



U.S. Department
of Transportation
**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue SE
Washington DC 20590

2021 Gas State Program Evaluation

for

IDAHO PUBLIC UTILITIES COMMISSION

Document Legend

PART:

- O -- Representative, Dates and Title Information
- A -- Progress Report and Program Documentation Review
- B -- Program Inspection Procedures
- C -- State Qualifications
- D -- Program Performance
- E -- Field Inspections
- F -- Damage prevention and Annual report analysis
- G -- Interstate Agent/Agreement States



2021 Gas State Program Evaluation -- CY 2021

Gas

State Agency: Idaho

Agency Status:

Date of Visit: 03/14/2022 - 03/16/2022

Agency Representative: Jeff Brooks, Program Manager - Idaho PUC

PHMSA Representative: David Lykken, PHMSA State Programs Division

Commission Chairman to whom follow up letter is to be sent:

Name/Title: Eric Anderson, President

Agency: Idaho Public Utilities Commission

Address: 11331 W. Chinden Blvd., Building 8, Suite 201-A

City/State/Zip: Boise, ID 83714

Rating:

60105(a): Yes **60106(a):** No **Interstate Agent:** No

INSTRUCTIONS:

Complete this evaluation in accordance with the Evaluator Guidance for conducting state pipeline safety program evaluations. The evaluation should generally reflect state program performance during CY 2021 (not the status of performance at the time of the evaluation). A deficiency in any one part of a multiple-part question should be scored as "Needs Improvement." Determine the answer to the question then select the appropriate point value. If a state receives less than the maximum points, include a brief explanation in the appropriate notes/comments section. If a question is not applicable to a state, select NA. Please ensure all responses are COMPLETE and ACCURATE, and they OBJECTIVELY reflect the state's program performance for the question being evaluated. Increasing emphasis is being placed on how the state pipeline safety programs conduct and execute their pipeline safety responsibilities (their performance). This evaluation, together with selected factors reported in the state's annual progress report attachments, provide the basis for determining the state's pipeline safety grant allocation.

Scoring Summary

PARTS	Possible Points	Points Scored
A Progress Report and Program Documentation Review	0	0
B Program Inspection Procedures	15	15
C State Qualifications	10	8
D Program Performance	50	49
E Field Inspections	15	15
F Damage prevention and Annual report analysis	10	10
G Interstate Agent/Agreement States	0	0
TOTALS	100	97
State Rating		97.0



PART A - Progress Report and Program Documentation Review

Points(MAX) Score

- 1 Were the following Progress Report Items accurate? (*items not scored on progress report) Info Only Info Only
Info Only = No Points
- a. Stats On Operators Data - Progress Report Attachment 1
 - b. State Inspection Activity Data - Progress Report Attachment 2
 - c. List of Operators Data - Progress Report Attachment 3*
 - d. Incidents/Accidents Data - Progress Report Attachment 4*
 - e. Stats of Compliance Actions Data - Progress Report Attachment 5*
 - f. List of Records Kept Data - Progress Report Attachment 6 *
 - g. Staff and TQ Training Data - Progress Report Attachment 7
 - h. Compliance with Federal Regulations Data - Progress Report Attachment 8
 - i. Performance and Damage Prevention Question Data - Progress Report Attachment 10*

Evaluator Notes:

a. Operator/Inspection Unit totals on Attachment 1 are consistent with the Operator/Inspection Unit totals on Attachment 3. b. No issues. C. No issues. Breakdown of Operators consistent with information found in the PDM. D. PDM shows 2 GD incidents and 1 LNG reported. Matches PR under attachment 4. e & f No issues. g. Information verified through T&Q Blackboard training site. Training for personnel found to be complete and accurate. h. New amendments adopted up through 3/12/2021.

Four points deducted on PR scoring for not having civil penalty amounts essentially the same as PHMSA.

Total points scored for this section: 0
Total possible points for this section: 0



PART B - Program Inspection Procedures

Points(MAX) Score

- 1** Do written procedures address pre-inspection, inspection and post inspection activities for each of the following inspection types: Chapter 5.1 5 5
Yes = 5 No = 0 Needs Improvement = 1-4
- a. Standard Inspections, which include Drug/Alcohol, CRM and Public Awareness Effectiveness Inspections
 - b. TIMP and DIMP Inspections (reviewing largest operator(s) plans annually)
 - c. OQ Inspections
 - d. Damage Prevention Inspections
 - e. On-Site Operator Training
 - f. Construction Inspections (annual efforts)
 - g. LNG Inspections

Evaluator Notes:

No revisions from prior year. Pre and Post inspection activities for each inspection type discussed under Attachment 'E' (Inspector Actions for Inspection Activities). Sections 1.5.1 and 3.0 of IPUC Program Operations Procedures. O&M 3.4, Std Insp 3.8, D&A 3.14, CRM 3.18, PAPEI 3.16. b: IMP 3.10, DIMP 3.17 c: Section 3.9 d: Sections 2.5/2.5.1 and 3.12 e: Section 3.13 f: Section 3.11 g: Section 4.0

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- 2** Do written procedures address inspection priorities of each operator, and if necessary each unit, based on the following elements and time frames established in its procedures? Chapter 5.1 4 4
Yes = 4 No = 0 Needs Improvement = 1-3
- a. Length of time since last inspection
 - b. Operating history of operator/unit and/or location (includes leakage, incident and compliance activities)
 - c. Type of activity being undertaken by operators (i.e. construction)
 - d. Locations of operator's inspection units being inspected - (HCA's, Geographic area, Population Centers, etc.)
 - e. Process to identify high-risk inspection units that includes all threats - (Excavation Damage, Corrosion, Natural Forces, Outside Forces, Material and Welds, Equipment, Operators and any Other Factors)
 - f. Are inspection units broken down appropriately?

Evaluator Notes:

Yes. All elements addressed under Section 1.0 Program Overview. Inspection frequencies listed under 1.2.2. Risked Based Insection procedures under Section 8.0. Operators/Units typically visited annually. Will be updating inspection interval language to align with one of the three options made available via Zach's 12/14/2021 email to the States.

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- 3** (Compliance Procedures) Does the state have written procedures to identify steps to be taken from the discovery to resolution of a probable violation? Chapter 5.1 3 3
Yes = 3 No = 0 Needs Improvement = 1-2
- a. Procedures to notify an operator (company officer) when a noncompliance is identified
 - b. Procedures to routinely review progress of compliance actions to prevent delays or breakdowns
 - c. Procedures regarding closing outstanding probable violations

Evaluator Notes:

a. Sub-Section 1.6 (Compliance Action) and Section 5.0 (Compliance 601050(a)). Sub-Section 5.7. Page 19 b: Sub-Section 5.7. Page 20. c: Sub-Section 5.7. Page 20.

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- 4** (Incident/Accident Investigations) Does the state have written procedures to address state actions in the event of an incident/accident? 3 3
Yes = 3 No = 0 Needs Improvement = 1-2
- a. Mechanism to receive, record, and respond to operator reports of incidents, including after-hours reports

b. If onsite investigation was not made, do procedures require on-call staff to obtain sufficient information to determine the facts to support the decision not to go on-site.

Evaluator Notes:

Yes. Section 6.0 (Incident Investigation). Provided copy of PHMSA Form 11 Incident/Accident Investigation for possible adoption and reference in written procedures. Also refer to comments under question D-8.

5 General Comments:
Info Only = No Points

Info Only Info Only

Evaluator Notes:

No point deductions under Part 'B'

Total points scored for this section: 15
Total possible points for this section: 15



PART C - State Qualifications

Points(MAX) Score

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- 1** Has each inspector and program manager fulfilled training requirements? (See Guidelines Appendix C for requirements) Chapter 4.3 **5** **5**
Yes = 5 No = 0 Needs Improvement = 1-4
- a. Completion of Required OQ Training before conducting inspection as lead
 - b. Completion of Required DIMP/IMP Training before conducting inspection as lead
 - c. Completion of Required LNG Training before conducting inspection as lead
 - d. Root Cause Training by at least one inspector/program manager
 - e. Note any outside training completed
 - f. Verify inspector has obtained minimum qualifications to lead any applicable standard inspection as the lead inspector (Reference State Guidelines Section 4.3.1)

Evaluator Notes:

No issues. Darren Ulmer & Bruce Perkins have completed all necessary courses to conduct inspections as lead. Jeff Brooks has completed Gas Inspector Path and is working to complete the Failure Path this year.

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- 2** Did state records and discussions with state pipeline safety program manager indicate adequate knowledge of PHMSA program and regulations? **5** **3**
Yes = 5 No = 0 Needs Improvement = 1-4

Evaluator Notes:

Two points deducted because the program manager has less than one year in the position and for not having sufficient knowledge of one or more of pipeline safety technology, enforcement applications, and administrative procedures. Jeff Brooks was appointed Program Manager effective 12-13-2021. He has been with the pipeline program since November 2020. Jeff has experience with Refinery processing and pressure piping and is a qualified NDE and certified welding inspector. Jeff has fully complete the Gas Inspector path and is working to complete the Failure Path courses.

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- 3** General Comments: **Info Only Info Only**
Info Only = No Points

Evaluator Notes:

2-point deduction under C-2.

Total points scored for this section: 8
Total possible points for this section: 10



PART D - Program Performance

Points(MAX) Score

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- | | | | |
|----------|--|---|---|
| 1 | Did state inspect all types of operators and inspection units in accordance with time intervals established in written procedures? Chapter 5.1
Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 5 |
|----------|--|---|---|
- a. Standard (General Code Compliance)
 - b. Public Awareness Effectiveness Reviews
 - c. Drug and Alcohol
 - d. Control Room Management
 - e. Part 193 LNG Inspections
 - f. Construction (did state achieve 20% of total inspection person-days?)
 - g. OQ (see Question 3 for additional requirements)
 - h. IMP/DIMP (see Question 4 for additional requirements)

Evaluator Notes:

No issues. Completed CRM inspection for Dominion Energy re-scheduled from CY2020 due to Covid-19 travel restrictions. DT&C days were 46.58% of total estimated field days.

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|----------|---|----|----|
| 2 | Did inspection form(s) cover all applicable code requirements addressed on Federal Inspection form(s)? Did State complete all applicable portions of inspection forms? Chapter 5.1. Do inspection records indicate that adequate reviews of procedures, records and field activities, including notes and the appropriate level of inspection person-days for each inspection, were performed?
Yes = 10 No = 0 Needs Improvement = 1-9 | 10 | 10 |
|----------|---|----|----|
- a. Standard (General Code Compliance)
 - b. Public Awareness Effectiveness Reviews
 - c. Drug and Alcohol
 - d. Control Room Management
 - e. Part 193 LNG Inspections
 - f. Construction
 - g. OQ (see Question 3 for additional requirements)
 - h. IMP/DIMP (see Question 4 for additional requirements)

Evaluator Notes:

The program utilizes the IA in CY2021 to document inspection results. IPUC Form 4 is used to document DT&C inspections.

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| 3 | Is state verifying monitoring (Protocol 9/Form15) of operators OQ programs? This should include verification of any plan updates and that persons performing covered tasks (including contractors) are properly qualified and requalified at intervals established in the operator's plan. 49 CFR 192 Part N
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

Evaluator Notes:

Yes. 25.5 days devoted to OQ plan and field verification activities in 2021. A reminder to use the Procol 9 Form 15 form on occasion. Most OQ items noted on IPUC Form 4.

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|----------|--|---|---|
| 4 | Is state verifying operator's integrity management Programs (IMP and DIMP)? This should include a review of plans, along with monitoring progress. In addition, the review should take in to account program review and updates of operator's plan(s). 49 CFR 192 Subparts O and P
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|
- a. Are the implementation plans of the state's large/largest operators(s) being reviewed annually to ensure they are completing full cycle of the IMP process?
 - b. Are states verifying with operators any plastic pipe and components that have shown a record of defects/leaks and mitigating those through DIMP plan?



- c. Are the states verifying operators are including low pressure distribution systems in their threat analysis?

Evaluator Notes:

Yes. 24.5 days devoted to DIMP/TIMP plan updates and field implementation activities.

5	<p>Did the state review the following (these items are NTSB recommendations to PHMSA that have been deemed acceptable response based on PHMSA reviewing these items during the evaluation process): Chapter 5.1</p> <p>Yes = 2 No = 0 Needs Improvement = 1</p> <ul style="list-style-type: none"> a. Operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization and if necessary remedial action was taken; b. Operator procedures for surveillance of cast iron pipelines, including appropriate action resulting from tracking circumferential cracking failures, study of leakage history, or other unusual operating maintenance condition? (Note: See GPTC Appendix G-18 for guidance); c. Operator emergency response procedures for leaks caused by excavation damage near buildings and determine whether the procedures adequately address the possibility of multiple leaks and underground migration of gas into nearby buildings Refer to 4/12/01 letter from PHMSA in response to NTSB recommendation P-00-20 and P-00-21; d. Operator records of previous accidents and failures including reported third-party damage and leak response to ensure appropriate operator response as required by 192.617; e. Directional drilling/boring procedures of each pipeline operator or its contractor to determine if they include actions to protect their facilities from the dangers posed by drilling and other trench less technologies; f. Operator procedures for considering low pressure distribution systems in threat analysis? g. Operator compliance with state and federal regulations for regulators located inside buildings? 	2	1
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Evaluator Notes:

1-point deduction for only partially completing forms. IPUC Form 2's reviewed from CY2021 not filled out correctly and incomplete. Some misunderstanding as to what question 1 is asking regarding Operator's emergency response plans. Question 1 typically marked as N/A for not having a history of leaks caused by excavation damage but should rather address the operator's written procedures in the event of an occurrence. a & b - are N/A for CI in ID.

6	<p>Did the State verify Operators took appropriate action regarding advisory bulletins issued since the last evaluation? (Advisory Bulletins Current Year)</p> <p>Yes = 1 No = 0 Needs Improvement = .5</p>	1	1
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Evaluator Notes:

Documented on IPUC Form 2. No Advisory Bulletins issued in CY2021.

7	<p>(Compliance Activities) Did the state follow compliance procedures (from discovery to resolution) and adequately document all probable violations, including what resolution or further course of action is needed to gain compliance? Chapter 5.1</p> <p>Yes = 10 No = 0 Needs Improvement = 1-9</p> <ul style="list-style-type: none"> a. Were compliance actions sent to company officer or manager/board member if municipal/government system? b. Were probable violations documented properly? c. Resolve probable violations d. Routinely review progress of probable violations e. Did state issue compliance actions for all probable violations discovered? f. Can state demonstrate fining authority for pipeline safety violations? g. Does Program Manager review, approve and monitor all compliance actions? (note: Program Manager or Senior Official should sign any NOPV or related enforcement action) 	10	10
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- h. Did state compliance actions give reasonable due process to all parties? Including "show cause" hearing, if necessary.
- i. Within 30 days, conduct a post-inspection briefing with the owner or operator outlining any concerns
- j. Within 90 days, to the extent practicable, provide the owner or operator with written preliminary findings of the inspection. (Incident investigations do not need to meet 30/90-day requirement)

Evaluator Notes:

Yes. No issues noted for a thru j. Compliance letters (12) sent to appropriate company/government officials, typically within one to two weeks of inspection completion. IPUC Form 3 Exit Interview Inspection Summary utilized for Post-inspection briefing. Company official signs copy at time of briefing. Avista Self-Reported Leak Survey non-compliance. No civil penalties issued in CY2021. As noted in last program evaluation a corrective action in the form of operator conducting second leak survey in lieu of staff proposed \$10,000 civil penalty was assessed.

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|----------|---|----|----|
| 8 | <p>(Incident Investigations) Were all federally reportable incidents investigated, thoroughly documented, with conclusions and recommendations?
 <small>Yes = 10 No = 0 Needs Improvement = 1-9</small></p> <ul style="list-style-type: none"> a. Does state have adequate mechanism to receive and respond to operator reports of incidents, including after-hours reports? b. Did state keep adequate records of Incident/Accident notifications received? c. If onsite investigation was not made, did the state obtain sufficient information from the operator and/or by means to determine the facts to support the decision not to go on site? d. Were onsite observations documented? e. Were contributing factors documented? f. Were recommendations to prevent recurrences, where appropriate, documented? g. Did state initiate compliance action for any violations found during any incident/accident investigation? h. Did state assist Region Office or Accident Investigation Division (AID) by taking appropriate follow-up actions related to the operator incident reports to ensure accuracy and final report has been received by PHMSA? i. Does state share any lessons learned from incidents/accidents? | 10 | 10 |
|----------|---|----|----|

Evaluator Notes:

Three reportable incidents in CY2021. Unable to conduct on-site investigation of Avista 10/28/21 (NRC #1320844) house explosion due to staff unavailability. The former PM had recently left the program, and the only other fully qualified inspector was on vacation, leaving only the newest unqualified inspector available. Mr. Brooks was able to collect the necessary information from the operator and was in communication with PHMSA AID. Had a conversation with the new PM about reviewing current Emergency Response procedures and making changes where necessary, having good forms for documenting incident information received, and for performing on-site investigations. Supplied a copy of PHMSA Form 11 - Pipeline Failure Investigation report for consideration.

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|----------|---|---|---|
| 9 | <p>Did state respond to Chairman's letter on previous evaluation within 60 days and correct or address any noted deficiencies? (If necessary) Chapter 8.1
 <small>Yes = 1 No = 0 Needs Improvement = .5</small></p> | 1 | 1 |
|----------|---|---|---|

Evaluator Notes:

Letter to Chairman sent out 8/17/2021. Chair's response received 8/23/2021. Civil penalty amounts noted as not being sufficient.

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|-----------|---|-----------|-----------|
| 10 | <p>Did State conduct or participate in pipeline safety training session or seminar in Past 3 Years? Chapter 8.5
 <small>Info Only = No Points</small></p> | Info Only | Info Only |
|-----------|---|-----------|-----------|

Evaluator Notes:

Last T&Q seminar held in 2018. Fireside chats conducted with operators twice a year.

11 Has state confirmed transmission operators have submitted information into NPMS database along with changes made after original submission? Info Only Info Only
 Info Only = No Points

Evaluator Notes:
 Yes. As in prior years. IPUC Form 2 - Supplemental Form, Question #10.

12 Does the state have a mechanism for communicating with stakeholders - other than state pipeline safety seminar? (This should include making enforcement cases available to public). 1 1
 Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:
 As noted in prior years, the IDPUC web site provides information on operator annual report data, Compliance Enforcement including compliance letters, operator responses, and close-out letters, and PHMSA State Program evaluation results and Progress Reports for the corresponding year.

13 Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.7 1 1
 Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:
 No SRCR's reported in CY2021. 1 reported on 3-14-2022 and is currently open. Confirmed in WMS. Reviewed PHMSA SRCR in WMS policy with the PM to ensure that assigned tasks are updated at the 10 & 30 day intervals.

14 Was the State responsive to: 1 1
 Yes = 1 No = 0 Needs Improvement = .5
 a. Surveys or information requests from NAPSRS or PHMSA; and
 b. PHMSA Work Management system tasks?

Evaluator Notes:
 The program responded to 9 of 12 NAPSRS surveys sent out in CY2021. Verified by NAPSRS Administrator. No IM notifications in CY2021. No other WMS tasks assigned other than one SRCR in CY2022.

15 If the State has issued any waivers/special permits for any operator, has the state verified conditions of those waivers/special permits are being met? This should include having the operator amend procedures where appropriate. 1 1
 Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:
 None requested in CY2021. No history of state waiver requests/approvals posted on PHMSA web site.

16 Were pipeline program files well-organized and accessible? Info Only Info Only
 Info Only = No Points

Evaluator Notes:
 No issues. Documents requested readily available and provided.

17 Discussion with State on accuracy of inspection day information submitted into State Inspection Day Calculation Tool (SICT). Has the state updated SICT data? 3 3
 Yes = 3 No = 0 Needs Improvement = 1-2

Evaluator Notes:
 SICT minimum estimated at 214 days. Actual for CY2021 was 325.50. DT&C inspections 34.15% of SICT minimum total days. Tool updated annually. No significant changes.



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- 18** Discussion on State Program Performance Metrics found on Stakeholder Communication Info Only Info Only
site.\ <http://primis.phmsa.dot.gov/comm/states.htm?nocache=4805>
Info Only = No Points

Evaluator Notes:

Damages per 1000 tickets continue downward from CY2016. Ratio is approximately 5.2 damages per which is higher than the national average of 2.38. Inspection days averaging 19 days per 1K miles of pipe. Inspector qualification core training average down to 75% due to changes in staff numbers. Total leaks, Hazardous Leaks, and Leaks Scheduled for Repair all trending downward as a result of ongoing Aldyl-A pipe replacement program resulting in fewer active leaks.

- 19** Did the state encourage and promote operator implementation of Pipeline Safety Management Systems (PSMS), or API RP 1173? This holistic approach to improving pipeline safety includes the identification, prevention and remediation of safety hazards. Info Only Info Only
Info Only = No Points

- a. <https://pipelinesms.org/>
- b. Reference AGA recommendation to members May 20, 2019

Evaluator Notes:

The program does promote implementation of PSMS via operator meetings. Avista Utilities has adopted API RP-1173. Will be promoting at the next fireside chat with Inter Mountain Gas scheduled for 3/17/22.

- 20** General Comments: Info Only Info Only
Info Only = No Points

Evaluator Notes:

D-5: 1-point deduction for only partially completing forms. IPUC Form 2's reviewed from CY2021 not filled out correctly and incomplete.

Total points scored for this section: 49
Total possible points for this section: 50



- 1** Operator, Inspector, Location, Date and PHMSA Representative (enter specifics into the Info Only Info Only comments box below) Info Only Info Only
 Info Only = No Points
- a. What type of inspection(s) did the state inspector conduct during the field portion of the state evaluation? (i.e. Standard, Construction, IMP, etc)
 - b. When was the unit inspected last?
 - c. Was pipeline operator or representative present during inspection?
 - d. Effort should be made to observe newest state inspector with least experience

Evaluator Notes:

A standard field evaluation of Intermountain Gas Company's Nampa District GD facilities located in the communities of Nampa, Weiser, New Plymouth, Payette, Fruitland, Emmett, and Star. This unit is inspected annually. The operator was represented. ID-PUC Inspector was Bruce Perkins.

- 2** Did the inspector use an appropriate inspection form/checklist and was the form/checklist used as a guide for the inspection? (New regulations shall be incorporated) 2 2
 Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes. The ID-PUC utilizes the IA to document inspection results for all inspection types. The IA GD Baseline Field Inspection directive was used for this inspection. The program also maintains a excel spreadsheet for documenting operator facilities (Reg Stations, Rectifiers, Odorizers, Casings/Spans, etc.) visited to record relevant data/measurements and to track past areas/facilities visited.

- 3** Did the inspector adequately review the following during the inspection 10 10
 Yes = 10 No = 0 Needs Improvement = 1-9
- a. Procedures (were the inspector's questions of the operator adequate to determine compliance?)
 - b. Records (did the inspector adequately review trends and ask in-depth questions?)
 - c. Field Activities/Facilities (did inspector ensure that procedures were being followed, including ensuring that properly calibrated equipment was used and OQ's were acceptable?)
 - d. Other (please comment)
 - e. Was the inspection of adequate length to properly perform the inspection?

Evaluator Notes:

No issues. Observed a Standard Field Inspection of IGC's GD facilities located in the communities of Nampa, Weiser, New Plymouth, Payette, Fruitland, Emmett, and Star. Included inspections of the certain gas pressure regulating stations, emergency valves, Rectifiers, CP test stations, bridge spans, and signage. The inspection was of adequate length. Observed two of the three total days devoted to the field facility checks.

- 4** From your observation did the inspector have adequate knowledge of the pipeline safety program and regulations? (Evaluator will document reasons if unacceptable) 2 2
 Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes. Bruce Perkins has been with the IPUC safety program since 2016 and demonstrated a good working knowledge of the regulations and program specifics.

- 5** Did the inspector conduct an exit interview, including identifying probable violations? (If inspection is not totally completed the interview should be based on areas covered during time of field evaluation) 1 1
 Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:



Yes. The program utilizes the "IPUC Exit Interview Inspection Summary" form for documenting inspection results. Findings and any corrective action taken (if any) by the operator at the time of the exit is recorded on this form. The form is signed by the IPUC inspector and the company representative, satisfying the 30 and 90 day notification requirements. Four items of concern identified as needing addressing involving emergency valve maintenance, pressure regulator failed lock-up, atmospheric corrosion (exposed pipe needing paint), and one CP site not meeting the -0.85 criterion.

- 6** Was inspection performed in a safe, positive, and constructive manner ? Info Only Info Only
Info Only = No Points
- a. No unsafe acts should be performed during inspection by the state inspector
 - b. What did the inspector observe in the field? (Narrative description of field observations and how inspector performed)
 - c. Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices)
 - d. Other

Evaluator Notes:

Yes, the inspector performed the inspection in a safe and positive manner. He conducted himself professionally. He observed the condition of the pipeline facilities to assure compliance with the regulations.

- 7** General Comments: Info Only Info Only
Info Only = No Points

Evaluator Notes:

No issues identified. No point deductions under Part 'E'.

Total points scored for this section: 15
Total possible points for this section: 15



PART F - Damage prevention and Annual report analysis

Points(MAX) Score

-
- | | | | |
|----------|--|---|---|
| 1 | Has the state reviewed Operator Annual reports, along with Incident/Accident reports, for accuracy and analyzed data for trends and operator issues.
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

Evaluator Notes:

Yes. Discussed above average percent of One-Call Notification Practice root cause excavation damages as reported by the States two largest LDC's for CY2021. Provided a copy of CY2021 GD Excavation Damage data by Root Cause to be used for discussion purposes with the state's two largest operators.

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|----------|--|---|---|
| 2 | Has the state verified that the operators analyze excavation damages for the purpose of determining root causes and minimizing the possibility of a recurrence? (192.617)
Has the state verified that the operators have appropriately identified excavators who have repeatedly violated one-call laws and damaged their facilities. Have the operators taken steps to mitigate that risks? (192.1007)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

Evaluator Notes:

Discussed above average percent of One-Call Notification Practice root cause excavation damages as reported by the States two largest LDC's for CY2021.

- | | | | |
|----------|--|---|---|
| 3 | Has the state reviewed the operator's annual report pertaining to Part D - Excavation Damage?
Yes = 4 No = 0 Needs Improvement = 1-3 <ol style="list-style-type: none">a. Is the information complete and accurate with root cause numbers?b. Has the state evaluated the causes for the damages listed under "One-Call Notification Practices Not Sufficient" (Part D.1.a.)?c. Has the state evaluated the causes for the damages listed under "Locating Practices Not Sufficient" (Part D.1.b.)? For each operator, does the state review the following?d. Is the operator or its locating contractor(s) qualified and following written procedures for locating and marking facilities?e. Is the operator appropriately requalifying locators to address performance deficiencies?f. What is the number of damages resulting from mismarks?g. What is the number of damages resulting from not locating within time requirements (no-shows)?h. Is the operator appropriately addressing discovered mapping errors resulting in excavation damages?i. Are mapping corrections timely and according to written procedures?j. Has the state evaluated the causes for the damages listed under "Excavation Practices Not Sufficient" (Part D.1.c.)? | 4 | 4 |
|----------|--|---|---|

Evaluator Notes:

Yes. Reviewed annually. As previously noted the program should pay particular attention to root cause statistics reported by the operators and ensure that data reported is accurate. Preliminary data reported by one LDC for damages related to One-Call Notification Practices at 45%. ED's per 1000 tickets for the two largest operators (5.9 & 3.8) above the national average of 2.51.

- | | | | |
|----------|---|---|---|
| 4 | Has the agency or another organization within the state collected data and evaluated trends on the number of pipeline damages per 1,000 locate requests?
Yes = 2 No = 0 Needs Improvement = 1 <ol style="list-style-type: none">a. What stakeholder group is causing the highest number of damages to the pipelines? Operator, contractor, locating company or public.b. Has the state verified the operator is appropriately focusing damage prevention education and training to stakeholders causing the most damages? | 2 | 2 |
|----------|---|---|---|



- c. Has the state evaluated which of the following best describes the reason for the excavation damages; i.e., operator or contractor not following written procedures, failure to maintain marks, failure to support exposed facilities, failure to use hand tools were required, failure to test-hole (pot hole), improper backfilling practices, failure to maintain clearance or insufficient excavation practices.
- d. Has the state verified the operator is appropriately focusing damage prevention education and training to address the causes of excavation damages?

Evaluator Notes:

Damages per 1000 tickets continue downward from CY2016. Ratio is approximately 5.2 damages per which is higher than the national average of 2.38 but still trending downward in CY2021.

5 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

No issues. No point deductions.

Total points scored for this section: 10
 Total possible points for this section: 10



PART G - Interstate Agent/Agreement States

Points(MAX) Score

-
- 1** Were all inspections of interstate pipelines conducted using the Inspection Assistant program for documenting inspections? Info Only Info Only
Info Only = No Points

Evaluator Notes:
N/A - Not an interstate agent or 60106 program.

- 2** If inspections were conducted independent of a PHMSA team inspection was notice of all identified probable violations provided to PHMSA within 60 days? Info Only Info Only
Info Only = No Points

Evaluator Notes:
N/A - Not an interstate agent or 60106 program.

- 3** If inspections were conducted independent of a PHMSA team inspection was PHMSA immediately notified of conditions which may pose an immediate safety hazard to the public or environment? Info Only Info Only
Info Only = No Points

Evaluator Notes:
N/A - Not an interstate agent or 60106 program.

- 4** If inspections were conducted independent of a PHMSA team inspection did the state coordinate with PHMSA if inspections not were not included in the PHMSA Inspection Work Plan? Info Only Info Only
Info Only = No Points

Evaluator Notes:
N/A - Not an interstate agent or 60106 program.

- 5** Did the state take direction from and cooperate with PHMSA for all incident investigations conducted on interstate pipelines? Info Only Info Only
Info Only = No Points

Evaluator Notes:
N/A - Not an interstate agent or 60106 program.

- 6** General Comments: Info Only Info Only
Info Only = No Points

Evaluator Notes:
Part G is N/A.

Total points scored for this section: 0
Total possible points for this section: 0

