



October 23, 2023

Mr. Alan Mayberry
Associate Administrator for Pipeline Safety
Office of Pipeline Safety
U.S. Department of Transportation, Pipeline and Hazardous Materials Safety Administration
1200 New Jersey Avenue, SE
Washington, DC 20590
United States

Re: Voluntary Adoption of American Petroleum Institute Recommended Practice 1173 for Gas Distribution Systems

Via Email

Dear Associate Administrator Mayberry:

The Northeast Gas Association¹ (“NGA”) is pleased to provide you and your staff with copies of updated supplemental work products, since our last meeting in October 2022, resulting from the NGA PSMS Implementation Collaborative. While I realize the recent information request was directed towards Distribution System Operators, our implementation collaborative members are comprised of most distribution system operators within the northeast region; some with operating organizations in multiple states not only in the northeast, but now spanning other regions of the country. We believe this information will demonstrate Collaborative Members’ voluntary adoption of API Recommended Practice (RP) 1173.

One of the primary goals of The Northeast Gas Association (NGA) is to facilitate a collaborative information sharing / continuous learning environment through a structured framework of membership driven, operationally focused, committees and working groups. In December of 2018, following the CMA Merrimack Valley tragedy, the NGA Board of Directors approved the creation of a Committee to specifically concentrate on voluntary adoption of API

¹ NGA is a regional trade association that focuses on pipeline safety and safety culture, education and training, technology research and development, operations, planning, and increasing public awareness of natural gas in the Northeast U.S. NGA supports a culture of pipeline safety and environmentally responsible energy delivery practices. NGA represents natural gas distribution companies, transmission companies, liquefied natural gas suppliers and associate member companies. Its member companies provide natural gas service to 14 million customers in 9 states (CT, MA, ME, NH, NJ, NY, PA, RI, VT).

RP 1173 Pipeline Safety Management Systems (PSMS) principles by embedding these fundamental concepts and processes into day-to-day natural gas utility operations. The Committee’s focus is on *operationalizing* a safety management system strategy by adopting a Plan-Do-Check-Act (PDCA) framework applicable to daily engineering, construction, operations, and maintenance activities. The Implementation Collaborative has grown significantly from a core complement of eleven Massachusetts based companies to a *movement* throughout the northeast and beyond now over 18 organizations strong with over 30 OpCo’s across the country including shared members of AGA and SGA. NGA’s members are committed to applying these basic principles of continuous improvement *with every decision and every action*, with the goal of zero incidents.

NGA PSMS Implementation Collaborative

- Over 2,000 Engagements with Employees
- 25 Engagements with Executives
- 16 Gap Analyses, Road Maps & Reports
- Over 50 Identified Leading Practices
- Over 7,300 Employees in the 2021 NGA Gas Distribution Pipeline Safety Culture Assessment – Largest LDC Assessment Ever!

The Blacksmith Group / P-PIC

Further, with the technical assistance and continued on-going support of the Blacksmith Group, we have provided members with a collaborative environment to transform existing operating practices, behaviors and ultimately, safety culture, through implementation of applicable elements and principles in API 1173 Pipeline Safety Management Systems. As we discussed, the unique nature of the collaborative is inclusive of regional pipeline safety regulatory participation. Our regional pipeline safety regulators are viewed as true pipeline safety partners and have fully supported and participated in the PSMS Implementation Collaborative since its inception. This inclusive approach to embracing pipeline safety management system core principles has demonstrated invaluable in *walking the pipeline safety talk* regarding with parallel goals of embracing regulatory perspectives and compliance conformance as a key performance indicator of our success.

In summary, while we can never forget the tragic nature of industry incidents that have brought us together in this journey to sustainably improve safety culture through adoption of PSMS fundamentals; this unique collaborative approach to PSMS implementation has proven to be a model others can potentially benefit from. You have our unwavering commitment to continue to share our experiences throughout the industry and hopefully demonstrate to others that PSMS implementation is more than a *check the box* assessment; *it's a way of life for pipeliners' to embrace in their day-to-day activities that when embraced and operationalized, provides a framework to reveal and manage risk, promotes a true learning environment, and continuously improves pipeline safety and integrity.*

Enclosed, please find updated materials to share with members of your team as you consider recent voluntary adoption survey results. While we have a long road ahead of us, these deliverables provide tangible evidence of the degree to which our members are committed to embedding PSMS core principles into their day-to-day business.

Sincerely,

Robert D. Wilson

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