BEFORE THE
STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

In the Matter of

Liberty Utilities (St. Lawrence Gas) Corp.

Case 24-G-0668

April 1, 2025

Prepared Exhibits of:
Staff Pipeline Safety Panel

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Office of Energy System Planning
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State of New York
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List of Exhibits

Relied Upon Responses to
Interrogatories (IR)
Index of Exhibit_(SPSP-1)
(Exhibit__(SPSP-1) will be filed in its entirety
on April 8, 2025)

St Lawrence Gas Safety Metrics
Case 24-G-0668

Leak Management

St. Lawrence Proposed and Staff Recommended Targets						
Metric	Leak Types	Leak Backlog Targets			NRA (BPs)	PRA (BPs)
		2026	2027	2028		
Year-end Leak Backlog	Total: Types 1, 2A, 2, and 3	4+	4+	4+	(18)	-

Emergency Response

	St. Lawrence Proposed and Staff Recommended Targets					
Metric	Response Time	Percent completed			NRA (BPS)	PRA (BPs)
		2026	2027	2028		
Emergency Response	Within 30 minutes	<75	<75	<75	(9)	-
		>85 - 90	>85 - 90	>85 - 90	-	3
		>90	>90	>90	-	6
	Within 45 minutes	<90	<90	<90	(6)	-
	Within 60 minutes	<95	<95	<95	(3)	-

Damage Prevention

St. Lawrence Proposed and Staff Recommended Targets						
Metric	Criteria	2026	2027	2028	NRA (BPs)	PRA (BPs)
Damage Prevention (per 1,000 one-call tickets)	No-calls, Excavator Error, Company and Company Contractor Error, and Mismarks	>2.60	>2.50	>2.40	(27)	-
		>2.25 - 2.60	>2.15 - 2.50	>2.05 - 2.40	(15)	-
		≥2.15 - 2.25	≥2.05 - 2.15	≥1.95 - 2.05	(5)	-
		<1.75	<1.75	<1.75	-	5
		<1.70	<1.70	<1.70	-	10

Non-compliance with Pipeline Safety Regulations

St. Lawrence Proposed and Staff Recommended Targets					
Record Violations					
Safety Regulations Performance Measures	**Categories**	**2026**	**2027**	**2028**	**Basis Points**
	High Risk	0-4	0-4	0-4	0 BP
		5 - 8	5 - 8	5 - 8	(1/2) BP
		>8	>8	>8	(1) BP
	Other Risk	0 - 8	0 - 8	0 - 8	0 BP
		>8	>8	>8	(1/4) BP
Field Violations					
Safety Regulations Performance Measures	**Categories**	**2026**	**2027**	**2028**	**Basis Points**
	High Risk	0 - 8	0 - 8	0 - 8	(1/2) BP
		>8	>8	>8	(1) BP
	Other Risk	All Violations	All Violations	All Violations	(1/4) BP

Compliance Measure Procedure

Applicability

The compliance measure applies to instances of non-compliances (occurrences or violations) of certain gas pipeline safety-related regulations set forth below that are identified and included in Staff's record and field audit letters. The categorization of non-compliances as high risk or other risk is for administrative purposes and does not constitute an admission by St. Lawrence Gas referred to as "the operator," as to the level of risk associated with any such regulation or the non-compliance thereunder, or that there is any risk associated with the non-compliance.

The compliance measure covers the calendar years associated with the rate proceeding in Case 24-G-0668 and shall remain in effect until changed by the Commission.

Targets

The operator will incur negative revenue adjustments for each high risk and other risk non-compliance as set forth in the following tables:

2026 through 2028 Field Audits		
Associated Risk	Target (Number of Non-Compliances)	Negative Revenue Adjustment (Basis Points per Non-Compliance)
High Risk	0-8	0.50
	Greater than 8	1
Other Risk	All Violations	0.25

For field audits, only actions performed or required to be performed by the operator in the calendar year the audit is conducted may constitute a non-compliance under this measure.

2026 through 2028 Record Audits		
Associated Risk	Target (Number of Non-Compliances)	Negative Revenue Adjustment (Basis Points per Non-Compliance)
High Risk	0 to 4	0
High Risk	5 to 8	0.50
High Risk	Greater than 8	1.00
Other Risk	0 to 8	0
Other Risk	Greater than 8	0.25

For record audits, only documentation required to be performed during the calendar year prior to the calendar year in which the record audit is conducted may constitute a non-compliance under this measure. Unless it is a continuing violation from prior years, in which case it may constitute a

non-compliance under this measure.

Field and Record Audits

On a calendar year basis, Staff conducts field and record audits to determine the operator's compliance with the pipeline safety regulations contained in 16 NYCRR 10, 232, 255, 257, 258, 259, 261, 262, 293, 420, 733, and 753, Title 49 of United States Code of Federal Regulations (49 CFR) 193, and the relevant statutory provisions in General Business Law and Public Service Law. At the conclusion of each audit, Staff will present its findings at a compliance meeting to the operator.

The operator shall have ten business days from the date of the compliance meeting to cure any identified document deficiency. Only official operator records, as defined in the operator's operating and maintenance procedures, shall be considered by Staff as a cure to a document deficiency. Staff shall provide the operator with the field and record audit letters and shall file the letter in Case 24-G-0668. Only non-compliances identified and included in Staff's field and record audit letters shall be considered for the compliance measure.

The field and record audit letters require, if applicable, that the operator respond within thirty days of the audit letter detailing what actions have and/or will be taken by the operator to remediate the non-compliances and to address Staff's concerns, and to prevent future reoccurrences. The operator's response may also include any disputes related to the non-compliance, including but not limited to, sufficient arguments regarding the appropriateness of applying a negative revenue adjustment. The operator shall file, if applicable, its response to an audit letter in Case 24-G-0668.

In addition, should the operator address non-compliances of a single regulation in excess of ten per audit type (field or record) per calendar year through a remediation plan, the operator shall file the remediation plan within ninety days of Staff's field or record audit letters in Case 24-G-0668. The remediation plan shall include, at a minimum, an analysis for the non-compliances, and an explanation of how the non-compliances will be resolved, including the dates by which the non-compliances will be brought into compliance or, where appropriate, when remedial actions will be taken to prevent future recurrence.

Staff then will review and consider each non-compliance for applicability with the compliance measure on a case-by-case basis. Non-compliances subject to a separate penalty proceeding under Public Service Law Section 25, and non-compliances for

which sufficient arguments have been raised regarding the appropriateness of a negative revenue adjustment, will be excluded from consideration. Once reviewed and the circumstances considered, Staff shall file the negative revenue adjustment letter in Case 24-G-0668.

Should the operator elect to dispute the non-compliances or negative revenue adjustments, or to seek exclusions based on extenuating circumstances, the operator shall file a petition within sixty days of Staff's negative revenue adjustment letter in Case 24-G-0668. For those disputed items or exclusions, the operator will not incur a negative revenue adjustment until such time that the Commission has issued a determination. Prior to the issuance of a determination, the Commission may, in its discretion, provide the operator with an evidentiary hearing.

Negative Revenue Adjustments

The operator will incur negative revenues adjustments for each high risk and other risk non-compliance up to a combined maximum of seventy-five basis points per calendar year, as per the above targets in Case 24-G-0668.

The number of non-compliances, for any applicable regulation, may be capped at ten per audit type (field or record) per calendar year provided a remediation plan is filed in Cases 24-G-0668. If the operator files a remediation plan, it shall include, at a minimum, an analysis for the non-compliances, and an explanation of how the non-compliances will be resolved, including the dates by which the non-compliances will be brought into compliance or, where appropriate, when remedial actions will be taken to prevent future recurrence.

Remediation plans shall be filed with the Secretary to the Commission within ninety days of Staff's field or record audit letters. If the operator fails to file a remediation plan or fails to comply with the provisions of its remediation plan, those non-compliances in excess of ten shall be incorporated with the remainder of the non-compliances being considered under this measure.

If the operator elects to dispute the non-compliances or negative revenue adjustments, or to seek exclusions of certain non-compliances based on extenuating circumstances, the operator shall file a petition within sixty days of Staff's negative revenue adjustment letter in Case 24-G-0668. For those disputed items or exclusions, the operator will not incur a negative revenue adjustment until the Commission has issued a determination. Prior to the issuance of a determination, the

Commission may, in its discretion, provide the operator with an evidentiary hearing.

The operator does not waive its right to seek judicial appeal of any Commission determination under applicable law. Should the operator elect to seek judicial appeal of any Commission determination under applicable law, the operator will not incur a negative revenue adjustment until such time that the judicial review is complete, and a determination rendered.

If a non-compliance is the subject of a separate penalty proceeding under Public Service Law Section 25, the non-compliance shall not be considered for the compliance measure.

If a non-compliance has a corresponding procedural non-compliance under 16 NYCRR §255.603(d), both non-compliances shall be considered as a single non-compliance for the compliance measure.

Risk Rankings

The pipeline safety regulations are contained in 16 NYCRR Parts 10, 232, 255, 257, 258, 259, 261, 262, 293, 420, 733, and 753, 49 CFR Part 193, and the relevant statutory provisions contained in General Business Law and Public Service Law. Set forth below are the high risk and other risk pipeline safety regulations being considered for the compliance measure.

	Chapter	Sub-chapter	Part	Section	Subdivision	Description	Risk
16	III	C	255	5	(g)	Class Locations	High
16	III	C	255	14	(a)	Conversion to Service Subject to this Part	High
16	III	C	255	14	(b)	Conversion to Service Subject to this Part	Other
16	III	C	255	17	All	Preservation of Records	Other
16	III	C	255	18	(a),(c)	Notifications and Reports	High
16	III	C	255	53	All	Materials - General	High
16	III	C	255	65	All	Materials - Transportation of Pipe	High
16	III	C	255	67	(a),(b)	Records - Material Properties	High
16	III	C	255	103	All	Pipe Design - General	High
16	III	C	255	127	(a),(b)	Records - Pipe Design	High
16	III	C	255	143	All	Design of Pipeline Components - General Requirements	High
17	III	C	255	153	(e)	Components fabricated by welding	High
16	III	C	255	159	All	Design of Pipeline Components - Flexibility	High
16	III	C	255	161	All	Design of Pipeline Components - Supports and Anchors	High
16	III	C	255	163	All	Compressor Stations - Design and Construction	Other
16	III	C	255	165	All	Compressor Stations - Liquid Removal	Other
16	III	C	255	167	All	Compressor Stations - Emergency Shutdown	High
16	III	C	255	169	All	Compressor Stations - Pressure Limiting Devices	High
16	III	C	255	171	All	Compressor Stations - Additional Safety Equipment	Other
16	III	C	255	173	All	Compressor Stations - Ventilation	High
16	III	C	255	179	All	Valves on Pipelines to Operate at 125 PSIG (862 kPa) or More	High
16	III	C	255	181	All	Distribution Line Valves	High
16	III	C	255	183	All	Vaults - Structural Design Requirements	High
16	III	C	255	185	All	Vaults - Accessibility	Other
16	III	C	255	187	All	Vaults - Sealing, Venting, and Ventilation	Other
16	III	C	255	189	All	Vaults - Drainage and Waterproofing	High
16	III	C	255	190	All	Calorimeter or Calorimixer Structures	Other
16	III	C	255	191	All	Design Pressure of Plastic Fittings	Other
16	III	C	255	193	All	Valve Installation in Plastic Pipe	Other
16	III	C	255	195	All	Protection Against Accidental Overpressuring	High

	Chapter	Sub-chapter	Part	Section	Subdivision	Description	Risk
16	III	C	255	197	All	Control of the Pressure of Gas Delivered from High Pressure Distribution Systems	High
16	III	C	255	199	All	Requirements for Design of Pressure Relief and Limiting Devices	High
16	III	C	255	201	All	Required Capacity of Pressure Relieving and Limiting Stations	High
16	III	C	255	203	All	Instrument, Control, and Sampling Piping and Components	Other
16	III	C	255	205	(a),(b)	Records - Pipeline Components	High
16	III	C	255	225	All	Qualification of Welding Procedures	High
16	III	C	255	227	All	Qualification of Welders	High
16	III	C	255	229	All	Limitations On Welders	Other
16	III	C	255	230	All	Quality Assurance Program	Other
16	III	C	255	231	All	Welding - Protection from Weather	High
16	III	C	255	233	All	Welding - Miter Joints	High
16	III	C	255	235	All	Preparation for Welding	High
16	III	C	255	237	All	Welding - Preheating	Other
16	III	C	255	239	All	Welding - Stress Relieving	Other
16	III	C	255	241	(a),(b)	Inspection and Test of Welds	High
16	III	C	255	241	(c)	Inspection and Test of Welds	Other
16	III	C	255	243	(a),(b),(c),(d),(e)	Nondestructive Testing - Pipeline to Operate at 125 PSIG (862 kPa) or More	High
16	III	C	255	243	(f)	Nondestructive Testing - Pipeline to Operate at 125 PSIG (862 kPa) or More	Other
16	III	C	255	244	All	Welding Inspector	High
16	III	C	255	245	All	Welding - Repair or Removal of Defects	High
16	III	C	255	273	All	Joining of Materials other than by Welding - General	High
16	III	C	255	279	All	Joining of Materials other than by Welding - Copper Pipe	High
16	III	C	255	281	All	Joining of Materials other than by Welding - Plastic Pipe	High
16	III	C	255	283	All	Plastic Pipe - Qualifying Joining Procedures	Other
16	III	C	255	285	(a),(b),(d)	Plastic Pipe - Qualifying Persons to make Joints	High
16	III	C	255	285	(c),(e),(f)	Plastic Pipe - Qualifying Persons to make Joints	Other
16	III	C	255	287	All	Plastic Pipe - Inspection of Joints	Other
16	III	C	255	302	All	Notification Requirements	High
16	III	C	255	303	All	Compliance with Construction Standards	High

	Chapter	Sub-chapter	Part	Section	Subdivision	Description	Risk
16	III	C	255	305	All	Inspection - General	High
16	III	C	255	307	All	Inspection of Materials	High
16	III	C	255	309	All	Repair of Steel Pipe	High
16	III	C	255	311	All	Repair of Plastic Pipe	High
16	III	C	255	313	(a),(b),(c)	Bends and Elbows	High
16	III	C	255	313	(d)	Bends and Elbows	Other
16	III	C	255	315	All	Wrinkle Bends in Steel Pipe	High
16	III	C	255	317	All	Protection from Hazards	Other
16	III	C	255	319	All	Installation of Pipe in a Ditch	Other
16	III	C	255	321	All	Installation of Plastic Pipe	High
16	III	C	255	323	All	Casing	Other
16	III	C	255	325	All	Underground Clearance	High
16	III	C	255	327	All	Cover	Other
16	III	C	255	353	All	Customer Meters and Regulators - Location	Other
16	III	C	255	355	All	Customer Meters and Regulators - Protection from Damage	Other
16	III	C	255	357	(a),(b),(c)	Customer Meters and Service Regulators - Installation	Other
16	III	C	255	357	(d)	Customer Meters and Service Regulators - Installation	High
16	III	C	255	359	All	Customer Meter Installations - Operating Pressure	Other
16	III	C	255	361	(a),(b),(c),(d)	Service Lines - Installation	Other
16	III	C	255	361	(e),(f),(g),(h),(i)	Service Lines - Installation	High
16	III	C	255	363	All	Service Lines - Valve Requirements	Other
16	III	C	255	365	(a),(c)	Service Lines - Location of Valves	Other
16	III	C	255	365	(b)	Service Lines - Location of Valves	High
16	III	C	255	367	All	Service Lines - General Requirements for Connections	Other
16	III	C	255	369	All	Service Lines - Connections to Cast Iron or Ductile Iron Mains	Other
16	III	C	255	371	All	Service Lines - Steel	Other
16	III	C	255	373	All	Service Lines - Cast Iron and Ductile Iron	Other
16	III	C	255	375	All	Service Lines - Plastic	Other
16	III	C	255	377	All	Service Lines - Copper	Other
16	III	C	255	379	All	New Service Lines not in Use	Other
16	III	C	255	381	All	Service Lines - Excess Flow Valve Performance Standards	Other
16	III	C	255	455	(a)	External Corrosion Control - Buried or Submerged Pipelines Installed after July 31, 1971	Other

	Chapter	Sub-chapter	Part	Section	Subdivision	Description	Risk
16	III	C	255	455	(d),(e)	External Corrosion Control - Buried or Submerged Pipelines Installed after July 31, 1971	High
16	III	C	255	457	All	External Corrosion Control - Buried or Submerged Pipelines Installed before July 31, 1971	High
16	III	C	255	459	All	External Corrosion Control - Examination of Buried Pipeline when Exposed	Other
16	III	C	255	461	(a),(b),(d),(e),(f),(g)	External Corrosion Control - Protective Coating	Other
16	III	C	255	461	(c)	External Corrosion Control - Protective Coating	High
16	III	C	255	463	All	External Corrosion Control - Cathodic Protection	High
16	III	C	255	465	(a),(e)	External Corrosion Control - Monitoring	High
16	III	C	255	465	(b),(c),(d),(f)	External Corrosion Control - Monitoring	Other
16	III	C	255	467	All	External Corrosion Control - Electrical Isolation	Other
16	III	C	255	469	All	External Corrosion Control - Test Stations	Other
16	III	C	255	471	All	External Corrosion Control - Test Leads	Other
16	III	C	255	473	All	External Corrosion Control - Interference Currents	Other
16	III	C	255	475	All	Internal Corrosion Control - General	Other
16	III	C	255	476	(a),(c)	Internal Corrosion Control - Design and Construction of Transmission Line	High
16	III	C	255	476	(d)	Internal Corrosion Control - Design and Construction of Transmission Line	Other
16	III	C	255	479	All	Atmospheric Corrosion Control - General	Other
16	III	C	255	481	All	Atmospheric Corrosion Control - Monitoring	Other
16	III	C	255	483	All	Remedial Measures - General	High
16	III	C	255	485	(a),(b)	Remedial Measures - Transmission Lines	High
16	III	C	255	485	(c)	Remedial Measures - Transmission Lines	Other
16	III	C	255	487	All	Remedial Measures - Distribution Lines other than Cast Iron or Ductile Iron Lines	Other
16	III	C	255	489	All	Remedial Measures - Cast Iron and Ductile Iron Pipelines	Other
16	III	C	255	490	All	Direct Assessment	Other
16	III	C	255	491	All	Corrosion Control Records	Other
16	III	C	255	493	All	In-Line Insepction of Pipelines	High

	Chapter	Sub-chapter	Part	Section	Subdivision	Description	Risk
16	III	C	255	503	All	Test Requirements - General	Other
16	III	C	255	505	(a),(b),(c),(d)	Strength Test Requirements for Steel Pipelines to Operate at 125 PSIG (862 kPa) or More	High
16	III	C	255	505	(e),(h),(i)	Strength Test Requirements for Steel Pipelines to Operate at 125 PSIG (862 kPa) or More	Other
16	III	C	255	506	All	Transmission Lines - Spike Hydrostatic Pressure Test	High
16	III	C	255	507	All	Test Requirements for Pipelines to Operate at less than 125 PSIG (862 kPa)	Other
16	III	C	255	511	All	Test Requirements for Service Lines	Other
16	III	C	255	515	All	Environmental Protection and Safety Requirements	Other
16	III	C	255	517	All	Test Requirements - Records	Other
16	III	C	255	552	All	Upgrading / Conversion - Notification Requirements	Other
16	III	C	255	553	(a),(b),(c),(f)	Upgrading / Conversion - General Requirements	High
16	III	C	255	553	(d),(e)	Upgrading / Conversion - General Requirements	Other
16	III	C	255	555	All	Upgrading to a Pressure of 125 PSIG (862 kPa) or More in Steel Pipelines	High
16	III	C	255	557	All	Upgrading to a Pressure Less than 125 PSIG (862 kPa)	High
16	III	C	255	603	All	Operations - General Provisions	High
16	III	C	255	604	All	Operator Qualification	High
16	III	C	255	605	All	Essentials of Operating and Maintenance Plan	High
16	III	C	255	607	All	Verification of Pipeline Materials and Attributes - Onshore Steel Transmission Pipelines	High
16	III	C	255	609	All	Change in Class Location - Required Study	High
16	III	C	255	611	(a),(d)	Change in Class Location - Confirmation or Revision of Maximum Allowable Operating Pressure	Other
16	III	C	255	613	All	Continuing Surveillance	Other
16	III	C	255	614	All	Damage Prevention Program	High
16	III	C	255	615	All	Emergency Plans	High
16	III	C	255	616	All	Customer Education and Information Program	High
16	III	C	255	619	All	Maximum Allowable Operating Pressure - Steel or Plastic Pipelines	High
16	III	C	255	621	All	Maximum Allowable Operating Pressure - High Pressure Distribution Systems	High

	Chapter	Sub-chapter	Part	Section	Subdivision	Description	Risk
16	III	C	255	623	All	Maximum and Minimum Allowable Operating Pressure - Low Pressure Distribution Systems	High
16	III	C	255	624	All	Maximum Allowable Operating Pressure Reconfirmation - Onshore Steel Transmission Pipelines	High
16	III	C	255	625	(a),(b)	Odorization of Gas	High
16	III	C	255	625	(e),(f)	Odorization of Gas	Other
16	III	C	255	627	All	Tapping Pipelines Under Pressure	High
16	III	C	255	629	All	Purging of Pipelines	High
16	III	C	255	631	All	Control Room Management	High
16	III	C	255	632	All	Engineering Critical Assessment for Maximum Allowable Operating Pressure Reconfirmation - Onshore Steel Transmission Pipelines	High
16	III	C	255	705	All	Transmission Lines - Patrolling	High
16	III	C	255	706	All	Transmission Lines - Leakage Surveys	High
16	III	C	255	707	(a),(c),(d),(e)	Line Markers for Mains and Transmission Lines	Other
16	III	C	255	709	All	Transmission Lines - Record Keeping	Other
16	III	C	255	710	(b),(c),(d), (e),(f),(g)	Transmission Lines - Assessments Outside of High Consequence Areas	High
16	III	C	255	711	All	Transmission Lines - General Requirements for Repair Procedures	High
16	III	C	255	712	(a),(b),(d), (e),(f),(g)	Analysis of Predicted Failure Pressure	High
16	III	C	255	713	All	Transmission Lines - Permanent Field Repair of Imperfections and Damages	High
16	III	C	255	715	All	Transmission Lines - Permanent Field Repair of Welds	High
16	III	C	255	717	All	Transmission Lines - Permanent Field Repairs of Leaks	High
16	III	C	255	719	All	Transmission Lines - Testing of Repairs	High
16	III	C	255	720	All	Distribution systems - Leak repair.	High
16	III	C	255	721	(b)	Distribution Systems - Patrolling	Other
16	III	C	255	723	All	Distribution Systems -Leakage Surveys and Procedures	High
16	III	C	255	724	All	Distribution systems - Service Lines	High
16	III	C	255	725	All	Test Requirements for Reinstating Service Lines	Other
16	III	C	255	726	All	Inactive Service Lines	Other
16	III	C	255	727	(b),(c),(d),(e),(f),(g)	Abandonment or Inactivation of Facilities	Other

	Chapter	Sub-chapter	Part	Section	Subdivision	Description	Risk
16	III	C	255	729	All	Compressor Stations - Procedures for Gas Compressor Units	High
16	III	C	255	731	All	Compressor Stations - Inspection and Testing of Relief Devices	High
16	III	C	255	732	All	Compressor Stations - Additional Inspections	High
16	III	C	255	735	All	Compressor Stations - Storage of Combustible Materials	Other
16	III	C	255	736	All	Compressor Stations - Gas Detection	High
16	III	C	255	739	(a),(b)	Pressure Limiting and Regulating Stations - Inspection and Testing	High
16	III	C	255	739	(c),(d),(e),(f)	Pressure Limiting and Regulating Stations - Inspection and Testing	Other
16	III	C	255	740	(b)	Pressure regulating, limiting, and overpressure protection - Individual service lines directly connected to gathering or transmission pipelines	High
16	III	C	255	741	All	Pressure Limiting and Regulating Stations - Telemetering or Recording Gauges	Other
16	III	C	255	743	(a),(b)	Pressure and Limiting and Regulating Stations - Testing of Relief Devices	High
16	III	C	255	743	(c)	Regulator Station MAOP	Other
16	III	C	255	744	All	Service Regulators and Vents - Inspection	Other
16	III	C	255	745	All	Transmission Line Valves	High
16	III	C	255	747	All	Valve Maintenance - Distribution Systems	Other
16	III	C	255	748	All	Valve Maintenance - Service Line Valves	Other
16	III	C	255	749	All	Vault Maintenance	Other
16	III	C	255	750	All	Launcher and Receiver Safety	High
16	III	C	255	751	All	Prevention of Accidental Ignition	High
16	III	C	255	753	All	Caulked Bell and Spigot Joints	Other
16	III	C	255	755	All	Protecting Cast Iron Pipelines	High
16	III	C	255	756	All	Replacement of Exposed or Undermined Cast Iron Piping	High
16	III	C	255	757	All	Replacement of Cast Iron Mains Paralleling Excavations	High
16	III	C	255	758	All	Joining plastic pipe by heat fusion; equipment maintenance and calibration	High
16	III	C	255	801	All	Reports of accidents	Other
16	III	C	255	803	All	Emergency Lists of Operator Personnel	Other
16	III	C	255	805	(a),(b),(e),(g),(h)	Leaks - General	Other
16	III	C	255	807	(a),(b),(c)	Leaks - Records	Other

	Chapter	Sub-chapter	Part	Section	Subdivision	Description	Risk
16	III	C	255	807	(d)	Leaks - Records	High
16	III	C	255	809	All	Leaks - Instrument Sensitivity Verification	High
16	III	C	255	811	(b),(c),(d),(e)	Leaks - Type 1 Classification	High
16	III	C	255	813	(b),(c),(d)	Leaks - Type 2A Classification	High
16	III	C	255	815	(b),(c),(d)	Leaks - Type 2 Classification	High
16	III	C	255	817	All	Leaks - Type 3 Classification	Other
16	III	C	255	819	(a)	Leaks - Follow-Up Inspection	High
16	III	C	255	821	All	Leaks - Nonreportable Reading	High
16	III	C	255	823	(a),(b)	Interruptions of Service	Other
16	III	C	255	825	All	Logging and Analysis of Gas Emergency Reports	Other
16	III	C	255	829	All	Annual Report	Other
16	III	C	255	831	All	Reporting Safety-Related Conditions	Other
16	III	C	255	905	All	High Consequence Areas	High
16	III	C	255	907	All	General (IMP)	Other
16	III	C	255	909	All	Changes to an Integrity Management Program (IMP)	Other
16	III	C	255	911	All	Required Elements (IMP)	High
16	III	C	255	915	All	Knowledge and Training (IMP)	High
16	III	C	255	917	All	Identification of Potential Threats to Pipeline Integrity and Use of the Threat Identification in an Integrity Program (IMP)	High
16	III	C	255	919	All	Baseline Assessment Plan (IMP)	High
16	III	C	255	921	All	Conducting a Baseline Assessment (IMP)	High
16	III	C	255	923	All	Direct Assessment (IMP)	High
16	III	C	255	925	All	External Corrosion Direct Assessment (ECDA)(IMP)	High
16	III	C	255	927	All	Internal Corrosion Direct Assessment (ICDA)(IMP)	High
16	III	C	255	931	All	Confirmatory Direct Assessment (CDA)(IMP)	High
16	III	C	255	933	All	Addressing Integrity Issues (IMP)	High
16	III	C	255	935	All	Preventive and Mitigative Measures to Protect the High Consequence Areas (IMP)	High
16	III	C	255	937	All	Continual Process of Evaluation and Assessment (IMP)	High
16	III	C	255	939	All	Reassessment Intervals (IMP)	High
16	III	C	255	941	All	Low Stress Reassessment (IMP)	Other
16	III	C	255	945	All	Measuring Program Effectiveness (IMP)	Other
16	III	C	255	947	All	Records (IMP)	Other
16	III	C	255	1003	All	General Requirements of a GDPIM Plan	High

	Chapter	Sub-chapter	Part	Section	Subdivision	Description	Risk
16	III	C	255	1005	All	Implementation Requirements of a GDPIM Plan	High
16	III	C	255	1007	All	Required Elements of a GDPIM Plan	High
16	III	C	255	1009	All	Required Report when Compression Couplings Fail	High
16	III	C	255	1011	All	Records an Operator Must Keep (GDPIM)	Other
16	III	C	255	1015	All	GDPIM Plan Requirements for a Master Meter or a Small Liquefied Petroleum Gas (LPG) Operator	High
16	III	C	261	15	All	Operation and Maintenance Plan	High
16	III	C	261	17	(a),(c)	Leakage Survey	High
16	III	C	261	19	All	High Pressure Piping	Other
16	III	C	261	21	All	Carbon Monoxide Prevention	High
16	III	C	261	51	All	Warning Tag Procedures	High
16	III	C	261	53	All	HEFPA Liaison	High
16	III	C	261	55	All	Warning Tag Inspection	High
16	III	C	261	57	All	Warning Tag - Class A condition	High
16	III	C	261	59	All	Warning Tag - Class B condition	High
16	III	C	261	61	All	Warning Tag - Class C Condition	Other
16	III	C	261	63	All	Warning Tag - Action and Follow-Up	Other
16	III	C	261	65	All	Warning Tag Records	Other

Title	Chapter	Sub-chapter	Part	Section	Sub-division	Description	Risk
49	I	D	193	2011	All	Reporting	Other
49	I	D	193	2017	All	Plans and Procedures	High
49	I	D	193	2019	All	Mobile and Temporary LNG Facilities	High
49	I	D	193	2057	All	Thermal Radiation Protection	High
49	I	D	193	2059	All	Flammable Vapor-Gas Dispersion Protection	High
49	I	D	193	2067	All	Wind Forces	High
49	I	D	193	2101	All	Design - Scope	High
49	I	D	193	2119	All	Design - Records	High
49	I	D	193	2155	All	Structural Requirements	High
49	I	D	193	2161	All	Design - Dikes	High
49	I	D	193	2167	All	Covered Systems	High
49	I	D	193	2173	All	Water Removal	High
49	I	D	193	2181	All	Impoundment Design and Capacity	High
49	I	D	193	2187	All	Nonmetallic Membrane Liner	High
49	I	D	193	2301	All	Construction - Scope	High
49	I	D	193	2303	All	Construction Acceptance	High
49	I	D	193	2304	All	Corrosion Control Overview	High
49	I	D	193	2321	All	Nondestructive Tests	High
49	I	D	193	2401	All	Equipment - Scope	High
49	I	D	193	2441	All	Equipment - Control Center	High
49	I	D	193	2445	All	Sources of Power	High
49	I	D	193	2501	All	Operations - Scope	High
49	I	D	193	2503	All	Operating Procedures	High
49	I	D	193	2505	All	Operations - Cooldown	High
49	I	D	193	2507	All	Monitoring Operations	High
49	I	D	193	2509	All	Emergency Procedures	High
49	I	D	193	2511	All	Personnel Safety	High
49	I	D	193	2513	All	Transfer Procedures	High
49	I	D	193	2515	All	Investigations of Failures	High
49	I	D	193	2517	All	Purging	High
49	I	D	193	2519	All	Communication Systems	High
49	I	D	193	2521	All	Operating Records	Other
49	I	D	193	2603	All	Maintenance - General	High
49	I	D	193	2605	All	Maintenance Procedures	High
49	I	D	193	2607	All	Foreign Material	Other
49	I	D	193	2609	All	Support Systems	High
49	I	D	193	2611	All	Fire Protection	High
49	I	D	193	2613	All	Auxiliary Power Sources	High
49	I	D	193	2615	All	Isolating and Purging	High
49	I	D	193	2617	All	Maintenance - Repairs	High
49	I	D	193	2619	All	Control Systems	High
49	I	D	193	2621	All	Testing Transfer Hoses	High
49	I	D	193	2623	All	Inspecting LNG Storage Tanks	High
49	I	D	193	2625	All	Corrosion Protection	High
49	I	D	193	2627	All	Atmospheric Corrosion Control	Other
49	I	D	193	2629	All	External Corrosion Control - Buried or Submerged Components	Other
49	I	D	193	2631	All	Internal Corrosion Control	Other
49	I	D	193	2633	All	Interference Currents	Other
49	I	D	193	2635	All	Monitoring Corrosion Control	High
49	I	D	193	2637	All	Remedial Measures	High
49	I	D	193	2639	All	Maintenance Records	Other

Title	Chapter	Sub-chapter	Part	Section	Sub-division	Description	Risk
49	I	D	193	2703	All	Design and Fabrication	Other
49	I	D	193	2705	All	Construction, Installation, Inspection, and Testing	High
49	I	D	193	2707	All	Operations and Maintenance	High
49	I	D	193	2709	All	Security	High
49	I	D	193	2711	All	Personnel Health	Other
49	I	D	193	2713	All	Training - Operations and Maintenance	High
49	I	D	193	2715	All	Training - Security	High
49	I	D	193	2717	All	Training - Fire Protection	High
49	I	D	193	2719	All	Training - Records	Other
49	I	D	193	2801	All	Fire Protection	High
49	I	D	193	2903	All	Security Procedures	High
49	I	D	193	2905	All	Protective Enclosures	High
49	I	D	193	2907	All	Protective Enclosure Construction	High
49	I	D	193	2909	All	Security Communications	High
49	I	D	193	2911	All	Security Lighting	High
49	I	D	193	2913	All	Security Monitoring	High
49	I	D	193	2915	All	Alternative Power Sources	High
49	I	D	193	2917	All	Warning Signs	Other