

P.S.C.U. Docket No. 21-057-12
DPU Data Request No. 2.16
Requested by the Division of Public Utilities
Date of DEU Response October 6, 2021

DPU 2.16: Messersmith's Direct at approximately lines 392-421 involves the CSP. Please explain in detail how the CSP will address compliance with 49 C.F.R Section 192.14(a)(4) for determination of the maximum allowable operating pressure.

Answer: DEU will conduct analysis and testing to ensure that the line meets all applicable code prior to placing the line into service. Unfortunately, the Company is not aware of any code section detailing a specific plan for "converting" a line into service under these circumstances. In an abundance of caution, DEU has developed a plan based on 49 C.F.R. § 192.14. This subsection of part 192 was developed for those lines previously used in services not subject to Part 192 (i.e. liquids transmission), but that can qualify for service under Part 192 if the operator prepares a written procedure to carry out the research and investigation of the records of the line. While this approach is not directly applicable to the line at issue here (Messersmith Direct at lines 360-364), this subpart provides useful guidance for safely bringing a pipeline like the PEMC pipeline into use in compliance with current regulations. The noted regulation was specifically intended for lines that were in one type of service (e.g. hazardous liquids, etc.) that needed a framework for conversion to a different service (e.g. gas service). The approach set forth in this subpart is conservative, and will ensure that recommissioning occurs safely.

The PEMC line was always subject to Part 192, either as a gathering line per 49 C.F.R. § 192.8 or as a jurisdictional transmission line and its service transporting gas will be the same after recommissioning. While the requirement of 49 C.F.R Section 192.14(a)(4) that "The pipeline must be tested in accordance with subpart J of this part to substantiate the maximum allowable operating pressure permitted by subpart L of this part" is a requirement for pipelines that had a different service than to transport natural gas, it is DEU's contention that the PEMC line has remained in the same service and is not subject to this requirement. Under the scenario being proposed by the Company, DEU's research and investigation into the line will drive whether an additional pipeline test is warranted.

Lines 340-346 discuss that the PEMC line underwent a post-installation hydrotest in July of 2008 that appears to have satisfied the minimum requirements of 49 C.F.R Section 192.619. After reviewing these records and determining that the pressure test met the minimum requirements under subparts J and L, DEU may consider this a valid test that satisfies the requirements of 49 C.F.R Section 192.14(a)(4) and will likely meet DEU's proposed MAOP. DEU will need some time after an approval by the Commission to determine its final MAOP, and will utilize the regulatory guidance provided in PHMSA-2011-0023. However, the line will likely be drastically downrated in MAOP to a pressure that will produce a hoop stress of less than 30% Specified Minimum Yield Strength (SMYS). While DEU

concur that there is some missing documentation relating 49 C.F.R Section 192.14(a)(1-3) compliance, based on the research that DEU has conducted on the line, it is a line that was constructed with modern materials and techniques and tested to an appropriate pressure. As such, with some additional analysis and work, DEU believes the line will satisfy DOT requirements.

As DEU executes its Conversion to Service plan, and new information is forthcoming from studies that are completed or after determining the existing hydrotest records do not meet the minimum requirements of DEU's proposed MAOP, DEU will re-test the line to confirm the line's integrity. Under this latter scenario, DEU will amend its Conversion to Service Plan to include the specifications needed to test the line to demonstrate that it satisfies the requirements for establishing a new Maximum Allowable Operating Pressure.

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