What’s Cooking in Gas Storage Regulation

Adam Peltz, Attorney
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Notable Moments in Gas Storage Governance

- **2010**
  - KS court case

- **2015 September**
  - API releases RPs

- **October**
  - Aliso Canyon leak starts

- **2016 January**
  - CA issues emergency regs

- **February**
  - Aliso leak plugged; primer launched; PHMSA issues guidance

- **June**
  - Safe Pipes Act enters into law

- **August**
  - CA informal rulemaking commences

- **October**
  - DOE report released

- **December**
  - PHMSA IFR released

- **2017 January**
  - PHMSA IFR in effect; SCG requests AC restart

- **February**
  - CA formal rulemaking commences?
PHMSA Regs: the Good and the Bad

Good
- Fills regulatory vacuum following Kansas case
- Provides standards for states that have minimal gas storage regulation
- Contains many reasonable provisions
- Has industry buy-in

Bad
- Gaps and vagueness
- Creates two-tiered system in states with strong regulations
- Lack of capacity to implement
- RMPs and variances approved after the fact