

# LPG Updates

NEPSR Seminar October 9, 2018

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# PROPANE UPDATES

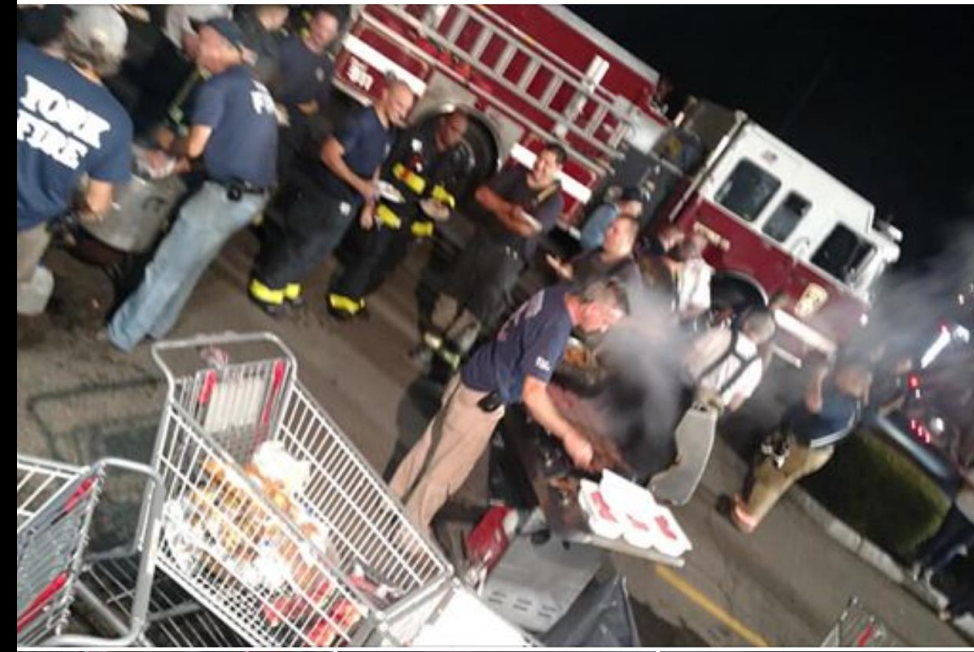
- Current LPG Issues in New England
- NAS JLP Consensus Study Report
- Recent FMCSA Letters of Interpretation

<https://www.youtube.com/embed/hUs9lfisNG8?rel=0>

# Propane's Role in Energy Security

- Propane is non-toxic and does not contain greenhouse gases.
- Propane is blessed by chemistry and is easily transportable in small volumes.
- During natural disasters, propane is the energy that powers and feeds first responders and displaced citizens.
- Generator power for winter storms, power outages, backup power for hospitals and emergency teams.

<https://whdh.com/news/south-lawrence-center-serving-hot-meals-again-after-gas-disaster/>





Propane is the greatest untapped energy source today.



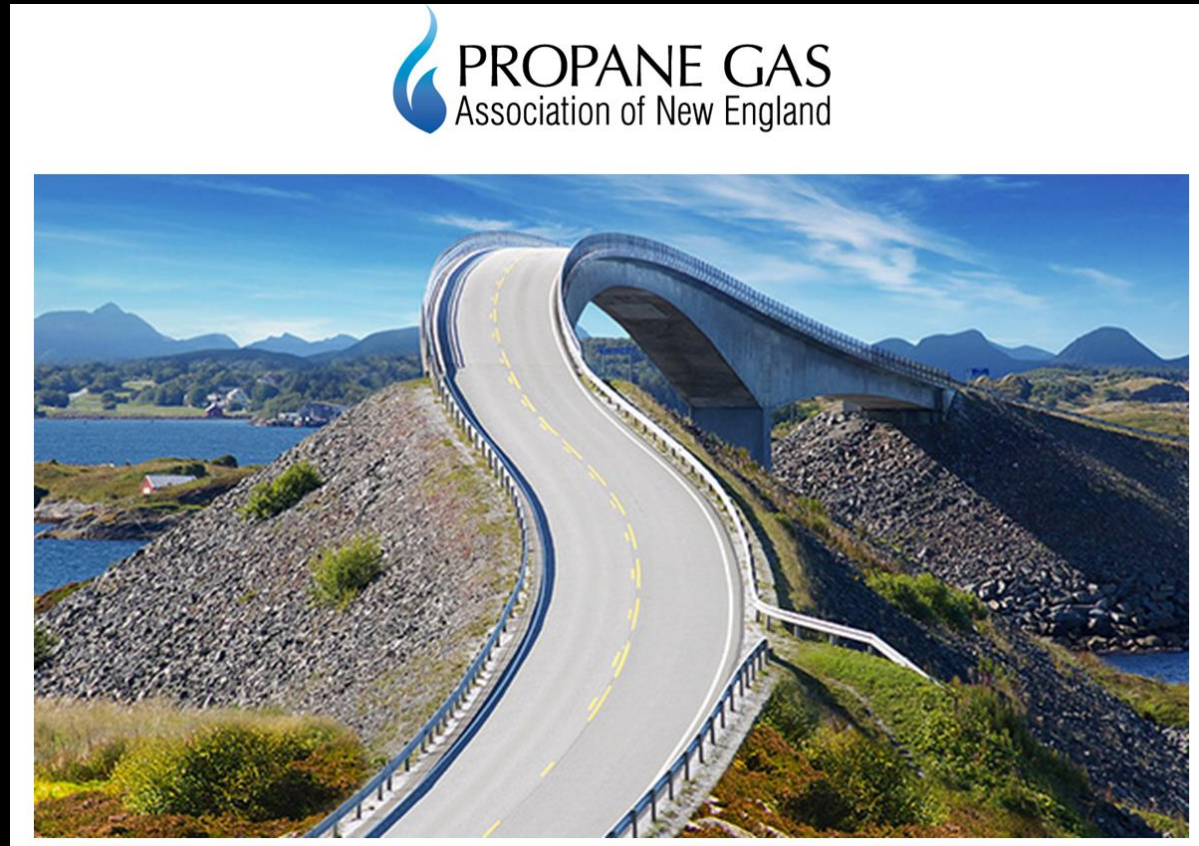
# TRB Study Report Released September 10, 2018



- Congress asked for a study of whether the federal regulatory requirements, which also apply to large natural gas distribution systems, are appropriate for small LPG systems that must already comply with the NFPA codes. The committee that carried out the study and wrote the report reviewed records of pipeline incidents and **found that serious incidents involving LPG distribution system are infrequent.**



# JLP Study Report “Kicks the Ball Down the Road”



# Report Found Huge Variation Among States Enforcement Agencies

- The committee also found evidence that many small multi-user LPG systems are not being inspected regularly for compliance with federal regulations, possibly due to inconsistent regulatory interpretations about when a system falls under the requirements.
- The observed enforcement variability among states may be indicative of some states viewing these systems as having a lower safety risk than the larger systems that regulators identify for more enforcement attention.

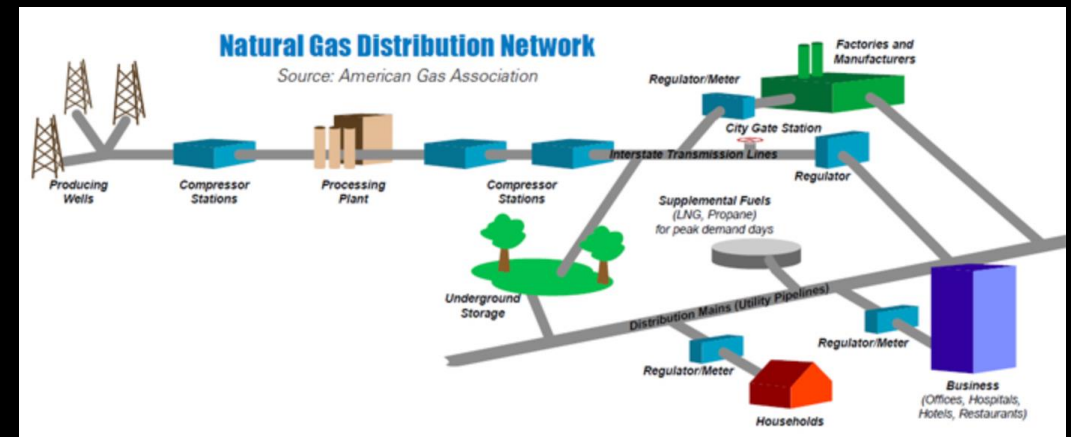
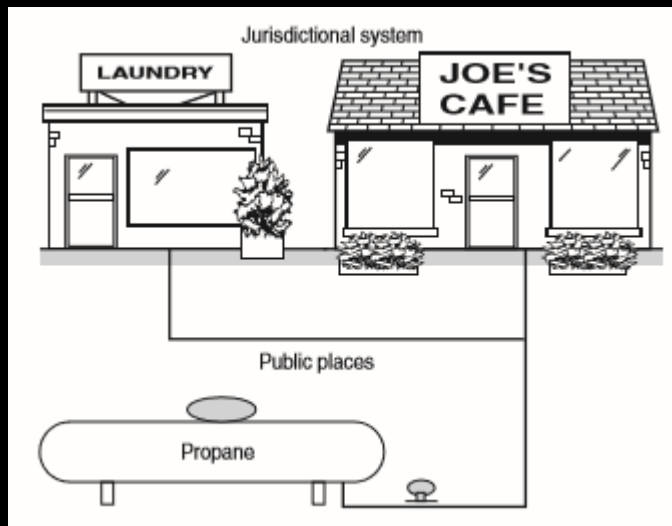
TABLE 4-3 Number of Jurisdictional LPG Pipeline Distribution Systems per State, Reported by 28 States That Provided Size Information, by System Size, 2017

State	2-9 Customers	10-99 Customers	100 or more Customers	Total
Arizona	0	1	5	6
Arkansas	0	3	0	3
California	69	516	65	650
Colorado	0	1	6	7
Connecticut	247	105	0	352
Delaware	9	48	45	102
Iowa	0	1	1	2
Maine	511	111	1	623
Maryland	10	36	11	57
Massachusetts	3	0	8	11
Michigan	9	18	2	29
Minnesota	1	6	4	11
Montana	0	2	3	5
Nevada	5	8	2	15
New Hampshire	539	292	1	832
New Mexico	0	6	0	6
New York	1	3	0	4
North Dakota	0	0	2	2
Ohio	0	0	2	2
Pennsylvania	0	10	5	15
Puerto Rico	14	16	1	31
South Carolina	0	3	0	3
Texas	11	45	20	76
Utah	0	34	0	34
Vermont	233	123	1	357
Virginia	10	56	2	68
West Virginia	0	0	1	1
Wyoming	0	1	0	1
Total	1,672	1,445	188	3,305

SOURCE: National Association of Pipeline Safety Representatives, "Questionnaire to State Pipeline Safety Program Managers on the Regulation of Liquefied Petroleum Gas Distribution Systems."

# Report Findings

- Propane < 12 Customers
- Single Digits
- Specific Code NFPA 58
- Natural Gas > 1,000 Customers
- Thousands
- DOT CFR 192





## NFPA 58 and CFR 192



- NFPA may be silent on an issue because it does not apply.
- This silence does not mean that it is not addressed.
- Silence may be evidence of a conflict.

# PGANE Recommends Systems < 100 Customers Be Exempt from 49 CFR 192.



- NFPA Codes are specifically developed and regularly updated for LPG.
- Strict compliance with NFPA codes should be viewed as sufficient for safety and additional 192 codes are unnecessary because they were developed with the risks of larger natural gas systems.
- Regulators should concentrate their efforts on larger higher risk systems.

# Inspection Frequency, Length, and Timing

- **Frequency:** Majority of States are not taking the same approach as New England.
- **Length:** Inspections with operators should not take more than a half day site visit.
- **Timing:** Inspections should not be conducted during the late fall, winter, and early spring for small propane businesses.

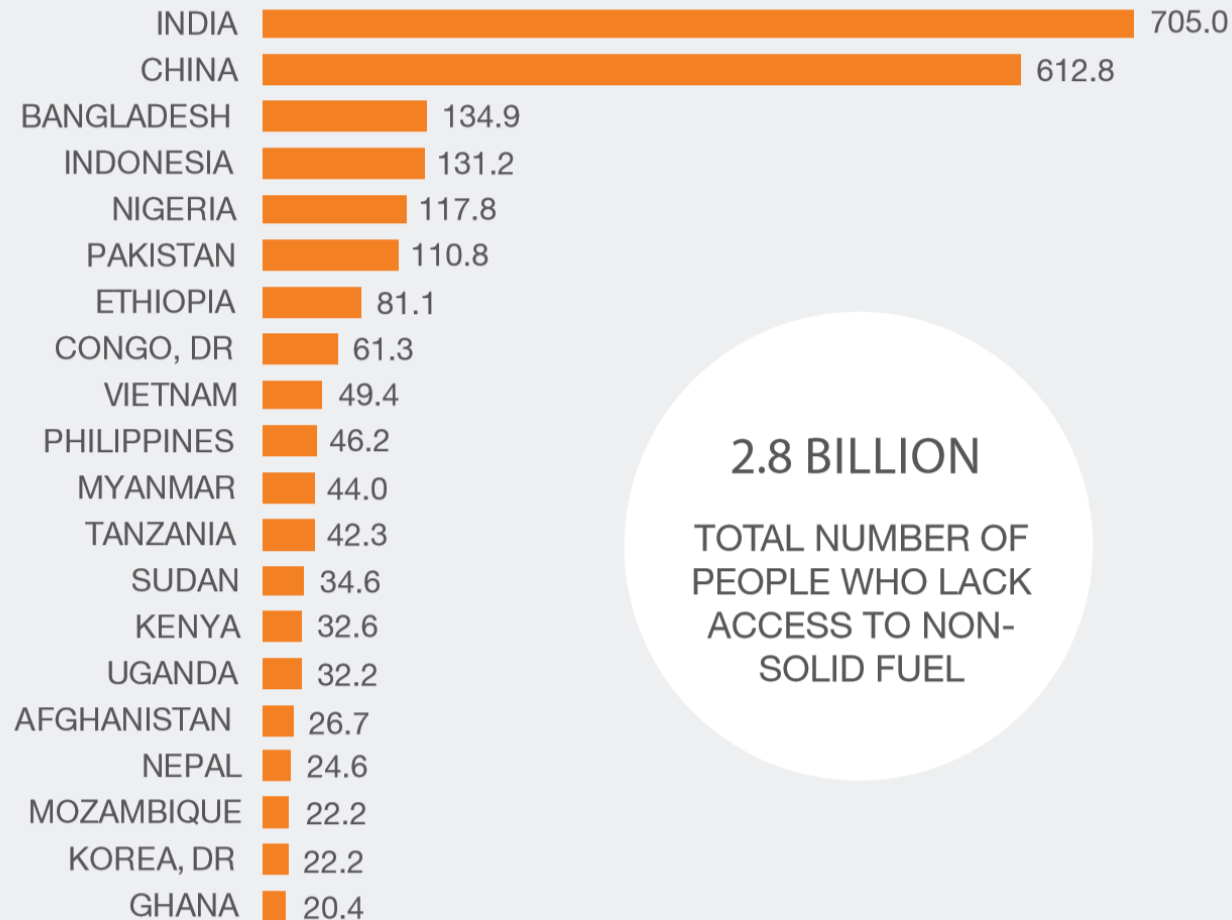




*Propane is an important energy component  
in New England and across the globe.*

*We should be working together to further the  
safe use of propane in New England.*

# Propane is saving millions of lives around the world every year as a clean energy source.



SOURCE: Sustainable Energy for All, 2013. Global Tracking Framework. Version 3.



# Cooking for Life – Changing People's Lives Around the World and Reducing CO<sub>2</sub>.





# Questions?

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