

Clause-wise Comments on the Draft amendments on "PNGRB (Integrity Management System for City or Local Natural Gas Distribution Networks) Regulations, 2013

1.0 Clause No: SCHEDULE-6 (6.1.1)

Comments:

- Integration of disparate data sources to a common location (GIS) / equivalent software. Kindly add GIS /Equivalent software (Instead of GIS)

2.0 Clause No: SCHEDULE-6 (6.1.5.1 Integrity Assessment Tools)

Comments:

- It is suggested to add the remarks mentioned below, at the end of the para 1 after (*"It may be noted that the baseline data for specific measurement should be available with the operator as a ready-reckoner....."*)
- If baseline data is not available, operators need to use opportunities that arise, such as the pipeline being excavated for operation, maintenance, or any other reason, to collect the required or any additional information.

3.0 Clause No: SCHEDULE-6 (6.1.5.1 A) Direct assessment and evaluation

Comments:

- May please add the points in italics after end of 6.1.5.1 A as given below.
- Direct assessment and evaluation: While implementing External Corrosion Direct Assessment and when the pipe is exposed, the company is advised to conduct examinations for threats other than that for external corrosion also (*like internal corrosion, stress corrosion cracking, MIC, coating condition etc.*) when such threats are identified relevant inspection is recommended.
- Since Direct Assessment is one of the major Integrity Assessment Tools, it is recommended to consider the frequency of the reassessment interval to be every 10 years. *Reason for selecting 10 years: Typically, CFR considers 7 years for transmission pipelines. However, 10 years is considered since the distribution pipelines are not subject to the same pressures as transmission pipelines and thus, may tend to leak rather than rupture.*

4.0 Clause No: SCHEDULE-6 (6.1.5.1 B Pressure testing)

Comments:

- May please consider removing the comments: ***“subsequent testing after a pipeline has been put in service”***, as It is difficult to carryout pressure test (hydro / pneumatic) of in-service gas pipelines.

5.0 Clause No: SCHEDULE-6 (6.2 Performance Plan)

Comments:

- The Board may please recommend list of minimum KPIs.
- Some of leading indicators can be – Maintenance backlog %, Network CP healthiness (voltage/current); no. of alarms/ trips; etc.
- Lagging indicators – no. of LOPC incidents greater that 500 kg, Leak from corrosion, Third party damage per 100 km, no of Major fire events, coating defects etc.

6.0 Clause No: SCHEDULE-6 (6.4 Management of Change Plan)

Comments:

- Following points may be added as part of Management of Change Plan.
- Management of change shall address technical, physical, procedural, and organizational changes to the system, whether permanent or temporary.
- In order to ensure the integrity of a system, a documented record of changes can be developed and maintained at one location in SAP / GIS / or any other application. This information will provide a better understanding of the system and possible threats to its integrity.

7.0 Clause No: SCHEDULE-8 (Implementation Schedule)

Comments:

- In Point # 5: May please consider replacing “approval of subsequent periodic review by CEO or Full-time Director of the entity” by “Key management personal designated by CEO / entity Board for subsequent periodic review”
- In Point #7: Submission of compliance report to PNGRB every year till all the observation are complied.

8.0 Appendix II List of Critical Activities in CGD Network

Comments:

- In Point #7: May please consider the Inspection interval of 3 year as part of operator responsibility (instead of every year) and with some aging criteria of the installation.

- The activities like leakage surveys, patrolling surveys, direct assessment, time period for application of cathodic protection from the date of pipe installation can be included in annexure II.

9.0 Appendix V (Annexure-III: AI RISK REGISTER)

Comments:

- May please add a separate column of risk level “high–medium-low” basis or as a numerical value.