

REGULATOR'S
PERSPECTIVE ON PUBLIC
SAFETY

PAPUC

Safety Division

- ▶ **Monitor Compliance towards public utilities providing safe and reliable service at reasonable rates**
- ▶ **Protect the public and property**
- ▶ **Enforcement and Compliance**

REGULATOR'S GOALS

- ▶ **Balancing the need between safe and reliable service and maintaining just and reasonable rates**
- ▶ **Shrinking customer base versus infrastructure replacement**
- ▶ **Integrity Management**

SAFE AND RELIABLE SERVICE

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- ▶ **Risk Identification and Risk Mitigation**
- ▶ **Does it work?**
- ▶ **Is it an excuse for minimizing resources**

INTEGRITY MANAGEMENT

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- ▶ **12,000 miles of Risky Pipelines**
- ▶ **About \$12 Billion cost to replace**
- ▶ **Who's to blame?**

**PENNSYLVANIA AGING
INFRASTRUCTURE**



- ▶ **Public includes utility workers and people working, residing, or involved in life**
- ▶ **Don't forget the utility workers**
- ▶ **Procedures should be written not to place them in harm's way**

**PROTECTING THE PUBLIC AND
PROPERTY**

- ▶ **A GOOD IDEA FOR BOTH NATURAL GAS AND ELECTRIC SAFETY**
- ▶ **REFORMS ARE NEEDED FOR NATURAL GAS**
- ▶ **ELECTRIC OPERATORS SHOULD SEE THE BENEFITS**

OPERATOR QUALIFICATION

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- ▶ **Contractors OQ'ed to Pipeline Operator's Procedures (not just training entity's procedures)**
- ▶ **This will create portability issues**
- ▶ **Need Robust Training – Enhanced OQ**
- ▶ **Independent Testing - Proctored Testing**
- ▶ **Annual OQ Evaluations**

OQ BASELINE REQUIREMENTS

- ▶ **Classroom Training, Hands-On Training, and Testing**
- ▶ **Alternative method for employees that have test taking problems**
- ▶ **College Credits**
- ▶ **Large Pool of Testing Questions**
 - ▶ **For example: 135 questions in the pool for a 35 question test**

OOQ BASELINE REQUIREMENTS

- ▶ **More operator inspectors in the field**
- ▶ **More random inspection of work for both operator employees and contractor employees**
- ▶ **Knowledge Retention – May require more frequent training and testing**
- ▶ **Reportable Incidents will have a “robust” review of Operator’s OQ program**

OQ BASELINE REQUIREMENTS

- ▶ **Compliance isn't an action, it's a corporate culture**
- ▶ **Enforcement has many faces**

COMPLIANCE AND ENFORCEMENT

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- ▶ Leadership and Management Commitment
- ▶ Stakeholder Engagement
- ▶ Risk Management
- ▶ Operational Controls
- ▶ Incident Investigation, Evaluation, and Lessons Learned
- ▶ Safety Assurance
- ▶ Management Review and Continuous Improvement
- ▶ Emergency Preparedness and Response
- ▶ Competence, Awareness, and Training
- ▶ Documentation and Record Keeping

SAFETY MANAGEMENT SYSTEMS

- ▶ NTSB Recommended
- ▶ American Petroleum Institute (API) develop comprehensive SMS standards specific to the pipeline industry

SMS

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- ▶ Non Compliance Letters
- ▶ Informal Settlements
- ▶ Formal Complaints
- ▶ Civil Penalties
- ▶ Actions in lieu of Civil Penalty

ENFORCEMENT

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