

INGAA Voluntary Winter Preparation Commitments

INGAA members recognize the importance and value of dependable natural gas deliveries to our customers, especially during cold weather periods. Whether they seek affordable natural gas for home heating, to fuel essential power generation, or to support local industries, our customers count on interstate natural gas pipelines for reliable, firm natural gas storage and transportation.

To ensure safe and reliable service, INGAA members voluntarily undertake pre-winter preparation activities, as listed below. These activities are a baseline; the list does not reflect all activities that INGAA members may undertake as part of their winter preparations. Depending on the geographic region or staffing structure, some of these activities may not be appropriate for a given facility. Each year, INGAA verifies compliance with these commitments and regularly reviews and updates these activities, as necessary, based on key findings from recent weather events or industry best practices.

Operators' execution of these activities helps ensure existing natural gas pipeline systems can meet the contracted needs of our customers, especially during extreme weather events. Winter preparations alone, however, will not be sufficient to meet the United States' future energy needs. Ultimately, the country needs more natural gas infrastructure to meet the growing need for energy reliability.



Asset Reliability Assurance

1. Where feasible due to air permit requirements, periodically test-run compressors and other equipment that will be required during peak demand, to confirm their operation prior to the time of greatest need.
2. Test-start and safety-check dehydration equipment or, where dehydration equipment is absent, ensure compensating controls are in place to prepare equipment and components to prevent freezing.
3. Test gas heating and ancillary systems, such as instrument air, and add weatherproofing, where appropriate.
4. Adjust meter run sequencing or change orifice plates to accommodate winter market flow rates.
5. Evaluate the availability of critical equipment spares and inventory.
6. Verify snow removal plans, including marking critical objects along the snow removal path.
7. Check carbon monoxide, smoke, and gas detectors.
8. Review and update manual operating procedures.
9. Adjust ventilation systems for cold weather operations.
10. Test lighting at compressor stations, tank batteries, and brine disposal stations.
11. Check aboveground structures, including drains and gutters, for any obstructions.
12. Stage and test backup power generators, where needed.
13. In the event of a winter storm, where warranted and feasible, run compressors in the path of the winter storm before the onset of the event so ancillary systems remain warm.
14. Based on lessons learned from seasonal events, expand weatherization procedures to applicable operating regions not traditionally susceptible to winter weather events.



Stakeholder Coordination

1. Offer planned pre-winter meetings or communications for customers and ISOs/RTOs. Topics that may be covered include:
 - a. Potential capacity constraints during periods of high demand, including maintenance events;
 - b. Points where requests for transportation historically have exceeded capacity;
 - c. Conditions that might require the pipeline operator to issue critical notices (including Operational Flow Orders to require shippers to remain within contract tolerances) or that otherwise might impact shippers; and
 - d. Lessons learned from prior cold weather events.
2. Throughout winter, communicate with customers including, as applicable, producers, marketers, gas utilities, and electric generators, and with other stakeholders such as ISOs/RTOs.
3. Step up communication cadence, as needed, during extreme winter event.

Personnel Safety

1. Maintain the availability of winter safety gear and other critical supplies at key compressor stations.
2. Ensure operating plans include provisions for food and accommodation so that personnel have appropriate rest when continuous deployment is required.
3. Review on-site safety protocols and implement additional personnel safety measures, as needed.
4. Confirm that vehicles are operational, snow removal equipment is available, and routine maintenance of both vehicles and snow removal equipment is up to date.
5. Facilitate a continuous improvement cycle by reviewing and updating, as appropriate, safety protocols, access, and snow removal plans at least annually to mitigate challenges encountered.



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