

UGI UTILITIES RESPONSE TO NTSB INFORMATION REQUEST
June 6, 2023

NTSB Request No. 103: Summarize how UGI uses external sources of information for threat identification, risk evaluation, and ranking. External sources of information may include but are not limited to: State pipeline safety regulatory actions, PHMSA pipeline failure investigation reports and advisory bulletins, NTSB findings, Plastic Pipe Database Committee status reports, and operator-provided information contained in PHMSA’s pipeline incident and annual reports.

UGI Response:

UGI attempts to review all pertinent external information relevant to its distribution system. The typical medium for this review and discussion occurs in UGI’s quarterly DIMP meetings with its subject matter experts (SME’s). Topics can include but are not limited to: NTSB Recommendations and Reports, PHMSA Advisory Bulletins (ADB), PHMSA Rule Makings, Industry incidents, and PA PUC Regulatory Letters and Notices.

A review of quarterly meetings going back to 2013 shows UGI has reviewed over 60 topics that pertain to UGI or its distribution system. Examples include the following:

1. The 2018 Merrimack Valley over-pressurization event. As a result of this industry event and NTSB recommendations, UGI initiated a targeted Operation program in 2019 to modify or replace approximately 73 LP Stations to ensure two forms of over-pressure protection are installed. Additional work was also done to review the location of sensing lines installed at LP stations and in some cases, relocate them above ground. UGI also incorporated this asset family into its SME models. To date UGI has 15 remaining LP stations to be completed, showing UGI’s commitment to reducing risk on its system.
2. The April 2016 former Texas Eastern 30” Transmission pipeline failure in Salem Township, PA. This failure identified the risk of a certain type of girth weld joint coating that could be susceptible to corrosion. UGI reviewed its transmission assets and identified a pipeline with similar installation methods at the girth weld, UGI proactively in-line inspected the approximately 14-mile transmission pipeline earlier than its assessment schedule as a result of the industry incident.
3. With respect to UGI’s incorporation of Aldyl-A mains and services into its SME model, UGI utilized previous PHMSA ADBs pertaining to Aldyl-A when assessing the risk and threats of Aldyl-A mains in UGI’s distribution system.

UGI also participates in the Plastic Pipe Database Committee and reviews their reports concerning the failure history of early vintage plastic. UGI incorporates external and internal events into its risk analysis in order to proactively reduce and mitigate asset related risk.