

**UGI UTILITIES RESPONSE TO NTSB INFORMATION REQUEST**  
**June 14, 2023**

**NTSB Request No. 109: Summarize UGI’s progress in implementing ANSI/API RP 1173, Pipeline Safety Management Systems (PSMS), including when UGI initially committed to implementing PSMS and actions taken towards implementation.**

**UGI Response:**

UGI Utilities, Inc. (“UGI”) began participating in the PSMS process in 2015 by participating in the AGA discussion group on Pipeline Safety Management System Management and attending relevant industry seminars. In 2016, UGI undertook the next step in the PSMS implementation process by performing a self-assessment using tools from API’s PSMS Implementation website ([www.pipelinesms.org](http://www.pipelinesms.org)). Thereafter, UGI undertook actions to improve its processes in several areas. These areas included: 1) updating its emergency response manual to broaden the use of Incident Command System (ICS); 2) creating a document and record keeping process; and 3) developing a PSMS Implementation Charter.

A key factor in a successful PSMS program is a positive safety culture. In October 2018, UGI announced an initiative to evaluate and improve its safety culture. As part of this effort, Dupont Sustainable Solutions was hired, and it provided tools to improve UGI’s safety culture, which included the “i’llbethe” rebranding effort.

In October 2019, UGI contracted with the Blacksmith Group, who conducted a Pipeline Safety Management System assessment for UGI at its Headquarters in Denver, Pennsylvania. This assessment included a collaborative discussion process with personnel from UGI who have expertise in current policies, programs, procedures, and work practices. Based on the assessment, an implementation roadmap was developed with short, medium, and long-term recommendations.

In March 2020, UGI reached level 2 on the Pipeline SMS Maturity Model, indicating that processes are being developed and implementation of such was approximately 50% complete. As shown in Appendix 109 - UGI PSMS PDCA Diagram, UGI has several programs and procedures within the 10 PSMS elements that are part of the Plan-Do-Check-Act continuous improvement framework.

A PSMS Governance Kaizen was conducted in August 2021. This resulted in a multi-departmental PSMS Governance Committee that was established in January 2022. The Committee focuses on continuous improvement by addressing priorities within each of the 10 PSMS elements. The position of Director – Pipeline Safety Management Systems was created and filled in July 2022 to manage and mature the program as we work towards full implementation.