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**AUG 22 2012**

August 21, 2012

Mr. Jeffrey D. Wiese  
Associate Administrator for Pipeline Safety  
U.S. Department of Transportation  
Pipeline and Hazardous Materials Safety Administration  
1200 New Jersey Ave., S.E.  
Washington, D.C. 20590

Dear Mr. Wiese,

Thank you for your June 13, 2012 letter. The Office of Regulatory Staff ("ORS") Pipeline Safety staff conducts on-site inspections of gas pipeline facilities and reviews safety records of operators to monitor their compliance with the safety regulations. We also conduct investigations of incidents to determine if there are any operator non-compliance issues that could have contributed to the incident. On all routine inspections and incident investigations, ORS takes enforcement action as appropriate to insure compliance and prevent recurrence of the same issues and future incidents.

In reference to higher risk pipelines, the ORS Pipeline Safety Staff has in place risk ranking matrices applicable to distribution pipeline systems, as well as transmission pipelines. These applications rank the pipelines based on leak history, age, operating pressures, total quantity in service, and other pertinent factors. Each jurisdictional pipeline facility is given a weighted numeric value and ranked from higher risk to lower risk. These rankings are then used to schedule inspection activity giving the higher risk facilities priority and then proceeding to lower risk facilities.

South Carolina has no remaining cast iron pipe gas systems. Operators in the state, as well as the Public Service Commission of South Carolina (the "Commission"), recognized this potential hazard many years ago. Operators developed plans and procedures, and then initiated action along with support from the Commission. South Carolina Electric & Gas Company ("SCE&G") began replacing its cast iron system in Charleston during 1978. It was completed in 1983. In Columbia, SCE&G started its replacement project in 1982 and completed the project in 1991. Piedmont Natural Gas Company began a cast iron replacement program in 1991. It was

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completed in 1996. Other smaller systems were replaced as plans and resources allowed. There is no longer any known natural gas cast iron piping in service in South Carolina.

We appreciate the PHMSA's continued interest and support of our agency's Pipeline Safety Program and the partnership we utilize to enforce safety regulation. We are also appreciative of the opportunity to respond to your request regarding cast iron piping operating in gas systems and replacement programs here in South Carolina. Please know that we are available to provide additional information upon your request.

Regards,



C. Dukes Scott