

# Southern Company Pipelines

## Transmission Integrity Management Program

The Southern Company Pipelines Integrity Management Plan (IMP) meets the requirements of 49 CFR Part 192 Subpart O and the appropriate incorporated by reference sections of ASME/ANSI B31.8S and NACE SP0502. As required by §192.911, the IMP contains the following elements:

- Identification and Assessment of High Consequence Areas and Moderate Consequence Areas
- Assessment Plan
- Threat Identification and Risk Assessment
- Performing Assessments
- Remediation Plan
- Continual Evaluation and Assessment
- Confirmatory Direct Assessment
- Preventive and Mitigative Measures
- Performance Plan
- Record Keeping
- Management of Change
- Quality Assurance
- Communications Plan
- Providing a Copy of the IMP to Jurisdictional Authorities
- Environmental and Safety Policies

Southern Company Pipelines only operates metallic (steel) pipelines, follows a prescriptive-based approach, and uses a systematic and comprehensive process designed to provide information to effectively allocate resources for the appropriate prevention, detection, and mitigation activities.

### High Consequence Area (HCA) Identification

Locations along the pipeline systems are evaluated to the criteria for High Consequence Areas (HCAs) then identified. Generally, HCAs include densely populated areas or difficult to evacuate facilities, such as hospitals, prisons, or school. Locations where people congregate such as churches, office buildings, or playgrounds are also included. Potential hazards are systematically identified for HCAs and are estimated for likelihood and consequences of potential adverse events. Preventative and mitigative measures are then put into place to ensure these hazards are addressed or deterred, when possible.

### Assessments

In addition to ongoing efforts to mitigate risk, assessments are completed periodically according to regulatory standards to properly oversee the pipelines' right of way, maintain the system's integrity, and evaluate the pipe's condition. After completing a baseline integrity assessment, the operator continues to assess the line pipe using one of the three primary assessment methods at intervals not to exceed seven years to ensure a safe and reliable delivery of gas to our customers.