

Views/Comments on the PNGRB IMS Regulations CGD Networks (Annexure-B24072020)					
Sr no.	Page	Clause	As per Draft received	MGL's Views / comments	Reason
1	3	5. Objective	These Regulations outline the basic features and requirements for developing and implementing an effective and efficient integrity management plan for making them reasonable and prudent operator of city gas distribution networks to manage its integrity and to continue providing safe and reliable delivery of natural gas to its customers through -	May be rephrased for better clarity as:- These Regulations outline the basic features and requirements for developing and implementing an effective and efficient integrity management plan for making the entities reasonable and prudent operator of city gas distribution networks to manage its integrity and to continue providing safe and reliable delivery of natural gas to its customers through -	For better clarity
2	5	1.1 (Schedule 1)	The objective of Integrity Management System (IMS) is to ensure the integrity of CGD networks at all times to ensure public protection of environment , optimal availability of CGD networks and also minimizing business risks associated with operations of gas network.	May be rephrased for better clarity as:- The objective of Integrity Management System (IMS) is to ensure the integrity of CGD networks at all times to ensure protection of public, environment , optimal availability of CGD networks and also minimizing business risks associated with operations of gas network.	For better clarity
3	5	1.1 (Schedule 1)	The availability of the Integrity Management System will allow professionals and technicians in integrity tasks to ensure work plans and targets in the short, medium and long term horizon which in turn will improve their efficiency and satisfaction.	May be rephrased for better clarity as:- The availability of the Integrity Management System will allow professionals and relevant personnel undertaking integrity tasks to ensure work plans and targets in the short, medium and long term horizon which in turn will improve their efficiency and satisfaction.	For better clarity
4	6	2.1 (Schedule 2)	Tenth line: It is, therefore, essential that a system is introduced which ensures maximum availability of the network with minimum disruption and damages.	It is, therefore, essential that a system is introduced which ensures optimal availability of the network with minimum disruption and damages.	Same as mentioned at 3rd line of clause 1.1 of Schedule 1.
5	8	4.3 (Schedule 4)	Fifth line: It also mandates the in-house development of Integrity Management Plan, Management of Change pertaining to technical aspects.	May be rephrased for better clarity as:- It also mandates the in-house development of Integrity Management Plan and Management of Change pertaining to technical aspects.	For better clarity
6	14	6.1.1 (Schedule 6)	Content after fourth para: Four aspects should be visualized during data collection:	Only three aspects are listed; probably " Data History " may be a separate aspects which will make four aspects.	For better clarity
7	14	6.1.1 (Schedule 6)	First point: 1) Data alignment - Integration of disparate data sources to a common location (GIS).	May be rephrased for better clarity as:- 1) Data alignment - Integration of disparate data sources to a common location (GIS or other system/method considered suitable by the entity).	For better flexibility.
8	14	6.1.2 (Schedule 6)	Identification of Threats: Gas pipeline incident data analyzed and classified by Pipeline Research Council International (PRCI) represents 22 root causes for threat to pipeline integrity. One of the causes reported by the operator is "unknown". The remaining 25 threats have been grouped into three groups based on time dependency and further in to nine categories of related failure types according to their nature and growth characteristic as below:	Mismatch in the number of threats between 22 & 25 as mentioned in the Para and as listed below the Para.	Threat count mismatch.
9	19 & 20	6.1.5.1 (Schedule 6)	Integrity Assessment tools: Integrity Assessment ToolsSome of the tools for Integrity assessment are provided below. The operator may use either of the methods a or b for integrity assessment techniques and as many monitoring tools support systems necessary from c to h to achieve the Integrity Management Plan for CGD networks, maintaining the compliance with PNGRB T4S regulations It may be noted that the baseline data for specific measurement should be available with the operator as a ready-reckoner:	More options may be added over & above (a) & (b) in view of the following constraints: (a) Direct Assessment (ECDA) is not always feasible in the CGD networks, especially for pipes laid below paved road surfaces, as per expert advice. (b) Pressure testing is not feasible for the pipelines already in service as it will lead to disruption of supply. As a suggestion the option of " Cathodic protection system surveys " as mentioned in the previous draft, may also be considered. (Also, where feasible, the frequency of ECDA may be clearly mentioned as different standards prescribe different frequencies ranging from 5 to 20 years)	For better flexibility, as explained.
10	21	6.1.5.2 (e) (Schedule 6)	Second paragraph third line : Leakage Surveys using gas detectors shall be done in accordance with the requirements of ASME B 31.8. Gas detectors, duly calibrated, shall be available at all times in ready use conditions for emergency surveys and use.	Third line may be rephrased as: Leakage Surveys using gas detectors shall be done in accordance with the requirements of ASME B 31.8. Gas detectors, duly calibrated, shall be available at all times in ready to use condition for emergency surveys and use.	minor typo
11	23	6.1.6 (Schedule 6)	Second paragraph first line: A tracker sheet may be develop to capture the abnormalities.....	May be reworded as: A tracker sheet may be developed to capture the abnormalities.....	minor typo
12	26	6.5 (Schedule 6)	Third paragraph: Internal audits of the CGD network integrity management system shall be performed on a regular basis. The purpose of the audits is to ensure compliance with the policies and procedures as outlined in these regulations. Recommendations and corrective actions taken shall be documented and incorporated into the CGD network integrity management system.	As previously suggested & discussed during the sub-committee meeting held on 14th July 2020, following content may be added: "If necessary, the entity may utilize the services of an expert agency for conducting internal audits, if considered beneficial."	As previously suggested & discussed during the sub-committee meeting held on 14th July 2020 Will provide more options to an entity for better quality internal audit.
13	28	Schedule 7	First Para: A CGD networks Integrity Management System is a management plan in the form of a document that explains to operator's employees, customers, regulatory authorities and all those who will be directly or indirectly affected by our activities, how the operator and its assets are managed, by stating:	As previously suggested & discussed during the sub-committee meeting held on 14th July 2020. The following may be rephrased as: A CGD networks Integrity Management System is a management plan in the form of a document that explains to operator's employees, regulatory authorities and all relevant stakeholders who will be directly or indirectly affected by our activities, how the operator and its assets are managed, by stating:	As previously suggested & discussed during the sub-committee meeting held on 14th July 2020
14	36	Appendix II	Sr. no. 7: Time period for implementation : Once in a year	As previously suggested & discussed during the sub-committee meeting held on 14th July 2020: Time period for the Implementation of the activity may be mentioned as 12 months as in line with the title of the column of the table i.e. Time period for implementation	As per the table, the time period to be mentioned should be for implementation of the system.