

THE PUBLIC UTILITIES COMMISSION OF OHIO

IN THE MATTER OF THE APPLICATION OF
COLUMBIA GAS OF OHIO, INC. FOR A
LIMITED WAIVER OF OHIO
ADMINISTRATIVE CODE 4901:1-16-
04(H).

CASE NO. 20-1356-GA-WVR

ENTRY

Entered in the Journal on September 23, 2020

I. SUMMARY

{¶ 1} The Commission grants the request of Columbia Gas of Ohio, Inc. for a limited waiver of Ohio Adm.Code 4901:1-16-04(H), until no later than July 31, 2022, consistent with this Entry.

II. DISCUSSION

{¶ 2} Columbia Gas of Ohio, Inc. (Columbia or Company) is a natural gas company and a public utility, as defined in R.C. 4905.03 and 4905.02, respectively, and an operator as defined in R.C. 4905.90, and, pursuant to R.C. 4905.90 through 4905.96, is subject to the jurisdiction and supervision of this Commission. Columbia is, therefore, required to comply with Ohio Adm.Code Chapter 4901:1-16, which sets forth the gas pipeline safety standards and requirements for intrastate gas pipeline facilities subject to the Commission's jurisdiction. Pursuant to Ohio Adm.Code 4901:1-16-03(A), the Commission has also adopted the gas pipeline safety regulations of the United States Department of Transportation contained in 49 C.F.R. Parts 40, 191, 192, and 199.

{¶ 3} Ohio Adm.Code 4901:1-16-04(H) requires that each operator classify all leaks utilizing leak detection equipment capable of detecting and measuring the concentration of natural gas in the atmosphere. Further, the rule provides that the operator shall classify all hazardous leaks immediately and classify all other leaks within two business days of discovery. The operator shall classify the leaks utilizing a prescribed three grade classification system. A grade-one classification represents an indication of leakage presenting an existing or probable hazard to persons or property and requires immediate

repair or continuous action until the conditions are no longer hazardous. A grade-two classification represents an indication of leakage recognized as being nonhazardous at the time of detection, but requires scheduled repair based upon the severity and/or location of the leak. A grade-three classification represents an indication of leakage recognized as being nonhazardous at the time of detection and can be reasonably expected to remain nonhazardous.

{¶ 4} On August 7, 2020, Columbia filed an application seeking a limited waiver of Ohio Adm.Code 4901:1-16-04(H), until July 31, 2022, to the extent that the rule requires that nonhazardous leaks be classified within two business days of discovery. Columbia requests the waiver solely to allow the Company, which has engaged Picarro, Inc. (Picarro), to pilot Picarro's new mobile leak detection equipment, to conduct supplemental leak surveys of Columbia's Accelerated Mains Replacement Program projects and newly installed mains, as well as to conduct quality assurance of previously surveyed traditional leakage compliance surveys. In regard to all of Columbia's remaining work, the Company commits to meet all requirements under Ohio Adm.Code 4901:1-16-04(H) and, while using the new leak detection equipment, to continue to maintain its compliance with 49 C.F.R. 192.723, to conduct leakage surveys with traditional leak survey equipment once every three calendar years not to exceed 39 months, and, in business districts, once each calendar year not to exceed 15 months. With the mobile leak detection equipment, Picarro must drive the designated survey area at least three separate drives (six passes), typically over two separate nights depending on the weather. After the third and final drive, Columbia will run an analytics report the next business day. Using Picarro's proprietary algorithm, the analytics report will risk rank each methane plume based on amplitude, concentration, ethane to methane ratio, disposition, and disposition confidence percentage and assign a risk score for each indication of a leak. Each indication of a leak will then be categorized into risk ranking groups 1 to 4, with Group 1, the top 10 percentile of highest risk leaks; Group 2, the top 25 percentile of highest risk leaks; Group 3, the top 50 percentile; and Group 4, the bottom 50 percentile. Columbia states that it will investigate all methane plumes with an

amplitude of 5.0 or greater within the same business day and investigate all methane plumes in risk ranking Group 1 within two business days. After all risk ranking Group 1 plumes are investigated, Columbia will investigate all risk ranking Group 2, Group 3, and Group 4 plumes within five business days, depending on weather, not to exceed ten calendar days. After grading the leaks in each risk ranking group, Columbia will remediate all graded leaks in the timeframes required pursuant to Ohio Adm.Code 4901:1-16-04(I), including dispatching its crews immediately for any hazardous leaks (grade one) and complying with the other requirements of Ohio Adm.Code 4901:1-16-04(H). Finally, Columbia states that the Company will evaluate whether to expand the use of the Picarro mobile leak detection equipment or continue to solely use the traditional methods of leak detection.

{¶ 5} On September 1, 2020, Staff filed its review and recommendation of Columbia's application for a limited waiver. Staff notes that the technology Columbia proposes to use for its pilot mobile leak detection program is based on laser absorption spectroscopy to assess the concentration of methane in the atmosphere, which is capable of detecting methane at very low concentrations. Staff also notes that, with such technology, there is the possibility of false positive indications from sewer gas, compost piles, or other biological sources. Accordingly, Staff states that Columbia is concerned that the Company may not be able to investigate all the methane plumes identified in the analytics report within the two-business day timeframe set forth in Ohio Adm.Code 4901:1-16-04(H). Staff notes that the only section of the pipeline safety regulations that addresses gas leaks on distribution systems is 49 C.F.R. 192.703, which requires that hazardous leaks must be repaired promptly. Staff reasons that 49 C.F.R. 192.703 is based on leaks being discovered as a result of gas odor or gas release and notification from the public or by way of a periodic leakage survey. Further, Staff reasons the purpose of Ohio Adm.Code 4901:1-16-04(H) is to establish guidelines for an operator's leak management program, including the grading of leaks into three categories with corresponding monitoring and repair requirements based on the severity of the leak. Staff reasons that, at the time this rule was established, two business days was considered a reasonable amount of time to complete the assessment and

classification of discovered nonhazardous leaks. Based on Columbia's application, Staff notes that Columbia proposes a period of five business days between when Columbia receives an analytics report and a suspected leak is confirmed or disproved through a field assessment using conventional leakage assessment methods. For methane plumes greater than an established baseline, Columbia commits to conduct a field assessment of the suspected leak within two business days. Once a leak is confirmed through a field assessment, the leak will be classified according to the criteria and timelines specified in Ohio Adm.Code 4901:1-16-04(H). On that basis, Staff concludes that Columbia will continue to perform leakage surveys using traditional leak detection equipment, in accordance with the requirements of 49 C.F.R. 192.723, to classify any leaks identified pursuant to the requirements of Ohio Adm.Code 4901:1-16-04(H), and, in addition, use the proposed mobile leak detection system, which will result in an equivalent or greater level of public safety. Further, Staff finds the response times proposed by Columbia to the methane plumes identified by the mobile leak detection system to be reasonable and appropriate, as the waiver essentially defines discovery as when the presence of a leak is confirmed through a field investigation. Staff also supports the establishment of a deadline to evaluate the results from the pilot program. Accordingly, Staff concludes the request for waiver is reasonable, and recommends the Commission approve the waiver with an expiration date of July 31, 2022.

{¶ 6} Upon review of Columbia's application for limited waiver and the Staff's review and recommendation, the Commission finds that Columbia has demonstrated good cause for its request and that the proposed pilot mobile leak detection process will result in an equivalent or greater level of public safety, as the Company will continue to conduct leakage surveys with traditional leak survey equipment during the pilot. Columbia shall work with Staff to prepare and submit to the Commission's gas pipeline safety division a report comparing the results of the mobile leak detection equipment to traditional means of leak detection for the period ending July 31, 2021, and the 12 months ending July 31, 2022, by October 1, 2021, and October 1, 2022, respectively. The Commission's approval of this

waiver is contingent upon the Company's compliance with the requirements of the pilot, and the other applicable provisions of 49 C.F.R. 192.703, 49 C.F.R. 192.723, and Ohio Adm.Code Chapter 4901:1-16. Notwithstanding Columbia's compliance, the Commission may suspend or terminate Columbia's waiver, at the Commission's sole discretion, for good cause, at any time. Further, the Commission emphasizes that nothing in this Entry relieves Columbia of its obligation to provide safe and reliable service. Accordingly, pursuant to Ohio Adm.Code 4901:1-16-02(E), the application for limited waiver should be granted until no later than July 31, 2022.

III. ORDER

{¶ 7} It is, therefore,

{¶ 8} ORDERED, That Columbia's waiver request be granted, until no longer than July 31, 2022, consistent with this Entry. It is, further,

{¶ 9} ORDERED, That nothing in this Entry relieves Columbia of its obligation to provide safe and reliable service. It is, further,

{¶ 10} ORDERED, That a copy of this Entry be served upon all interested persons of record.

COMMISSIONERS:

Approving:

Sam Randazzo, Chairman
M. Beth Trombold
Lawrence K. Friedeman
Daniel R. Conway
Dennis P. Deters

GNS/hac

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

9/23/2020 2:37:19 PM

in

Case No(s). 20-1356-GA-WVR

Summary: Entry granting the request of Columbia Gas of Ohio, Inc. for a limited waiver of Ohio Adm.Code 4901:1-16-04(H), until no later than July 31, 2022, consistent with this Entry. electronically filed by Ms. Mary E Fischer on behalf of Public Utilities Commission of Ohio