

3/14/03 Gas IM Meeting

Gas IM Rule Objectives

Clear HCA Definition

Set Minimum Standards

Instill Public Confidence

Reaffirm Industry's Credibility

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HCA Definition Issues

HCA Confusion

Identified Sites

Moderate Risk Area

Potential Impact Circle

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HCA Definition Observations

Definition Confusing to Many in Industry & Public

Should Pass “Simple Logic Diagram” Test

IF HCA Not Clear - Rest of Rule a Distraction

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HCA “Identified” Sites

Key to Gaining Public Confidence

Especially Class 1 & 2

Provides Clearer Focus on Unsheltered

Outside Areas

Hard to Evacuate Buildings

Where People Congregate

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Moderate Risk Area (MRA)

Conflicts with HCA Objective?

A Class 3 or 4 Exclusion!

Overly Complicates/Confuses HCA

Not Well Received by Public

Cannot Support MRA Concept

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Potential Impact Circle

Clarification Needed

Use Across all Classes

Circle of Radius or Threshold Radius

Which One?

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Other Gas IM Rule Issues

Pipeline Siting/Modifications

The Myth of IM

Performance Measurements in Risk Management

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Pipeline Siting/Modifications

PIR not a Siting Tool

Empirical Screening Tool for IM Focus

Advise Engineering Analysis for Sensitive Areas

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The Myth of IM

IM Plays Important Role

No Excuse for Abusive Operation/Maintenance

No Protection for Poor Risk Management Processes

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Key Questions/Issues for Discussion

Does HCA Definition Pass “Simple Logic Diagram” Test?

What Percentage of Pipeline Miles are HCA?, by Class?

Driving Toward Smaller Higher Pressure Pipelines?

What Performance Metrics are Subject to Review?

Final Rule Timing?