7.2.5. [redacted]

7.3. Threat Identification Process

7.3.1. Process

a. The DIMP Integrity Engineer and TIMP Integrity Engineer will meet with SMEs from each region during the SME IHP DIMP (odd years), and SME FL DIMP (even years) meetings to identify and evaluate possible threats. Historical leak data is utilized in conjunction with input from SMEs (which included operating and design history, and environmental factors) to compile the list of possible threats. Prior versions of the threat identification process and results that are no longer current are retained and stored. (See OnBase, "IM DIM Support Documents" description "Threat/Action".) Refer to 8.5 for list of SME roles.

7.3.2. Potential Threat Identification

a. Depending upon the SME meeting's focus for that year, the DIMP Integrity Engineer, and Operations Engineering, or the DIMP Integrity Engineer, TIMP Integrity Engineer and High Pressure Engineering will conduct a review of potential threat data sources in preparation for the SME DIMP meeting and identify potential threats to the IHP or FL systems. The list of identified potential threats is provided via email to the SMEs (see 8.5.1.a and 8.5.2.a) prior to the SME IHP DIMP and SME FL DIMP meetings. Potential threats are identified on a global basis, and each region will determine if the potential threat is applicable to its specific region and identify actions to reduce the Risk associated with the threat (see Appendix C) during the SME DIMP meetings.

b. Data sources for potential threats may include the following:

i. National Transportation and Safety Board (NTSB) Reports and Recommendations applicable to Pipeline Accidents. Reports may be found at:

Investigation Report (ntsb.gov);

Recommendation Letters may be found at:

http://www.ntsb.gov/_layouts/ntsb.recsearch/RecTabs.aspx.

ii. Department of Transportation Pipeline and Hazardous Materials Safety Administration (PHMSA) Notices and Advisory Bulletins:

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iii. Notices and Advisory Bulletins | PHMSA (dot.gov) in a local, regional, or national gas association (e.g. American Gas Association, Northeast Gas Association, Southern Gas Association, etc.) and involvement in Association workshops and forums that share knowledge regarding distribution Pipeline threats

iv. Review of trade journals and magazines that publish material regarding gas distribution.

v. Review the Plastic Piping Database Committee (PPDC) status reports on plastic pipe failure cause. Reports may be found at: PPDC Initiative page located at: https://www.aga.org/safety/promoting-safety/plastic-pipe-database-collection-initiative/.

vi. Review of TIMP assessments completed since the last SME FL DIMP meeting was held.

vii. System operating data including, but not limited to:

1. Leak data;
2. High/low pressure events (DIMP Integrity Engineer to request the data annually from the Gas Control Department);
3. Facility inspection and maintenance reports; and
4. Safety Related Conditions (SRC).

viii. In 2021, Dominion Energy established the Dominion Energy Outside Threat Database that lists and tracks information related to threats identified outside the company: DE Outside Threats - Default View (sharepoint.com). The table includes the date of notice, threat description, what the threat may apply to, and action items to address the issue.

7.3.3. Existing Threat Identification

a. Depending upon the SME meeting's focus for that year, the DIMP Integrity Engineer, and Region Engineering, or the DIMP Integrity Engineer, TIMP Integrity Engineer and High Pressure Engineering shall conduct a review of existing threats to the IHP or HP system prior to the SME DIMP meetings. The DIMP Integrity Engineer and/or TIMP Integrity Engineer prepares the documents for the review and includes leak history, Pipeline System information, high/low pressure events, and apparent cause of excavator damages. The review includes trend analysis of leak data and leak cause of damages to identify additional Sub-Threats to the existing threats where such data is available. A complete summary of existing threats is documented on the SME Risk form (see Appendix C). Sub-Threats are identified on a global basis, and each region will determine if the Sub-Threat is applicable to its specific region and identify actions to reduce the Risk associated with the Sub-Threat during the SME DIMP meetings.

8. Evaluation and Relative Ranking of Risk

8.1. Objective

8.1.1. Risk analysis is an ongoing process of understanding what factors affect the Risk posed by threats to the entire Pipeline System and which threats represent relatively higher Risk. The primary objectives of the evaluation and ranking of Pipeline Risk are:

a. Consider each applicable current and potential threat;

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