

UGI UTILITIES RESPONSE TO NTSB INFORMATION REQUEST
August 10, 2023

NTSB Request No. 122:

Please confirm that UGI is moving towards a probabilistic risk assessment model to support their distribution integrity management program and indicate the status of this activity as of March 24, 2023. Indicate whether this change was driven by a regulatory requirement or agreement.

UGI Response:

UGI Utilities, Inc. (UGI) is moving towards a probabilistic risk model to support its distribution integrity management program (DIMP). As of March 24, 2023, UGI had assembled a group of internal subject matter experts (SMEs) who were in the process of developing a request for proposal (RFP) from potential candidates who would be tasked with implementing 3 separate risk models (Transmission, Distribution, Facilities).

There is no regulatory requirement or agreement for UGI to implement a probabilistic risk assessment model for our distribution assets. However, as risk modeling technology has evolved, UGI has targeted such implementation in an effort to continuously improve consistent with API RP 1173 – Pipeline Safety Management Systems. UGI shared its decision to implement a probabilistic risk assessment model with the Pennsylvania Public Utility Commission’s (PUC) Gas Safety Division on January 13, 2021, and has provided updates of such to the Gas Safety Division during DIMP inspections.