



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

1200 New Jersey Avenue SE
Washington DC 20590

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Pipeline Safety

2020 Gas Base Grant Progress Report

for

IDAHO PUBLIC UTILITIES COMMISSION

Please follow the directions listed below:

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Pipeline and Hazardous Materials Safety Administration
1200 New Jersey Avenue, SE
Washington DC 20590

OFFICE OF PIPELINE SAFETY

2020 Gas Base Grant Progress Report

Office: IDAHO PUBLIC UTILITIES COMMISSION

M. Barrett-Riley for Paul Kjellander

Authorized Signature

Maria Barrett-Riley

Printed Name

Executive Director

Title

3-4-2021

Date



PROGRESS REPORT ATTACHMENTS (GAS)

PHMSA Form No. PHMSA F 999-92

INSTRUCTIONS:

These attachments request information either for the entire calendar year (CY 2020: January 1 through December 31, 2020) or as of (or on) December 31, 2020. Please report actual as opposed to estimated numbers on the attachments. Be careful to provide complete and accurate information since the PHMSA State Programs will be validating the attachments during the state's next annual evaluation.

- **Attachment 1: State Jurisdiction and Agent Status Over Facilities.** Requires the state to indicate those pipeline operator types over which the state agency has jurisdiction under existing law. If the state does not have jurisdiction over an operator type, indicate why not in the column designated No, using the one alpha code (A or B) which best describes the reason. If the state agency has jurisdiction over an operator type, place an X in the column designated Yes and provide information on the number of operators, the number and percent of operators inspected, the number of inspection units, and the number and percent of inspection units inspected. If the jurisdiction over a type of operator is under a Section 60106 Agreement, indicate X/60106 in the column designated Yes. If an operator has multiple types of system (i.e. gas distribution and intrastate transmission), each type should be counted in corresponding category. Total operator count listed in Attachment 3 may not match Attachment 1 totals due to multiple types of systems per operator. If the same operator/inspection unit is visited more than once during the year, count only once under number of operators inspected/number of inspection units inspected on Attachment 1. The multiple visits would, however, be reflected under total inspection person-days in Attachment 2.
- **Attachment 2: Total State Field Inspection Activity.** Requires the state to indicate by operator type the number of inspection person-days spent during CY 2020 on inspections; standard comprehensive; design, testing, and construction; on-site operator training; integrity management; operator qualification; investigating incidents or accidents; damage prevention activities; and compliance follow-up. Attachment 2 should include drug and alcohol inspections. Counting "In Office" Inspection Time - An inspector may choose to review pipeline company procedure manuals or records away from the company facility in order to effectively use on-site inspection time. The amount of time spent reviewing procedures and records may be counted as part of the inspection process. It is important that an inspector only record time for activities that normally would be completed as part of an on-site inspection. For example, an inspector may attribute the three hours he or she spent reviewing a pipeline operator's procedure manual and records prior to an on-site inspection towards the total inspection time. Each supervisor must carefully review the reported time to ensure the time attributed is consistent with the activity completed and is carefully delineated from normal office duties.
- **Attachment 3: Facility Subject to State Safety Jurisdiction.** States should only list the facilities that are jurisdictional under Parts 192 and 193 (Gas) and Part 195 (Hazardous Liquid) of which the state has safety authority over. This attachment requires the business name and address of each person subject to the pipeline safety jurisdiction of the state agency as of December 31, 2020. Also indicate the operator type (e.g., intrastate transmission) consistent with the listing in Attachment 1 and include the number of inspection units in each operator's system. The operator identification number (OPID) assigned by PHMSA must also be included on this attachment. If an operator has multiple types of system (i.e. gas distribution and intrastate transmission), each type should be counted in corresponding category. Total operator count listed in Attachment 3 may not match Attachment 1 totals due to multiple types of systems per operator. Please make comments in notes section to provide any clarification on operator name changes, mergers, removals and other anomalies.

- Attachment 4: Pipeline Incidents.** Requires a list of incidents investigated by or reported to the state agency that involved personal injury requiring hospitalization, a fatality, property damage exceeding \$50,000, and others deemed significant by the operator. Clearly identify the operator's reported cause AND the state's determination of the cause of the incident using the one most appropriate alpha code footnoted in the attachment. We summarize this information for Congress by classifying the cause into one of eight top-level categories: (A) corrosion failure; (B) natural force damage; (C) excavation damage; (D) other outside force damage; (E) material failure of pipe or weld; (F) equipment failure; (G) incorrect operation; (H) other accident cause. Within each top-level cause you will find multiple sub-causes, select the appropriate cause code. You can also choose (IP) Investigation Pending for those incidents remaining under investigation as of December 31. Then provide a summary of incident investigations.
- Attachment 5: State Compliance Actions.** This requires a summary of state pipeline inspection and compliance actions. [In the Number of Compliance Actions Taken column, keep in mind one compliance action can cover multiple probable violations.]
- Attachment 6: State Record Maintenance and Reporting.** Requires a list of records and reports maintained and required by the state agency.
- Attachment 7: State Employees Directly Involved in the Pipeline Safety Program.** This attachment requires a list by name and title of each employee directly involved in the pipeline safety program. Be sure to include the percentage of time each employee has been involved in the pipeline safety program during 2020. If an employee has not been in the pipeline safety program the full year of 2020, please note the number of months working on the program. Indicate a Qualification Category for each of the state's inspectors (see Attachment 7a). The categories are shown in descending order of education and experience. Please enter the number of the highest description applicable to each inspector. For each inspector and supervisor, indicate the month and year he/she successfully completed the training courses at the Pipeline Safety Office of Training and Qualifications in Oklahoma City, OK. Finally, provide in summary form the number of all staff (supervisors, inspectors/investigator, damage prevention/technical and clerical/administrative) working on the pipeline safety program and the person-years devoted to pipeline safety. Person-years should be reported in hundreds (e.g., 3.25).
- Attachment 8: State Compliance with Federal Requirements.** This requires the state to indicate whether it is in compliance with applicable federal requirements. If a particular requirement is not applicable to the state (e.g. offshore inspections), indicate NA in the column designated Y/N/NA and indicate in the notes section why the regulation is not applicable. If a regulation has been adopted, indicate the date adopted (e.g., 05/01/04) in the appropriate column. If the regulation is applicable but has not been adopted indicate N in the Y/N/NA column and explain why not in the appropriate column (e.g., requires legislative action). If the state has not adopted the maximum penalty amounts for a related series of violations please indicate civil penalty levels in effect in the state as of December 31. For State Adoption of Part 198 State One Call Damage Prevention Program if a state has any penalty amount for its damage prevention law please mark item 7.h as "Adopted but Different Dollar Amounts" and list the penalty amount in the Note section. Note at the end of Attachment 8 we are requesting each state to indicate the frequency its legislature meets in general session. This information will be taken into account when determining if applicable federal regulations have been adopted within 24 months of the effective date or two general sessions of the state legislature.
- Attachment 10: Performance and Damage Prevention Questions.** This attachment requires a narrative of each states goals and accomplishments. In addition it requires a narrative on each states progress toward meeting the nine elements of an effective damage prevention program as described in the PIPES Act of 2006.



DEFINITIONS

- **Inspection Unit.** An inspection unit is all or part of an operator's pipeline facilities that are under the control of an administrative unit that provides sufficient communication and controls to ensure uniform design, construction, operation, and maintenance procedures for the facilities. (See Glossary of Terms in Guidelines for States Participating in the Pipeline Safety Program for application of the inspection unit concept to transmission and hazardous liquid pipeline systems, distribution systems, liquefied gas systems, municipality, master meter system, regulated gathering pipeline systems, and propane-air systems/petroleum gas systems.)
- **Inspection Person-Day.** An inspection person-day is all or part of a day spent by a state agency representative including travel in an on-site examination or evaluation of an operator or his system to determine if the operator is in compliance with federal or state pipeline safety regulations, in an on-site investigation of a pipeline incident, or in job-site training of an operator. Time expended on such activities should be reported as one inspection person-day for each day devoted to safety issues, regardless of the number of operators visited during that day.
- **Probable Violation.** A probable violation is a non-compliance with any section or, where a section is divided into subsections (a), (b), (c), etc., any subsection of federal or state pipeline regulations. Each numbered section should be counted separately. Multiple non-compliances of a numbered section discovered on the same inspection should be counted as one probable violation with multiple pieces of evidence.
- **Compliance Action.** A compliance action is an action or series of sequential actions taken to enforce federal or state pipeline regulations. One compliance action can cover multiple probable violations. A compliance action may take the form of a letter warning of future penalties for continued violation, an administratively imposed monetary sanction or order directing compliance with the regulations, an order directing corrective action under hazardous conditions, a show-cause order, a criminal sanction, a court injunction, or a similar formal action.



Attachment 1 - Stats on Operators

STATE JURISDICTION AND AGENT STATUS OVER GAS FACILITIES AS OF DECEMBER 31, 2020

Operator Type	State Agency Jurisdiction/ Agent Status		No. of Operators	Operators Inspected		No. of Inspection Units	Units Inspected	
	No ¹	Yes		#	%		#	%
Distribution								
Private		X/60105	3	3	100.0%	10	7	70.0%
Municipal	A		0	0	N/A	0	0	N/A
Master Meter		X/60105	0	0	N/A	0	0	N/A
LPG		X/60105	0	0	N/A	0	0	N/A
Other	A		0	0	N/A	0	0	N/A
Transmission								
Intrastate		X/60105	2	2	100.0%	2	2	100.0%
Interstate	F		0	0	N/A	0	0	N/A
LNG								
Intrastate		X/60105	1	1	100.0%	1	1	100.0%
Interstate	A		0	0	N/A	0	0	N/A
Other								
Gathering Lines		X/60105	1	1	100.0%	1	1	100.0%
Offshore Facilities	A		0	0	N/A	0	0	N/A
Total			7	7	100.0%	14	11	78.6%

¹Codes: A - None in state and does not have jurisdiction;

B - State does not have jurisdictional authority (Provide current status or action being taken to obtain authority in notes section below)

F - No, State is currently not an interstate agent.

X/60105P = Yes, I have Section 60105 (Certification) over some of the operator type (meaning: I have 60105 authority over some, but not all of this operator type and do not have a 60106 agreement with PHMSA to inspect them). These operators are identified in the notes below.

X/IA - Yes, I have Interstate Agent jurisdiction over this type of operator

Distribution "Other" - ie Co-ops, Public Utility Districts, etc.

States should explain any special circumstances

General Instructions - All above facilities should only include facilities as defined by federal pipeline regulations and should not include extended jurisdiction by state regulation.

Attachment 1 Notes:

Idaho actually only has 4 operators: 1. Avista (distribution only), 2. Dominion (transmission and distribution), 3.

Intermountain Gas Company (transmission, distribution and LNG), and 4. Northwest Gas Processing (gathering only). Due to travel restrictions and COVID-19 Pandemic some of the Inspection units were postponed from 2020 to 2021. New for 2021 Douglas Pipeline will be added as an operator (transmission only).



Attachment 2 - State Inspection Activity

**TOTAL STATE FIELD INSPECTION ACTIVITY AS
OF DECEMBER 31, 2020**

Operator Type	Standard Comprehensive	Design, Testing and Construction	On-Site Operator Training	Integrity Management	Operator Qualification	Investigating Incidents or Accidents	Damage Prevention Activities	Compliance Follow-up	Total
Distribution									
Private	86.000	123.500	21.000	5.500	7.000	0.000	3.500	0.000	246.500
Municipal	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Master Meter	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
LPG	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Other	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Transmission									
Intrastate	10.500	0.000	7.000	20.000	3.000	0.000	2.000	0.000	42.500
Interstate	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
LNG									
Intrastate	5.000	0.000	0.000	0.000	1.000	0.000	0.000	0.000	6.000
Interstate	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Other									
Gathering Lines	15.500	13.000	0.000	0.000	1.000	0.000	0.000	0.000	29.500
Offshore Facilities	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Total	117.000	136.500	28.000	25.500	12.000	0.000	5.500	0.000	324.500

Drug and Alcohol

Total Count of Drug and Alcohol Inspections

5

Attachment 2 Notes

Attachment 3 - List of Operators

GAS FACILITIES SUBJECT TO STATE SAFETY JURISDICTION AS OF DECEMBER 31, 2020

Operator Business Name Operator ID Address	Distribution (Operator type & Inspection Units)				Transmission (Operator type & Inspection Units)		LNG(Operator type & Inspection Units)		Other (Operator type & Inspection Units)	
	Private	Municipal	Master Meter	LPG Other	Intrastate	Interstate	Intrastate	Interstate	Gathering Lines (Jurisdictional)	Offshore Facilities (State Waters)
Avista Corporation 31232 1411 E. Mission, Spokane, WA 99220	4	0	0	0	0	0	0	0	0	0
Dominion Energy 12876 1040 W. 200 S., Salt Lake City, UT 84145	1	0	0	0	1	0	0	0	0	0
Douglas Pipeline Co 31442 3829 Willow Ave Suite 203, Pittsburg, PA 15234	0	0	0	0	1	0	0	0	0	0
Intermountain Gas Company 8160 555 South Cole, Boise, ID 83707	5	0	0	0	1	0	1	0	0	0
Northwest Gas Processing, LLC 39370 15021 Katy Freeway, Suite 400 Houston, TX 77094	0	0	0	0	0	0	0	0	1	0



	Distribution (Operator type & Inspection Units)			Transmission (Operator type & Inspection Units)		LNG(Operator type & Inspection Units)		Other (Operator type & Inspection Units)			
	Private	Municipal	Master Meter	LPG	Other	Intrastate	Interstate	Intrastate	Interstate	Gathering Lines (Jurisdictional)	Offshore Facilities (State Waters)
Inspection Unit totals by type	10	0	0	0	0	3	0	1	0	1	0

Total Operators **5**

Attachment 3 Notes:
Douglas was assigned to the state, will not be inspected until 2021.



Attachment 4 - Incidents/Accidents

SIGNIFICANT⁴ GAS INCIDENTS/ACCIDENTS JANUARY 1, THROUGH DECEMBER 31, 2020

Date of Incident	Location - City/County/etc.	System Type	Injuries #	Fatalities #	Property Damage ³ \$	Operator Cause Code ¹	State Cause Code ¹
01/16/2020	IDAHO FALLS	GD	0	0	\$61,756.00	C4	G5
Name of Operator: INTERMOUNTAIN GAS CO							
Operator ID: 8160		Report No: 20200025					
Summary ² Leak was identified via a failed pressure test, corrosion happened due to improper application of field wrap that replaced a piece of vintage coal tar wrap that had been knocked off years ago.							

¹High Level Cause Codes: A - Corrosion failure; B - Natural Force Damage; C - Excavation Damage; D - Other Outside Force Damage; E - Pipe, Weld or Joint Failure; F - Equipment Failure; G - Incorrect Operation; H - Other Incident Cause; IP - Investigation Pending;

²Please include a summary or report of the state agency's investigation of each of the above incidents.

³Interstate agents should use the 191.3 Incident definition for listing incidents investigated on interstate facilities.

Attachment 4 Notes



Attachment 5 - Stats on Compliance Actions

STATE COMPLIANCE ACTIONS -- CALENDAR YEAR (CY) 2020

Probable Violation Categories	Intrastate	Interstate
Number carried over from all previous CY's	0	0
Number Found During CY	11	0
Number submitted for DOT action [60106 Agreement agent only]	0	0
Number corrected during CY (including carry over from previous year(s))	11	0
Number to be corrected at end of CY (including carry over)	0	0

Number of Compliance Actions Taken ¹

(see definition) 11

Civil Penalties

Number assessed during CY	0
Dollars assessed during CY	\$0.00
Number collected during CY	0
Dollars collected during CY	\$0.00

¹Do not double count for a related series of actions.

Attachment 5 Notes



Attachment 6 - List of Records Kept

GAS STATE RECORD MAINTENANCE AND REPORTING DURING CY 2020

Records Maintained by the State Agency

- Pipeline Safety Program Annual Certification/Progress Report
- Operator Annual Reports
- Common Ground Alliance
- Compliance Actions
- Damage Prevention Program
- Inspection Field Days
- Annual Inspection Schedule
- Operator Incident/Accident
- PHMSA Correspondence
- PUC Pipeline Safety Program Plan (POP)
- PHMSA Program Evaluation
- OPS Grants- Base Grant Application
- Safety Related Condition Reports
- Pipeline Training
- T & Q Seminars
- NAPSR Surveys
- Inspection Reports: 2016, 2017, 2018, 2019, 2020

Reports Required from Operators

- Incident Reports as per IPUC rule
- Operators Annual Report

Attachment 6 Notes

NAPSR Surveys are conducted on-line using Survey Monkey.



Attachment 7 - Staffing and TQ Training

STATE EMPLOYEES DIRECTLY INVOLVED IN THE GAS PIPELINE SAFETY PROGRAM DURING CY 2020

Name/Title	% Time	# Months	Qual. Cat.
Supervisor			
Ulmer, Darrin Program Manager	40.000	12	NA
Inspector/Investigator			
Jeff Brooks			
Inspector	100.000	1	III
Perkins, Bruce			
Inspector	100.000	12	II
Russo, Kyle			
Inspector	100.000	4	II
Ulmer, Darrin			
Inspector	60.000	12	II

Summary

<u>Employee Type</u>	<u>No. of Staff</u>	<u>Person-Years</u>
Supervisor	1	0.400
Damage Prevention/Technical	0	0.000
Inspectors/Investigators	4	2.020
Clerical/Administrative	0	0.000
Total	5	2.420

Attachment 7 Notes

Attachment 8 - Compliance with Federal Regulations

STATE COMPLIANCE WITH FEDERAL REQUIREMENTS AS OF DECEMBER 31, 2020

No.	Effective Date	Impact	Adoption Date	Adoption Status
1		<p>Maximum Penalties Substantially same as DOT (\$222,504/\$2,225,034). State must adopt minimum penalties of at least (\$100,000/\$1,000,000). Indicate actual amount in notes.</p> <p>\$2,000 per each violation per day the violation persists. \$200,000 maximum for any related series of violations.</p>	04/1970	Adopted Other
2		Part 192 Amendments		
1-115	Pre 2011	[All applicable amendments prior to and including 2010]	12/31/2010	Adopted
Note ¹				
116 - 76 FR 5494	4/4/2011	Mechanical Fitting Failure Reporting Requirements	04/2012	Adopted
Note ¹				
117-76 FR 35130	8/15/2011	Control Room Management/Human Factors	04/2013	Adopted
Note ¹				
118 - 78 FR 58897	10/25/2013	Administrative Procedures, Updates, and Technical Corrections (Not applicable to States)	04/2016	Adopted
Note ¹				
119 - 80 FR 168	3/6/2015	Periodic Updates of Regulatory References to Technical Standards and Miscellaneous Edits	04/2016	Adopted
Note ¹				
120 - 80 FR 12779	10/1/2015	Miscellaneous Changes to Pipeline Safety Regulations (Part 192.305 DELAYED)	04/2016	Adopted
Note ¹				

121 - 81 FR 70989	4/14/2017	Expanding the Use of Excess Flow Valves in Gas Distribution Systems to Applications Other Than Single-Family Residences	07/2018	Adopted
Note ¹				
122 - 81 FR 91860	1/18/2017	Safety of Underground Natural Gas Storage Facilities	1/18/2017	N/A
Note ¹				
123 - 82 FR 7972	3/24/2017	Operator Qualification, Cost Recovery, Accident and Incident Notification, and Other Pipeline Safety Changes	07/2018	Adopted
Note ¹				
124 - 83 FR 58694	1/22/2019	Use of Plastic Piping Systems in the Transportation of Natural and Other Gas		Not Adopted
Note ¹	Will be addressed in the next upcoming legislation session.			
125 - 84 FR 52180	7/1/2020	Pipeline Safety: Safety of Gas Transmission Pipelines: MAOP Reconfirmation, Expansion of Assessment Requirements, and Other Related Amendments		Not Adopted
Note ¹	Will be addressed in the next upcoming legislation session.			
3		Part 193 Amendments (applicable only where state has jurisdiction over LNG)		
1-23	Pre 2011	[All applicable amendments prior to and including 2010]	12/2010	Adopted
Note ¹				
24 - 78 FR 58897	10/25/2013	Administrative Procedures, Updates, and Technical Corrections	04/2016	Adopted
Note ¹				
25 - 80 FR 168	3/6/2015	Periodic Updates of Regulatory References to Technical Standards and Miscellaneous Edits	04/2016	Adopted
Note ¹				
4		Part 199 - Drug Testing	03/2001	Adopted
Note ¹				
5		Part 199 Amendments		
1-24	Pre 2011	[All applicable amendments prior to and including 2010]	12/2010	Adopted
Note ¹				

25 - 78 FR 58897	10/25/2013	Administrative Procedures, Updates, and Technical Corrections	04/2016	Adopted
Note ¹				
26 - 80 FR 168	3/6/2015	Periodic Updates of Regulatory References to Technical Standards and Miscellaneous Edits	04/2016	Adopted
Note ¹				
27 - 82 FR 7972	3/24/2017	Operator Qualification, Cost Recovery, Accident and Incident Notification, and Other Pipeline Safety Changes	07/2018	Adopted
Note ¹				
28 - 84 FR 16770	4/23/2019	Conforming Amendments and Technical Corrections to Department Rules Implementing the Transportation Industry Drug Testing Program		Not Adopted
Note ¹		Will be addressed in the next upcoming legislation session.		
6		State Adoption of Part 198 State One-Call Damage Prevention Program		
a.		Mandatory coverage of areas having pipeline facilities	04/1990	Adopted
Note ¹				
b.		Qualification for operation of one-call system	04/1990	Adopted
Note ¹				
c.		Mandatory excavator notification of one-call center	09/1990	Adopted
Note ¹				
d.		State determination whether calls to center are toll free	04/1991	Adopted
Note ¹				
e.		Mandatory intrastate pipeline operator participation	04/1990	Adopted
Note ¹				
f.		Mandatory operator response to notification	04/1990	Adopted
Note ¹				
g.		Mandatory notification of excavators/public	07/2002	Adopted
Note ¹				



h. Civil penalties/injunctive relief substantially same as DOT 07/2018 Adopted but Different Dollar Amounts
Note¹ Current law provides for \$1,000 penalty for second occurrence; \$5,000 for any subsequent occurrences.

'If Adoption Status is No, Please provide an explanation

State Attendance at 2020 NAPS Regional Meeting: Attended full time (Lead rep or alternative pipeline staff)
Frequency of General Legislative Session: Annually

Attachment 8 Notes

All enforcement authority for damage prevention is held within Idaho Division of Building Safety's Damage Prevention Board. The Commission does hold a seat on the 11 person board but does not have any directive authority over it.



Attachment 10 - Performance and Damage Prevention Questions

CALENDAR YEAR (CY) 2020

Planned Performance: What are your Planned Annual and Long-term goals for your Pipeline Safety Program?

The IPUC Pipeline Safety Program is committed to improving our safety program. The Commission's annual goals are to ensure Idaho jurisdictional pipeline operators are providing the safe transportation and delivery of natural gas to its customers and doing this without affecting the safety of the public. This is accomplished by a comprehensive program of inspections and audits of the companies' records and field equipment and following-up on each incident and non-compliance found. During the next year, the Commission has added a new operator into their inspection plan. The Commission's inspection staff will conduct more construction inspections, conduct follow-up inspections of the high-pressure service sets (HPSS/farm taps) and will attempt to attend the construction of the renewable natural gas pipelines that are planned in the near future. The Commission's goal is to their new inspector qualified to lead basic inspections.

Past Performance: What did the Pipeline Safety Program accomplish during the subject year (to this document) to contribute toward the program's annual and long-term goals?

Four Intrastate operators within the Commission's jurisdiction were inspected for the safe transportation and delivery of natural gas within the state according to the Commission's approved program of operating procedures. Any deficiencies noted were documented, discussed with the operators for corrective actions, and follow-up inspections were performed when required. IPUC inspectors completed 5 T&Q courses and the scheduled inspections that could be completed due to the travel restrictions from Covid-19. With limited overnight travel the inspectors increased local construction inspections. The PUC's third inspector departed the Commission, but a replacement has been hired to fill the vacancy.

1. Has the state or agency reviewed the Damage Prevention Assistance Program (DPAP) document in the last twelve months?

No

2. Has the state or agency developed or is in the process of developing a plan to address the nine elements contained in the PIPES Act of 2006 for an effective State Damage Prevention Program?

Yes

If yes to question 2, where does the state or agency stand on implementation of the nine elements contained in the PIPES Act of 2006? Please provide a description of how the state or agency has or will meet each element. If not, please provide a brief passage explaining the reasons why the state or agency has not.

The Commission has continued to participate in the statewide coalition for damage prevention but does not have statutory authority to develop a State Damage Prevention Program that would have any enforcement ability. All enforcement authority for damage prevention is held within Idaho Division of Building Safety's Damage Prevention Board. The Commission does hold a seat on the board but would not have any directive authority over it. The board's objective plan has addressed the nine elements for an effective State Damage Prevention Program. The Commission supports the program through an alliance with two one-call centers, Operator's public awareness programs, and utility coordinating councils. The goal of the coalition is to improve the underground damage prevention law, eliminate as many exemptions as possible, educate the public and establish an effective enforcement mechanism in accordance with the 9 elements contained in the PIPES Act. During annual audit(s) of each operator, the Commission continues to review operator's damage prevention program against rules and standards to ensure the programs processes are in place and effective. Noted deficiency(s) are documented on the IPUC Form 1 and the appropriate section of the PHMSA checklist. Significant process deficiencies result in immediate corrective actions and if needed a compliance action. Procedures for probable violation process established in the Commission's program operating procedures will be followed.

Attachment 10 Notes

The State of Idaho does not have a formal Damage Prevention Assistance Program document. There is not any provision in statute for a specific state agency to develop and enforce such a document.

