

Case 13-G-0484
In the Matter of Review of
Gas Emergency Preparedness

Update on December 18, 2013 Order that
Directed the Filing of Updated Gas Emergency Plans and
Invited Comments on Best Practices

Background

- Since its inception, 16 NYCRR 255 has required natural gas pipeline operators to have an emergency plan. This requirement, and the associated plans, has evolved over the years.
- This evolution has taken a significant step forward in the last few years in light of the increase in both size and frequency of natural disasters in New York State.
- In Fall 2013, DPS Staff hosted a Pipeline Safety Seminar at which a group of pipeline operators, along with federal and state safety personnel, developed a list of Best Practices for Emergency Plans by Pipeline Operators.
- These Best Practices became the basis for Case 13-G-0484 which is designed to increase focus on and improve gas emergency plans.

Ordering Clauses

- The eleven major natural gas distribution utilities were to review the 46 best practices listed in Appendix to the Order for possible incorporation into its current Emergency Plan.
- After completing the review in a filing within sixty days:
 - Identify those best practices in its Emergency Plan or which the utility intends to incorporate.
 - Identify those best practices which the utility concludes should not be incorporated in its Emergency Plan or must be modified before it can be incorporated.

Filings

- All eleven major natural gas distribution utilities complied with the Order.
- Eight reviews along with updated emergency plans were filed by February 28, 2014.
 - National Grid's three New York natural gas distribution utilities filed as one.
 - Iberdrola USA's two New York natural gas distribution utilities filed as one.
- DPS Safety Staff performed a review of the filings.

Initial DPS Staff Review

- Found no acceptable justification for exclusion or modification of any of the 46 best practices.
- Reviewed the eight updated Emergency Plans for:
 - Compliance with of 16 NYCRR 255.615 Emergency Plans (19 requirements).
 - Eleven requirements concerning minimum plan provisions.
 - Three requirements concerning utility actions.
 - Five requirements concerning liaison with fire, police, and other public officials.
 - Incorporation of the 46 Best Practices
 - General (12), Communications (9), Mutual Assistance (6), Incident Command System (3), Training (6), Outage Management (2), Sectionalizing Zones (6), and Post Emergency (2).

Review of 16 NYCRR 255.615

- Staff identified 53 instances, ranging from 3 to 12 per plan, of code issues with the most frequent instances being:
 - Procedure not including availability of personnel, equipment, tools, and materials.
 - Procedure not notifying and coordinating with fire, police, and other public officials in both planned and actual response during an emergency.
 - Training of appropriate utility operating personnel and verification of training effectiveness.
 - Planning of operator and public officials in mutual assistance.

Review of Best Practices Incorporation

- Staff identified 141 instances, ranging from 8 to 30 per plan, where a plan did not fully incorporate a best practice (area of concern) with the most frequent instances being :
 - Use of GPS to identify the location of critical facilities.
 - Identifying emergency response equipment and its location.
 - Coordination with other utilities before, during, and after an event.
 - Outage management systems in the procedure.
 - Location of sectionalizing valves, including use of GPS.

Follow-up to Review

- Results of each review were communicated to the utilities.
- Utilities were given 30 days to respond with revised Emergency Plans that addressed code issues and areas of concern.
- Staff has reviewed the 30 day responses from all utilities.
 - The vast majority of code issues and areas of concern have been addressed.
 - Those utilities with plans that still require modification will be notified and given 60 days to make them acceptable.

Areas Which Might Require Future Commission Action

- 16 NYCRR 255.827 requires natural gas pipeline operators to evaluate their response to significant events and adjust their plans accordingly. This gives a method of continuous improvement on these plans.
- Based upon Staff's review of the current plans, here are some areas where the Commission may assist in the improvement of Emergency Response:
 - Coordination with fire, police, other public officials and other utilities.
 - GPS - Use for locating of critical facilities.
 - Outage Management - Development of formal procedures and their use.

Conclusion

- Recent events have shown a need for more robust Emergency Plans for natural gas distribution utilities. The Commission has recognized this through its Case 13-G-0484 proceeding.
- Natural gas utilities in New York State have responded and worked with Staff to meet this goal.
- Staff expects full acceptance of all 46 Best Practices by the natural gas utilities.
- Continued improvement to these plans can be expected through existing means as required by 16 NYCRR 255.