



**Philadelphia Gas Works’ Response to the 2022 PAPUC Winter Reliability Data Request**

The following is Philadelphia Gas Works’ (“PGW” or the “Company”) response to the 2022 Pennsylvania Public Utility Commission’s (“Commission”) Winter Reliability Data Request. The text of the Commission’s Data Request is below. It is followed by PGW’s response in the next section.

1. Winter Readiness

Provide a summary of your company’s winter preventative maintenance program(s) which directly facilitate safe and reliable service over the heating season. Provide a description of any potential best practices including any new leak detection programs.

2. Employee Safety/Readiness

Provide a description of any procedures and/or training protocols your company uses to ensure personnel are adequately prepared and staffed for the heating season. Also, Provide a summary of your organization’s participation in emergency preparedness exercises over the past 12 months, whether internal or with external stakeholders. Describe the general scenarios simulated.

3. Communications Outreach

Provide a summary of the communications procedures your company has in place to effectively manage potential crisis events during the heating season. Include a description of outreach activities and any exercises done with local and regional emergency management organizations to coordinate emergency response procedures.



4. Gas Supply and Planning

Describe the methods and protocols your company uses to ensure reliable gas delivery at least cost during the heating season. Include how your company plans to manage peak demand days, capacity planning, interstate supply coordination, storage, curtailment, and weather forecasting. Provide a description of any best practices, including communications and coordination with natural gas suppliers and interruptible service customers on your system ahead of anticipated peak usage.

5. Natural Gas Demand from Electric Generators

Provide your company's view on any potential concerns about fuel availability over the winter heating season given the increased demand for natural gas as an electric generation fuel source and possible increased use of firm gas transportation service. Include any new protocols or plans your company may have in place to manage this new dynamic.

***PGW'S RESPONSE:***

**1. Winter Readiness**

*PGW submits the following summary of its winter preventive maintenance programs in response to the 2022 PUC Winter Reliability Data Request. The programs summarized directly facilitate safe and reliable service during the heating season.*

- The PGW Gas Processing Department's Preventative Maintenance Program ("PMP") uses a Work Management System to ensure that all process heaters, boilers, vaporizers, valves, safeties, and auxiliary systems are inspected, calibrated, and tested



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before being put into service for winter operations at PGW's LNG gas plants. Using the PMP, PGW manages resources to assure that they will provide safe reliable service during the winter months.

- The Gas Processing Department maintains an Emergency Snow Plan. The Gas Emergency Snow Plan coordinates decision making and personnel for the Richmond and Passyunk LNG plants under the direction of a Snow Emergency Coordinator. Its purpose is to minimize the effects of a heavy snowfall on plant operations.
- The Gas Processing Department conducts readiness testing on the vaporizers at the Richmond and Passyunk LNG plants in preparation for winter operations.
- The Winter Load Operating Group ("WLOG") meets periodically throughout the year to review design hour load requirements for the high-pressure distribution system. The WLOG reviews plans for various operating scenarios including maximum load or system failure scenarios. The WLOG makes contingency plans to meet customer load requirements for the various system failure scenarios. The WLOG also reviews and discusses any changes made during the year to the distribution system
- With respect to winter weather and forecasting, PGW receives a 5-week forecast that is updated weekly and a 7-day forecast that is updated 3 times daily.
- PGW's Winter Manpower Management is a five-phase Emergency Response and Manpower Allocation plan which directs allocation of available resources, field crew assignments, and field technicians to maximize the efficient use of all these resources to meet the 24-hour, 7 day a week distribution system maintenance and reliability demands.
- PGW has a robust, in-house, fully staffed Damage Prevention program that continues its operation through the winter.



- PGW has an industry best practices leak survey program in place that is supplemented by additional survey programs during the winter months (See attached Distribution Department Bulletin #127). Starting on December 1st and continuing through March 31st of each year, PGW performs a general winter patrol by conducting an Optical Methane Detection (“OMD”) mobile leakage survey of all areas in which there is a high concentration of cast iron main. PGW also performs a prudent winter Frost Patrol by surveying the top 600 blocks ranked by the Main Replacement and Prioritization (“MRP”) model every twenty working days following a “Frost event”. Additionally, all 12” cast iron mains operating at 10-35 psig throughout the city undergo a leak survey by OMD once every two months during the winter period.
- PGW’s Fleet Operations Department activates its protocol for installing snow chains/cables on specified emergency response and other vehicles once snow is predicted to accumulate to four or more inches.
- PGW’s Fleet Operations Department has a mandatory winter detail schedule for PGW’s Fleet mechanics that goes into effect December 5th through March 31st, which provides for coverage 24/7 to support all PGW departments that use PGW vehicles.

## **2. Employee Safety/Readiness**

*Below is a brief description of procedures and training that PGW uses to ensure that personnel are adequately prepared and the enterprise is adequately staffed for the heating season.*

- **Field Personnel Safety** — Prior to the heating season PGW conducts all-day annual training and safety schools focusing on worker and public safety policies and procedures.



- **Emergency Dispatch** — PGW has a five-phase Emergency Response and Manpower Allocation plan which assures proper allocation of resources, staff, field technicians, and work crews to meet the 24-hour, 7 day a week distribution system demands.
- **Gas Processing Department Personnel Training** — Personnel are trained initially upon hire and given re-fresher training annually for PGW safety protocols. There also is training throughout the year to comply with CFR 192 and 193.
- **Customer Service Representative (“CSR”) Refresher Training** — PGW’s Customer Affairs Department conducts the following initial and annual refresher training for its frontline staff who operate the PGW Call Center:
  - **Emergency Training** — This annual refresher training reviews the proper procedure for managing leak and emergency calls and how and when to issue a trouble order to Field Operations.
  - **Customer Responsibility Program (“CRP”)** — This training entails staff being refreshed on when and how to enroll a customer into PGW’s low income program, the Customer Responsibility Program. CRP provides customers with a consistent, discounted bill each month to help them better afford their bills and keep gas service on.
  - **High Bill Refresher Training** — To prepare for the heating season, CSRs are refreshed on how to properly review usage patterns and explain customer billing.
  - **Payment Arrangement Refresher Training**- This annual training refreshes CSRs on how to determine the most appropriate restoration and payment arrangement terms for customers.
- ***A summary of PGW’s participation in emergency preparedness exercises over the past 12 months***



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- A table top review of the Peak Winter Operations Leak Classification Procedure was performed to simulate extreme winter weather conditions and the process to safely utilize manpower and resources throughout the emergency period.
- The emergency shut down of a Distribution main is simulated during Annual Safety School utilizing grease off equipment. This scenario may generally be required due to large fires, wash outs, excavation damages, or explosions.
- Participate in the City of Philadelphia Office of Emergency Management “Winter Weather Preparedness Workshop”.
- PGW participated in the PA Public Utility Commission’s Black Sky Steering Committee meeting, this meeting focused on cybersecurity and the interdependencies of critical sectors and liquid fuels.

### 3. Communications Outreach

*Following is a summary of the communications procedures that PGW has in place to effectively manage potential crisis events during the heating season. It includes a description of outreach activities and any exercises done with local and regional emergency management organizations to coordinate emergency response procedures.*

- **In the event of an emergency** — PGW makes communication a priority and activates its Crisis Communications Plan, which includes:
  - Notifying key personnel that a potential crisis is in effect, assigning short-term tasks and setting up an initial briefing session;
  - Assigning trained personnel to gather and share relevant information with employees, customers and additional audiences via the appropriate internal and external communications channels;



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- Working collaboratively and effectively through PGW's Corporate Communications & External Affairs and various PGW operating departments via well-defined roles and responsibilities to identify available and needed resources, and utilize the same;
  - Assigning personnel to communicate the variety of communication options through which internal and external audiences can gather information from PGW, share information with PGW and report their concerns to PGW;
  - Monitoring the coordination and content of all communications activities with internal and external audiences by the communications team;
  - Sharing information with audiences on how PGW is responding to the potential crisis, as warranted;
  - Utilizing relationships with local officials, community groups and other entities to share information at the community level;
  - Postponing planned communications activities to ensure our communications channels are devoted to the potential crisis and available to audiences.
- **Additional Emergency Communications** — communications staff is available 24-hours a day to respond to media inquiries. State legislators and city council members in our distribution area receive correspondence along with email follow-up in the event of an emergency. The company's External Affairs Team meets with elected officials and attends community events throughout the city to share outreach messages on a routine basis.
  - **Customer Communications** — Every PGW customer receives our monthly informational bill newsletter *The Good Gas News* which shares important safety information and contact numbers. *The Good Gas News* is posted on the company website [www.pgworks.com](http://www.pgworks.com) each month and delivered electronically to e-bill



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customers. Our website also features a dedicated section titled Safety & Reliability that features gas leak safety information, weatherization tools and instructions on how to contact PGW in the event of an emergency (also available in Spanish). The home page of the website can also post important customer messages, when necessary.

- **Philadelphia Resident Emergency Communications** — In the event of an emergency, PGW makes communication a priority by offering a variety of communication options to customers and Philadelphia residents. Customers can contact the Customer Call Center and the automated Interactive Voice Response phone system to report an odor or suspicion of a gas leak 24 hours a day, 7 days a week.
- **Employee Communications** — PGW uses a mobile and computer-based notification system which allows PGW to contact all employees quickly and efficiently with a consistent message. This notification system can contact employees at home, work, by text message, cell phone or through email.
- **First Responder Communications** — PGW works with and communicates closely with the Philadelphia Fire Department and Philadelphia Police Department on training and response procedures surrounding the response to emergency gas leaks, water main breaks, Carbon Monoxide, Fire and Foreign Odor reports.
- **Emergency Management Outreach and Exercise Activities** — PGW assists the Philadelphia Office of Emergency Management (“OEM”) with both their Excessive Heat and Severe Winter Weather response plans, and is coordinating with OEM on evacuation planning. PGW has a representative working with the City of Philadelphia Critical Infrastructure Working Group. This representative also Co-Chairs the Southeastern Pennsylvania Tasks Force Infrastructure Working Group. PGW attends the Delaware Valley Intelligence Center’s (“DVIC”) briefings and receives real time updates from the DVIC as needed. PGW works closely with and participated in





exercises with the U.S. Department of Homeland Security Protective Services Division on several major events.

- **PUC’s Cold Weather Survey** — In October, PGW began conducting its annual Cold Weather Survey. The annual Cold Weather Survey consists of PGW surveying all of its residential customers who were terminated during the year, and the service is still off. As part of the survey, PGW makes four attempts (one in person) to provide terminated customers with information on how they can restore service. PGW also surveys how the customer plans on heating their home during the winter season. The survey results are then submitted to the PUC by no later than December 15th. A resurvey is also conducted in January.

**LIHEAP and CRISIS Outreach** — Each year PGW conducts various forms of outreach to customers who may qualify to receive LIHEAP and/or CRISIS grants.

#### 4. Gas Supply and Planning

*Below is a description of methods and protocols that PGW uses to ensure reliable natural gas delivery at least cost during the heating season. Descriptions of methods to manage peak demand days, capacity planning and interstate supply coordination, storage, curtailment and weather forecasting are included.*

- **Peak Design Day Evaluation** — PGW models project customer gas requirements for a design (coldest) hour, design day and design winter. These gas requirements form the basis for capacity commitments for pipeline supply, storage, and transportation contracting.
- **System Supply Requirement Review** — PGW’s supply portfolio is split into four distinct categories. First, the Company has entered into long-term gas deals. These long-term gas deal arrangements provide gas supply that fills approximately Twenty-nine percent (29%) of PGW's daily firm transportation entitlements. Second, the



Company enters into winter-only supply contracts. These winter-only supply arrangements provide gas supply that fills approximately eleven percent (11%) of PGW's daily firm transportation entitlements. Third, an additional twenty-six percent (26%) of PGW's gas supply portfolio is purchased on a one hundred percent gas daily pricing basis that allows for daily volumetric changes. Fourth, the company utilizes one unbundled pipeline storage service along with five bundled storages and our LNG facilities, as an additional source of supply.

- ***Interstate Supply and Capacity Arrangements*** — Enbridge and Williams pipelines represent the only interstate pipeline facilities with physical connections to the PGW service territory. These supply contracts also recognize pipeline receipt and delivery rights. By sourcing supply in this manner, PGW not only ensures security of supply from the pipelines, but also can take advantage of varying basis differentiated pricing in the market.
- ***Utility and Contract Storage Inventory Delivery Plans*** — PGW utilizes bundled storage and LNG to meet operational requirements and to accomplish other cost saving initiatives.
- ***Emergency Curtailment Plans*** — PGW utilizes a three phase Emergency Curtailment Plan, first Contractual Load Shedding, next Voluntary Usage Reductions and last Mandatory Usage Reductions.
- ***Weather and Forecasting*** — PGW receives a 5-week forecast that is updated weekly and a 7-day forecast that is updated 3 times daily.
- ***Communications and Coordination with natural gas suppliers*** — For its third party suppliers (Choice Program), PGW utilizes the Choice Electronic Bulletin Board (“EBB”) to send message to its Choice suppliers in order to make sure they are aware of any anomalies which may affect their gas deliveries to the PGW City Gate. These could be weather related or pipeline related. To date PGW has not had to interrupt its IT suppliers or FT suppliers.



**5. Natural Gas Demand from Electric Generators**

*Following is PGW's response to the PUC question on Natural Gas Demand from Electric Generators.*

Currently within the Philadelphia Gas Works' service territory there is one electric generation facility that generates electricity for sale that uses natural gas as its fuel source. This facility nominates purchases and transports gas to the city gate using its own contracts. PGW takes the gas at the city gate and transports this gas to the electric generation facility on PGW's gas distribution system. This customer's natural gas nominations and purchases are independent of the PGW contracts for natural gas purchases for its other customers and will have no effect on PGW's fuel availability or PGW's ability to deliver gas to our firm customers even under design conditions.