

State of North Carolina
North Carolina Utilities Commission

Docket No. G-40, Sub 142

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION:

In the Matter of
Frontier Natural Gas Company – Violations of Title 49
Code of Federal Regulations,
Part 192, Subpart O

DIRECT TESTIMONY

OF

RODNEY MYERS

October 4, 2017

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Oct 04 2017

1 **Q. Please state your name and business address.**

2 A. My name is Rodney Myers. My business address is 6000 Fairview Road,
3 Suite 200, Charlotte, NC, 28210

4 **Q. By whom and in what capacity are you employed?**

5 A. I am employed by AECOM as its Associate Vice President, Energy and
6 Infrastructure.

7 **Q. Please describe your educational and professional background.**

8 A. I have been working in the natural gas industry for over 28 years,
9 predominantly in utility engineering and operations. My educational
10 background includes a Bachelor of Science in Mechanical Engineering
11 from North Carolina State University, Raleigh, NC, and a Masters of
12 Business Administration from Queens University, Charlotte, NC. I am
13 also a registered Professional Engineer.

14 **Q. Have you previously testified before the North Carolina Utilities**
15 **Commission or any other regulatory authority?**

16 A. Yes, I provided written and oral engineering testimony for PSNC Energy
17 projects to expand natural gas service to unserved counties in western NC
18 *(dates uncertain, service to Cherokee, Bryson City, etc and possibly*
19 *another expansion project to the county north of Buncombe)*. In addition,
20 I have developed engineering testimony and fulfilled data requests for
21 PNSC Energy, NCNG, ENCNG and Piedmont Natural Gas.

22 **Q. Do you hold any positions in professional or trade associations?**

1 A. I have previously served on the American Gas Association (AGA)
2 Managing Committee and other committees, Interstate Natural Gas
3 Association of America (INGAA) Pipeline Safety Committee, as a Board
4 member of Gas Technology Institute – Operations Technology
5 Development (GTI-OTD), as educational Chair of the Geospatial
6 Information Technology Association (GITA), as educational Chair of
7 Professional Engineers of North Carolina (PENC), and on various other
8 association committees.

9 **Q. What is the purpose of your testimony in this proceeding?**

10 A. The purpose of this testimony is to advise the Commission as to the work
11 AECOM has been hired to do for Frontier Natural Gas Company with
12 regard to achieving an updated assessment of Frontier's system and what
13 steps are necessary and appropriate to bring Frontier's system and its
14 integrity management plans into full compliance with Title 49 Code of
15 Federal Regulations, Part 192, Subpart O to implement and maintain its
16 integrity management plan.

17 **Q. Can you please describe the circumstances under which AECOM was**
18 **retained by Frontier and scope of work you have been asked to work**
19 **on?**

20 A. AECOM was retained on September 11, 2017 to provide engineering and
21 consulting services, primarily focused on compliance with TIMP and
22 other pipeline safety programs. At the end of the engagement, AECOM

1 will provide an assessment report, framework and plan to achieve full
2 compliance.

3 **Q. Can you please describe what process AECOM has proposed to**
4 **Frontier to achieve the goal of full compliance of Frontier's Integrity**
5 **Management Plan and system with applicable PHMSA regulations?**

6 A. AECOM has proposed the following approach:

7 (i) Audit Frontier compliance with existing TIMP plan. This is
8 underway. Recommend assessment approaches based on applicable
9 threats and associated risks. This will include reestablishment of baseline
10 assessments where necessary and may include additional activities above
11 and beyond those required for typical reassessment, as applicable, to
12 bring the entire transmission system back into regulatory compliance.

13 (ii) Audit Frontier compliance with 49 CFR Part 192 regulations.
14 Review all of Frontier's O&M, OQ, Emergency Response and Integrity
15 Management programs, processes and procedures and work with them to
16 make sure they are up to date and address any regulatory changes,
17 reinterpretations, best practices and lessons learned since the IM
18 regulations went into effect in 2004.

19 (iii) Inventory, scan and index asset and compliance records. This is
20 underway.

21 (iv) Verify Maximum Allowable Operating Pressure (MAOP) for
22 transmission lines.

1 (v) Evaluate processes, systems and other resources for achieving
2 compliance with TIMP and other pipeline safety regulations.

3 (vi) AECOM will provide an assessment report and recommend a
4 framework for achieving compliance.

5 (vii) Develop and implement a Pipeline Safety Management System,
6 consistent with the best practices in API 1173.

7 (viii) Assist Frontier with the implementation of recommendations,
8 recordkeeping, management and data integration and analysis efforts that
9 will enable Frontier to maintain full regulatory compliance as well as safe
10 and efficient system operations.

11 **Q. Has AECOM started this process and what does the schedule look**
12 **like for completing the process?**

13 A. Yes. We have begun the process of reviewing Frontier's integrity
14 programs and assisting them with integrity assessment recommendations
15 and logistics. Procedure review, modifications and implementation will
16 take several months, and complete assessment activities, including any
17 anomaly investigation and remediation, could take up to two years to
18 complete, allowing for permitting, additional easement acquisition,
19 system studies and modifications, contingency planning, heating season
20 stoppage of field activities, etc. A more detailed schedule with
21 milestones identified will be developed as part of our scoping activities
22 due by the end of January, 2018.
23

1 **Q. Have you provided any specific timelines and/or budgets to Frontier**
2 **for the completion of the work necessary to bring Frontier into full**
3 **compliance with PHMSA regulations?**

4 A. Yes, preliminary timelines and budgets have been discussed and will be
5 developed in greater detail by the end of January, 2018. Scoping has not
6 been sufficiently developed to date to provide detailed estimates of cost
7 and schedule.

8 **Q. Based on your current knowledge regarding the Frontier system do**
9 **you have any knowledge that would suggest to you that Frontier's gas**
10 **transmission system is currently unsafe?**

11 A. Audits and assessments outlined above have recently begun, so I have
12 limited knowledge of Frontier's system, compliance programs, and other
13 operating history. However, I am unaware of any information that would
14 indicate that the Frontier system is unsafe.

15 **Q. If Frontier and AECOM follow the process you have discussed above**
16 **will this lead to compliance of Frontier's integrity management plan**
17 **and system with PHMSA regulations?**

18 A. Yes.

19 **Q. Does this conclude your direct testimony?**

20 A. Yes it does.
21