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 UTILITIES COMMISSION NEVADA

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: Nevada
Agency Status:
Rating:
60105(a): Yes **60106(a):** No **Interstate Agent:** No
Date of Visit: 08/23/2021 - 08/26/2021
Agency Representative: Neil Pascual, Sr. Gas Pipeline Engineer

PHMSA Representative: David Lykken, Transportation Specialist, PHMSA-State Programs
Commission Chairman to whom follow up letter is to be sent:

Name/Title:	Stephanie Mullen, Executive Director
Agency:	Public Utilities Commission of Nevada
Address:	1150 E. Williams Street
City/State/Zip:	Carson City, Nevada 89701-3109

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	0	0
B	Program Inspection Procedures	15	15
C	State Qualifications	10	10
D	Program Performance	50	50
E	Field Inspections	15	15
F	Damage prevention and Annual report analysis	10	10
G	Interstate Agent/Agreement States	0	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 = 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*	Info Only	Info Only

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 consistant with information found in the PDM. D. PDM shows 1 GD incident reported. Matches PR under attacment 4. e & f No issues. g. Information verified through T&Q Blackboard training site. Training for personnel found to be complete and accurate. h. No issues. Automatic adopt new GT rule amendments on 7/1/2020.

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

PART B - Program Inspection Procedures

		Points(MAX)	Score
1	Do written procedures address pre-inspection, inspection and post inspection activities for each of the following inspection types: Chapter 5.1 Yes = 5 No = 0 Needs Improvement = 1-4 a. Standard Inspections, which include Drug/Alcohol, CRM and Public Awareness Effectiveness Inspections b. TIMP and DIMP Inspections (reviewing largest operator(s) plans annually) c. OQ Inspections d. Damage Prevention Inspections e. On-Site Operator Training f. Construction Inspections (annual efforts) g. LNG Inspections	5	5

Evaluator Notes:
a - d. Section 8.1 of Procedures Manual: Pre, Insp, & Post inspection activities Pgs 55-63 and Appendix C.2. Also Section 8.2 Pre, Audit, & Post Audit activities Pgs 65-82. OQ - (85-86); PAPEI (86-88); CRM - (88-89); DIMP (89-91); TIMP (91-95); D&A (95-96); DP (96-97) & Appenicies C.4 & C.5. e - Section 5.4 Pgs 25-30; f - Sections 6.3, 7.5, and 8.1. Also Appendix C.1. g N/A. No jurisdictional LNG facilities.

		Points(MAX)	Score
2	Do written procedures address inspection priorities of each operator, and if necessary each unit, based on the following elements and time frames established in its procedures? Chapter 5.1 Yes = 4 No = 0 Needs Improvement = 1-3 a. Length of time since last inspection b. Operating history of operator/unit and/or location (includes leakage, incident and compliance activities) c. Type of activity being undertaken by operators (i.e. construction) d. Locations of operator's inspection units being inspected - (HCA's, Geographic area, Population Centers, etc.) e. Process to identify high-risk inspection units that includes all threats - (Excavation Damage, Corrosion, Natural Forces, Outside Forces, Material and Welds, Equipment, Operators and any Other Factors) f. Are inspection units broken down appropriately?	4	4

Evaluator Notes:
Section 4.7 Operator's Risk Profile and Risk Ranking. Section 8.2 pg 65. LPG, MM, and GT annually. Appendix E: Operator Risk Rankings, Inspection Inrtervals and Inspection Days for 2017 - 2021.

		Points(MAX)	Score
3	(Compliance Procedures) Does the state have written procedures to identify steps to be taken from the discovery to resolution of a probable violation? Chapter 5.1 Yes = 3 No = 0 Needs Improvement = 1-2 a. Procedures to notify an operator (company officer) when a noncompliance is identified b. Procedures to routinely review progress of compliance actions to prevent delays or breakdowns c. Procedures regarding closing outstanding probable violations	3	3

Evaluator Notes:
Section 8.2 under Post-Audit Activities pgs 74-79 and Post Audit flow chart on pg 82. Section 9.0 Gas Code Enforcement Activities. Appendicies C.3-A Protocols for Taking Enforcement Action and C.3-B Protocols for Determination of Appropriate Gas Enforcement Action.

		Points(MAX)	Score
4	(Incident/Accident Investigations) Does the state have written procedures to address state actions in the event of an incident/accident? Yes = 3 No = 0 Needs Improvement = 1-2 a. Mechanism to receive, record, and respond to operator reports of incidents, including after-hours reports	3	3

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 12.0 Incident Outage Reporting and Incident Investigation Pgs 111-127. Appendicies C.7 Protocol for Internal PUCN Notification of Incident/Outage Events and C.8 On-Site Incident Investigation Protocols.

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5 General Comments: Info Only Info Only

Info Only = No Points

Evaluator Notes:

No issues. No point deductions under Part B.

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

PART C - State Qualifications

		Points(MAX)	Score
1	Has each inspector and program manager fulfilled training requirements? (See Guidelines Appendix C for requirements) Chapter 4.4 Yes = 5 No = 0 Needs Improvement = 1-4 a. Completion of Required OQ Training before conducting inspection as lead b. Completion of Required DIMP/IMP Training before conducting inspection as lead c. Completion of Required LNG Training before conducting inspection as lead d. Root Cause Training by at least one inspector/program manager e. Note any outside training completed f. Verify inspector has obtained minimum qualifications to lead any applicable standard inspection as the lead inspector (Reference State Guidelines Section 4.3.1)	5	5

Evaluator Notes:

Yes. Inspection personnel who conducted inspections as Lead in CY2020 have completed all required training. All have completed Root Cause training as of May 2021.

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

Evaluator Notes:

Yes. Paul Maguire, Managing Engineer has been with the program since 2014. Neil Pascual, Senior Gas Pipeline Engineer who manages the day to day operations has been with the program since 2012.

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

Evaluator Notes:

No point deductions under Part C.

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

PART D - Program Performance

		Points(MAX)	Score
1	Did state inspect all types of operators and inspection units in accordance with time intervals established in written procedures? Chapter 5.1 Yes = 5 No = 0 Needs Improvement = 1-4 a. Standard (General Code Compliance) b. Public Awareness Effectiveness Reviews c. Drug and Alcohol d. Control Room Management e. Part 193 LNG Inspections f. Construction (did state achieve 20% of total inspection person-days?) g. OQ (see Question 3 for additional requirements) h. IMP/DIMP (see Question 4 for additional requirements)	5	5

Evaluator Notes:
Yes. No issues noted. All inspection types completed within established timeframes. The program's DT&C days were 77.49% of SICT total estimated inspection person-days.

2	Did inspection form(s) cover all applicable code requirements addressed on Federal Inspection form(s)? Did State complete all applicable portions of inspection forms? Chapter 5.1. Do inspection records indicate that adequate reviews of procedures, records and field activities, including notes and the appropriate level of inspection person-days for each inspection, were performed? Yes = 10 No = 0 Needs Improvement = 1-9 a. Standard (General Code Compliance) b. Public Awareness Effectiveness Reviews c. Drug and Alcohol d. Control Room Management e. Part 193 LNG Inspections f. Construction g. OQ (see Question 3 for additional requirements) h. IMP/DIMP (see Question 4 for additional requirements)	10	10

Evaluator Notes:
IA equivalent forms used for Standard Inspections, OQ Program & Field, DIMP and TIMP Programs, Public Awareness, D&A, and CRM insections. PUCN forms used for DT&C, LPG, DP, Annual Report reviews, small O&M activity inspections.

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

Evaluator Notes:
Yes. The program devoted 32.75 days to OQ plan and field verification inspections. Four OQ written plan reviews conducted in CY2020.

4	Is state verifying operator's integrity management Programs (IMP and DIMP)? This should include a review of plans, along with monitoring progress. In addition, the review should take in to account program review and updates of operator's plan(s). 49 CFR 192 Subpart P Yes = 2 No = 0 Needs Improvement = 1 a. Are the state's largest operator(s) plans being reviewed annually 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

Evaluator Notes:
Yes. 51.75 days devoted to IM activities. A total of 9 DIMP and TIMP annual plan reviews and/or plan verification activities conducted in CY2020.

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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 — 2 — 2

Yes = 2 No = 0 Needs Improvement = 1

a. Operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization and if necessary remedial action was taken;

b. Operator procedures for surveillance of cast iron pipelines, including appropriate action resulting from tracking circumferential cracking failures, study of leakage history, or other unusual operating maintenance condition? (Note: See GPTC Appendix G-18 for guidance);

c. Operator emergency response procedures for leaks caused by excavation damage near buildings and determine whether the procedures adequately address the possibility of multiple leaks and underground migration of gas into nearby buildings Refer to 4/12/01 letter from PHMSA in response to NTSB recommendation P-00-20 and P-00-21;

d. Operator records of previous accidents and failures including reported third-party damage and leak response to ensure appropriate operator response as required by 192.617;

e. Directional drilling/boring procedures of each pipeline operator or its contractor to determine if they include actions to protect their facilities from the dangers posed by drilling and other trench less technologies;

f. Operator procedures for considering low pressure distribution systems in threat analysis?

g. Operator compliance with state and federal regulations for regulators located inside buildings?

Evaluator Notes:
a thru e: Reviewed completed copies of the programs "Special PHMSA/NTSB checlist operators NVE 2020-Q1 Audit , SWG 2020-Q1 Audit, Prospector Pipeline 2020 Audit, RYZE LLC 2020 Audit, Empire Mining 2020 Audit, and Wendover Gas Company 2020 Audit. F: No known low pressure systems in NV. G: The program has sent correspondence to applicable operators regarding inside meter set installations. Two inspections conducted in 2020 (SWG & NV Energy) reviewed. The two LDC's in NV no longer allow indoor Mtr and Pressure Reg sets.

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

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:
Advisory bulletins covered during operator pipeline seminars and via correspondence. 2021 seminar presentations by program staff reviewed. 4 AB's applicable in NV. Underwater crossings, Permalock Tees, Low Pressure systems (none in state but has discussed with operators), Indoor MTR & Reg sets). Reviewed SWG underwater crossing inspection report, NV Energy Permalock correspondence, and as noted in D-5 Two inspections conducted in 2020 (SWG & NV Energy) 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 — 10 — 10

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:

a. Yes, Letters sent to appropriate company officials. B thru e. Yes. The program maintains a Operator PV Log to track violations, AOC's, compliance actions, and final resolutions. No issues identified. f. Fines assessed $60,000. Collected $60,000. g & h. Yes. No issues identified. i. Exit interviews typically conducted at the close of inspections. J. None exceeding 90 day requirement in CY2020.

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

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

a. Does state have adequate mechanism to receive and respond to operator reports of incidents, including after-hours reports?

b. Did state keep adequate records of Incident/Accident notifications received?

c. If onsite investigation was not made, did the state obtain sufficient information from the operator and/or by means to determine the facts to support the decision not to go on site?

d. Were onsite observations documented?

e. Were contributing factors documented?

f. Were recommendations to prevent recurrences, where appropriate, documented?

g. Did state initiate compliance action for any violations found during any incident/accident investigation?

h. Did state assist Region Office or Accident Investigation Division (AID) by taking appropriate follow-up actions related to the operator incident reports to ensure accuracy and final report has been received by PHMSA?

i. Does state share any lessons learned from incidents/accidents?

Evaluator Notes:

Yes. The PUCN provides operators with a External Emergency Contact phone list. One reportable incident (SWG NRC #20200066)in CY2020. Confirmed in PDM. A on-site investigation was conducted. Reviewed PUCN Incident investigation documentation and complince letters. The program makes excellent use of photographs in it's incident reports and provides the necessary detail to support their investigation findings. 2 NOPV's and 3 Issues (Area's) of Concern were identified. PUCN provided regular updates to PHMSA AID.

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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:

Yes. Evaluation results letter out via email on 9/13/2020. No response required but response was sent on 10/13/2020 highlighting "official interactions" between PUCN staff and PHMSA State Programs in CY2020.

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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. Operator seminar held in April 2018 and again in April 2021. Staff also holds quarterly compliacne meetings with it's two large LDC's.

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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. The PUCN tracks operator annual submissions. Reviewed tracker.

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

Evaluator Notes:
Yes via the PUCN's website provides information PHMSA State performance metrics, and the NPMS. Access to the agency's Active Docket web page for accessing Inspection summary and NOPV letters, Civil Penalties, incident investigations, and both Intra and Interstate (FERC) gas transmission pipeline permitting, and Damage Prevention/One-Call infprmation.

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

Evaluator Notes:
No SRCR's submitted and assigned to the program in CY2020. Confirmed in WMS and PDM.

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

Evaluator Notes:
Yes. The program responded to a total of 18 survey requests from NAPSR and individual state surveys. No Operator IM notifications or WMS system tasks assigned to the program. Confirmed in the WMS and PDM.

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:
None new issued in CY2020. None currently open. Verified on PHMSA web site.

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

Evaluator Notes:
Yes. Information readily provided through flash drive and via email exchange. Most documentation stored electronically.

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:
Tool updated annually. For CY2020, SICT minimum total estimated days at 421. Actual was 655.75. DT&C inspections 77.49% of SICT minimum total days. Should re-evaluate estimates to better align with historical average actuals.

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

Evaluator Notes:
Discussed. No significant changes from CY2019. The metrics show above average performance in all areas. Excavation damages per 1000 tickets (requested) continues to trend down since 2014 averaging approximately 2.0 damages the last two years. Inspection days continuing to trend upward since 2015. Inspector qualification percentages well above average in all categories. Total leaks/hazardous leaks eliminated/repaired trending downward significantly since 2016, indicative of the program's communication to operators on repairing of leaks when identified as opposed to carrying over.

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 = No Points — Info Only | Info Only

a. https://pipelinesms.org/

b. Reference AGA recommendation to members May 20, 2019

Evaluator Notes:

Discussed with operators during 2018 and 2021 pipeline seminars. SWG participated in AGA test work group as commented on during last year's program evaluation.

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20 General Comments: Info Only = No Points — Info Only | Info Only

Evaluator Notes:

No point deductions under Part D.

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 = No Points a. What type of inspection(s) did the state inspector conduct during the field portion of the state evaluation? (i.e. Standard, Construction, IMP, etc) b. When was the unit inspected last? c. Was pipeline operator or representative present during inspection? d. Effort should be made to observe newest state inspector with least experience	Info Only	Info Only

Evaluator Notes:
A standard field facilities evaluation of Southwest Gas Company's North and South District GD facilities located in Las Vegas and surrounding communities. This unit is inspected annually. A site visit was conducted of the operator's materials testing and EMER (Leak City) facilities. The operator was represented. The NV-PUC was represented by Kelly Everson and Neil Pascual.

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

Evaluator Notes:
Yes. The program utilized separate customized forms for conducting Regulator Station Maintenance, Valve Maintenance Inspection, Rectifier Inspections, Annual Main CP (Test Station Reads), and Construction. Noted that the program should add relevant questions for documenting instrument calibration and equipment checks to each of these forms as needed.

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

Evaluator Notes:
Yes. a: Copies of company procedures were readily available for the inspector's use. b: No records were reviewed during this portion of the field inspection. Testing calibration records were requested. c: Included inspections of the certain gas pressure regulating stations, emergency valves, rectifiers, CP test stations, signage, and a Aldyl-A main/service replacement project. e: The inspection was of adequate length to determine compliance.

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

Evaluator Notes:
Yes. Mr. Everson has been with the program in 2013. Kelly demonstrates adequate knowledge of the program 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) Yes = 1 No = 0 Needs Improvement = .5	1	1

Evaluator Notes:
Yes. No PV's or AOC's identified. Low CP reads found on rectifier system during annual CP survey. The operator will be providing updates to the program once the deficiency has been corrected. Requests for certain pressure gage instrument calibration records was also requested.

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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. A site visit was conducted of the operator's materials testing and EMER (Leak City) facilities. The inspection included visits to certain gas pressure regulating stations, emergency valve locations, CP rectifiers, CP test stations, signage, and inspection of ongoing Aldyl-A main/service replacement project.

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7 General Comments: Info Only Info Only

Info Only = No Points

Evaluator Notes:

No pint deductions under Part E.

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

PART F - Damage prevention and Annual report analysis

		Points(MAX)	Score
1	Has the state reviewed Operator Annual reports, along with Incident/Accident reports, for accuracy and analyzed data for trends and operator issues. Yes = 2 No = 0 Needs Improvement = 1	2	2

Evaluator Notes:

Operator Annual Report submitals reviewed by inspection staff. Results are entered into the programs Standard Special Audit Tracker spreadsheet. Staff trends data for the two largest LDC"S. NVE and SWG Annual Report Graphs for 2012 thru 2020 reviewed. For operator 30-day incident reports it is the program's policy to review the draft incident report with the operator prior to official submittal to PHMSA to ensure accuracy and completeness.

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:

Yes, as noted during last year's program evaluation, both large LDCs Southwest Gas and NV Energy provide staff with emails of all excavation damages so that inspection staff can investigate those damages for compliance with the Nevada One-Call Law. Reviewed sample emails from CY2020.

3	Has the state reviewed the operator's annual report pertaining to Part D - Excavation Damage? Yes = 4 No = 0 Needs Improvement = 1-3 a. Is the information complete and accurate with root cause numbers? b. Has the state evaluated the causes for the damages listed under "One-Call Notification Practices Not Sufficient" (Part D.1.a.)? c. Has the state evaluated the causes for the damages listed under "Locating Practices Not Sufficient" (Part D.1.b)? For each operator, does the state review the following? d. Is the operator or its locating contractor(s) qualified and following written procedures for locating and marking facilities? e. Is the operator appropriately requalifying locators to address performance deficiencies? f. What is the number of damages resulting from mismarks? g. What is the number of damages resulting from not locating within time requirements (no-shows)? h. Is the operator appropriately addressing discovered mapping errors resulting in excavation damages? i. Are mapping corrections timely and according to written procedures? j. Has the state evaluated the causes for the damages listed under "Excavation Practices Not Sufficient" (Part D.1.c.)?	4	4

Evaluator Notes:

Yes. No change from prior years. Excavation damage report data is reviewed with the two large LDC's to ensure accuracy prior to submital to PHMSA. Review sessions include review of items a thru j. Causal information is often corrected at that time. NVE and SWG annual report data is collected by the PUCN. Trend analysis reports for CY's 2012 thru 2020 reviewed.

4	Has the agency or another organization within the state collected data and evaluated trends on the number of pipeline damages per 1,000 locate requests? Yes = 2 No = 0 Needs Improvement = 1 a. What stakeholder group is causing the highest number of damages to the pipelines? Operator, contractor, locating company or public. b. Has the state verified the operator is appropriately focusing damage prevention education and training to stakeholders causing the most damages?	2	2

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:

Yes to a thru d as described under questions F-1 thru F-3.

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5 General Comments: Info Only Info Only

Info Only = No Points

Evaluator Notes:

No point deductions under Part F.

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 = No Points	Info Only	Info Only

Evaluator Notes:
Not an interstate agent or 60103 program.

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

Evaluator Notes:
Not an interstate agent or 60103 program.

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

Evaluator Notes:
Not an interstate agent or 60103 program.

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

Evaluator Notes:
Not an interstate agent or 60103 program.

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

Evaluator Notes:
Not an interstate agent or 60103 program.

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

Evaluator Notes:
N/A. Not an interstate agent or 60103 program.

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