UGI UTILITIES RESPONSE TO NTSB INFORMATION REQUEST August 9, 2023

NTSB Request No. 109 Supplemental:

Supplement your response to NTSB Request No. 109 by indicating which Maturity Model UGI uses to evaluate its program, if this is a self-assessment, and how frequently it is done. If it is done annually, provide the results for 2021 and 2022.

UGI Response:

UGI Utilities, Inc. ("UGI") uses the Pipeline Safety Management Systems (PSMS) Maturity Model shown in Appendix Supplemental 109a. This is a self-assessment model drawn from API's PSMS website (www.pipelinesms.org). UGI is developing its PSMS consistent with level 2 maturity and has not changed its maturity level in 2021 or 2022. UGI is currently conducting an implementation review using API's PSMS's Implementation Tool, which evaluates and summarizes the implementation status by question, element, and overall status along with tracking development of programs to implement RP 1173 up to level 3 or 4 maturity. This implementation review is expected to be completed later this year and was last completed in 2019. A sample of the Pipeline Safety Management Systems Implementation tool is included in Appendix Supplemental 109b.