



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

1200 New Jersey Avenue SE
Washington DC 20590

2020 Gas State Program Evaluation

for

Public Service Commission of the District of Columbia

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



2020 Gas State Program Evaluation -- CY 2020

Gas

State Agency: District of Columbia

Agency Status:

Date of Visit: 9/14-9/16/2021

Agency Representative: Udeozo Ogbue, Chief Office and Compliance Enforcement

PHMSA Representative: Don Martin

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

Name/Title: Willie L. Phillips, Chair

Agency: Public Service Commission of the District of Columbia

Address: 1325 G Street NW

City/State/Zip: Washington, DC 20095

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 2020 (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

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

Possible Points Points Scored

0	0
15	15
10	10
50	50
15	15
10	10
0	0
100	100

TOTALS

State Rating **100.0**

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. DC has one operator with one distribution unit and one transmission unit. It is consistent with information in the PDM.
- (b. Reviewed 2020 Inspection Person Day pdf provided by the DCPSC. The information in the file verified the 228 days on Attachment 2 of the Progress Report.
- (c. Unit totals on Attachment 3 match totals on Attachment 1.
- (d. There were no incidents listed in Attachment 4. The PDM does not contain any incidents reported during calendar year 2020.
- (e. 49 Notices Of Probable Violations (NOPVs) were prepared in CY 2020. 49 were issued for civil penalties totaling \$345,100 and 1 NOPV was carried over to CY 2021. In CY 2020 civil penalties totaling \$323,600 were collected and included \$86,950 which was carried over from CY 2019. No issues.
- (f. No issues.
- (g. TQ's Blackboard training system was reviewed. All inspectors have completed the minimum training requirements to lead a standard inspection. With engineering degrees, the completion of training warrants a Category I level which matches the entries in Attachment 7.
- (h. The DCPSC has automatic adoption authority. Further, per DC Code ?? 34-706 (b) and DCMR 2398.2, civil penalties for gas pipeline safety violations are linked to the maximum established by federal laws and regulations.
- (i. No issues were found with Attachment 10.

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



- | | | | |
|---|---|---|---|
| 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 | 5 | 5 |
|---|---|---|---|
- 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:

- (a. The DCPSC provides this guidance on Pages 11, 12 and 16 of NATURAL GAS PIPELINE SAFETY INSPECTION AND ENFORCEMENT PROCEDURES, revision June, 2020 (DCPSC Procedures). Pre-inspection activities are described beginning on Page 11. Standard Inspection activities are described beginning on Page 12. Post inspection activities are covered on Page 16. No issues.
- (b. DIMP inspection activities are covered on Page 13 in DCPSC Procedures. TIMP inspection activities are described beginning on Page 13. Pre-inspection activities are described beginning on Page 11. Standard Inspection activities are described beginning on Page 12. Post inspection activities are covered on Page 16. No issues.
- (c. OQ Inspection Procedures are described beginning on Page 14 in DCPSC Procedures. Pre-inspection activities are described beginning on Page 11. Standard Inspection activities are described beginning on Page 12. Post inspection activities are covered on Page 16. No issues.
- (d. Damage Prevention Inspection Procedures are described beginning on Page 15 in DCPSC Procedures. Pre-inspection activities are described beginning on Page 11. Standard Inspection activities are described beginning on Page 12. Post inspection activities are covered on Page 16. No issues.
- (e. The DCPSC has one private distribution operator. There are no small operators in Washington DC. Operator training is not applicable in DC.
- (f. Construction Inspection Procedures are described beginning on Page 15 in DCPSC Procedures. Pre-inspection activities are described beginning on Page 11. Standard Inspection activities are described beginning on Page 12. Post inspection activities are covered on Page 16. No issues.
- (g. There are no LNG facilities in the District of Columbia.

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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
Yes = 4 No = 0 Needs Improvement = 1-3 | 4 | 4 |
|---|--|---|---|
- 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:

The DCPSC considers (a through (f for identifying locations within the one operator's system. There is not a need to prioritize inspection units since the entire area of the District of Columbia is served by one operator and two inspection units. .

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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
Yes = 3 No = 0 Needs Improvement = 1-2 | 3 | 3 |
|---|--|---|---|

- 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:

The DCPSC provides enforcement procedures on Pages 19 - 21 of NATURAL GAS PIPELINE SAFETY INSPECTION AND ENFORCEMENT PROCEDURES.

- (a. On Page 20. No issues.
- (b. On Page 20 and 21. No issues.
- (c. On Page 20 and 21. No issues.

4	(Incident/Accident Investigations) Does the state have written procedures to address state actions in the event of an incident/accident?	3	3
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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:

The DCPSC provides reportable incident investigation procedures on Pages 18 and 19 of NATURAL GAS PIPELINE SAFETY INSPECTION AND ENFORCEMENT PROCEDURES and Commission Rule in FC No. 1089.

- (a. From 15 DCMR 2306 and 3017.8 - Provides the requirement and mechanism for operators to report incident that meet federal reporting thresholds. Pages 18 and 19 of DCPSC Procedures provide response procedures to operator reports. No issues.
- (b. From Pages 18 and 19 of the DCPSC Procedures - "Based on the initial information received by the DC PSC, the Office of Compliance and Enforcement may determine not to conduct on site-site investigation. The Office will keep records to support the decisions made. The Office will conduct on-site investigations of all federal reportable incidents (i.e., resulting in death, injury requiring hospitalization, or property damage exceeding \$50,000)." No issues.

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

Evaluator Notes:

There were no findings that resulted in the loss of points in Part B of this evaluation.

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 | 5 | 5 |
| | <ul style="list-style-type: none">a. Completion of Required OQ Training before conducting inspection as leadb. Completion of Required DIMP/IMP Training before conducting inspection as leadc. Completion of Required LNG Training before conducting inspection as leadd. Root Cause Training by at least one inspector/program managere. Note any outside training completedf. 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:

Upon a review of TQ's Blackboard training system, the following results were identified:

All inspectors have completed training to lead an OQ inspection.

All inspectors are qualified to lead a DIMP inspection and two inspectors are qualified for transmission IMP.

There are no LNG facilities in DC.

Root cause training requirement met.
training was noted.

No outside

All inspectors have completed the required training to lead a Standard Inspection.

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| 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 |
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Evaluator Notes:

The Program Manager successfully completed the minimum required courses plus additional courses. He has a good understanding of pipeline safety regulations, state guidelines and grant document requirements.

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| 3 | General Comments:
Info Only = No Points | Info Only | Info Only |
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Evaluator Notes:

There were no issues that resulted in the loss points in Part C of this evaluation.

Total points scored for this section: 10
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 |
| | <ul style="list-style-type: none">a. Standard (General Code Compliance)b. Public Awareness Effectiveness Reviewsc. Drug and Alcohold. Control Room Managemente. Part 193 LNG Inspectionsf. 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:

The DCPSC's CY 2020 Inspection Spreadsheet Report/DCPSC Actual Inspection Intervals Spreadsheet and OCE's 2020 Inspection Person Days was reviewed. The DCPSC procedures intervals are more stringent than PHMSA's five year requirement. The DCPSC met PHMSA's five year interval but was late on a few inspections on the intervals in the Procedures. The DCPSC was impacted by the Covid-19 pandemic in meeting its inspection intervals which is taken into account for achieving five points on D.1.

- (a. Interval met
- (b. Interval met
- (c. Interval Met
- (d. 2 months past interval
- (e. Not applicable
- (f. The DCPSC exceeded 20%
- (g. Transmission OQ Plan Inspection was 1 month past interval
- (h. Transmission IMP was 1 month past interval

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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 |
| | <ul style="list-style-type: none">a. Standard (General Code Compliance)b. Public Awareness Effectiveness Reviewsc. Drug and Alcohold. Control Room Managemente. Part 193 LNG Inspectionsf. Constructiong. OQ (see Question 3 for additional requirements)h. IMP/DIMP (see Question 4 for additional requirements) | | |

Evaluator Notes:

(a. - (h. - The DCPSC's CY 2020 Inspection Spreadsheet Report/DCPSC Actual Inspection Intervals Spreadsheet and OCE's 2020 Inspection Person Days was reviewed. The DCPSC's sample EN Inspection Forms were reviewed. Inspection/Violation Reports with "Unsatisfactory" inspection finding and Exit Interview notes on expected enforcement action for violation(s) were reviewed.

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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 |
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Evaluator Notes:

The DCPSC's CY 2020 Inspection Spreadsheet Report/DCPSC Actual Inspection Intervals Spreadsheet and OCE's 2020 Inspection Person Days was reviewed. The DCPSC's sample EN 32.9 Inspection Forms were reviewed. Inspection/

Violation Reports with "Unsatisfactory" inspection finding and Exit Interview notes on expected enforcement action for violation(s) were reviewed. No issues.

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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 Subpart P
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
| | a. Are the state's largest operator(s) plans being reviewed annually to ensure they are completing the full cycle of the DIMP/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:

The DCPSC's CY 2020 Inspection Spreadsheet Report/DCPSC Actual Inspection Intervals Spreadsheet and OCE's 2020 Inspection Person Days was reviewed. The DCPSC's sample EN 62 and 70 Inspection Forms were reviewed. Inspection/ Violation Reports with "Unsatisfactory" inspection finding and Exit Interview notes on expected enforcement action for violation(s) were reviewed. No issues.

- (a. There is one transmission operator in DC with 4.6 miles of pipeline. The DCPSC monitors this operator's activities but there is not activity annually with this low mileage of pipeline.
(b. Plastic pipe failures are covered during DIMP inspections.
(c. The DCPSC has verified the operator is considering its low pressure systems as a threat.

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| 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
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
| | 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:

The DCPSC's CY 2020 Inspection Spreadsheet Report/DCPSC Actual Inspection Intervals Spreadsheet and OCE's 2020 Inspection Person Days was reviewed. Documents extracted from WGL's O & M Manual and records related to examination of cast iron pipe for evidence of graphitization, tracking circumferential cracking failures on CI pipelines, emergency procedures for leaks caused by excavation damage near buildings, and operator records of previous accidents and failures was reviewed with the following results.

- (a. The question is on DCPSC Inspection Form (EN 42). The procedures are contained on Page 2 of WGL's O&M Procedures No.
(b. Yes, contained WGL's O&M Procedures No.s 4011, 4014, 4050, 4078, 4079, and 4083. The DCPSC's Inspectors verifies the Operator conducts failure analysis of failed components as part of its engineering review.
(c. It is contained in WGL's O&M Procedure # No.s 1040 and 3220 thru 3222. The procedures are also ncluded in WGL's Emergency Procedures Manual. A question is on DCPSC Inspection Form (EN 42). DCPSC Inspectors monitor to ensure

that the operator tests for the presence of gas in a 360-degrees pattern from the point of origin, not just around the pipe, to determine the extent of migration.

(d. WGL files mandatory bi-monthly damage reports. the DCPSC Inspectors conduct records inspections and confirm appropriate root cause investigation and remedial action by the Operator. Also, our Inspectors encourage the Operator to conduct failure analysis of failed components as part of its engineering review.

(e. The DCPSC reviews WGL's O & M Manual Section 4100 and monitor its deployment of HDD/boring and other trenchless technologies in the District. The DCPSC has also included the protection of gas facilities from the hazards of drilling and other trenchless technologies in DCPSC's Damage Prevention Inspection Form (EN 27).

(f. The DCPSC's review of WGL's DIMP plan confirmed that low pressure distribution systems in threat analysis.

(g. The DCPSC has revised its DIMP inspection form to cover regulators and meters installed inside of building structures.

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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)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|---|--|---|---|

Evaluator Notes:

For advisory bulletin related to overpressure protection of low pressure systems, WGL's Advisory Bulletin on Overpressure Protection revision to O&M Procedures manual was reviewed. For the advisory bulletin related to inside meters, the DCPSC continued to monitor WGL's Mercury Service Regulator Surveys, Replacement, and Relocation Program (in FC 1157) and WGL's Meter and Regulator Field Alert document was reviewed.

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

Copies of Field Inspections-generated and Damage Reports-generated NOPVs complete with exit interviews and Unsatisfactory observations and follow up enforcement actions were reviewed.

- (a. Yes
- (b. Yes
- (c. Yes
- (d. Yes
- (e. Yes
- (f. Yes, see DCPSC Pipeline Safety Rules (DCMR) in FC 1089.
- (g. Yes
- (h. Yes, see DCPSC Pipeline Safety Rules (DCMR) in FC 1089.
- (i. Yes
- (j. Yes
- (e. Yes

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|---|---|----|----|
| 8 | (Incident Investigations) Were all federally reportable incidents investigated, thoroughly documented, with conclusions and recommendations?
Yes = 10 No = 0 Needs Improvement = 1-9 | 10 | 10 |
|---|---|----|----|

- 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:

There were no reportable incidents during the calendar year of 2020.

- (a. It is described in Commission Rule in FC No. 1089 and in OCE's NGPSIEP Manual.
- (b. NA
- (c. NA
- (d. NA
- (e. NA
- (f. NA
- (g. NA
- (h. The AID did not provide information whereby the DCPSC did not assist.
- (I. NA

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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:

There were no deficiencies found in the CY2019 evaluation; therefore, a response was not required.

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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:

Yes, held virtual sessions with MDPSC and VASCC to review and implement two (2) Stays of Enforcement on Meter Inspections and Drug and Alcohol Inspections. Participated in all NARUC Staff Committee sessions and meetings on pipeline safety.

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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:

Yes, see NPMS Session ID Session ID: 17922 NPMS_CY20_WG_SHEN_LATLON.shp: No issues were found in the data.

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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:

The DCPSC's website has a section on pipeline safety and damage prevention that is accessible to all stakeholders. The pipeline safety mission is stated. There is a link to DCPSC and Federal pipeline safety regulations. There is a directory of pipeline safety contacts in the DCPSC. The proceedings in gas pipeline safety formal cases such as Projectpipes2 to continue replacement of at-risk pipes continue to be posted on the Commission web site and project progress is posted on

social media such as Facebook and Instagram. Further, enforcement actions such as NOPVs and related Settlements are available via the website's Commission e-docket system. Various social media are now deployed for Call 811/Dig Safe Campaigns.

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| 13 | Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.3
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

There was one Safety Related Condition Report filed during 2020. Although the DCPSC was late in its update to the Work Management System, the DCPSC did take the necessary follow-up actions and the report was closed.

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

- (a. There were no known instances where the DCPSC did not comply with survey requests.
(b. There were no notifications listed in the PDM for CY2020. No delinquent notification tasks were found in the WMS.

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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.
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|--|---|---|

Evaluator Notes:

The DCPSC has not issued any waivers. In collaboration with MDPSC and VASCC the Commission/OCE initiated, implemented, and verified that the conditions on two (2) PHMSA-mandated temporary Stays of Enforcement on DC Meter Inspections and Drug and Alcohol Inspections to WGL were fully met.

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

The DCPSC made changes in 2020 Progress Report - Updated Program Procedures, Staff Training since the previous evaluation. While conducting the CY2020 Program Evaluation, the electronic records functioned well.

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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?
Yes = 3 No = 0 Needs Improvement = 1-2 | 3 | 3 |
|-----------|---|---|---|

Evaluator Notes:

The SICT submittal (in CY2020) for CY2021 minimum inspection person days was discussed with the program manager in a Microsoft Teams Meeting on September 15th. The DCPSC's SICT projects 127 inspection person days for Design, Test and Construction inspections which based upon past experience. Construction activity is not known for the calendar year at the time the SICT has to be completed. The inspection person days for all other inspections are 98 days for a total of 225 inspection person days.

Peer review notes from your State Inspection Calculation Tool submission ?

"Need to take a look at the days allocated for the various program inspections like CRM, DA, PAPEI, etc. Are the days based on your staff on hand or actual minimum level of inspection days?

General notes for all programs ?

? Is your number of construction days appropriate? (see attached construction data)

? Are you risk ranking/noting risk concerns or unique considerations?"

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

The performance metrics were discussed with the program manager in a Microsoft Teams Meeting on May 19th. The bar charts contained in Primis were reviewed. The program manager was aware that damages per 1000 ticks had leveled off in the last two years reversing a downward trend. The program manager had initiated discussions with stakeholders focusing on

improvement ideas. The damages per 1000 tickets continued a downward trend in CY2020 (after an uptick in CY2019). Leaks repaired have trended upwards but is the result of operator's more proactive action to repair leaks instead of monitoring. This is supported when viewing leaks scheduled for repair at the end of year (carry-over) has been reduced annually. All other metrics appeared to be reasonable.

- 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 DCPSC continues to monitor and assess WGL's SMS and Safety Culture Implementation Plans from OCE/WGL Technical Conferences.

- 20** General Comments: Info Only Info Only

Info Only = No Points

Evaluator Notes:

There were no issues identified that resulted in the loss of points for Part D of this evaluation.

Total points scored for this section: 50
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 Info Only

Info Only = No Points

- What type of inspection(s) did the state inspector conduct during the field portion of the state evaluation? (i.e. Standard, Construction, IMP, etc)
- When was the unit inspected last?
- Was pipeline operator or representative present during inspection?
- Effort should be made to observe newest state inspector with least experience

Evaluator Notes:

- The DCPSC conducted a construction inspection on a 4 inch plastic main Washington Gas and Light (WGL) is altering to allow for dual gas flow. The construction inspection was conducted on September 16, 2021.
- Construction inspections are conducted as needed and the DCPSC continually conducts these inspections.
- WGL's representative was Matthew Masters, Construction Supervisor. The construction location was in the vicinity of L Street and S. Capitol Street in Washington, DC.
- The DCPSC inspector was Ahmadou Bagayoko.

- 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:

The inspector utilized EN 34. The inspector followed the questions on the inspection form.

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

Evaluator Notes:

- Yes, construction procedures were reviewed for plastic butt fusion, plastic electric fusion, pipe installation in ditch and backfilling pipe in ditch.
- The inspector reviewed operator qualification for individuals performing covered tasks during the construction.
- Yes, the inspector verified that procedures were being followed plastic pipe fusing, pipe installation and backfilling. Calibrations were verified.
- None
- The inspection time was appropriate for the activities taking place during the day.

- 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, the inspector was well versed in the regulations concerning design and construction of pipeline facilities and operator qualifications requirements.

- 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 inspector provided a briefing with Matthew Master, WGL's construction supervisor. The inspector describe the activities he observed and stated that there were no non-compliance issues found during the inspection.

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:

- (a. Yes, the inspector wore the proper personal protective equipment and attended a pre-construction briefing before conducting the inspection.
- (b. The inspector observed the following construction activities: Operator Qualification records, plastic pipeE butt fusion, plastic pipe electric fusion, pipeline ditch preparation, pipe storage, pipe lay into ditch, backfill of pipeline in ditch and procedures related to all construction activities.
- (c. None
- (d. None

7 General Comments: Info Only Info Only

Info Only = No Points

Evaluator Notes:

There were no issues identified that resulted in the loss of points in Part E of this evaluation.

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:

The DCPSC reviewed the two Annual Reports (Distribution and Transmission) submitted by the sole operator in the District of Columbia, Washington Gas and Light (WGL). The DCPSC also reviewed WGL's DC CY 2020 Damage Prevention Annual Report. No issues.

- | | | | |
|----------|--|---|---|
| 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:

WGL produces a report annually illustrating damage information on its facilities in the District of Columbia. The DCPSC reviewed the CY2020 report and communicated with WGL about the findings in the report.

- | | | | |
|----------|---|---|---|
| 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:

During the review by the DCPSC noted in Question F.1, the damages root cause information is evaluated for accuracy and problematic trends. It provides topics for discussion with the operator on how improvements can be initiated to prevent future damages.

- (a. Yes
- (b. One-Call Notification Practices Not Sufficient is categorized under the label WGL. For clarity, the DCPSC should request that WGL illustrate the data as One-Call Notification Practices Not Sufficient. .21 damages per 1000 locates are caused by One-Call Notification Not Sufficient.
- (c. Yes. .21 damages per 1000 locates are caused by Locating Practices Not Sufficient.
- (d. Yes
- (e. Yes
- (f. Of the 16 damages caused by Locating Practices Not Sufficient, 6 were due to Mismarks.
- (g. Of the 16 damages caused by Locating Practices Not Sufficient, 10 were due to Failed to Mark as Requested.
- (h. Yes
- (i. Yes
- (j. Yes

- | | | | |
|---|--|---|---|
| 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 | 2 | 2 |
|---|--|---|---|
- 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.
 - d. Has the state verified the operator is appropriately focusing damage prevention education and training to address the causes of excavation damages?

Evaluator Notes:

WGL's DC CY 2020 Damage Prevention Annual Report and OCE's DC Damage Prevention Summary and Trend Analysis/ Graph was reviewed.

- (a. Third party excavators. 1.04 damages per 1000 locates are caused by Excavating Practices Not Sufficient.
- (b. Yes, WGL's DC CY 2020 Damage Prevention Annual Report provides training information.
- (c. Yes.
- (d. Yes, the DCPSC discusses the information contained in the Damage Prevention Annual Report with WGL.

5 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

There were no issues identified that resulted in the loss of points in Part F of this evaluation.

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:

DCPSC is not an interstate agent.

- 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:

DCPSC is not an interstate agent.

- 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:

DCPSC is not an interstate agent.

- 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:

DCPSC is not an interstate agent.

- 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:

DCPSC is not an interstate agent.

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

Evaluator Notes:

DCPSC is not an interstate agent.

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