

# The Commonwealth of Massachusetts

## DEPARTMENT OF PUBLIC UTILITIES

### MEMORANDUM

TO: Service List – D.P.U. 24-GSEP-01 – 24-GSEP-06

FROM: Elyssa Klein, Hearing Officer

RE: GSEP Risk Assessment Working Group

DATE: May 15, 2025

CC: Patrick A. Leeman, Pipeline Safety Division  
Mark D. Marini, Secretary

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#### I. INTRODUCTION

On April 30, 2025, the Department of Public Utilities (“Department”) issued Orders in D.P.U. 24-GSEP-01 through D.P.U. 24-GSEP-06 adjudicating each local distribution companies’ (“LDCs”) petition for approval of its 2025 Gas System Enhancement Plans (“GSEP”), filed pursuant to G.L. c. 164, § 145, for rates effective May 1, 2025.<sup>1</sup> In the Orders, the Department established the GSEP Risk Assessment Working Group to be led by the Department’s Pipeline Safety Division. The GSEP Risk Assessment Working group is charged with facilitating development of a more comprehensive risk-prioritization strategy and improving the transparency and consistency of risk prioritization within GSEP filings. In addition to convening the GSEP Risk Assessment Working Group, the Orders require the LDCs to demonstrate that they considered the feasibility of advanced leak repair and relining

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<sup>1</sup> The Department docketed the LDCs’ petitions as follows: Fitchburg Gas and Electric Light Company (D.P.U. 24-GSEP-01); The Berkshire Gas Company (D.P.U. 24-GSEP-02); Boston Gas Company (D.P.U. 24-GSEP-03); Liberty Utilities (New England Natural Gas Company) Corp. (D.P.U. 24-GSEP-04); Eversource Gas Company of Massachusetts (D.P.U. 24-GSEP-05); and NSTAR Gas Company (D.P.U. 24-GSEP-06).

methods as an alternative to pipe replacement in addressing leak-prone pipe and extending the useful life of the asset.

Pursuant to the Orders, the Pipeline Safety Division will hold in-person technical sessions to develop proposed risk-based prioritization principles that will guide the 2026 GSEP filings this fall. The technical sessions will also consider available advanced leak repair and relining methods and examine the extent to which those technologies are, or should be, integrated into the LDCs' GSEP filings. The technical sessions and corresponding topics will be held at **the Department's office, One South Station, 3rd Floor, Boston, Massachusetts, on May 27, June 30, July 30, and August 20, 2025, beginning at 9 am** in accordance with the schedule outlined below. Agendas will be circulated in advance of each session.

## II. TECHNICAL SESSION TOPICS

The technical sessions will primarily consist of targeted technical discussions between individual LDCs and the Pipeline Safety Division, focusing on their current risk assessment models and how to prioritize the highest-risk pipe for remediation. Each technical session will focus on an LDC(s) individual GSEP program(s). As indicated in the Orders, the GSEP Risk Assessment Working Group can also include interested parties such as the Office of the Attorney General, other intervenors, and independent experts deemed qualified by the Pipeline Safety Division.

Additionally, the Department issues the attached information request to each LDC to ensure that these sessions remain focused and productive. The LDCs should file their responses to these information requests in their respective 2026 GSEP dockets. The Department has scheduled technical sessions for discussion of individual GSEP programs. The individual program discussions will address the following topics:

### 1. **How does the LDC rank risk?**

- a. Review of LDC's Risk Model and discussion of Sample Risk Score
- b. Compare DIMP Risk Model with GSEP Risk Analysis

### 2. **How does the LDC remediate risk?**

- a. Repair v. Replacement
  - i. Analysis
  - ii. CIPL technologies
- b. Non-Pipe Alternatives

### 3. **How does the LDC implement its GSEP program?**

- a. Risk Prioritization Considerations in Project Substitutions

- b. GSEP vs. GREC
- c. Stranded Assets

**4. How do the LDC's GSEP investments contribute to measurable reductions in system risk over time?**

**III. TECHNICAL SESSIONS SCHEDULE**

Technical sessions will be held on the following dates:

**May 27, 2025:**

9:00am-12:00pm: Boston Gas Company d/b/a National Grid Program Discussion  
1:00pm-4:00pm: Eversource Gas of Massachusetts and NSTAR Gas  
Company both d/b/a Eversource Energy Program Discussion

**June 30, 2025:**

9:00am-12:00pm: Liberty Utilities Program Discussion  
1:00pm-4:00pm: Fitchburg Gas and Electric Light Company d/b/a Unitil Program  
Discussion

**July 30, 2025:**

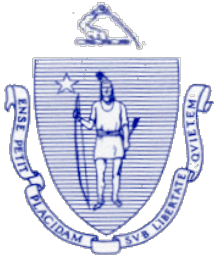
9:00am-12:00pm: The Berkshire Gas Company Program Discussion

**August 20, 2025:**

9:00am-1:00pm: Review of Common Findings and Discussion

**IV. CONCLUSION**

Parties wishing to participate in any of the technical sessions should email a participant list to Patrick A. Leeman, at [Patrick.A.Leeman@mass.gov](mailto:Patrick.A.Leeman@mass.gov) no later than five days prior to the technical session. If you have any questions regarding this procedural memorandum, please contact Hearing Officer Elyssa Klein, at [Elyssa.Klein@mass.gov](mailto:Elyssa.Klein@mass.gov).



THE COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF PUBLIC UTILITIES

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CHAIR

CECILE M. FRASER  
COMMISSIONER

STACI RUBIN  
COMMISSIONER

May 15, 2025

Re: GSEP Risk Assessment Working Group Information Request

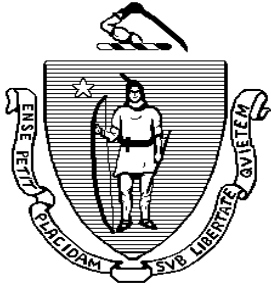
To: All Local Distribution Companies:

Enclosed please find the first set of information requests from the Department of Public Utilities to all Local Distribution Companies ("LDCs") regarding the above-captioned matter. Responses should be filed **on or before Wednesday, May 21, 2025**. Please file the responses **electronically only, in both PDF and Excel format**, to the email addresses noted in the instructions. If you have any questions, please feel free to contact me at Elyssa.Klein@mass.gov. Thank you for your attention to this matter.

Sincerely,

/s/  
Elyssa Klein  
Hearing Officer

Enclosure



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## DEPARTMENT OF PUBLIC UTILITIES

### FIRST SET OF INFORMATION REQUESTS FROM THE DEPARTMENT OF PUBLIC UTILITIES TO LOCAL DISTRIBUTION COMPANIES D.P.U. 25-GSEP-01 THROUGH D.P.U. 25-GSEP-06

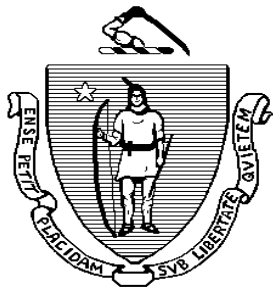
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Pursuant to 220 CMR 1.00, 69.00, and 100.00, the Department of Public Utilities ("Department") hereby submits to The Berkshire Gas Company; Fitchburg Gas & Electric Light Company d/b/a Unitil; Liberty Utilities (New England Natural Gas Company) Corp. d/b/a Liberty; Boston Gas Company d/b/a National Grid; and NSTAR Gas Company and Eversource Gas Company of Massachusetts each d/b/a Eversource Energy (collectively, the "LDCs") its First Set of Information Requests with respect to the GSEP Risk Analysis Working Group.

#### Instructions

The following instructions apply to this set of information requests and all subsequent information requests issued by the Department in this matter.

1. "Operator" or "Respondent" means each LDC, its officers, directors, employees, consultants, and attorneys.
2. "Operator Filing" or "Filing" means all the documents that the Operator filed in this matter.
3. "Employee" means any person who, on behalf of the Operator, performs an operation, maintenance, or emergency response function regulated by 49 C.F.R. Parts 190 through 199, and 220 CMR 69.00, and 101.00 through 115.00, including persons employed by the Operator, contractors engaged by the Operator, and persons employed by such contractors.
4. Each request should be answered in writing on a separate page with a recitation of the request, and with a reference to the request number, and the name of the person responsible for the answer.
5. Please do not wait for all answers to be completed before supplying answers, but instead provide the answers as they are completed.

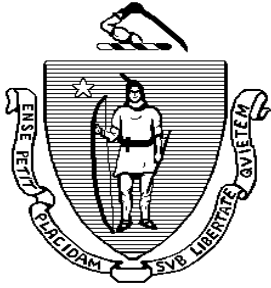


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6. These requests shall be deemed continuing so as to require further supplemental responses if the Operator or its witnesses receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
7. The phrase “provide complete and detailed documentation” means:

Provide all data, assumptions, and calculations on which the response relies; provide the source of and basis for all data and assumptions employed; include all studies, reports, and planning documents from which data, estimates, or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates; and provide and explain all supporting work papers. Where applicable, provide supporting work papers and calculations in the form of working Microsoft Excel spreadsheets with all cell references and formulae intact.
8. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, photo-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources, and other data compilations from which information can be obtained, and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
9. If the Operator finds that any of these requests is ambiguous, please notify the Department, so the request can be clarified prior to the preparation of a written response.
10. All documents should be submitted in electronic PDF and Excel format to the following:  
[Elyssa.Klein@mass.gov](mailto:Elyssa.Klein@mass.gov)  
[W.Jay.Lee@mass.gov](mailto:W.Jay.Lee@mass.gov)  
[Carol.Pieper@mass.gov](mailto:Carol.Pieper@mass.gov)  
[Richard.Enright@mass.gov](mailto:Richard.Enright@mass.gov)  
[Phillip.Denton@mass.gov](mailto:Phillip.Denton@mass.gov)  
[Emily.J.Hamrock@mass.gov](mailto:Emily.J.Hamrock@mass.gov)  
[Patrick.A.Leeman@mass.gov](mailto:Patrick.A.Leeman@mass.gov)



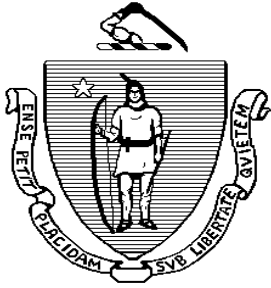
# The Commonwealth of Massachusetts

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## DEPARTMENT OF PUBLIC UTILITIES

[mark.marini@mass.gov](mailto:mark.marini@mass.gov)

[dpu.efiling@mass.gov](mailto:dpu.efiling@mass.gov)



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### Requests

IR 1-1

#### **DIMP Plan Overview**

- a) Provide the most recent copy of Operator's written DIMP Plan.
- b) Provide the most recent copy of Operator's procedure or written methodology for computing risk rankings.

IR 1-2

#### **Risk and Methods to Mitigate Risks**

- a) Provide a copy of, or an explanation of, the process employed by Operator to incorporate the risk model rankings into a projected pipeline replacement project list and how those risk rankings are verified/optimized.
- b) Provide a copy of Operator's current risk model/risk rankings.
- c) Provide a copy of, or an explanation of, Operator's process to identify and define pipe segments for risk analysis.
- d) Provide a copy of Operator's previously employed risk model as well as any previous versions of risk ranking methodology for the past two years.
- e) Provide a copy of, or an explanation of, the process used to determine how repair (e.g., clamps, muffs, linings, CISBOT) vs. replacement is determined, and if that process takes into consideration the risk ranking results.
- f) Does the current method used to mitigate or eliminate risks call for any accelerated actions ("A/As")?

IR 1-3

#### **Non-Pipeline Alternatives ("NPAs") in Lieu of Main Replacements**

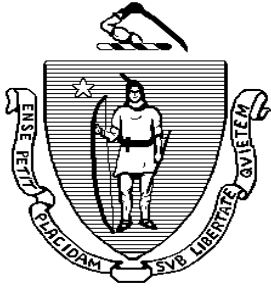
- a) Provide a copy of, or an explanation of, Operator's process that directs the analysis of non-pipeline alternatives in lieu of full pipeline replacements.
- b) Provide copies of any documents that include justifications for the Operator's decisions not to pursue non-pipeline alternatives for segments slated for replacement.

IR 1-4

#### **Advanced leak repair and relining methods/Technologies**

- a) Which currently available technologies have been considered as repair methods and how do these technologies figure into Operator's GSEP filing?





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- b) Provide any feasibility studies evaluating pipe repairs, linings, CISBOT repair, etc. and how pipe conditions and materials are matched with possible alternate repairs.
- c) Provide documentation on how pipeline repair and/or replacement considers expected pipeline life or possible future decommissioning (i.e., does the proposed intervention consider lifecycle costs and expected asset life, and the potential for future decommissioning).

IR 1-5

### **Municipal Paving Projects and Risk-based Prioritization for Main Replacements**

- a) Explain the process for considering and applying municipalities' advance paving notifications to planned replacement projects and the prioritization of projects (i.e., how do paving notifications affect the compilation of selected replacement segments, both on a pre-planned basis and on an emergent basis?). Provide copies of any related documentation.
- b) Describe the Operator's methods/rationale for choosing full replacement, where alternatives appear viable.

IR 1-6

### **Municipal Demographics**

- a) Explain how municipal demographics, such as income status, affect your data collection, data analysis, and risk prioritization related to GSEP planning and project selection.

Dated: May 15, 2025