OMB Control No. 2060-0722
Approval expires 12/31/2024

Methane Challenge Program Implementation Plan

Partner Name
City of Tallahassee Gas Utility

Current As Of (Date)
01/01/2022

Methane Challenge Commitments[1] - BMP Commitment Option

	Source	Start Date	Achievement Year
	Onshore Production		
☐	Pneumatic Controllers		
	Equipment Leaks/Fugitive Emissions (*commitment not finalized*)		
	Liquids Unloading (*commitment not finalized*)		
	Pneumatic Pumps (*commitment not finalized*)		
☐	Fixed Roof, Atmospheric Pressure Hydrocarbon Liquid Storage Tanks		
	Continuous Improvement Source (TBD)		
	Continuous Improvement Source (TBD)		
	Gathering and Boosting		
☐	Pneumatic Controllers		
	Equipment Leaks/Fugitive Emissions (*commitment not finalized*)		
	Pneumatic Pumps (*commitment not finalized*)		
☐	Fixed Roof, Atmospheric Pressure Hydrocarbon Liquid Storage Tanks		
☐	Reciprocating Compressors - Rod Packing Vent		
☐	Centrifugal Compressors - Venting		
	Continuous Improvement Source (TBD)		
	Continuous Improvement Source (TBD)		
	Natural Gas (NG) Processing		
☐	Reciprocating Compressors - Rod Packing Vent		
☐	Centrifugal Compressors - Venting		
	Continuous Improvement Source (TBD)		
	Continuous Improvement Source (TBD)		
	NG Transmission & Underground Storage		
☐	Reciprocating Compressors - Rod Packing Vent		
☐	Centrifugal Compressors - Venting		
☐	Equipment Leaks (Compressor Blowdown and Isolation Valves)		
☐	Transmission Pipeline Blowdowns between Compressor Stations *(Commitment Rate: ; must be 50% or greater)*		
☐	Pneumatic Controllers		
	Continuous Improvement Source (TBD)		
	Continuous Improvement Source (TBD)		
	NG Distribution		
	M&R Stations/City Gates (*commitment not finalized*)		
☐	Mains – Cast Iron and Unprotected Steel *(Commitment Rate:)*		
☐	Services – Cast Iron and Unprotected Steel		
■	Distribution Pipeline Blowdowns *(Commitment Rate:* 90% *; must be 50% or greater)*	01/01/2022	2027
■	Excavation Damages	01/01/2022	2023
☐	Renewable Natural Gas		
	Continuous Improvement Source (TBD)		

[1] Partners may delete unused rows within the table and may duplicate rows and add relevant details as needed (e.g., a corporate parent partner that has different commitments for each LDC can duplicate relevant rows to list the commitments for each LDC).

	Source	Start Date	Achievement Year
	Continuous Improvement Source (TBD)		

Methane Challenge Commitments - ONE Future Emissions Intensity Commitment Option

Segment:		Intensity Target:		Target Year:	

Milestones/Timeframes for Meeting Commitments

Provide information on steps for achieving commitments such as anticipated rate of progress, key milestones, or other context (e.g., referencing work to be done during the next planned shutdown of a facility).

Distribution Blowdown Emissions:

Distribution pipeline blowdown in our utility comes from main extensions/tie-ins, relocations, and abandonments. The COT Gas Utility is targeting a blowdown emissions reduction of 90% over 5-years from our 2020 total of 830 MCF of methane. In order to reduce emissions in these processes the COT Gas Utility plans to systematically reduce emissions through evaluating the following best management practices:

· Route gas to a compressor and re-injecting into an adjacent downstream pipeline.
· Utilize hot-tapping procedures to continue the flow of gas and reducing the need for gas to be blown down.
· Use stop-off equipment to reduce the length of pipe needing to be blown down.
· Reroute the blowdown from venting to flaring to limit the harmful impact of GHG emissions.
· Lowering of pressure in pipeline section through valve closure upstream and isolation.

The COT Gas Utility plans to actively evaluate and determine the efficacy of all BMP's for blowdown emission reduction over our 5-year targeted span. We plan to start at 20% reductions and ending at 90% after year 5. The milestones to accomplish at the end of each year include emission reductions as follows:

Timeline	Milestone	Calendar Year
Start	20% Reduction	End of 2022
Year 1	28% Reduction	End of 2023
Year 2	38% Reduction	End of 2024
Year 3	50% Reduction	End of 2025
Year 4	68% Reduction	End of 2026
Year 5	90% Reduction	End of 2027

Additional Information/Context (optional)

Use this space, if desired, to provide other information about Program participation, such as plans for expanding Methane Challenge commitments, how historical actions informed Methane Challenge commitments, or other information on how the Program will be implemented.

Excavation Damage Emissions:

Excavation damage emissions are the leading form of unintentional methane emissions at the COT Gas Utility. Over the next year the COT Gas Utility plans to implement enhanced damage prevention efforts to target an incident rate reduction. The action to be taken are as follows:

· Tracking totals for excavation damages, locate calls, damages that result in pipeline shutdown.
· Tracking and reporting number of damages by pipe material and system of pipe damaged.
· Conduct root cause analysis on all excavation damages to sort and classify damages
· Conduct annual excavator education awareness meetings in accordance with RP 1162.
· Maintain as a key performance indicator the emergency response time and target an average time to site of 30 minutes or less.
· Maintain as a key performance indicator the percentage of excavation damages per 1000 locates with a target of 4.5 or less per year.