

Small Gas System Study: Inventory Phase  
An Initial Inventory of Publicly-Owned Natural Gas Systems and Propane Systems

In the final consultant report on Small Gas Pipeline Systems, the UTC consultant, Paul Oleksa, identified 21 areas of concern which he believes should be addressed by operators of all small gas pipeline systems. Oleksa recommends that the Washington UTC pipeline safety program consider these areas of concern when developing regulations for jurisdictional systems, assuming approval by the federal Office of Pipeline Safety. He also recommends that his list of concerns be applied to non-jurisdictional systems either by amending state law to require their application or to encourage compliance voluntarily and through education.

The consultant's 21 concerns is not a consensus list but rather represents the consultant's best estimate of what should be done, adjusted in response to stakeholder comments from the fall 2006 workshop and to written comments to the first draft of the consultant report.

The pipeline safety program has not endorsed the consultant's recommendations and will not consider further action on them until it has had the opportunity to assess the practical application of these concerns and the potential cost to operators for compliance. The potential number of applicable gas systems is unknown yet potentially overwhelming in terms of the program's limited resources. As part of this assessment, the pipeline safety program will undertake a limited inventory of small gas systems using the 21 areas of concerns proposed by Oleksa. And using the information gathered during that inventory to inform a recommended regulatory and educational program for all small gas pipeline systems.

The 2007 legislature is considering extending state jurisdiction over publicly-owned master meter systems and allow for safety regulation of propane distribution systems without first requiring the filing of tariffs. (SB 5225/HB 1314)

Given the possibility of this new authority, the pipeline safety program believes a reasonable approach to furthering its study objective while also meeting its potential new jurisdictional responsibilities is to focus its small gas study inventory on this set of systems. That is, the first phase of the inventory will target publicly-owned small gas pipeline systems (master meter or not) and identifying and inspecting all propane distribution systems. The pipeline safety program has two key reasons for looking at all publicly-owned systems and not just those that meet the master meter definition. First, the program wants to explore Oleksa's findings regarding the shortcomings of the master meter definition and second, the pipeline safety program believes there is strong public interest in reviewing the safety of all publicly-owned gas pipeline systems.

## Inventory Schedule – First Phase

### March-April 2007

- ◆ Distribute final consultant report.
- ◆ Ask for stakeholder comment on Oleksa's list of concerns and his other findings
- ◆ Refine inventory questionnaire based on the report and stakeholder feedback

### March to April 2007

- ◆ Develop list of public institutions which may own gas systems
- ◆ Contact these public institutions directly to identify specific gas systems, acquiring information regarding location, contact and an initial screen as to whether the system meets the federal definition of master meter. This last information will help in identifying field days for certification purposes.
- ◆ Contact propane distributors regarding their knowledge of customers who have distribution systems.
- ◆ Compile list of all publicly-owned gas systems and establish priority
- ◆ Compile list of possible propane distribution systems.

### May 2007 to January 2008

- ◆ Field verify/technical assistance of known publicly-owned master meter systems and possibly other publicly-owned small gas pipeline systems
- ◆ Field verify/technical assistance of known propane distribution systems

### May 2007 to January 2009

- ◆ Field verify/inventory all publicly-owned small gas systems
- ◆ Prepare inventory report and recommendations.

## Issues

The purpose of this inventory is to:

- 1) Field test the 21 areas of concerns to determine whether valid and sufficient concerns.
- 2) Provide technical assistance with facility owners.
- 3) Determine condition of these systems and catalog the actions needed to bring them into compliance and/or mitigate safety concerns.