LD1473 An Act to Require Utilities to Monitor Meters for Natural Gas Leaks

Joint Standing Committee on Energy, Utilities and Technology

Opposition Testimony, April 24, 2025

Good afternoon, Senate Chair Mark Lawrence, House Chair Melanie Sachs and members of the Energy, Utilities and Technology Committee, I am Mark Gallagher, and I offer testimony on behalf of Summit Natural Gas of Maine.

Summit Natural Gas of Maine delivers mostly conventional energy, providing Mainers with a cost-effective way to warm their homes and fuel their businesses. We are taking steps and preparing to transition Summit's Maine distribution system. Through the innovation of PEAKS Renewables, a subsidiary of Summit Natural Gas of Maine, we were one of the first gas utilities in the country to enable customers to offset their energy usage with renewable natural gas credits.

Safety is the cornerstone of everything we do. Summit Natural Gas of Maine began operations in 2013, utilizing all new pipe infrastructure at the time. The expected lifespan of this piping is upward of 50 years, ensuring a reliable foundation for long-term service.

While we agree that systems must be maintained to the highest degree and that any discrepancy is addressed immediately, it is important to underscore that this is already mandated through the Maine Public Utilities Commission (MPUC). This bill is redundant for the following reasons:

- 1. Pipeline & Hazardous Materials Safety Administration (PHMSA) regulates federal pipeline regulations. Summit Natural Gas of Maine is subject to these regulations in relation to its construction and operations and maintenance activities. PHMSA rules also address pipeline integrity requirements.
- The MPUC already requires leak detection surveys and meter testing. <u>The MPUC is in</u> <u>compliance with PHMSA regulations that require that the Local Distribution Company</u> (LDC) maintain records of testing and repairs for 10 years and provide those records to <u>the PUC upon request;</u>
- 3. The MPUC gas safety division is designated by PHMSA to enforce these rules.
- 4. The 7100 report is a report required by PHMSA that annually reports on the facilities operated by the utility, total number of services, miles of main etc. It also includes a leak number of leaks. Every gas company has to submit it, every year. https://www.phmsa.dot.gov/forms/gas-distribution-annual-report-form-f71001-1

Leaks at the meter at the house are rare and miniscule. In the event a leak is detected, the meter is pulled from service and repaired. Summit files a monthly Leak Response and Odorant report with the PUC. Additionally, Summit files a yearly Statistical Meter Test Program with the MPUC.

Summit Natural Gas of Maine uses advance leak detection that goes beyond compliance. For example, the Piccaro vehicle detects natural gas leaks by thoroughly reviewing the area at least three times. This cutting-edge technology is equipped with advanced leak detection capabilities. The vehicle enhances the safety and reliability of Summit Natural Gas of Maine system while also reducing the potential direct emissions from the pipeline network.

Pipeline safety is essential. It is already regulated on the federal and state level. LD1473 is redundant and can only lead to additional costs that burden ratepayers. I respectfully urge the Ought Not To Pass since this is already happening and working well within the state of Maine.

Thank you for your careful consideration.

# REFERENCE:

# 5. PHMSA Leakage Survey requirements are set forth in Section 192.723

## § 192.723 Distribution systems: Leakage surveys.

(a) Each <u>operator</u> of a distribution system shall conduct periodic leakage surveys in accordance with this section.

(b) The type and scope of the leakage control program must be determined by the nature of the operations and the local conditions, but it must meet the following minimum requirements:

(1) A leakage survey with leak detector equipment must be conducted in business districts, including tests of the atmosphere in gas, electric, telephone, sewer, and water system manholes, at cracks in pavement and sidewalks, and at other locations providing an opportunity for finding gas leaks, at intervals not exceeding 15 months, but at least once each calendar year.

(2) A leakage survey with leak detector equipment must be conducted outside business districts as frequently as necessary, but at least once every 5 calendar years at intervals not exceeding 63 months. However, for cathodically unprotected <u>distribution</u> lines subject to § <u>192.465(e)</u> on which <u>electrical surveys</u> for corrosion are impractical, a leakage survey must be conducted at least once every 3 calendar years at intervals not exceeding 39 months.

## 5. PUC Chapter 440 Section 3 governs meter performance and accuracy

B. Meter Performance and Accuracy

## 1. Utility Testing

All meters shall be tested to ensure and document compliance with the applicable performance and accuracy standards. The testing may be performed by the gas utility, or by a qualified third party retained by the gas utility, using testing equipment and processes that meet the applicable codes, standards, and requirements or otherwise conform to standard utility practice. The gas utility's testing protocols shall include (i) testing and verification by the meter manufacturer for each new meter before it is placed in service, (ii) testing by the gas utility, or a third party on behalf of the gas utility, of any existing meters before redeployment or reuse of the meter, and(iii) testing upon request of a customer, and (iv) periodic testing in accordance with the gas utility's Terms and Conditions.