



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

IDAHO PUBLIC UTILITIES COMMISSION

Document Legend

PART:

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



2020 Gas State Program Evaluation -- CY 2020

Gas

State Agency: Idaho

Agency Status:

Date of Visit: 04/21/2021 - 04/21/2021

Agency Representative: Darrin Ulmer, Program Manager - Idaho PUC

PHMSA Representative: David Lykken, PHMSA State Programs Division

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

Name/Title: Paul Kjellander, President

Agency: Idaho Public Utilities Commission

Address: 11331 W. Chinden Blvd

City/State/Zip: Boise, ID 83714

Rating:

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

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

Possible Points Points Scored

- 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

0
15
10
50
15
10
0

0
15
10
50
15
10
0

TOTALS

100 100

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. Operator/Inspection Unit totals on Attachment 1 are consistent with the Operator/Inspection Unit totals on Attachment 3. b. No issues. C. No issues. Breakdown of Operators consistent with information found in the PDM. D. PDM shows 1 GD incident reported. Matches PR under attachment 4. e & f No issues. g. Information verified through T&Q Blackboard training site. Training for personnel found to be complete and accurate. h. Working to adopt new GT amendments. May propose amendment to correct civil penalty deficiency during 2022 legislative session.

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



PART B - Program Inspection Procedures

Points(MAX) Score

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|---|---|---|---|
| 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 |
| | <ul style="list-style-type: none">a. Standard Inspections, which include Drug/Alcohol, CRM and Public Awareness Effectiveness Inspectionsb. TIMP and DIMP Inspections (reviewing largest operator(s) plans annually)c. OQ Inspectionsd. Damage Prevention Inspectionse. On-Site Operator Trainingf. Construction Inspections (annual efforts)g. LNG Inspections | | |

Evaluator Notes:

Pre and Post inspection activities for each inspection type discussed under Attachment 'E' (Inspector Actions for Inspection Activities). Sections 1.5.1 and 3.0 of IPUC Program Operations Procedures. O&M 3.4, Std Insp 3.8, D&A 3.14, CRM 3.18, PAPEI 3.16. b: IMP 3.10, DIMP 3.17 c: Section 3.9 d: Sections 2.5/2.5.1 and 3.12 e: Section 3.13 f: Section 3.11 g: Section 4.0

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| 2 | Do written procedures address inspection priorities of each operator, and if necessary each unit, based on the following elements and time frames established in its procedures? Chapter 5.1 Yes = 4 No = 0 Needs Improvement = 1-3 | 4 | 4 |
| | <ul style="list-style-type: none">a. Length of time since last inspectionb. Operating history of operator/unit and/or location (includes leakage, incident and compliance activities)c. Type of activity being undertaken by operators (i.e. construction)d. Locations of operator's inspection units being inspected - (HCA's, Geographic area, Population Centers, etc.)e. Process to identify high-risk inspection units that includes all threats - (Excavation Damage, Corrosion, Natural Forces, Outside Forces, Material and Welds, Equipment, Operators and any Other Factors)f. Are inspection units broken down appropriately? | | |

Evaluator Notes:

Yes. All elements addressed under Section 1.0 Program Overview. Inspection frequencies listed under 1.2.2. Risked Based Insection procedures under Seation 8.0. Operators/Units typically visited annually.

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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 |
| | <ul style="list-style-type: none">a. Procedures to notify an operator (company officer) when a noncompliance is identifiedb. Procedures to routinely review progress of compliance actions to prevent delays or breakdownsc. Procedures regarding closing outstanding probable violations | | |

Evaluator Notes:

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

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| 4 | (Incident/Accident Investigations) Does the state have written procedures to address state actions in the event of an incident/accident? 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. | 3 | 3 |
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Evaluator Notes:
Yes. Section 6.0 (Incident Investigation)

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| 5 | General Comments: Info Only = No Points | Info Only | Info Only |
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Evaluator Notes:
No issues. No point deductions.

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



PART C - State Qualifications

Points(MAX) Score

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|---|---|---|---|
| 1 | Has each inspector and program manager fulfilled training requirements? (See Guidelines Appendix C for requirements) Chapter 4.4 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:

Bruce Perkins and Darrin Ulmer have completed all necessary courses to conduct inspections as lead. Both have completed Root Cause Training. One new hire in December 2020 to replace inspector lost in May 2020.

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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:

Darrin Ulmer has demonstrated adequate knowledge of PHMSA programs and regulations. He has been with the pipeline program since 2015.

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

No issues. No point deductions.

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:

No issues. Unable to complete CRM inspection for Dominion Energy within 5 yr time interval due to Stay-at-Home order issued by the ID Dept. of Health and Welfare on 3/25/2020. Subsequent amended orders posted at <https://coronavirus.idaho.gov/governors-actions/>. Inspection was re-scheduled for 2021. DT&C days were 46.58% of total estimated field days..

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| 2 | Did inspection form(s) cover all applicable code requirements addressed on Federal Inspection form(s)? Did State complete all applicable portions of inspection forms? Chapter 5.1. Do inspection records indicate that adequate reviews of procedures, records and field activities, including notes and the appropriate level of inspection person-days for each inspection, were performed? Yes = 10 No = 0 Needs Improvement = 1-9 | 10 | 10 |
| | <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:

The program utilizes the IA in CY2020 to document inspection results. IPUC Form 4 used for DT&C inspections.

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

Yes. 12 days devoted to OQ plan and field verification activities in 2020.

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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 |
| | <ul style="list-style-type: none">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:

Yes. 25.5 days devoted to DIMP/TIMP plan updates and field implementation activities.

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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:

Yes. A & b - No CI in ID; c thru g covered on IPUC Form 2 (Supplemental Checklist). No LP GD in ID.

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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 |
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Evaluator Notes:

Yes. Documented on IPUC Form 2, Question 13 (Supplemental Checklist). In CY2020 bulletins issued ADB-2020-01 (Inside Meter Sets and ADB-2020-2 (Overpressure of LP Systems). No LP GD in ID. Inside MTR sets covered on IPUC Form 2, Question #4.

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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:

Yes. Compliance letters (11) sent to appropriate company/government officials, most within one to two weeks of inspection completion. IPUC Form 3 Exit Interview Inspection Summary utilized for Post-inspection briefing satisfying 30 and 90 day requirement. Company official signs copy at time of briefing.

Avista Self-Reported Leak Survey non-compliance. Corrective action in the form of operator conducting second leak survey in lieu of staff proposed \$10,000 civil penalty.

Discussed repeat violations regarding IGC's Pressure Regs (192.739(a)(1) and .739(4) issues going back to 2018. Issues with operator have been resolved. Discussed the necessity of stepping up enforcement action for repeat violations. The IPUC Safety Division is currently developing an enforcement manual to address agency policy on issues or potential violations, and serve as guidance for outside companies jurisdictional to the Commission.

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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:

Yes to all. One reportable incident in CY2020. No site visit conducted. IPUC Inspection Form 1 used to document findings of the reported incident and identify the report as an Incident follow-up inspection.

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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 Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

Letter to Chairman sent out 8/14/2020. Chair's response received 8/18/2020. Civil penalty amounts not sufficient. May bring to state legislature in 2022.

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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 = No Points | Info Only | Info Only |
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Evaluator Notes:

Last T&Q seminar held in 2018. Annual operator "Fireside Chats" held in general. None in 2020 due to Covid-19 restrictions. Inspection staff attended outside training covering various pipeline safety related subjects thru the OSHA

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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 = No Points | Info Only | Info Only |
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Evaluator Notes:

Yes. IPUC Form 2 - Supplemental Form, Question #10.

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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). Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

Yes. The IDPUC web site provides information on operator annual report data, Compliance Enforcement including compliance letters, operator responses, and close-out letters, and PHMSA State Program evaluation results and Progress Reports for the corresponding year.

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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:

No SRCR's reported in CY2020. Confirmed in WMS.

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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:

Yes. Reviewed sample response.

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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 |
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Evaluator Notes:

None requested in Cy2020. No history of state waiver requests/approvals posted on PHMSA web site.

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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:

No issues. Documents were made readily available via email correspondence.

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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 |
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Evaluator Notes:

SICT minimum estimated at 293 days. Actual for CY2020 was 324.50. DT&C inspections 46.58% of SICT minimum total days. Tool updated annually. No significant changes.

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

Evaluator Notes:

Damages per 1000 tickets continue downward from CY2016. Ratio is approximately 5.2 damages per which is higher than the national average of 2.7. Inspection days averaging 23 days per 1K miles of pipe. Inspector qualification core training average at 100%. Total leaks, Hazardous Leaks, and Leaks Scheduled for Repair all trending downward as a result of ongoing Aldyl-A pipe replacement program resulting in fewer active leaks. Estimated project competition in CY2022.

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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. During annual fireside chats and operator seminars.

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

Evaluator Notes:

D-1 Unable to meet five-year timeframe for completing one CRM inspections due to ID issued Covid-19 stay-at-home executive order. Inspection re-scheduled for 2021.

D-7 Discussed concerns over repeat violations regarding IMG Pressure Regulation stations (192.739(a)(1) and 192.739(4) issues going back to 2018. Recommended stepping up enforcement action for repeat violations.

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:

A standard field evaluation of Intermountain Gas Company's Idaho Falls GD facilities located in the communities of St. Anthony, Rexburg, and Sugar City. This unit is inspected annually. The operator was represented. ID-PUC reps Darrin Ulmer and Jeff Brooks.

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

Evaluator Notes:

Yes. No issues.

- 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:

a thru e. No issues. Observed a Standard Inspection of IGC's GD facilities located in the St. Anthony, Rexburg, and Sugar City area. Included inspections of the certain gas pressure regulating stations, emergency valves, CP test stations, bridge spans, signage.

- 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. Mr. Ulmer PM/Inspector joined the program in 2015. Mr. Brooks has been with the program less than one year and is working to complete all required gas T&Q courses. Jeff demonstrates a baseline knowledge consummate with the time he has been with the safety program.

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

Evaluator Notes:

Yes. The program utilizes the "IPUC Exit Interview Inspection Summary" form for documenting inspection results. Findings and any corrective action taken (if any) by the operator at the time of the exit is recorded on this form. The form is signed by the IPUC inspector and the company representative, satisfying the 30 and 90 day notification requirements. Several items identified requiring corrective action. The IPUC has required the company to corrected noted deficiencies no later than Nov 1 and provide proper documentation demonstrating compliance.

6 Was inspection performed in a safe, positive, and constructive manner ?

Info Only Info Only

Info Only = No Points

- a. No unsafe acts should be performed during inspection by the state inspector
- b. What did the inspector observe in the field? (Narrative description of field observations and how inspector performed)
- c. Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices)
- d. Other

Evaluator Notes:

Yes. No unsafe acts were observed. The field inspection covered the annual maintenance for regulator stations and the general condition of regulator station facilities including security, signage, pipe to soil interfaces, cathodic protection. Also the operation of certain critical valves, cathodic protection systems and bridge spans. The inspectors conducted themselves in a courteous and professional manner.

7 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

No issues noted.

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**

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| 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 |
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Evaluator Notes:

Yes. Discussed above average percent of One-Call Notification Practice root cause excavation damages as reported by the States two largest LDC's for CY2020.

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

Yes. The program reviews data on the number of pipeline damages per 1,000 locate requests through reviewing operator's annual reports. The annual reports are filed within the IPUC office to compare results reported by operators within the state. As noted under F-1, discussed above average percent of One-Call Notification Practice root cause excavation damages as reported by the State's two largest LDC's for CY2020.

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| 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 |
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Evaluator Notes:

Yes. Reviewed annually. Again as previously noted the program should pay particular attention to root cause statistics reported by the operators and ensure that data reported is accurate. Preliminary data reported by two LDC's for damages related to One-Call Notification Practices abnormally high.

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

As noted under question D-18 CY2019 data only available at time of evaluation. Damages per 1000 tickets continue downward from CY2016. Ratio is approximately 5.2 damages per which is higher than the national average of 2.7. Still trending downward in CY2020.

5 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

No point deductions.

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



PART G - Interstate Agent/Agreement States

Points(MAX) Score

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

Evaluator Notes:

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

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

Evaluator Notes:

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

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

Evaluator Notes:

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

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

Evaluator Notes:

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

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

Evaluator Notes:

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

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

Evaluator Notes:

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

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