


AGA Regulatory Update and the Impacts to the Contractor Community

Centuri Operations Roundtable (CORT)

An aerial photograph showing a two-lane asphalt road that curves through a dense, lush green forest. To the left of the road is a body of water with a striking turquoise or light blue hue. The forest consists of many tall, thin evergreen trees. The lighting suggests a bright, sunny day, with some shadows cast by the trees.

The American Gas Association, founded in 1918, represents more than 200 local energy companies that deliver clean natural gas to 180 million Americans throughout the United States.

Nearly 187 million Americans and 5.8 million businesses use natural gas because it is **affordable, reliable, safe and essential** to improving our environment.

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Topics

- Reauthorization update – PHMSA Pipeline Safety Program
- PHMSA Rulemaking look-ahead
- Other PHMSA happenings
 - Guidance and Enforcement Procedures
 - GPAC update
- Advisory Bulletin ADB-2026-01
- NTSB Final Reports
- Safety of Gas Distribution Pipelines (SGDP) Rulemaking Update
- Pipeline Safety Management Systems (PSMS) & Contractors

3/6 House E&C Hearing – PHMSA Reauthorization








PHMSA Administrator Paul Roberti testifying

- Congressional Reauthorization of PHMSA’s Pipeline Safety Program
- Opportunity to clarify PHMSA priorities (studies, R&D, funding, regulations, etc.)
- **Written remarks** reiterate PHMSA priorities for 2026
 - [LNG \(Part 193\) NPRM](#)
 - [Gas Transmission Pipeline Repair Criteria](#) NPRM
 - [Safety of Gas Distribution Pipelines \(SGDP\)](#) GPAC meeting
- **Hearing remarks:**
 - Pipelines remain the safest mode of energy transportation
 - PHMSA inspection and enforcement staffing not affected by staff attrition
 - Reiterated enforcement transparency and focus on risk and high-consequence events
 - LDAR remains a priority, but not on deck for 2026



Pipeline Safety Reauthorization


PIPELINE Safety Act of 2025


- House & Senate Committees draft bills
 - House T&I  9/16/2025
 - Senate Commerce (CST)  10/21/2025
 - House E&C  2/25/2026
 -  • Excavation Damage Prevention – Section 9
 -  • Strengthening Penalties for Pipeline Safety Violations (*Disrupting Operation of Pipeline Infrastructure*) – Section 6
 -  • 5-year Reauthorization Period – Section 7
 -  • Minimum Safety Standards (*Regulatory cost-benefit analysis = "safety and economic benefits" in the U.S.*) – Section 3
- **Look-ahead:**
 - House and Senate must still coalesce around a single bill
 - Still need to determine how to attach Reauth to other “vehicle” legislation
 - Timing TBD

PHMSA Rulemaking Look-Ahead

- ★ • **Safety Of Gas Distribution Pipelines (SGDP)** [RIN 2137-AF53]
 - Preparing for **May 2026** GPAC Meeting
- ☞ • **Amendments to Part 193 (LNG Facilities)** [RIN 2137-AF45]
 - NPRM expected **July 2026**
- ☞ • **Gas Transmission Pipeline Repair Criteria** [RIN 2137-AF44]
 - NPRM expected **Summer 2026**

PHMSA Rulemaking Look-Ahead

-  **Mandatory Regulatory Reviews (Part 190-199) [RIN 2137-AF73]**
 - NPRM/NPRMs/DFRs **2026 (?)**

-  **Gas Pipeline Leak Detection And Repair (LDAR) [RIN 2137-AF51]**
 - Supplemental NPRM **2027 (?)**

-  **Pipeline Operational Status [RIN 2137-AF52]**
 - NPRM expected **February 2027**

Final Rule

DOT Rulemaking, Guidance, and Enforcement Procedures

- Effective **5/27/2026**
- Takeaways:
 - **Guidance documents (e.g., interpretations)** must undergo centralized DOT review and clearance process and maintain them in a public-facing system. Inspectors and enforcement staff must rely only on approved, posted guidance (not internal memos or unwritten interpretations).
 - **Guidance/interp disclaimers must be clearly stated** explaining that guidance is non-binding and cannot create new legal obligations.
 - **Enforcement cannot use guidance/interps alone**, but must explicitly tie alleged violations to to statutes or regulations
 - **Standardized enforcement procedures** with enhanced documentation, justification, and transparency in enforcement.
 - **More explicit and structured rulemaking requirements** for administrative (Secretary-level), analytical, legal, and cross-agency review.



GPAC (Gas Pipeline Advisory Committee) Update

- [PAC "Clear the Decks" – 9/2/2025](#)
- PHMSA call for GPAC/LPAC nominees
- Nominations submitted **10/2**

Government	Industry	Public
David Chislea (G) Manager, Gas Operations Section Michigan Public Service Commission Lansing, MI	Robert Mitchell (I) Vice President Carrera Gas Companies Tulsa, OK	James Burgess (P) Director of Training and Grants Administration International Association for Firefighters McLeansville, NC
Kim David (G) Chairman OK Corporation Commission Oklahoma City, OK 73101	Kevin Lang (I) Vice President, Engineering Staff Southwest Gas Las Vegas, NV	Howard (Skip) Elliott (P) Ponte Vedra Beach, FL
Drue Pearce (G) Counselor to the Assistant Secretary on Land and Minerals Management Department of Interior Anchorage, AK	Matt Stennett (I) Vice President Middle TN Natural Gas Utility District Smithville, TN	Don Ledversis (P) Cranston, RI
Terry Turpin (G) Director, Office of Energy Projects Federal Energy Regulatory Washington, D.C.	Eric Taylor (I) Director of Engineering Services BHEGT&S Bridgeport, WV	Sarah Magruder Lyle (P) President and Chief Executive Officer Common Ground Alliance Alexandria, VA
Mary Zanter (G) Pipeline Safety Program Manager South Dakota PUC Pierre, SD	Chad J. Zamarin (I) President and Chief Executive Officer The Williams Companies, Inc. Tulsa, OK	John Woulfe (P) Senior Advisor International Association of Fire McLean, VA

PHMSA Advisory Bulletin (ADB-2026-01)

PHMSA Advisory Bulletins

[ADB-2026-01](#) – DIMP Considerations for Plastic Piping and Components

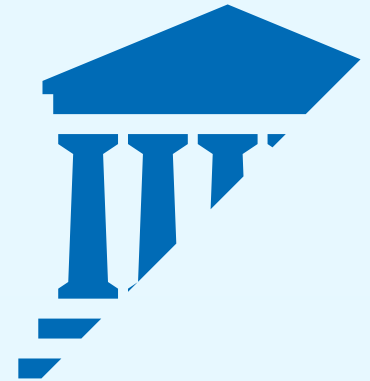


PHMSA reminder to operators of gas distribution systems: *“consider accelerated degradation risks associated with elevated temperature environments” and encouraging them to “complete an inventory of plastic pipe and components that may be susceptible to such environments.”*

- Study [NTSB Pipeline Investigation Report PIR-25-01](#) on the March 24, 2023 West Reading incident involving Aldyl A piping and Aldyl A tees with Delrin inserts.
- **Evaluate Integrity Management Plan (DIMP):**
 - Assess pipeline design, operating characteristics, and environmental conditions – particularly elevated temperatures – to identify threats and risks in accordance with §§ 192.1005 and 192.1007(a)(1).

PHMSA Advisory Bulletins

[ADB-2026-01](#) – DIMP Considerations for Plastic Piping and Components



- **Identify Threat-Susceptible Plastic Assets:**

- Consider environmental heat sources and create an inventory of plastic components vulnerable to slow crack growth or thermal degradation.
- Materials of concern include:
 - pre-1973 Aldyl A
 - PE 3306
 - Aldyl A tees with Delrin inserts
 - Plexco Celcon caps
 - Driscopipe 7000/8000

- **Gather Additional Information:**

- When heat-related threats exist, develop a plan to collect more data through ongoing design, maintenance, and construction activities.
- Prioritize risks based on likelihood and consequence
- Take risk-reduction measures: *leak management, targeted replacement, material verification, and enhanced leak surveys.*

NTSB Updates

NTSB Update

- 1/24 & 1/27/2024 Jackson, MS incidents

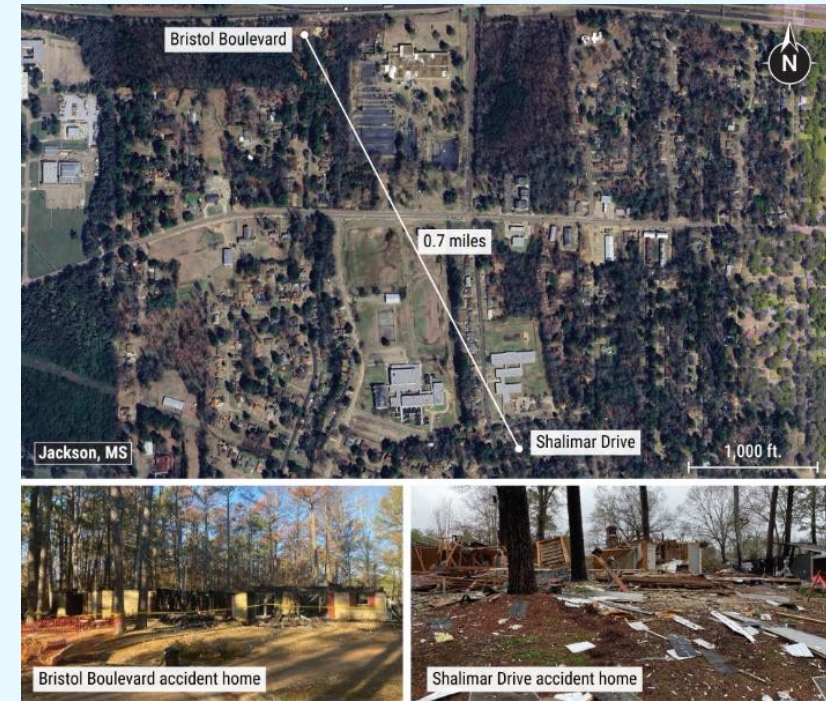
- Final Investigation Report issued **3/12/2026**
- Expansive clay and heavy rainfall caused soil movement
- Leaks occurred from partial pull-out of compression couplings
- Recommendations = 10



NTSB Update

- 1/24 & 1/27/2024 Jackson, MS incidents

- Final Investigation Report issued **3/12/2026**
- Recommendation to PHMSA (P-26-2):
 - Issue an advisory bulletin urging operators to adopt probabilistic risk models for DIMP where appropriate.
 - PHMSA's (2020) report on the risk model types indicated:
 - Probabilistic models were more robust than qualitative and relative-risk models
 - Equipped pipeline operators to make better safety-related decisions.
 - Natural gas distribution pipeline operators should be reminded of the superior decision-informing capabilities that probabilistic models can provide.



NTSB Update

- 11/6/2024 South Jordan, UT incident
 - Final Investigation Report issued **3/31/2026**
 - Involved 1976 vintage 4” Aldyl-A gas main operating at a pressure of approximately 43 psig
 - Through-wall crack formed from rock impingement, leading to a leak involving gas migration to the structure.
 - Recommendations = 0



NTSB Update

- 11/6/2024 South Jordan, UT incident



- Lessons Learned include acknowledgement of:
 - Enbridge Gas Utah's recent efforts to make natural gas alarms and carbon monoxide detectors available to residents in South Jordan and the Salt Lake City area.
 - Enbridge Gas Utah's plan to address threats of Aldyl A piping, including:
 - survey of 100% of Aldyl A facilities with advanced mobile leak detection system, and repair of immediate action leaks.
 - increase in capital spend for targeted replacement of high-risk Aldyl A piping
 - evaluation of leak history, leak survey results, and repair data to inform ongoing O&M and replacement activities
 - Enbridge Gas Utah's revision of two standard operations practices:
 - improvements in efficiencies and resource deployment during gas emergencies to isolate leaks quickly
 - requiring bar hole testing during leak investigation to include perimeter of structures and over all gas assets in the area of a leak

Safety of Gas Distribution Pipelines (SGDP) Rulemaking Update

Safety of Gas Distribution Pipelines (SGDP) Rulemaking Estimated Timeline

September 2018

Merrimack Valley Incident



December 11, 2020
PIPES Act of 2020



August 17, 2023

Notice of Proposed Rulemaking



November 6, 2023
Comment Period Closes



May 28, 2026

Gas Pipeline Advisory Committee Meeting



Q2 2027 (Estimated)

Final Rule Publishes



January 1, 2028 (Estimated)
New requirements go into effect



GPAC Overview

- **Gas Pipeline Advisory Committee (GPAC)**
 - (Nearly) last opportunity to influence rulemakings between NPRM and Final Rule
 - Convene to discuss provisions of Proposed Rule
 - Technically feasible?
 - Reasonable?
 - Cost-effective?
 - Practicable?
 - 15 committee members
 - 5 industry
 - 5 public
 - 5 government
 - Meeting 5/28 at DOT Offices (Washington DC) to discuss SGDP



Safety of Gas Distribution Pipelines (SGDP) NPRM

- PIPES Act 2020 (Sections 202, 203, 204, 206) – **Safety of Gas Distribution Pipelines**
 - DIMP plan enhancement (consider risks to cast iron & low-pressure equipment)
 - Enhance emergency plans for fire/explosion/fatality/significant interruption (e.g., contacting first responders, public officials, & affected public)
 - Revise O&M manual / Emergency plans to include procedures for responding to overpressure indications
 - Traceable/Reliable/Complete records for gas distribution facilities “critical to ensure proper pressure controls”
 - Monitoring for overpressure by OQ-qualified person during certain construction projects
 - Assess risk of (and eliminate) common mode of failure at district regulator stations



Merrimack Valley, 2018
Photo WCVB

Safety of Gas Distribution Pipelines (SGDP) NPRM

- NPRM published **9/7/2023** in the Federal Register
- NPRM joint-industry comments (AGA/APGA/NGA) submitted to docket **11/6/2023**
 - <https://www.regulations.gov/comment/PHMSA-2021-0046-0273>

Safety of Gas Distribution Pipelines (SGDP) NPRM – Major Provisions

- **DIMP plan updates**
 - **Consider threats of cast iron** *202 and other piping with known issues
 - Consider threat of age on distribution systems ⚠
 - **Associations:** Age is not a standalone threat
 - **Evaluate risk of events that could results in overpressurization of low-pressure systems** *202
 - **Unless event has no potential consequences, per engineering analysis***202 ⚠
 - **Associations:** Significant consequences (ALARP)

Safety of Gas Distribution Pipelines (SGDP) NPRM – GPAC Slides

- **DIMP plan updates – PHMSA considerations for GPAC**
 - *Limiting the specified materials to cast iron and historic plastics with known issues, and reducing repetition of these materials in multiple elements*
 - *Removing the provision around minimizing risk of overpressurization **due to natural forces***
 - *Treating age as a consideration in evaluating the risk of other threats, i.e., under §192.1007(c), and reduce repetition*

Safety of Gas Distribution Pipelines (SGDP) NPRM – Major Provisions

- **Revisions to Emergency Response Plans (§ 192.615) to:**
 - **Immediate notification to emergency response officials of *203**
 - fatalities or
 - shutdown of gas service to 50 or more customers ⚠
 - **Associations:** 270+ customers, > 24 hours
 - **Establish communications with the public in an emergency *203**
 - Info about the gas pipeline emergency
 - Status of the emergency ⚠
 - Timeline for service restoration ⚠
 - **Implementation of an opt-in system (i.e., “Reverse 9-1-1”) to inform customers of safety status during pipeline emergencies *203**

Safety of Gas Distribution Pipelines (SGDP) NPRM – GPAC Slides

- **Revisions to Emergency Response Plans (§ 192.615) – PHMSA considerations for GPAC**
 - *Not pursuing gathering line requirements in this rulemaking as that is out of scope*
 - *Not adding ‘notification of potential rupture’ as an emergency for all operators in (a)(3)*
 - *Revisiting the significant outage threshold based on further data analysis*
 - *Amending the requirement to communicate with the general public to specify the affected public.*
 - *Also clarify limited applicability with respect to odor calls*
 - *Allowing more clearly for operators to employ a third-party opt-in notification system*
 - *Cutting down prescriptive, unnecessarily lengthy requirements around notification content and written procedures for the opt-in notifications and general public notifications*

Safety of Gas Distribution Pipelines (SGDP) NPRM – Major Provisions

- **Overpressurization**

- Equip all district regulator stations serving LP systems with 2 levels of overpressure protection *206 

	# DRS Serving LP	# DRS Serving LP <i>without</i> 2 nd -level OPP	Cost to upgrade DRS with 2 nd -level OPP
PHMSA estimate (NPRM)	10,199	6,119	\$7,500
AGA/APGA/NGA estimate	57,250	50,265	\$50,000 (median) - \$176,000 (mean)

- **Associations:** New DRS – “alternative measures”
- **Associations:** 10 years to upgrade existing DRS (15 for existing DRS w/full-capacity relief or slam-shut)

Safety of Gas Distribution Pipelines (SGDP) NPRM – GPAC Slides

- **Overpressurization – PHMSA considerations for GPAC**
 - *Clarifying that operators may employ the same method of protection twice (i.e., two means)*
 - *Requiring secondary protection on all low-pressure distribution systems, consistent with the mandate, while providing significant additional time for any necessary upgrades to existing stations*
 - *Articulating where it would be appropriate to allow an existing system to use an alternative to the secondary protection requirement, like impracticable design, or where the operator has plans to replace the low-pressure system*

Safety of Gas Distribution Pipelines (SGDP) NPRM – Major Provisions

- **Overpressurization**
 - **Shutting in (or reducing pressure) upon indication of overpressurization *204** ⚠
 - **Associations:** Confirmation of overpressurization
 - Provide real-time monitoring of outlet gas pressure at district regulator station on LP systems

Safety of Gas Distribution Pipelines (SGDP) NPRM – GPAC Slides

- **Overpressurization – PHMSA considerations for GPAC**
 - *Allowing existing low-pressure distribution lines to have remote monitoring or mechanical pressure devices (i.e., §192.741(a)), while continuing to ensure remote monitoring of gas pressure **on go-forward basis***
 - *Not including an additional requirement for minimizing the risk of overpressurization **in design of new DRS feeding low-pressure systems** (§ 192.195(c))*
 - *already required by § 192.199(g)*
 - *can be further covered by DIMP amendments*

Safety of Gas Distribution Pipelines (SGDP) NPRM – Major Provisions

- **Management of Change**

- **Develop an MOC process** *204 for installing/modifying/replacing/ upgrading regulators, pressure monitoring, or OPP ⚠
 - Associations: Like-kind replacements & routine O&M exempted
 - Associations: MOC provisions must be focused on pressure-controlling distribution facilities
- MOC for modification of alarm setpoints ⚠
 - Associations: Permanent changes to alarm setpoints
- MOC for introduction of new technologies for OPP
- **Ensure qualified personnel** (Subpart N) **review and certify construction plans** *204 ⚠
 - Associations: Personnel provide signature on construction plans; no OQ qual

Safety of Gas Distribution Pipelines (SGDP) NPRM – GPAC Slides

- **Management of Change – PHMSA considerations for GPAC**
 - *Addition of “as necessary” qualifier to exclude work that does not pose a known risk of overpressurization*
 - *Limiting the MOC requirement to “significant” changes*
 - *Excluding emergency work*
 - *Excluding in-kind replacement work not requiring design plans*
 - *Specifying that the person reviewing and certifying construction plans must be a P.E. or SME (not an individual qualified under Subpart N), since construction plans are not covered tasks*

Safety of Gas Distribution Pipelines (SGDP) NPRM – Major Provisions

- **Presence of Qualified Personnel**
 - **Require** qualified **personnel at district regulator stations to monitor certain construction projects to prevent or respond to an overpressurization** *206
 - Qualification to include:
 - reading and understanding gas monitoring equipment
 - responding to AOCs
 - shutting off or reducing the pressure to the system
 - incident notification

Safety of Gas Distribution Pipelines (SGDP) NPRM – GPAC Slides

- **Presence of Qualified Personnel – PHMSA considerations for GPAC**
 - *Removing specific requirement to have stop work authority*
 - *Excluding third-party work that is not related to pipeline construction*

Safety of Gas Distribution Pipelines (SGDP) NPRM – Major Provisions

- **Gas Distribution Recordkeeping** *206
 - Identify and maintain maps/records critical to ensuring proper pressure controls
 - Maps and records must be traceable, verifiable, and complete ⚠
 - Associations: traceable, reliable, and complete

Safety of Gas Distribution Pipelines (SGDP) NPRM – GPAC Slides

- **Gas Distribution Recordkeeping – PHMSA considerations for GPAC**
 - *Reiterating that traceable, verifiable, and complete has the same meaning as traceable, reliable, and complete*
 - *Noting that these components are above ground or otherwise easily visually observed.*
 - *§ 192.607(c) [Verification of material properties and attributes] not applicable*

Safety of Gas Distribution Pipelines (SGDP) NPRM – Major Provisions

- **Pressure Test Records**

- Revise § 192.517 to require pressure test data for new, replaced, or relocated gas distribution pipelines ⚠
 - **Associations:** reduce data to segment tested, date, and test pressure
- Ensure such records are maintained for life of the pipeline ⚠
 - **Associations:** maintain for 10 years
- Each disconnected service line must be tested as a new/replaced/relocated service line

Safety of Gas Distribution Pipelines (SGDP) NPRM – GPAC Slides

- **Pressure Test Records** – *PHMSA considerations for GPAC*
 - *Not included in GPAC slides*
 - *Likely ~~struck~~ from final rule*

Safety of Gas Distribution Pipelines (SGDP) NPRM – Major Provisions

- **Prohibiting self-inspection of construction activities (§ 192.305)** 

- Each transmission line or main must be inspected to ensure that it is constructed in accordance with this part.
 - In the final rule issued on March 11, 2015, PHMSA amended § 192.305 to specify that a pipeline operator must not use operator personnel to perform a required inspection if the operator personnel also performed the construction task that required inspection. This amendment was based, in part, on a petition (Docket No. PHMSA-2010-0026) from the National Association of Pipeline Safety Representatives (NAPSR),^[1] which suggested that contractors who install transmission lines or mains should be prohibited from inspecting their own work for compliance purposes.

Safety of Gas Distribution Pipelines (SGDP) NPRM – GPAC Slides

- **Prohibiting self-inspection of construction activities – PHMSA considerations for GPAC**
 - *Not included in GPAC slides*
 - *Likely **struck** from final rule*

Leak Detection and Repair (LDAR) Rulemaking Update

LDAR Update

- Unofficial Final Rule Released (1/17/2025) , but not through the Federal Register. Therefore, has no legal standing
- Sent back to PHMSA by Office of Federal Register (OFR) per [Trump II regulatory freeze](#) announced **1/20/2025**.
- We expect LDAR rule to re-start in 2027. AGA expects it to closely follow the legislative mandates, but to be drastically changed and scaled back when it reappears

LDAR Update - Review of 2020 PIPES Act Directives

- PHMSA will require leak detection/repair programs to consider the environment, use advanced leak detection technologies/practices, and the repair/replacement of all leaking pipe
- Leak detection/repair programs must be able to identify, locate, and categorize all leaks that are hazardous to human safety or the environment, or can become hazardous to human safety.
- Advanced leak detection allows scenarios to use practices that depend on human senses. **(Section 113)**

LDAR Update - Highlights

Grade 2 leaks

PHMSA: evaluate every 30 days, repair within 6 months

Cross-industry proposal: evaluate every 90 days, repair within 12 months

Leak grades change infrequently

Longer repair interval necessary for seasonal/permitting constraints, and to fully leverage project bundling

LDAR Update - Highlights

Grade 3 leaks

PHMSA: evaluate every 6 months, repair within 24 months

Cross-industry proposal: evaluate every 12 months, repair within 24 months

Flexibility for leaks on mains 'scheduled' for replacement

Pipeline Safety Management Systems (PSMS)

Pipeline Safety Management Systems: Vital for the Safe Operation of Pipelines (The problem)

- The National Transportation Safety Board (NTSB) has found that pipeline safety would be enhanced if companies implemented Pipeline Safety Management Systems (PSMS).
- Although PSMS have been adopted by operators representing 85 percent of industry pipeline mileage, many operators, particularly smaller operators, have not yet adopted PSMS.[1]. AGA Members have committed to be at a level 3 maturity by 2027.
- The pipeline industry continues to have accidents that could have been prevented or the consequences more effectively mitigated had risks been more thoroughly identified and addressed.
- Without full commitment from the pipeline industry to implement and mature PSMS, pipeline accidents will continue to occur and the industry will not be able to meet their goal of zero accidents, fatalities, and serious injuries.

1. Pipeline Safety Management Systems Industry Team, 2022 Pipeline SMS Annual Report, (Washington, DC: American Petroleum Institute, 2023)

Pipeline Safety Management Systems: Vital for the Safe Operation of Pipelines (Related Investigations)

Between 2010 and 2021, the NTSB investigated four accidents that demonstrated how pipeline safety would be enhanced if companies implement a PSMS. With a PSMS, operators will be better positioned to evaluate their systems and respond efficiently because they will have reduced the possibility of accidents and employees will be better prepared to respond if an accident occurs.

As a result of the Marshall and San Bruno accidents, NTSB issued Safety Recommendation [P-12-17](#), asking the American Petroleum Institute (API) to facilitate the development of a PSMS that could be adopted by its members. The recommendation was classified Closed—Exceeds Recommended Action after API published Recommended Practice (RP) 1173, which provides a framework for PSMS designed specifically for pipeline operators. As a result of the Huntington Beach accident, NTSB issued Safety Recommendation [P-24-2](#), asking the Pipeline and Hazardous Materials Safety Administration (PHMSA) to issue an advisory bulletin to all PHMSA-regulated pipeline owners and operators to promote the benefits of PSMS. The recommendation is currently classified Open—Acceptable Response

Pipeline Safety Management Systems: Vital for the Safe Operation of Pipelines (What can pipeline operators do?)

- **Implement a robust PSMS as described in API RP 1173.** API RP 1173 Pipeline Safety Management System Requirements provides guidance for operators to establish a system to continuously track and improve safety.[2]
- **For those who have incorporated PSMS into their practices, continue to improve operations and training.** Pipeline operators with PSMS cannot be complacent. One of the hallmarks of a good PSMS is that it continuously evolves and improves safety programs. **(PCDA)**

2. American National Standards Institute/American Petroleum Institute Recommended Practice 1173, Pipeline Safety Management System Requirements, First edition, July 2015.

Pipeline Safety Management Systems: Vital for the Safe Operation of Pipelines (What can pipeline operators do?)

- **Support revisions to API RP 1173 and other guidance as it is developed to include small operators and contractors in their efforts to establish a PSMS.** According to the 2022 Pipeline SMS Annual Report, “Last year also featured important initiatives to support small operator **and contractor implementation** of RP 1173 along their journey of continuous improvement and the combined vision of One Industry, One Team, One Mission, Pipeline Safety.”[3]
- **With a PSMS, operators can ensure pipelines are designed, constructed, operated, and maintained in a way that complies with more than the minimum safety standards found in regulations.** Experience has shown that using a PSMS can be effective and result in significant reductions of serious pipeline accidents each year.

3. Pipeline Safety Management Systems Industry Team, 2022 Pipeline SMS Annual Report, (Washington, DC: American Petroleum Institute, 2023))

Contractor Guidance

- The Recommended Practice 1173, Pipeline Safety Management Systems, 1st Edition was released in 2015 by the American Petroleum Institute (API) and establishes a safety management system standard for pipeline operators jurisdictional to the US DOT. While this standard is not mandated by regulation, strong support towards its full adoption exists.
- An Industry Team was developed to serve in facilitating the implementation of API Recommended Practice (RP) 1173 among the energy pipeline industry and contractor community.
 - Currently the 2nd edition is being completed

Content from: <https://pipelinesms.org/wp-content/uploads/2022/11/Pipeline-SMS-Contractor-Guide-Compendium-PPT.pdf>

Contractor Guidance

- The Pipeline SMS Industry Team developed and released A Contractor's Guide, 1st Edition November 2022, to provide contractors with general guidance as they work to implement or improve their current safety management systems and support pipeline operator implementation of RP 1173.
- **One Industry, One Goal**
 - The guide is designed by industry for industry. It incorporates a diverse set of new and existing efforts into a common guidance document that supports contractor Pipeline SMS journeys and pipeline operator implementation of RP 1173.
- **It is scalable and flexible.**
 - It recognizes the diversity of organization size, sophistication and scope of the pipeline contractor community. It accommodates an organization's existing safety processes while helping those who may be new to Pipeline SMS.

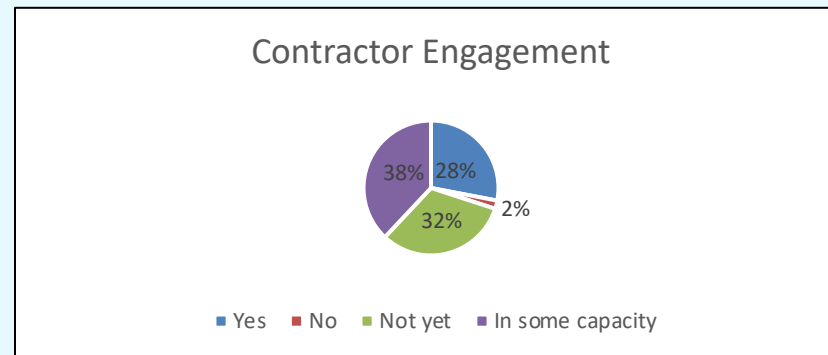
Content from: <https://pipelinesms.org/wp-content/uploads/2022/11/Pipeline-SMS-Contractor-Guide-Compendium-PPT.pdf>

Contractor Guidance

Contractors are vital to a pipeline operator's Pipeline SMS effectiveness.

Every year, industry wide surveys continue to show a majority of pipeline operators adopting and maturing Pipeline SMS to improve their overall safety performance. The surveys are a tool that helps inform the Industry Team on key focus areas, and supporting contractor journeys continues as a key area of focus on industry's journey towards zero incidents.

- ❖ **Contractor Engagement (AGA Members – 2025 Pipeline SMS Survey)**
 - **Yes** – 28%
 - **No** – 2%
 - **Not yet** – 32%
 - **In some capacity** – 38%



Content from: <https://pipelinesms.org/wp-content/uploads/2022/11/Pipeline-SMS-Contractor-Guide-Compendium-PPT.pdf>

Contractor Guidance

Target Audience

- **Contractors**
 - Primary Contractors doing work on behalf of the pipeline operator, including subcontractors. Example contracted services may include design and engineering, construction and operations and maintenance.
- **Operators**
 - Secondary Pipeline operators who elect to have contractor(s) perform work on their behalf. This document may be used as a guidance tool for contractor engagement in key areas of collaboration related to Pipeline SMS.

Content from: <https://pipelinesms.org/wp-content/uploads/2022/11/Pipeline-SMS-Contractor-Guide-Compendium-PPT.pdf>

Thank You



TrueBlueNaturalGas.org

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naturalgas

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The American Gas Association, founded in 1918, represents more than 200 local energy companies that deliver clean natural gas throughout the United States. There are more than 76 million residential, commercial and industrial natural gas customers in the U.S., of which 95 percent — more than 72 million customers — receive their gas from AGA members. Today, natural gas meets more than 30 percent of the United States' energy needs.

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