

SOFT OFFs Safety and Convenience Considerations



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Annual Seminar

New England

Pipeline Safety Representatives

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What is a Soft Off?

- ▣ Some years ago, LDCs began to use the practice of what has come to be known as “Soft Offs” when discontinuing gas service to customers.
- ▣ The term “Soft Off” describes when an LDC closes a gas account but does not physically visit the premises and lock the gas meter

Schenectady, NY Incident



Image capture: Aug 2011 © 2016 Google

Schenectady, New York
Street View - Aug 2011

Schenectady, NY Incident



Schenectady, NY Incident



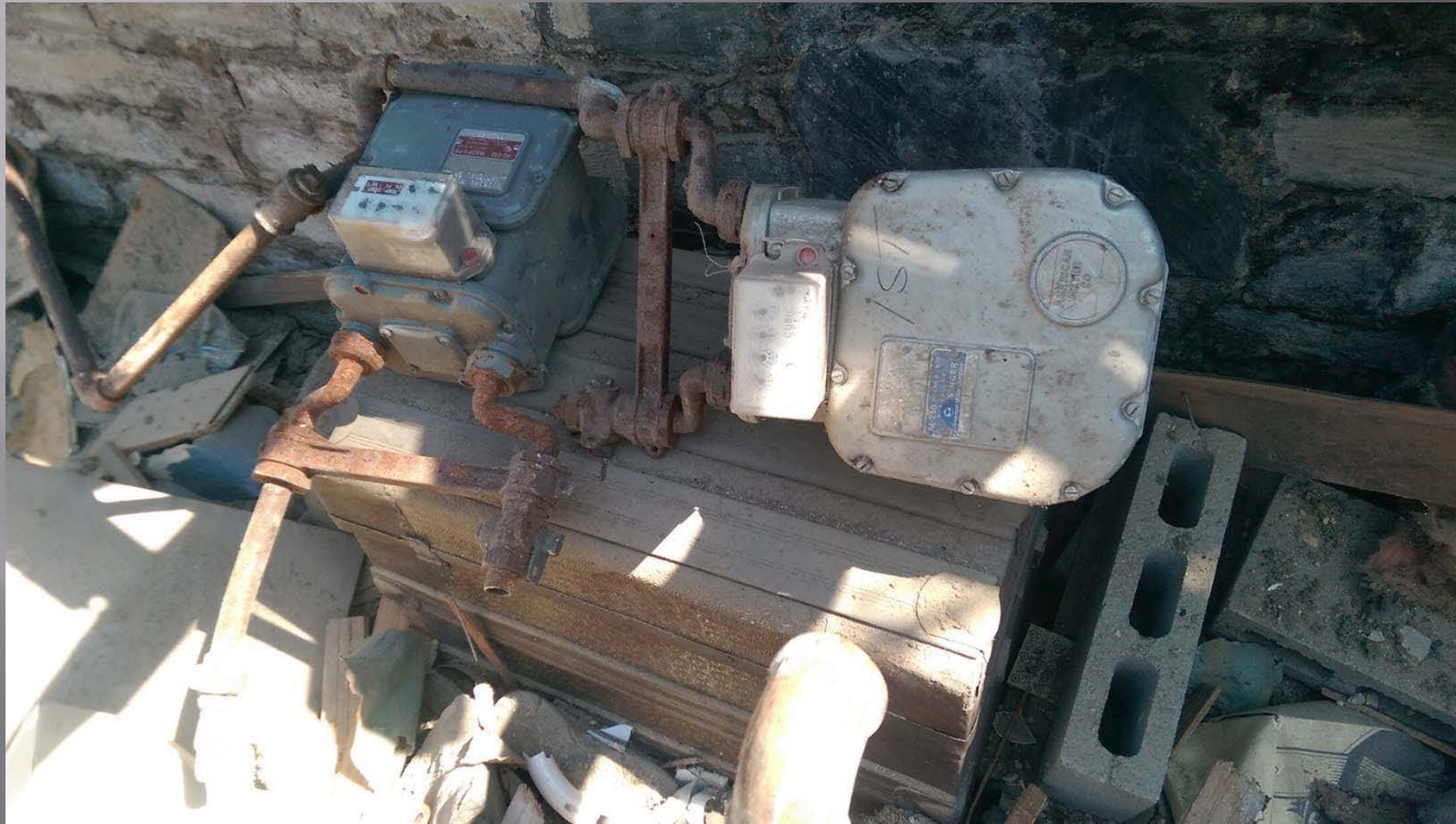
Schenectady, NY Incident



Schenectady, NY Incident



Schenectady, NY Incident



Schenectady, NY Incident



Schenectady, NY Incident

Inside meter for first
floor service valve still in
“on” position



Schenectady, NY Incident

- ▣ Schenectady in Capital Region, NY
- ▣ Service territory of a large operator
- ▣ Foreclosure Auction October 2012 City became property owner
- ▣ 2 unit property owned by City Agency as of Feb 2013
- ▣ As of March 2013 both electric and gas accounts were marked "inactive"

Schenectady, NY Incident

- ❑ The Large Operator did not deactivate the service line
- ❑ House was vacant and subject to vandalism and squatters use
- ❑ 541 days later on August 18, 2014 squatters had likely cut inside pipes for scrap metal
- ❑ 2 days later on August 20, 2014 the house exploded
- ❑ No fatalities, no bodily injury, property damage value of house

Schenectady, NY Incident

- ▣ Operator piping extended into the interior of basement and gas meters were located inside
- ▣ Determined damage occurred upon the gas piping downstream of the meter
- ▣ Low Pressure, 1.25" gas pipe bare steel
- ▣ Incident most likely would have been avoided if gas had been shut off and locked.

Schenectady, NY Incident

- ▣ Should the operator even be having soft off policies?
- ▣ What is the appropriate duration of soft off policies?
- ▣ 5 days, 10 days, 30 days, 60 days?
- ▣ The longer the duration the higher the risk to vandalism and removing interior gas piping
- ▣ Copper especially is easily removed because of its higher scrap value and ease of removal

Schenectady, NY Incident

- ▣ The Large Operator did not follow its “Meter Turn Off (Lock) Procedure”
- ▣ The Large Operator was using its “Soft Off Policy
- ▣ No admission of liability but will incur shareholder funding to accomplish 4 objectives:

Schenectady, NY Incident

4 objectives

1. Piloting a program for remote automated service valve shutoffs
2. \$500,000 shareholder liability in educating public on vacancy issues and identifying vacant properties
3. Training CSRs on inactive accounts, alteration of scripts, improvements to review of gas usage on inactive accounts
4. Increased effort to move meters from inside to out

INCIDENT #2

Watermill, NY Incident

- ▣ Watermill is in Southhampton, Suffolk County, Long Island NY
- ▣ Service territory of a large operator
- ▣ Dec 11, 2014 Former Owner of Residential Property requested termination of service
- ▣ Phone Call to Customer Service Rep
- ▣ House was scheduled to undergo renovations so gas was not needed during the renovation period (months)

Watermill, NY Incident

- ▣ The Large Operator did not deactivate the service line as requested
- ▣ Renovations began, house was vacant except for workers
- ▣ 61 days later on February 11, 2015 the house exploded
- ▣ 2 contractors working for the new owner were hurt, one suffered burns on face and required hospitalization
- ▣ Fire erupted and continued as gas was supplying the fuel

Watermill, NY Incident

- ▣ 2 gas workers who happened to be working in area heard the event, rushed to scene and shut off the curb valve prior to firefighters arriving
- ▣ Inside demolition was occurring within basement
- ▣ Operator piping extended into the interior of basement and gas meter was located inside
- ▣ Determined damage occurred upon the gas piping upstream of the meter.

Watermill, NY Incident

- ▣ Demolition permit was listed as “pending”
- ▣ Structure demolition permits in New Hampshire require the Gas Operator to sign off on the demolition permit signifying gas disconnected and other utilities disconnected
- ▣ Does interior demolition require permitting in your jurisdictions?
- ▣ Have you looked into this? Do you require confirmation of all demolitions?

Watermill, NY Incident

- ▣ The Large Operator did not follow its “Meter Turn Off (Lock) Procedure”
- ▣ The Large Operator was using its “Soft Off Policy”
- ▣ No admission of liability but will incur shareholder funding to:
- ▣ \$500,000 civil penalty in educating smaller contracting community in renovations, increase public awareness
- ▣ Training CSRs on inactive accounts
- ▣ \$1,498,000 in an excess flow valve enhancement program

Watermill, NY Incident



Watermill, NY Incident



Watermill, NY Incident



Watermill, NY Incident



Watermill, NY Incident



Watermill, NY Incident

1/2" Service was
inserted into 3/4"
shown outside front
wall



Watermill, NY Incident

Melted steel to
plastic transition
fitting



Watermill, NY Incident

Melted steel to
plastic transition
fitting inside wall



Watermill, NY Incident

Inside service
and piping



192.727 (a)

- ▣ Subpart M - Maintenance
- ▣ § 192.727 Abandonment or Deactivation of Facilities
- ▣ (a) Each operator shall conduct abandonment or deactivation of pipelines in accordance with the requirements of this section.
- ▣ *Section here refers to 192.727 all parts*
- ▣ *Standard language*

192.727 (b)

- ▣ (b) Each pipeline abandoned in place must be disconnected from all sources and supplies of gas; purged of gas; in the case of offshore pipelines, filled with water or inert materials; and sealed at the ends. However, the pipeline need not be purged when the volume of gas is so small that there is no potential hazard.
- ▣ *Pipeline applies to service lines and mains*
- ▣ *727 (b) applies to abandoned pipelines not deactivated*

192.727 (b)

- ▣ (b) Each pipeline abandoned in place must be disconnected from all sources and supplies of gas; purged of gas; in the case of offshore pipelines, filled with water or inert materials; and sealed at the ends. However, the pipeline need not be purged when the volume of gas is so small that there is no potential hazard.
- ▣ *4 requirements: (1) disconnected, (2) purged, (3) filled with inert materials and (4) sealed.*

192.727 (c)

- ▣ (c) Except for service lines, each inactive pipeline that is not being maintained under this part must be disconnected from all sources and supplies of gas; purged of gas; in the case of offshore pipelines, filled with water or inert materials; and sealed at the ends. However, the pipeline need not be purged when the volume of gas is so small that there is no potential hazard.
- ▣ *This applies to inactive mains that are no longer being maintained*
- ▣ *Same 4 requirements: (1) disconnected, (2) purged, (3) filled with inert materials and (4) sealed.*
- ▣ *This does not apply to abandonments*
- ▣ *This does not apply to service lines thus not the focus of this presentation*

192.727 (d)

- ▣ (d) Whenever service to a customer is discontinued, one of the following must be complied with:
- ▣ (1) The valve that is closed to prevent the flow of gas to the customer must be provided with a locking device or other means designed to prevent the opening of the valve by persons other than those authorized by the operator.
- ▣ (2) A mechanical device or fitting that will prevent the flow of gas must be installed in the service line or in the meter assembly.
- ▣ (3) The customer's piping must be physically disconnected from the gas supply and the open pipe ends sealed.

192.727 (d)

- ▣ *727 (d) applies to deactivated services*
- ▣ *Does not apply to abandoned services*
- ▣ *Does not apply to mains*
- ▣ *Must do at least 1 of 3 options*
- ▣ *The operator may do more than 3 options*

Soft Off in NH

- ▣ Commission approved June 2015
- ▣ The Soft Off Policy applies only to Largest Operator
- ▣ No Safety Division Input
- ▣ Policy based on Cost of Gas proceedings and Consumer Affairs input
- ▣ Policy Goal to reduce cost of sending out technicians twice

Soft Off in NH

- ▣ Soft Offs do not apply to commercial accounts
- ▣ Soft Offs only apply to residential accounts with
 - ▣ 1) an outside meter
 - ▣ 2) No gas appliances can be removed
- ▣ Soft Offs do not apply to Residential customers that:
 - ▣ a) Have inside meters
 - ▣ b) Are removing at least 1 appliance
 - ▣ c) Indicate gas will be off for extended period
 - ▣ d) Indicate premise will be demolished

Soft Off in NH

- ▣ Soft Off duration can last up to 30 days after termination request
- ▣ After 30 days meter shut off request is generated
- ▣ Meter Shut offs can take place year round including the winter period

Soft Off in NH

- ▣ Our second largest operator has almost identical Soft Off Procedures that predate those that are listed in previous slide

Soft Off in Region

- ▣ What is the appropriate balance between customer convenience and safety?
- ▣ Should there be any balance or should safety always take priority in every instance?
- ▣ Do you have a copy of your Company's soft off policy?
- ▣ Who is responsible for updates?

For other Soft Off Incidents see other states such as Ohio, Nevada