

In addition to grouping distribution facilities into the above assets, consideration is given to applying a "situational" component to the threat identification. Some threats may be situational to certain geographic areas or to certain materials within the asset group. Section 7.1.3 provides a more in-depth discussion of this process.

## 6.3 DIMP Steering Team Analysis

To leverage the knowledge and experience of Operations personnel, the Company has established an SME-based approach to identify threats to the distribution system. The process described within this Section applies to the initial threat identification and is to be repeated on a periodic basis, in accordance with the requirements within Section 10 concerning the complete program re-evaluation.

The DIMP Coordinator will arrange a DIMP Steering Team meeting to classify the nature of threats for each threat category and within each asset group as listed in Sections 6.1 and 6.2, respectively. The DIMP Coordinator could supplement the meeting participation with additional personnel to ensure there is sufficient knowledge of all territories within the Company. Additional personnel could include those with experience within Field Operations, Damage Prevention, Leakage, Regulation, Corrosion, Construction, and Engineering (see Section 2.1.3 DIMP Steering Team for more information).

To classify threats, the team will consider reasonably available information relating to the system's design, operation, maintenance, and environmental factors. Sources of data may include, but are not limited to, incident and leak history, corrosion control records, continuing surveillance records, patrolling records, maintenance history, and excavation

damage experience. References to these records can be found within Table A-1 "IM Program Records Summary" located in Appendix A.

The DIMP Coordinator ensures the following information is addressed during the meeting:

- (a) Available data used to support the identification of threats,
- (b) The existence of known leak histories resulting from each threat category and within each asset group, and
- (c) Which threats are not considered "general" in nature, such that there is a **significant difference** in risk associated with the threat:
  - a. For certain geographic areas,

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- b. For certain root causes within each threat category, or
- c. For certain types of attributes within each asset group, such as size, pressure, manufacturer/model, etc.

Threat identification information will be consolidated and represented within Table B-1 "Threat Identification" and located in Appendix B. The information within this table will be at the Company level, such that the threat classification applies to all Operating Centers within the state.

If it is apparent there are truly significant differences in threats among Operating Centers (e.g., one location may not have cast iron pipe), the difference may be addressed using the appropriate code on Table B-1 indicating a situational condition exists.

Where Table B-1 reflects a situational condition (Code D), the details of the issue shall be documented sufficiently in the event further action is warranted in accordance with Section 7.1.3.