State of Utah
Department of Commerce
Division of Public Utilities

[redacted]
Executive Director

[redacted]
Director, Division of Public Utilities

[redacted]
Governor

[redacted]
Lieutenant Governor

March 27, 2019

[redacted]
VP & General Manager, Western Gas Distribution
Dominion Energy Utah
UC450
PO Box 45360
Salt Lake City UT 84145-0360

[redacted],

Utah Pipeline Safety (UTPS) received your follow-up letter dated March 8, 2019 responding to concerns our office raised over Aldyl-A facilities, and how Dominion Energy Utah (DEU) addresses and quantifies these risks in the Distribution Integrity Management Program (DIMP) plan. We would like to thank you for your continued efforts in reviewing DEU standard practices, and for making improvements to these plans when possible to enhance public safety.

Although third-party damages are the leading cause of leaks on DEU's distribution system, continued efforts to prevent leaks from all causes are necessary in a successful DIMP plan. UTPS is satisfied with the modifications to DEU's Standard practice 2-33-01 to install reinforcement clamps on all vintages of Aldyl-A pipeline facilities 1 ¼" diameter and greater that have been previously squeezed. Incorporating these formalized changes into the engineering review process to prioritize susceptible pipe will be necessary to ensure this issue is systematically addressed. UTPS also encourages the continued replacement projects aimed at prioritized Aldyl-A facilities, especially as patterns prompting these discussions are identified.

The Utah Public Service Commission (Commission) is authorized by Title 54, Chapter 13 of the Utah State Code to adopt rules and regulations in conformance with the Natural Gas Pipeline Safety Act of 1968, as amended, and other applicable laws. The Commission, by orders issued in Docket No. 89-999-06, has adopted Title 49 CFR Parts 190, 191, 192, 198, 199, and Part 40 along with certain subsequent amendments. Through delegation from the U.S. Department of Transportation, the Division of Public Utilities' Pipeline Safety Section (UTPS) monitors compliance and enforces intrastate gas pipeline safety requirements.

Your review and response is satisfactory regarding our recommendations concerning Aldyl-A piping, and no further action is required or recommended at this point. Thank you for the cooperation and support of your staff during these discussions and for your continued interest in pipeline safety. If you have any questions concerning this letter or the compliance process you may contact me at [redacted] or call our office at [redacted]

Sincerely,

[redacted]

Pipeline Safety Engineer

[redacted]

cc: (via email)

[redacted]