

UGI UTILITIES RESPONSE TO NTSB INFORMATION REQUEST
June 6, 2023

NTSB Request No. 108: List all Additional / Accelerated Actions that target UGI's Aldyl A assets.

UGI Response:

As stated in DR Response 102, UGI first incorporated Aldyl-A mains and services as unique asset families in early 2015. Prior to their introduction into the subject matter experts (SME) Model, UGI conducted a review of Aldyl-A risk at the Company. Appendix 108 - Aldyl-A Risk Review DIMP Meeting Minutes provides a summary of the review discussions with UGI SMEs. Below is a brief timeline of those events:

- June 2014 DIMP Quarterly Review
- October 2014 DIMP Quarterly Review
- January - March 2015: Facilitated special meetings to review data and risk-rank Aldyl-A Mains and Services by legacy operating company.
- August 2015: Incorporated into DIMP Plan new Section 11.3 memorializing the threat and risk analysis efforts on Aldyl-A mains.

The result of these efforts separated Aldyl-A assets out from more contemporary medium and high-density plastics in the UGI SME model. This allowed the UGI SME model to differentiate modern versus vintage plastics. It also allows UGI SME's to continually review data and provide feedback as to the risk Aldyl-A poses. These efforts introduced a new accelerated action within UGI's DIMP Plan:

- DIMP Appendix I-7: *Non-contemporary services (bare steel, vintage plastic, copper) are typically renewed when leaking rather than repaired and are also typically renewed during main replacements.*

UGI also incorporates the following accelerated actions that include Aldyl-A assets.

- DIMP Appendix I-3: *Initiate efforts to use the latest, approved advances in plastic pipeline materials to enhance the integrity of the pipeline system. UGI chooses to use higher quality plastics rather than minimally acceptable material.*
- UGI GOM Procedure 50.10.30 – Uprating – Section 3.8 states: *When practical, ALDYL A (1/2" & 1" pipe manufactured prior to 1984; 1-1/4" and larger pipe manufactured prior to 1988), PE 3306, and other older plastic should be replaced. Uprating of older plastic pipe is permitted if operating history and engineering analysis indicates the pipe is not prone to brittle-like cracking or is not in an area with leaks due to rock impingement.*