 1,700 steam customers

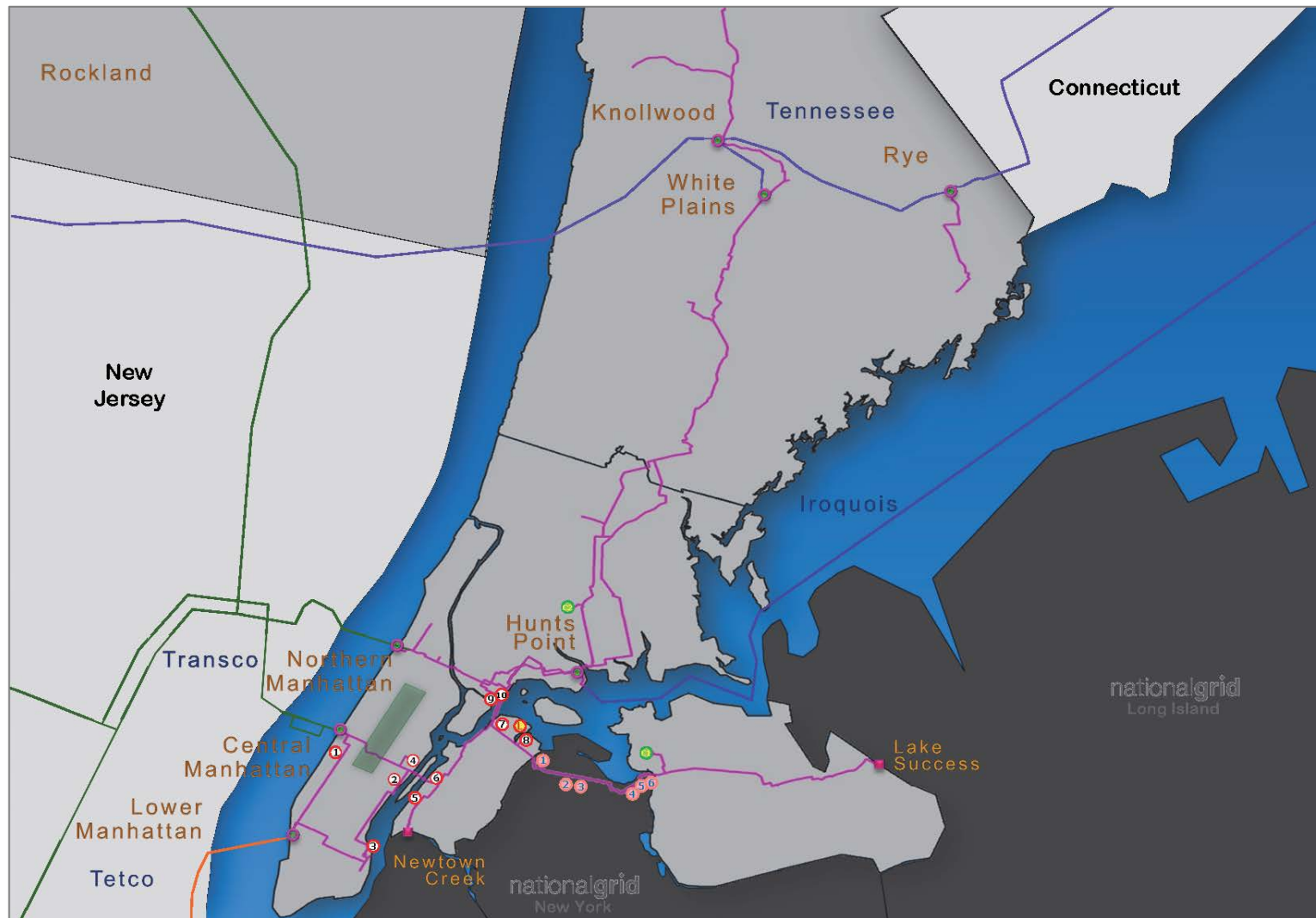
Orange and Rockland (O&R)

- 303,000 electric customers
- 131,000 gas customers



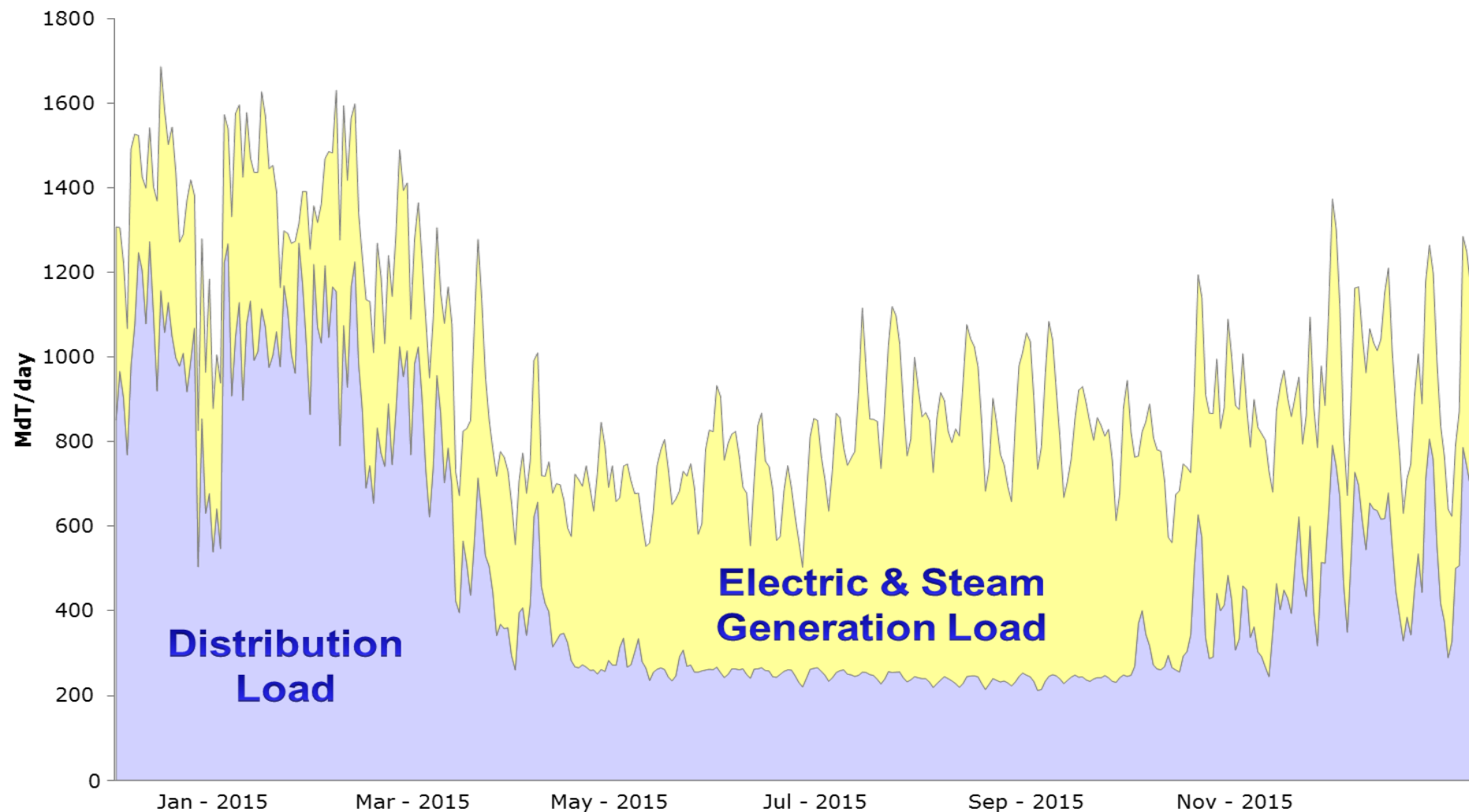
Overview

Con Edison – Generation & Interconnects



Overview

Con Edison Gas System Load



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

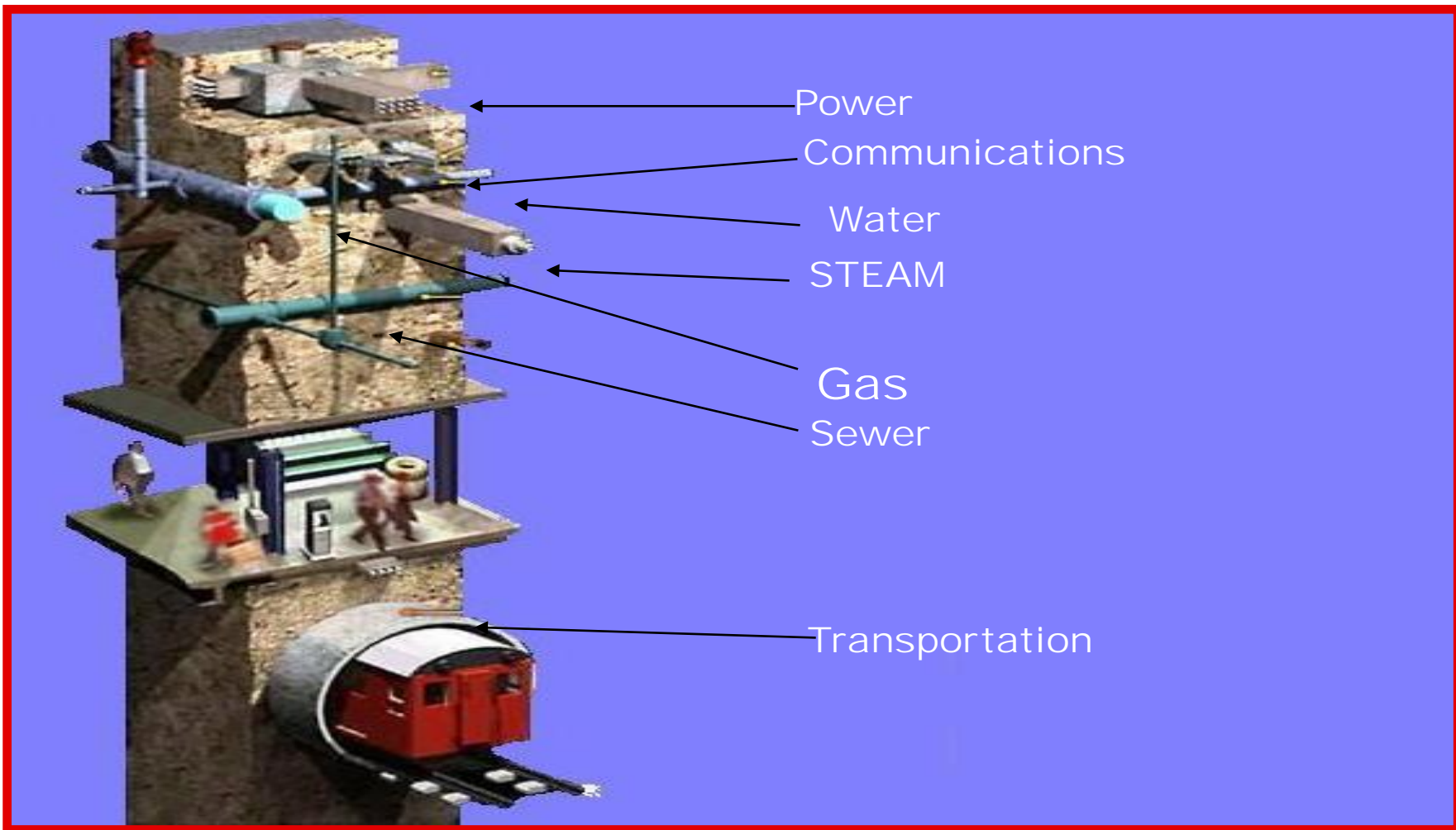
Service Territory Specific Challenges

Urban Underground Infrastructure

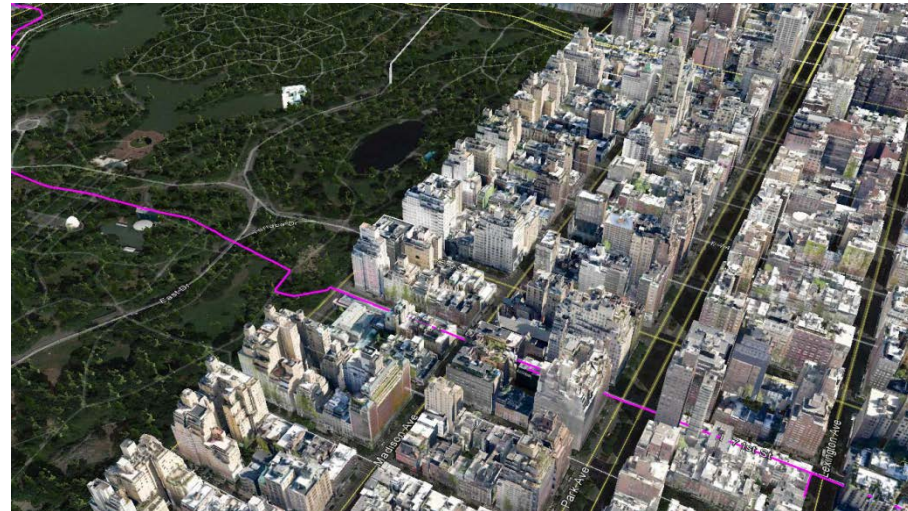


Service Territory Specific Challenges

Urban Underground Infrastructure



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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