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

1200 New Jersey Avenue SE
Washington DC 20590

2019 Gas State Program Evaluation

for

OREGON PUC

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

2019 Gas State Program Evaluation -- CY 2019

Gas

State Agency: Oregon
Rating:
Agency Status:
60105(a): Yes **60106(a):** No **Interstate Agent:** No
Date of Visit: 10/01/2020 - 10/01/2020
Agency Representative: Kevin Hennessy, Chief Pipeline Safety
PHMSA Representative: David Lykken, Transportation Specialist
Commission Chairman to whom follow up letter is to be sent:

Name/Title: Megan Decker, Chair
Agency: Oregon Public Utility Commission
Address: 201 High Street SE, Suite 100
City/State/Zip: Salem, OR 97301-3398

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 2019 (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	10
D	Program Performance	50	49
E	Field Inspections	15	15
F	Damage prevention and Annual report analysis	4	4
G	Interstate Agent/Agreement States	0	0
TOTALS		**94**	**93**
State Rating			**98.9**

PART A - Progress Report and Program Documentation Review

	Points(MAX)	Score
1 Were the following Progress Report Items accurate? Info Only = No Points	Info Only	Info Only

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. No issues. Inspection Unit totals by operator type on Attachment 3 are consistent with the Inspection Unit totals on Attachment 1.
b. Minimum number of inspection days required was 414. Actual was 395.5. DT&C days were 45.04% of SICT total minimum. Two-point deduction on PR scoring for not meeting minimum number of inspection person-days.
c. Reviewed PDM data including operator annual reports. No issues.
d. No reportables in CY2019. Confirmed in PDM.
e. Entry error on CY2018 PR. Number carried over should be "3" not "32".
f. Revise list of records maintained by the program. Not a comprehensive list.
g. Review TQ training in Black board system to verify individuals in training system as active and Inspector Categories are assigned correctly.
h. Taking steps to adopt PE rules.
I. No issues

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 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	5	5

Evaluator Notes:
a. Section V (Conducting Inspection). Pages 16 thru 24.
b. Section V, Chapter N.
c. Section V, Chapter I. Page 21.
d. Section V, Chapter M
e. Section V, Chapter L on page 22.
f. Section V, Chapter H.
g. Section "C". Chapter IV.

		Points(MAX)	Score
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 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?	4	4

Evaluator Notes:
Section IV - Inspection Planning. Time intervals listed on page 13. Program utilizes a "Inspection Unit Updated Worksheet" to document length of time between inspection types, document significant information such as incident history. List of factors for prioritizing inspections listed on page 12.

		Points(MAX)	Score
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 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	3	3

Evaluator Notes:
Section V (Conducting Inspections), Chapter C (General Code Compliance Inspection Guidelines- Inspection Activities), Chapter P (NOPV's), Chapter Q (NOPV Actions and Enforcement), Chapter R (Notice of Probable Violation Tracking), and Section S (Removal or Correction of Probable Violation).

		Points(MAX)	Score
4	(Incident/Accident Investigations) Does the state have written procedures to address state actions in the event of an incident/accident? Yes = 3 No = 0 Needs Improvement = 1-2	3	3

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:

Part VI Investigation of Incidents Chapter B. Program maintains 24hr Pipeline Emergency Reporting number. Chapter F Specific Investigation Issues including On-site Incident/Accident Investigations addressed.

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5 General Comments: Info Only Info Only

Info Only = No Points

Evaluator Notes:

No issues. 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
1	Has each inspector and program manager fulfilled training requirements? (See Guidelines Appendix C for requirements) Chapter 4.4 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)	5	5

Evaluator Notes:

Yes. a) OQ training necessary for conducting OQ inspections. b) Hennessy and Ivey conduct IM inspections as lead have completed all necessary T&Q training. c) Hennessy and Ivey have completed the T&Q Root Cause training. e) Inspectors who conducted standard inspections as lead have attend all necessary T&Q courses.

2	Did state records and discussions with state pipeline safety program manager indicate adequate knowledge of PHMSA program and regulations? Chapter 4.1,8.1 Yes = 5 No = 0 Needs Improvement = 1-4	5	5

Evaluator Notes:

Yes. PM has been with the pipeline safety program since 2003.

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

Evaluator Notes:

No issues. No point deduction under Part C.

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

PART D - Program Performance

		Points(MAX)	Score
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 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)	5	5

Evaluator Notes:

Intervals met for all Operators and inspection types.

		Points(MAX)	Score
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 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)	10	10

Evaluator Notes:

Yes. The program utilizes the IA for conducting Standard, PAPEI, OQ, TIMP, DIMP, CRM, and D&A inspections.

		Points(MAX)	Score
3	Is state verifying operators OQ programs are up to date? 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:

No issues. Field verification typically conducted during standard inspections and during construction inspections.

		Points(MAX)	Score
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 Subpart P Yes = 2 No = 0 Needs Improvement = 1 a. Are the state's largest operator(s) plans being reviewed annually? 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?	2	2

Evaluator Notes:

No issues identified. Largest operators have regular
reviews of IMP to ensure tests and remedial actions are being conducted

5 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 — 2 — 2

Yes = 2 No = 0 Needs Improvement = 1

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?

Evaluator Notes:

a/b: No known CI remaining in OR. c: Covered under IA GT and GD Baseline Procedures directives. D: Tracked and reviewed annually with data pulled from the PDM, DIRT, program's own investigative reports, and Non-reportable event data. f: Procedural question incorporated into IA DIMP protocol question set. g: Procedural question incorporated into IA GD Baseline P/R/O, DIMP, DIMP Implementation, MMLPGIM, and DT&C question sets.

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6 Did the State verify Operators took appropriate action regarding advisory bulletins issued since the last evaluation? (Advisory Bulletins Current Year) — 1 — 1

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

No new Advisory Bulletins issued in 2019. Usually covered during monthly Oregon Utility Safety Committee (OUSC) meetings.

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7 (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 — 10 — 9

Yes = 10 No = 0 Needs Improvement = 1-9

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)

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:
Inspection reports sent to appropriate company official. Probable Violations well documented. The program tracks and reviews progress and resolution of PV's via Master Inspection List. Compliance actions issued for all PV's identified. Last civil penalty issued was in CY2013. 90 day requirement to communicate preliminary findings exceeded in a number of cases. Written notices via compliance letter to company officer or manager.

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8 (Incident Investigations) Were all incidents investigated, thoroughly documented, with conclusions and recommendations? 10 10

Yes = 10 No = 0 Needs Improvement = 1-9

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?

Evaluator Notes:
No reportable incidents in CY2019. Confirmed in PDM. Program maintains 24hr Pipeline Emergency Reporting number. Program maintains good communications with AID and Western Region. Lessons learned shared during NAPSR western region meetings and monthly OUSC meeting when applicable.

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9 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 1 1

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:
Letter out 8/27/19. Chair's response received 10/22/19.

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10 Did State conduct or participate in pipeline safety training session or seminar in Past 3 Years? Chapter 8.5 Info Only Info Only

Info Only = No Points

Evaluator Notes:
Program no longer conducts regular seminars. PM attend the monthly Oregon Utility Safety Committee (OUSC) meetings. PM controls agenda. Audience primarily made up of pipeline operators and other utilities. Reviewed agendas which demonstrate pipeline specific items are covered. These meeting are bi-monthly.

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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:
Covered under the programs Operator HQ Annual Records review inspections. Results are recorded in the IA.

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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 during passt evaluations. Web site provides minimal information. Past inspection and enforcement history available through public records request only.

13 Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.3 — 1 — 1

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

No SRCR's in CY2019. Confirmed in WMS and PDM.

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14 Was the State responsive to: — 1 — 1

Yes = 1 No = 0 Needs Improvement = .5

a. Surveys or information requests from NAPSR or PHMSA;

b. Operator IM notifications; and

c. PHMSA Work Management system tasks?

Evaluator Notes:

Yes on surveys. Confirmed no IM Notifications or other WMS tasks assigned.

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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:

One waiver was still active. PHMSA 2012-0323 Alternative Strength Testing Methods for certain pipe segments. To date no action taken yet by operator yet.

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16 Were pipeline program files well-organized and accessible? — Info Only — Info Only

Info Only = No Points

Evaluator Notes:

No issues. Most program records for this evaluation provided via MS OneDrive.

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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:

Tool was updated in CY2020. No significant changes. DT&C estimated days accounting for minimum 20%.

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18 Discussion on State Program Performance Metrics found on Stakeholder Communication site.\ http://primis.phmsa.dot.gov/comm/states.htm?nocache=4805 — Info Only — Info Only

Info Only = No Points

Evaluator Notes:

Discussed. Excavation Damages continuse to trend downward averaging 2.9 per 1000 tickets. Inspector core training at 80% and inspector 5yr retention rate at 80%.

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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:

Yes. Has been discussed during OUSC safety council meetings. Reviewed 7/19/2019 meeting agenda.

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20 General Comments: — Info Only — Info Only

Info Only = No Points

Evaluator Notes:

D-7 One point deduction for not communicating preliminary findings to operators within the 90-day requirement.

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

PART E - Field Inspections

		Points(MAX)	Score
1	Operator, Inspector, Location, Date and PHMSA Representative (enter specifics into the comments box below) 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	Info Only	Info Only

Evaluator Notes:
A standard inspection of Avista Utilities - Klamath Falls Service District. Portions last inspected in 2019. Operator was present. Lead inspector David Hoy has been with the pipeline program since 2014. Cody Cox also since 2014.

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) Yes = 2 No = 0 Needs Improvement = 1	2	2

Evaluator Notes:
The IA was used to document inspection results. IA Groups PRR (Records), FR (Field) , OQ Field, and portions of PA Effectiveness sub-group selected.

3	Did the inspector adequately review the following during the inspection 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?	10	10

Evaluator Notes:
Inspectors conducted a records review at the operator's facility and remotely prior to field visit. Procedures were reviewed during field site visits. Field site visits selected based on the records review and a random selection of facilities. Inspection was of adequate length. Two days record review and three days devoted to field site visits.

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

Evaluator Notes:
Yes. Inspection team demonstrated good knowledge of 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) Yes = 1 No = 0 Needs Improvement = .5	1	1

Evaluator Notes:
Final exit interview not observed since inspection is ongoing. Three Unsats and four AOC's identified. Issues identified and brought to the attention of the operator during inspection. Both program inspectors did an excellent job communicating POV's and AOC's.

6	Was inspection performed in a safe, positive, and constructive manner ? Info Only = No Points a. No unsafe acts should be performed during inspection by the state inspector	Info Only	Info Only

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:

Staff examined records for any inconsistencies/discrepancies that warranted a follow up discussion or field investigation? during the audit. Staff reviewed paper records and the conducted site visits to five valve locations and met with a contract locator at two locations. Avista field personnel were observed performing standard maintenance activities at each location. Staff also reviewed the physical condition of visible facilities at these location. Pipeline ROW and Odorant testing sites also visited.

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7 General Comments: Info Only Info Only

Info Only = No Points

Evaluator Notes:

No issues noted. 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:

Annual report data pulled from PDM and loaded into spreadsheet for historical reference, risk analysis, and inspection planning. Information shared with operators and during OUSC meetings.

		Points(MAX)	Score
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	NA

Evaluator Notes:

No point question in CY2019. Harvests annual report source data from PHMSA for their three major operators. Pull out significant leading indicators and how they are performing. Same thing for materials. Reviewed staff compilation of PHMSA F7100.1 LDC Operator Data spreadsheet (2020-2019).

		Points(MAX)	Score
3	Has the state reviewed the operator's annual report pertaining to Part D ? Excavation Damage? Yes = 4 No = 0 Needs Improvement = 1-3 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	NA

Evaluator Notes:

No-point question for CY2019. As noted under F.2Harvest annual report source data from PHMSA for their three major operators. Pull out significant leading indicators and how they are performing. Same thing for materials. Reviewed staff compilation of PHMSA F7100.1 LDC Operator Data spreadsheet (2020-2019).

		Points(MAX)	Score
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 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? 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.	2	2

d. Has the state verified the operator is appropriately focusing damage prevention education and training to address the causes of excavation damages?

Evaluator Notes:

Same as previous years. The state collects damage data on larger operators and performed sufficient analysis to understand target areas for enhancing excavation safety.

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5 General Comments: Info Only Info Only

Info Only = No Points

Evaluator Notes:

No issues identified.

Total points scored for this section: 4
Total possible points for this section: 4

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 = No Points	Info Only	Info Only

Evaluator Notes:
Not a Interstate agent or 60106 agreement 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 = No Points	Info Only	Info Only

Evaluator Notes:
Not a Interstate agent or 60106 agreement 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 = No Points	Info Only	Info Only

Evaluator Notes:
Not a Interstate agent or 60106 agreement 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 = No Points	Info Only	Info Only

Evaluator Notes:
Not a Interstate agent or 60106 agreement program.

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

Evaluator Notes:
Not a Interstate agent or 60106 agreement program.

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

Evaluator Notes:
Not a Interstate agent or 60106 agreement program.

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