



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

MISSISSIPPI PUBLIC SERVICE 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: Mississippi

Agency Status:

Date of Visit: 07/19/2021 - 07/22/2021

Agency Representative: Rickey Cotton, Director Pipeline Safety

PHMSA Representative: Agustin Lopez, State Liaison, PHMSA, PHP-50

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

Name/Title: Dane Maxwell, Chairman

Agency: Mississippi Public Service Commission

Address: 501 N. West Street, Suite 201A

City/State/Zip: Jackson, MS 39201

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

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
13
10
44
15
10
0

TOTALS

100 92

State Rating **92.0**

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. Reviewed operator list and PDM to verify operator data. Reviewed MS PSC database to verify inspections and number of units.
- B. Reviewed MS PSC data to verify inspection activity. Notified MS PSC to count Drug and Alcohol inspection days under "Standard Comprehensive" category. In reviewing data the total Drug and Alcohol inspection days were not included in the Progress Report.
- C. Reviewed operator list and PDM to verify operator data.
- D. There were no intrastate reportable incidents in MS in 2020 or any carried over from previous years.
- E. Verified compliance actions with MS PSC data.
- F. MS PSC keeps records in secured files and electronically.
- G. Verified TQ training in Blackboard.
- H. The MS PSC has adopted the regulations.
- I. Performance and damage prevention activities are listed in attachment 10.

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 | 5 | 4 |
| | <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:

The MS PSC has current procedures but they are not state specific to their program. The procedures mirror the "State Guidelines" which are to generic for many of the procedures. The MS PSC needs to amend their procedures to be more specific to the way they operate the program. The MS PSC should use Appendix S of the "State Guidelines" as a reference.

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

Section 2.1 of MS PSC Procedures addresses the inspection priorities.

Procedures are in place but they mirror the "State Guidelines" and need to be better organized. The table of content does not match up with the correct content in the procedures. The MSPSC needs to use Appendix S of the State Guidelines as a guide to make their procedures more specific to their state.

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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 | 2 |
| | <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:

Section 2.1(5) and (6) include compliance procedures which address steps to take from the discovery to the resolution of a probable violation.

The MS PSC has current procedures but they are not state specific to their program. The procedures mirror the "State Guidelines" which are to generic for many of the procedures. The MS PSC needs to amend their procedures to be more specific to the way they operate the program. The MS PSC should use Appendix S of the "State Guidelines" as a reference.

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

Section 3.3(IV) has mechanism for receiving and responding to incidents. The MS PSC gathers enough information if no onsite is made, but do investigate all reportable incidents.

The MS PSC has current procedures but they are not state specific to their program. The procedures mirror the "State Guidelines" which are too generic for many of the procedures. The MS PSC needs to amend their procedures to be more specific to the way they operate the program. The MS PSC should use Appendix S of the "State Guidelines" as a reference

5 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

Issues Identified:

The MS PSC has current procedures but they are not state specific to their program. The procedures mirror the "State Guidelines" which are too generic for many of the procedures. The MS PSC needs to amend their procedures to be more specific to the way they operate the program. The MS PSC should use Appendix S of the "State Guidelines" as a reference. There was a one point deduction on both B.1 and B.3 due to this issue.

Total points scored for this section: 13
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:

- a. Yes the MS PSC inspectors are qualified as lead to conduct OQ inspections.
- b. Mr. John Thompson is the only inspector leading TIMP inspections.
- c. There are no LNG facilities in MS.
- d. Yes MS PSC inspectors have completed the Root Cause training.
- e. no outside training in 2019.
- f. Verified that lead inspectors are qualified to lead the type of inspection being conducted.

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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:

Yes, Mr. Rickey Cotton is very knowledgeable of the pipeline safety program and regulations.

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

The MS PSC is mainly complying with Part C of the 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:

Reviewed randomly selected inspection reports to verify units are being inspected per the established interval in the MS PSC procedures, which is 5 year interval for each type of inspection. It seems that the MS PSC is performing each type of inspection per the established interval. In reviewing the inspection reports it was noted that Atmos Energy does have a Control Room which was last inspected in 2019 by the MS PSC along with other states.

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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 | 7 |
| | <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:

Reviewed randomly selected inspection reports and found several standard inspections that were incomplete. The 2020 Standard/Comprehensive inspections of Waveland, Picayune and Liberty had many questions on the inspection form marked as either "N/C or N/A" which in discussions with the program manager should've been checked during the inspections. For example, both the Waveland and Picayune inspections had cathodic protection and corrosion sections of the form marked as "N/A or N/C". In addition the Liberty inspection form had "N/C" for odorant checks in the field which should've been checked during a standard/comprehensive inspection. There was a two point deduction for this issue.

In reviewing randomly selected 2020 inspection reports there were a couple that had "U" for unsatisfactory which did not have explanation as to how the issue was resolved. The reports in question involve the 2020 Standard/Comprehensive inspections of Picayune and Liberty. In talking with the Program Manager it seems that the "U" were an error and should've been marked as "S". The MS PSC has the review inspection reports to assure results of each inspection are correct. This was an issue last year so there is a one point deduction for this issue.

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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 MS PSC is conducting OQ inspections of operator OQ programs per their procedures. Reviewed OQ inspection reports to verify OQ Programs are being conducted. Verified that OQ Programs are being reviewed within the inspection cycle of every 5 years.

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| 4 | <p>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</p> <p>Yes = 2 No = 0 Needs Improvement = 1</p> <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? | 2 | 2 |
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Evaluator Notes:

Yes, reviewed randomly selected DIMP and IMP inspections which are conducted by the MS PSC. Verified that DIMP and IMP inspections are being conducted per the inspection cycles, which is every 5 years.

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

- A. this is in the Standard inspection form under section 605(b)(2) 192.459.
 - B. This is in the DIMP inspection form.
 - C. This is in the Standard inspection form under section 605(b)(1) 192.615(a)(7).
 - D. This is in the Standard inspection form under section 605(b)(1) 192.615 (b) (3).
 - E. Verified during Damage Prevention inspections.
 - F. In discussions with MS PSC there are no low pressure systems in MS.
 - G. In discussions with MS PSC there are no regulators located inside buildings in MS.
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| 6 | <p>Did the State verify Operators took appropriate action regarding advisory bulletins issued since the last evaluation? (Advisory Bulletins Current Year)</p> <p>Yes = 1 No = 0 Needs Improvement = .5</p> | 1 | 1 |
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Evaluator Notes:

Discuss ADBs during conferences and meetings. Municipalities and Master Meter operators are required to have continuing education so most attend the meetings and conferences.

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| 7 | <p>(Compliance Activities) Did the state follow compliance procedures (from discovery to resolution) and adequately document all probable violations, including what resolution or further course of action is needed to gain compliance? Chapter 5.1</p> | 10 | 7 |
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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:

In reviewing randomly selected inspection reports along with compliance action files there were several compliance cases that are still open with no response from operator. The compliance letter for the standard inspections of SE Transmission and Utica were issued on October 9, 2020 and September 10, 2020 respectively and both cases have had no response from the operator. In addition, the compliance letter issued on December 7, 2020 to Waveland due to a standard inspection conducted on November 23, 2020 did not have a response from the operator until June 2021. The MS PSC compliance action letters state that the operator has 30 days to respond to the compliance letter. The MS PSC must routinely review the progress of probable violations/compliance actions and assure they are resolved in a timely manner. There was a two point deduction for this issue.

In reviewing MS PSC Compliance files, it was noted that the MS PSC does not keep copies of signed compliance action letters in their files. The only document kept is the original Word copy of the compliance action but it is not signed nor is it in MS PSC letterhead. The MS PSC has to keep copies of compliance action letters to properly document the compliance file. There was a one point deduction for this issue.

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

There were no reportable incidents in 2020 in MS but the MS do conduct incident investigations of all reportable incidents.

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
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Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes PHMSA received response within the required 60 days.

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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:

Have seminar every year, did not have one in 2020 due to the pandemic.

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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, the question is on inspection forms and asked during standard/comprehensive inspections.

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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:

Show cause enforcement actions are open to the public and also thru FOIA. Attend 811 Summit and MS Gas Association Seminars and trade shows.

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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 were no SRCR in 2020 on intrastate pipelines in MS.

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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, Rickey Cotton responds to surveys, IMP notifications and WMS tasks.

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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:

There are no waivers in MS that require state verification of special conditions.

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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:

Yes, inspection reports were sent electronically with no issues and seem to be well organized

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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:

Discussed SICT and there are no issues. Have construction days and risk ranking for operators. Large operators have adequate construction days.

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

Evaluator Notes:

Discussed performance metrics. Downward trends on damages per 1,000 and leak data. No issues with upward trends.

- 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:

Have sent inspectors to conferences/training to learn more about PSMS to be able to present/share information to operators.

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

Evaluator Notes:

Issues identified:

D.2 Reviewed randomly selected inspection reports and found several standard inspections that were incomplete. The 2020 Standard/Comprehensive inspections of Waveland, Picayune and Liberty had many questions on the inspection formed marked as either "N/C or N/A" which in discussions with the program manager should've been checked during the inspections. For example, both the Waveland and Picayune inspections had cathodic protection or corrosion sections of the form marked as "N/A or N/C". In addition the Liberty inspection form had "N/C" for odorant checks in the field which should've been checked during a standard/comprehensive inspection. There was a two point deduction for this issue.

In reviewing randomly selected 2020 inspection reports there were a couple that had "U" for unsatisfactory which did not have explanation as to how the issue was resolved. The reports in question involve the 2020 Standard/Comprehensive inspections of Picayune and Liberty. In talking with the Program Manager it seems that he "U" were an error and should've been marked as "S". The MS PSC has the review inspection reports to assure results of each inspection are correct. This was an issue last year so there is a one point deduction for this issue.

D.7- In reviewing randomly selected inspection reports along with compliance action files there were several compliance cases that are still open with no response from operator. The compliance letter for the standard inspections of SE Transmission and Utica were issued on October 9, 2020 and September 10, 2020 respectively and both cases have had no response from the operator. In addition, the compliance letter issued on December 7, 2020 to Waveland due to a standard inspection conducted on November 23, 2020 did not have a response from operator until June 2021. The MS PSC compliance action letters state the operator has 30 days to respond to the compliance letter. The MS PSC must routinely review the progress of probable violations/compliance actions and assure they are resolved in a timely manner. There was a two point deduction for this issue.

In reviewing MS PSC Compliance files, it was noted that the MS PSC does not keep copies of signed compliance action letters in their files. The only document kept is the original Word copy of the compliance action but it is not signed nor is it in MS PSC letterhead. The MS PSC has to keep copies of compliance action letters to properly document the compliance file. There was a one point deduction for this issue.

Total points scored for this section: 44
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:

Corinth Gas Water Department
John Thompson- Lead Inspector
Location: Corinth, MS
June 16-17, 2021
Agustin Lopez- State Evaluator

Mr. John Thompson conducted a standard inspection of Corinth Gas distribution system. He did a field inspection on June 16 and records review on June 17. He was evaluated while reviewing records. The evaluation was conducted virtually due to the covid pandemic.

- Mr. John Thompson conducted a standard inspection of Corinth distribution system.
- Last inspection was in 2019.
- Yes, Corinth representative was present during inspection.
- Mr. John Thompson hasn't been evaluated in the past several years.

- 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, a PHMSA equivalent form was used during the inspection.

- 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:

- Only specific procedures were reviewed if there were issues found during the records review.
- Yes, records were reviewed during the inspection.
- Field activities were conducted but it was not part of the evaluation.
- No other activities were conducted.
- Yes, the inspection was adequate in length to the size of the system.

- 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, John Thompson had knowledge of the pipeline safety rules and regulations.

- 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, an exit interview was conducted at the conclusion of the inspection. Only issue identified was the area code on p/l markers was not updated.

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

Evaluator Notes:

Yes, the inspection was conducted in a safe and positive manner.

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

Evaluator Notes:

Mr. John Thompson has knowledge of the pipeline safety regulations and was very thorough in his inspection.

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 |
|---|--|---|---|

Evaluator Notes:

Yes, discussed with Mr. Rickey Cotton. Annual Reports are reviewed for accuracy and used to prioritize inspections based on information. Unaccounted gas is big trigger as well as new/removed services. Incidents are reviewed during inspections and as part of a pre-inspection activity.

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

Evaluator Notes:

MS PSC is working with operators to assure operators are following the regulations. Have issued actions for operators to comply with 192. 617.

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

Evaluator Notes:

Yes, the MS PSC reviews Annual Reports for accuracy and high number of damages. MS PSC is working with operators to reduce the number of 3rd party damage and to prevent re-occurrence of incidents.

- | | | | |
|---|---|---|---|
| 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?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? | 2 | 2 |
|---|---|---|---|

Evaluator Notes:

Review data provided in PRIMIS and State Performance Metrics. Meet with operators to discuss damages and have also improved the Damage Prevention law to help improve 3rd party damages

5 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

The MS PSC is mainly complying with Part F of the 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:

MS PSC is not an Interstate Agent nor has a 60106 Certification.

- 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:

MS PSC is not an Interstate Agent nor has a 60106 Certification

- 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:

MS PSC is not an Interstate Agent nor has a 60106 Certification

- 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:

MS PSC is not an Interstate Agent nor has a 60106 Certification

- 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:

MS PSC is not an Interstate Agent nor has a 60106 Certification

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

Evaluator Notes:

MS PSC is not an Interstate Agent nor has a 60106 Certification

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