

Herman Oil & Gas, LLC

135 Harris Road, Butler, PA 16002 PH:724-841-0341

**Re: Docket No. M-2024-3050313 TUS Data Request Addressed to Public Utilities
Distributing Natural Gas Concerning Plastic Pipe Data – 2025**

Dear Secretary Homsher:

Herman Oil & Gas is in receipt of the Pennsylvania Public Utility Commission's letter dated December 16, 2025, regarding the above-referenced data request for a catalog of all plastic pipelines and other plastic components in our natural gas distribution system.

Herman Oil & Gas does not currently maintain a comprehensive catalog of plastic pipelines and other plastic components that includes the requested quantities (footage or number/quantity), brand, and age for every item in our system.

Pursuant to the Commission's instructions in the data request letter, Herman Oil & Gas provides the following plan to identify and catalog the amount and type of plastic components within our distribution system, along with an explanation of how we differentiate between older, at-risk plastic components and newer ones in our Distribution Integrity Management Program (DIMP).

Plan to Identify and Catalog Plastic Components Herman Oil & Gas will implement a structured, 10-year plan to develop and maintain a complete catalog of plastic pipelines and components. The plan is divided into the following phases:

1. **Records Review Phase (Years 1–3):** We will conduct a comprehensive review of all available historical records, as-built drawings, material purchase orders, installation logs, and maintenance records.
2. **GIS Integration Phase (Years 4–6):** All plastic pipe segments and components identified during the records review will be incorporated or updated in our Geographic Information System (GIS) with attributes for material type, brand (where documented), approximate installation year/age, and location.
3. **Field Verification Phase (Years 7–9):** For any segments or components where records remain incomplete or absent, we will execute a targeted, risk-prioritized field verification program. This will utilize non-destructive testing, sample excavations, and visual identification during routine maintenance and leak surveys, beginning in high-consequence areas and progressing system-wide.
4. **Completion and Ongoing Maintenance (Year 10 and Beyond):** By the end of Year 10, the initial catalog will be fully populated. Thereafter, the inventory will be maintained as a living database with annual reviews and updates tied to new construction, repairs, and replacements.

Differentiation of Older, At-Risk vs. Newer Plastic Components in DIMP The following methods will be written into the new DIMP plan:

- Older, at-risk plastic components (primarily Aldyl-A and other pre-1980s plastics known for susceptibility to slow crack growth and joint failures) will be assigned elevated risk scores in our DIMP threat identification and risk assessment processes. These will be prioritized for replacement based on leak survey data, pressure test results, and industry failure statistics.
- Newer plastic components (primarily modern high-density polyethylene such as PE4710 or equivalent, installed after 2000) will receive lower risk scores due to improved material properties, better resistance to environmental stress cracking, and documented performance data.

These methods will be formally documented in the revised DIMP and will continue to be refined as new data becomes available from the cataloging effort described above.

The facts set forth in this response are true and correct to the best of my knowledge, information, and belief.

I, Andrew Smith, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Respectfully submitted,

Andrew Smith, President

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