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Via E-File

January 14, 2021

B.C. Utilities Commission
Suite 410 - 900 Howe Street
Vancouver, BC V6Z 2N3

File No.: 4.2 (2021)

Attention: Marija Tresoglavic
Acting Commission Secretary

Dear Ms. Tresoglavic:

**Re: Pacific Northern Gas Ltd.
Application for a Certificate of Public Convenience and Necessity for the
Salvus to Galloway Gas Line Upgrade Project
Response to BCOAPO Information Request No. 1**

Accompanying, please find the response of Pacific Northern Gas Ltd. to the referenced information request.

Please direct any questions regarding the application to my attention.

Yours truly,

Original on file signed by:

Verlon G. Otto

Encl.

REQUESTOR NAME: BCOAPO *et al.*
INFORMATION REQUEST ROUND NO: #1
TO: PNG (N.E.) Ltd.
DATE: 17 December, 2020
APPLICATION NAME: CPCN for the Salvus to Galloway Gas Line Upgrade Project

1.0 Reference: Exhibit B-1, page 2

The referenced page states:

The ongoing challenges have been heightened by the vintage of the original pipeline system and the accepted design and construction specifics for this pipeline segment when originally constructed in 1968. This resulted in a higher risk of physical damage and failure, complexity of maintenance and repair, and existing and resultant less than desirable conditions that “must be lived with”. PNG has managed these conditions and outcomes as best possible in an environment with limited market opportunities for natural gas in the Prince Rupert area for 12 the past 30 years. The status quo, however, is no longer acceptable, resulting in the Project proposed herein.

- 1.1 Please provide (i) the original cost of the pipeline when constructed and (ii) the current net book value of the assets.

Response:

The original CPCN granted in December 1966 for the Western Transmission Gas Line from Summit Lake to Prince Rupert was for a capital cost of \$26 million.

As the original CPCN and pipeline date back over 50 years ago, PNG does not have detailed records to be able to explicitly identify the total cost of the portion of the Western Transmission Gas Line that is specifically related to the Salvus to Galloway section. The original fixed asset accounting records were all paper-based documents, and PNG has had numerous accounting system conversions over this time.

On a best-efforts basis, over the past 10 years PNG has attempted to reconstruct more detailed records on the pipeline. Based on these reconstructed records, PNG estimates that the value of the Salvus to Galloway section of the pipeline had an original cost of approximately \$7 million, which is considered reasonable based on the total capital cost of \$26 million for the entire Western Transmission Gas Line.

Similarly, because of the lack of detailed asset records, on a best-efforts basis PNG estimates that the net book value of the Salvus to Galloway section of the pipeline was \$8.7 million at December 31, 2019. This estimate was based on the estimated original 1969 cost of \$7 million, plus the value of all additions that were identified for the Salvus to Galloway section, and reduced by the value of all retirements that were determined to be associated with this section of the pipeline.

The following table provides a summary of the determination of the estimated net book value.

Original Cost of pipeline	MP 311 to MP 362			
	System betterment Additions	Retirements	Accumulated Depreciation	NBV at Dec.31, 2020
7,149,635	14,745,019	(1,097,254)	(12,075,624)	8,721,776

PNG further notes that changes in depreciation rates over the years due to a number of depreciation studies have also contributed to the challenge of creating this estimate of the net book value of the Salvus to Galloway section of the pipeline.

2.0 Reference: Exhibit B-1, page 3 (and 24)

The referenced page states:

Following a 20-plus year period where PNG deferred certain maintenance and integrity management practices in order to operate within an economic circumstance void of significant industrial customers, PNG must now look to undertake projects and investment that allow for the significant repair and upgrade of aged assets in order to safeguard the integrity and safety of its pipeline system. This is of utmost priority for the Salvus to Galloway pipeline segment that has been identified as being susceptible to high hazard and risk associated with threats such as corrosion, mechanical damage, and geohazards.

- 2.1 In PNG's view, if it hadn't "deferred certain maintenance and integrity management practices," would or could the remediating activities now proposed in the instant case have been mitigated, in terms of cost and scope, to some extent? If not, please explain why not.

Response:

PNG is of the view that had maintenance and integrity management practices on the Salvus to Galloway pipeline segment been more completely executed over the past 20-plus years, the cost and scope of the project activities proposed in the Application could have potentially been mitigated to some extent. However, this would be limited to incremental costs associated with repair quantities. This is because the high costs associated with the planning, logistics, and access to work areas, which are generally independent of the total number of repairs to be conducted, would be expected to remain relatively unchanged and in some instances would have been incurred multiple times over the past 20 years had previously deferred work been conducted.

A significant contributor to both cost and scope of the proposed Project and associated activities is the site remoteness, access and construction complexities, and the legacy of the original construction quality. As such, limiting the number of times the pipe is accessed can help reduce costs but must be weighed against any potential impacts to the reliable provision of gas service.

PNG believes it has maintained an appropriate balance between costs and reliability over the operation of the pipeline but believes that in order to continue the safe reliable operation of the pipeline the work proposed in the Project is required.

- 2.2 In general, if deferring maintenance and integrity practices does not increase the future cost of performing these activities later, then why wouldn't the utility defer them as a general practice?

Response:

In general, deferring maintenance and integrity practices does increase the future cost of performing the activities. The degree to which this is true is activity, asset, and location specific.

Generally, asset inspections, repairs, and other associated maintenance that are integrity based is to be done at a frequency and degree of completeness that ensures the safety of the asset(s). Deferring such activities needs to be done in consideration of the overall impacts and risk. As described in PNG's response to Question 2.1, the remoteness and cost of accessing the Salvus to Galloway section are significant cost drivers for any work being performed regardless of the quantity of repairs being undertaken.

- 2.3 In British Columbia, it is uncontroversial to assert that utilities such as PNG can expect to recover 100% of all prudently incurred expenses from ratepayers by order of the regulator and, in addition, get a return on and return of capital on those capital expenditures. Given that fact, please explain why, other than in circumstances where the utility is seeking large rate increases for other reasons and wishes to avoid compounding that increase with those relating to normal maintenance and integrity activities, a utility would defer those maintenance and integrity activities.

Response:

A utility that has lost significant load and revenue from industrial customers, such as PNG, may look at any and all cost saving activities including, when absolutely necessary, the deferment of certain maintenance and integrity activities if the cost of those activities alone would result in very significant rate increases for other customer classes whose rates have seen substantial increases to recover the cost of service given the loss of industrial loads. Any such proposed maintenance and integrity activity deferral would require the confirmation that it was safe to do so, adjusting the balance between the accepted bounds of risk tolerance and aversion, while ensuring the ongoing safe and reliable operation of associated assets.

3.0 Reference: Exhibit B-1, pages 4-5

The referenced pages state:

Given the materiality of the potential revenues associated with these incremental RECAP volumes, PNG has given consideration to the expected impact on average delivery rates of the Project, both alone and in combination with potential incremental demand from RECAP at both 30 MMSCFD and 65 MMSCFD. On a standalone basis (without any RECAP revenues or costs), PNG anticipates that the Project will increase residential delivery rates for PNG-West customers by approximately 11% once fully implemented. However, under both the 30 MMSCFD and 65 MMSCFD RECAP scenarios the RECAP revenues are expected to more than offset the entire cost of service impact of the Project over the average initial 20-year term of the RECAP TSAs.

- 3.1 Can PNG confirm that, barring anything untoward occurring, residential delivery rates are expected to decrease due to the RECAP revenues under both scenarios?

Response:

PNG expects that, in isolation, the excess RECAP revenues (revenues in excess of the RECAP cost of service) will more than offset the cost of service associated with the Salvus to Galloway Gas Line Upgrade Project under both scenarios noted in the preamble. However, PNG cannot know at this time what other costs or revenues will materialize over time as compared to PNG's 2021 cost of service.

Under BCUC Order G-35-20, the decision on PNG's Application Regarding Process for Allocation of Reactivated Capacity and Approval of Large Volume Industrial Transportation Rate, PNG was granted approval to create a new interest-bearing deferral account, the Large Volume Industrial Deferral Account (LVIDA), to record revenues from RS 80 including the firm demand charges and toll premiums as per executed Transportation Service Agreements (TSAs) and reservation fees from the executed Transportation Reservation Agreements (TRAs) related to RECAP (PNG notes there were no TRAs executed). The LVIDA will be in place to mitigate rate volatility and may also be utilized to offset potentially adverse rate impacts upon the expiry of the initial term of the TSAs (among other purposes). Additions to and withdrawals from the LVIDA are expected to be determined through future revenue requirements applications.

PNG notes that the intent of the LVIDA is more fully described in Section "9.1 Description and Justification" of its Application Regarding Process for Allocation of Reactivated Capacity and Approval of Large Volume Industrial Transportation Rate. PNG replicates Section 9.1 below for reference.

9.1 Description and Justification

PNG expects a successful outcome from the RECAP to result in the execution of long term contracts for the capacity on its pipeline system. PNG is also proposing that a credit deferral account be created to provide PNG some flexibility on how to manage the incremental revenues to be received from shippers and the reservation fees to be received from future shippers. The intent is to:

- manage the inherent uncertainty related to the RECAP outcome,
- avoid volatility in customer rates by systematically managing expected rate decreases,
- have the ability to avoid rate shock as contracts eventually expire, and
- provide flexibility to manage any unforeseen circumstances that may arise in the future.

The following examples illustrate how the LVIDA may be applied:

- Future negative impact on remaining ratepayers' rates following a Rate Schedule 80 Shipper(s) contract expiring and not being renewed could be significant. The LVIDA would be applied for the benefit of ratepayers to help smooth rates and avoid the likely potential of rate shock.
- Capital requirements to allow PNG to have sufficient capacity to meet RECAP demand will depend on the outcome of the allocation process. The contract term will likely be shorter (ranging between 20 and approximately 40 years) than the depreciable life of the assets (approximately 60 years) which will misalign the timing between the collection of revenues from the contracts and the associated cost of service. This misalignment could result in future rate shock if the financial contribution from Rate Schedule 80 shipper(s) ceases at the end of their contract before the related rate base is fully recovered. In other words, the remaining customer classes will be adversely affected by the departure of Rate Schedule 80 shipper(s) at the end of their contract life. The LVIDA would be applied for the benefit of ratepayers to help smooth rates and mitigate the likely potential of rate shock.
- If unexpected capital expenses (e.g. for system reliability) are incurred in the initial years of new shipper contracts when Schedule 80 rates are fixed and are not on a rolled-in basis, the LVIDA could be applied to alleviate the impact of this unexpected capital requirement.
- If an unforeseen credit collection issue were to arise with a Rate Schedule 80 shipper, the LVIDA could mitigate the effects of this unforeseen event.

One of the main objectives of the RECAP is to optimize benefits to existing ratepayers by lowering their rates as PNG collects revenues from the new shippers in excess of the costs to provide such service. PNG will not know what the magnitude of these benefits will be until after the completion of the RECAP. At that time, PNG will be able to better understand the longer-term impact on customer rates and the requirements for the credit deferral account.

PNG plans to address additions and the method of amortization in future revenue requirement applications or via a separate regulatory application, if required.

3.1.1 If not, please explain why not.

Response:

Please see the response to Question 3.1.

3.2 Please provide an estimate for each year of a 20-year initial term under this “smooth sailing” scenario an estimate of the net impact (costs and revenues) on residential rates in both (i) the 30 MMSCFD RECAP scenario, and (ii) the 65 MMSCFD RECAP scenario.

Response:

As described in PNG’s response to Question 3.1, PNG expects that, in isolation, the excess RECAP revenues (revenues in excess of the RECAP cost of service) will more than offset the cost of service associated with the Salvus to Galloway Gas Line Upgrade Project under both the 30 MMSCFD and the 65 MMSCFD scenarios.

However, the magnitude of the impact on rates will depend on a number of factors including future costs and revenues as well as any contributions to or withdrawals from the LVIDA. Actual rate impacts will be determined by future revenue requirements applications and, as such, it is impossible to determine an estimate of the net impact on residential rates for each year of the 20-year initial term of the TSAs.

4.0 Reference: Exhibit B-1, page 21

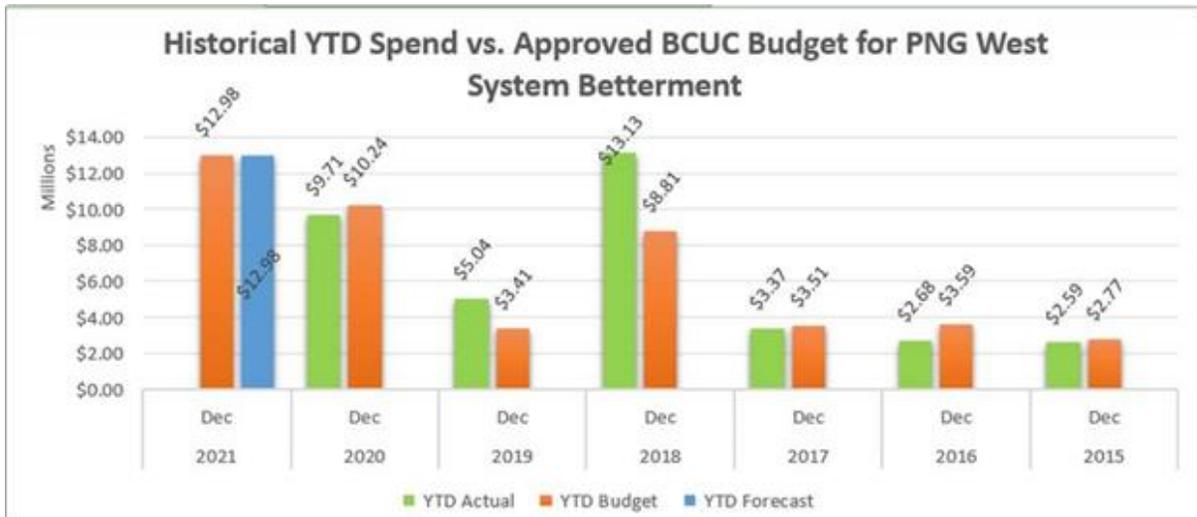
The referenced page states:

In recognition of the condition of PNG’s aging transmission system, PNG has made significant increases in its system betterment expenditures over the past 7 years. As an example of this, whereas in 2015 PNG spent \$2.6 million on system betterment, this amount has increased to forecast amounts of \$10.2 million and \$13.0 million for 2020 and 2021, respectively.

4.1 Please provide a brief description of the various “system betterment expenditures” made in each year between 2015 and the (proposed) 2021 inclusive.

Response:

The following graphical representation provides an illustration of the incremental increases in system betterment expenditures by PNG from 2015 to 2021 (proposed). This is followed by a table of specific and appreciable discrete betterment expenditures.



System Betterment Expenditures (\$) – 2015 to 2021 (proposed)

Expenditure	2015	2016	2017	2018	2019	2020	2021
Unspecified Mainline Repairs	525,680		780,530	1,025,600	590,918	912,665	793,315
Investigative Dig Cut-outs	23,789	54,719	264,546	530,821	726,413	416,821	1,220,901
Other Minor System Betterment Projects	118,877	304,976	212,023	110,819	99,465	442,761	363,982
Compressor Station Upgrades	510,107	189,790	527,136	2,655,432	944,359	1,221,012	1,469,417
Meter & Regulating Station Upgrades	79,419	50,740		37,210	75,073	80,906	69,705
Line Heater Replacements	258,162	574,830	108,797	542,683		21,729	980,139
Cathodic Protection RMU	102,200						
Kitimat Lateral Receiving Barrel	183,716						
Structure Improvements	122,437						
Distribution Main Improvements	134,289						
Paint Glen Creek Falls Bridge	322,339						
Telkwa River Crossing Replacement	205,025						
Transmission Mainline Repairs and Assessments		498,167	47,445	1,210,656	349,829	3,541,918	2,893,975
MP 299 - New Crossing and Line Lowering		259,596	917,052				
M/L Repair Washout MP 285.3		639,495					
Access Upgrades - Work Channel & Gitnadoix			83,643				
Replace 6 Communication Repeaters			374,464				
Copper River MP 250 Repair				5,927,403	57,052	294,587	
Salvus to Galloway Remediation - MP311-362 - Phase 1				324,444	24,040	24,313	
Salvus to Galloway Remediation - MP311-362 - Phase 2					584,669	454,722	
Salvus to Galloway Remediation - MP311-362 - Phase 3						1,916,290	
Salvus to Galloway Remediation - Execution Phase							2,598,209
Automatic Meter Reading Pilot Project				249,582			

Expenditure	2015	2016	2017	2018	2019	2020	2021
Kleanza Crk Crossing Rplmt TER				69,449	822,557	95,851	
Highway 16/37 Skeena Station Relocation				444,195	761,969	33,001	
MP 195.9 Exposed Pipe Lowering						112,726	
MP 297 Exposed Pipe Remediation - Phase 1						117,100	56,624
MP 297 Exposed Pipe Remediation - Phase 2							917,217
High Voltage Alternating Current Mitigation						25,238	190,338
MP 208 Rock Armouring							321,728
Port Edward Storage Bottle Removal to Assess 8" ML - Phase 1							183,645
10" & 8" Barrel Site Construction							592,055
Piping Modification for Gas Blowdown Reduction							239,515
Methanex Lateral at Kitimat River Crossing Repair - Phase 1							122,526
Total	2,586,039	2,572,311	3,315,636	13,128,295	5,036,345	9,711,641	13,013,291

- 4.2 Can PNG confirm that none of the earlier betterment spending will be made redundant (i.e., unnecessary in retrospect) due to the work included in the applied for proposal? That is, had PNG known (somehow) in 2015 and in subsequent years that the current proposal would be undertaken in 2020 and thereafter, would it have still made the same 2015-2019 betterment expenditures and why?

Response:

None of the previous or planned system betterment will be made redundant given the proposed Project scope. The system betterment work has been inclusive of incremental increases in routine integrity management related spending and discrete one-off capital projects in order to sustain (and in some cases regain) compliance with CSA Z662 and the BC OGC's regulatory purview. Previous system betterment repairs were made to address the aging nature of PNG's assets, changes in standards and regulations, and the threats and locational conditions to which the assets are exposed (environmental corrosion, stress corrosion cracking, third party damage, hydrotechnical hazards related to seasonal floods and stream channel meander, geohazards, vegetation regrowth rate, for example). The nature of the proposed scope of the Project is to address identified pipeline integrity issues through localized repairs rather than the replacement of large sections of pipe.

5.0 Reference: Exhibit B-1, page 22

The referenced page states:

In the first 20 years of operation, the Salvus to Galloway pipeline segment experienced at least 15 recorded significant repair or section replacement projects and it has been noted in previous reviews that (due to expected dents, corrosion, low depth of cover, and exposure concerns) future line relocation, upgrading, and lowering works should be anticipated. This was all prior to the first ILIs in the mid-1990s.

- 5.1 In PNG's experience, is it typical or atypical for a pipeline to experience "15 recorded significant repair or section replacement projects" in its first twenty years of operation? If atypical, were there any concerns with respect to any initial construction issues – as opposed to geologic and environmental issues – that drove the frequency of repair/replacement projects?

Response:

The frequency and quantity of repairs experienced on the Salvus to Galloway pipeline segment is outside of industry norms and can be attributed to both the construction practices employed during original construction and the extremely rugged and remote mountain and river valley terrain over which the pipeline traverses in areas of increased geohazard risks. Shallow depth of cover, external coating practices, and original weld quality are noted contributors from original construction. Some of the original construction characteristics were likely related to the difficult and remote terrain in which the pipeline is situated.

For further emphasis and clarity around the impact of locationally specific geohazard risk, terrain, and associated construction practice complexities on the frequency of pipeline failures globally, please see the appended PDF copy titled "Attachment BCOAPO 5.1 - Updated Estimates of Frequencies of Pipeline Failures Caused by Geohazards (Porter et al. 2016)".

6.0 Reference: Exhibit B-1, page 31 and page 34, Table 4-5

The first referenced page states:

As a result of the number of pipeline incidents related to rock slides, debris flow and other geohazards, PNG undertook geohazard-specific inventory and risk assessment studies across the Salvus to Galloway pipeline corridor through 2018-2019 to better understand the magnitude of geohazard risk along the corridor. The results of this work can be found in Appendix C, the BGC Engineering Inc. (BGC) 2019 Preliminary Geohazard Assessment, NPS 8 Mainline Pipeline from Salvus to Galloway Rapids report (BGC 2019 Report), and Appendix D, the BGC 2020 Development Support for Geohazard Mitigation Plan, NPS 8 Mainline Pipeline from Salvus to Galloway report (BGC 2020 Report), which have been filed in support of this Application on a confidential basis. These studies identified the prominent presence of geotechnical, hydrotechnical, rockslide, rock fall, avalanche, debris flow, debris slide, and glaciomarine landslide threats. These threats, in conjunction with the legacy pipeline condition, original construction methods, and documented incident event history informed an assignment of the industry accepted hazard indicator Probability of Failure (PoF) and relative hazard rating for each of the identified geohazard locations. Table 4-4 lists the values for PoF and hazard rating generally accepted industry wide and used by numerous pipeline operators in Canada and the United States. PoFs greater than 1×10^{-3} are typically considered to exceed acceptable risk tolerance.

- 6.1 Can PNG confirm that a probability of failure (PoF) " $> 1 \times 10^{-2}$ " corresponds to a probability of failure greater than 1% over a specified time period?

Response:

Probability of failure (PoF) is the probability of pipeline failure due to a geohazard, expressed as an annual frequency. Assessing geohazards using the PoF framework allows for a common metric to compare various geohazard types and to assist with prioritizing mitigation. A PoF of 1×10^{-2} corresponds to 1% probability that a failure could occur in a given year. The expected number of failures over a period of time is estimated as the PoF multiplied by the number of years (ex. 1 failure is predicted within a period of 100 years for a site with a PoF of 1×10^{-2}).

- 6.1.1 If not, please explain what the specified PoF does mean.

Response:

Please see the response to Question 6.1.

- 6.2 Can PNG confirm that the PoFs it has stated are those generally accepted in the industry, correspond to actual probabilities of failures that have been experienced/observed in practice by the industry in general?

Response:

As identified in Section 5.0, Geohazard Assessment Results, of the 2019 BGC Engineering report (Appendix C to the Application), the geohazard related PoF values stated by PNG are those generally accepted in the industry. They are in accepted application by over 20 pipeline operators in Canada and the US for which BGC provides geohazard risk management support.

To the extent possible, BGC has calibrated the methods used to estimate PoF against historical pipeline failure rates observed in industry. The estimated PoF values have also been validated using the rate of actual historical failures and impacts along the Salvus to Galloway pipeline. The values as provided by PNG in Table 4-4 of the Application and by BGC in Table 5.1 of their 2019 report are used to provide relative mitigation and corrective action prioritization, noting that PoF greater than 1×10^{-3} is generally considered to exceed operator risk tolerance, and do not reflect actual probability of failure experienced by operators in the industry.

Further insight into actual failure frequencies within the industry can be found in the appended PDF document titled "Attachment BCOAPO 5.1 - Updated Estimates of Frequencies of Pipeline Failures Caused by Geohazards (Porter et al. 2016)" that was provided in association with the response to Question 5.1, and to which BGC Engineering professionals were contributors.

- 6.2.1 Do they correspond to actual probabilities or experiences in PNG's own operations in general (i.e. in the aggregate as opposed to specific to the Salvus to Galloway Gas Line)? If not, why not?

Response:

Given PNG's history of system betterment investment in the last 50 years across the entirety of its operations related to geohazard incidents involving landslides, debris flows, frost heave, and river migration and stream channel erosion, for example, PNG can confirm that the PoF ranges presented in Table 4-4 of the Application do correspond in general to the actual experiences of PNG.

While the Salvus to Galloway pipeline segment is of particularly higher risk and has a historical record related to geohazard influenced failures, other incidents in areas such as Terrace to Salvus and the Telkwa pass on the NPS10 mainline have contributed significantly to PNG's experience base. PNG's NPS10 west transmission pipeline is referenced within the failure frequency related PDF document identified as "Attachment BCOAPO 5.1 - Updated Estimates of Frequencies of Pipeline Failures Caused by Geohazards (Porter et al. 2016)" and provided in association with the response to Question 5.1.

- 6.3 Is any use made of the sample variance (the second moment about the mean) to take into account that the PoFs used are not equal to actuals except on average?

Response:

No. The hazard rating is intended as a basis to prioritize sites for mitigation and to guide any alternate follow-up actions (e.g., ground inspections, detailed assessments). They are intended to be used in a relative sense in order to gauge the current level of threat against company- and industry-accepted risk tolerance, and to guide monitoring and mitigation actions accordingly.

- 6.4 Has PNG conducted any analyses that contemplate “fat tailed distributions” or “Black Swans” (as described by Nassim Nicholas Taleb in his 2007 book The Black Swan: The Impact of the Highly Improbable)?

Response:

PNG has not conducted any analyses that contemplate “fat tailed distributions” or “Black Swans”.

- 6.4.1 If not, why not?

Response:

The high priority sites listed in BGC’s report are driven by frequent events that have the potential to cause a pipeline failure.

Certain low probability, high impact events (e.g. rock avalanches) were considered in BGC’s assessment. However, these low probability events would result in consequences of similar order of magnitude as the higher probability events and, therefore, do not have significant bearing on the cost benefit analysis.

7.0 Reference: Exhibit B-1, page 73, Table 5-13 and Exhibit A-4, BCUC IR 1.14.0 series

- 7.1 Under the proposed scoring system, UA1 gets an overall score of 3.42 while the utility's preferred alternative, UA2 gets a score of 3.67. How robust is this ranking with respect to the subjective allocation of weights? In other words, how small of a shift in weightings would result in UA1 getting a higher score than UA2?

Response:

In developing the weighting and scoring of the alternatives, PNG held a series of workshops with both internal personnel as well as third-party experts, and the results of the workshops informed the weighting and scoring of the various alternatives. While there is a level of subjectivity in scoring and weighting, PNG believes the workshop process was robust and was informed by multiple opinions.

With respect to how small a shift in weightings would result in UA1 getting a higher score than UA2, there are multiple weightings that make up the score and inform the overall rankings. However, PNG does note that if the Financial criteria weighting (where UA1 has the highest score) was given an overall weighting of 50% rather than 40%, and Integrity Management (where UA1 has the lowest score) was adjusted to 30%, UA1 and UA2 would be virtually tied at 3.75 and 3.74 respectively.

While the overall score of UA1 and UA2 are generally close, PNG believes that UA2 is the preferred alternative as it better addresses the integrity issues by including allowance for rectifying depth of cover issues in the highest risk areas and rectifies one geohazard, while significantly reducing cost risk related to dent repair treatment by including costs to repair all prioritized dents, versus UA1 where there is an assumption that an apportioned list of dents will avoid repair through engineering assessment (FEA). PNG believes UA2 strikes an appropriate balance of mitigating pipeline integrity risks while managing the rate impacts associated with the Project.