

A. Does your state have cast iron piping in gas service?

*Yes, there is cast iron piping in service in Texas.*

B. If yes, has your commission authorized a cast iron piping replacement program?

*There is not a formalized cast iron replacement program in effect with any Texas gas distribution operators.*

C. If yes to question B above, what is the rate of replacement per year that has been authorized?

*Although the programs in place are not formalized, the rate of replacement is generally about 5% per year.*

D. What are the special characteristics of the piping being replaced (e.g. small diameter, pressure level, or all cast iron piping)?

*Cast iron of all sizes is being replaced. Priority is often given to areas of shifting soil characteristics, any cast iron leakage, and replacements concurrent with paving or other infrastructure projects within shared easements.*

E. Please provide an estimated year when your cast iron replacement program will be completed.

*Implementation of DIMP and Texas' proposed Distribution Facilities Replacement regulations are expected to accelerate current cast iron replacement programs considerably.*

F. Upon completion of the program under D above, will all cast iron piping have been replaced in your state?

*Most cast iron piping in the state will be replaced upon completion of programs being carried out by our larger operators. Smaller investor owned and municipal systems, that operate small amounts of cast iron, are expected to address those segments in their Distribution Integrity Management Plans and Facility Replacement Programs.*

G. If the answer to F above is No, in what year do you estimate your cast iron piping will be completely removed in your state?

*We anticipate all cast iron to be replaced by 2025.*