



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

PENNSYLVANIA PUBLIC UTILITY 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: Pennsylvania

Agency Status:

Date of Visit: 05/25/2021 - 06/09/2021

Agency Representative: Mr. Robert Horensky
Fixed Utility Valuation Manager

PHMSA Representative: Clint Stephens
State Liaison

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

Name/Title: Ms. Gladys Brown Dutrieuille, Chair
Agency: Pennsylvania Public Utility Commission
Address: 400 North Street
City/State/Zip: Harrisburg, Pennsylvania 17120

Rating:

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

INSTRUCTIONS:

Complete this evaluation in accordance with the Evaluator Guidance for conducting state pipeline safety program evaluations. The evaluation should generally reflect state program performance during CY 2020 (not the status of performance at the time of the evaluation). A deficiency in any one part of a multiple-part question should be scored as "Needs Improvement." Determine the answer to the question then select the appropriate point value. If a state receives less than the maximum points, include a brief explanation in the appropriate notes/comments section. If a question is not applicable to a state, select NA. Please ensure all responses are COMPLETE and ACCURATE, and they OBJECTIVELY reflect the state's program performance for the question being evaluated. Increasing emphasis is being placed on how the state pipeline safety programs conduct and execute their pipeline safety responsibilities (their performance). This evaluation, together with selected factors reported in the state's annual progress report attachments, provide the basis for determining the state's pipeline safety grant allocation.

Scoring Summary

PARTS

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

Possible Points Points Scored

0 0
15 15
10 10
50 48
15 15
10 10
0 0

TOTALS

100 98

State Rating 98.0

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:

- 1a. Information in Attachment 1 of Progress Report seems accurate.
- 1b. Information in Attachment 2 of Progress Report seems accurate.
- 1c. Will correct number of operator units for private companies to 98 on Attachment 3 and contact Carrie Winslow.
- 1d. Information in Attachment 4 of Progress Report seems accurate based on correlation of data in PDM.
- 1e. Information in Attachment 5 of Progress Report seems accurate.
- 1f. Information in Attachment 6 of Progress Report seems accurate.
- 1g. Information in Attachment 7 of Progress Report seems accurate.
- 1h. Information in Attachment 8 of Progress Report seems accurate.
- 1i. Information in Attachment 10 of Progress Report gives detail of planned and past performance of the PAPUC.

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 | 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:

The inspection procedures were found in Section 9.18.3 ? Pre-Inspection Activity, Section 9.18.4 ? Inspection Activities, Section 9.18.5 ? Post Inspection Activities of the General Inspection, Enforcement & Incident Investigation Procedures Manual. Construction inspection procedures are found in Section 9.20.3, 9.20.2, and 9.20.5. OQ inspection procedures are found in Section 9.21.3, 9.21.4, and 9.21.5. Damage prevention procedures are found in Section 9.22.3, 9.22.4, and 9.22.5. IM inspection procedures are found in Section 9.23.3, 9.23.4, and 9.23.5. DIMP inspection procedures are found in Section 9.24.5, 9.24.6, and 9.24.7. LNG inspection procedures are found in Section 9.25.4, 9.25.5, 9.25.6.

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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:

The inspection procedures are found in Section 7.6 ? Inspection Priority Procedures, page 24.

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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:

The procedures are found in Section 7.3 ? Notification to Operators regarding Non-Compliance, Section 10 ? Enforcement & Compliance, Section 9.32 ? Non-Compliance Follow-up Inspection, and Section 7.4, #6 ? Inspectors Responsibilities (Gas).

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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 | 3 | 3 |
| | <ul style="list-style-type: none">a. Mechanism to receive, record, and respond to operator reports of incidents, including after-hours reports | | |

- b. If onsite investigation was not made, do procedures require on-call staff to obtain sufficient information to determine the facts to support the decision not to go on-site.

Evaluator Notes:

The procedures are found in Section 12.0 Investigation of Incidents. Each operator has a contact list of the PAPUC staff for which they contact after hours. There needs to be more detail in manual.

5 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

There were no issues identified in Part B of the evaluation.

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



PART C - State Qualifications

Points(MAX) Score

- | | | | |
|---|---|---|---|
| 1 | Has each inspector and program manager fulfilled training requirements? (See Guidelines Appendix C for requirements) Chapter 4.4
Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 5 |
| | <ul style="list-style-type: none">a. Completion of Required OQ Training before conducting inspection as leadb. Completion of Required DIMP/IMP Training before conducting inspection as leadc. Completion of Required LNG Training before conducting inspection as leadd. Root Cause Training by at least one inspector/program managere. Note any outside training completedf. Verify inspector has obtained minimum qualifications to lead any applicable standard inspection as the lead inspector (Reference State Guidelines Section 4.3.1) | | |

Evaluator Notes:

Yes. There were no issues with staff having the required training to lead OQ, DIMP/IM, LNG, and standard inspections.
There is staff that have completed the Root Cause training.

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

The state pipeline safety program manager showed adequate knowledge of PHMSA program and regulations.

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

There were no issues identified in 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 | 4 |
| | <ul style="list-style-type: none">a. Standard (General Code Compliance)b. Public Awareness Effectiveness Reviewsc. Drug and Alcohold. Control Room Managemente. Part 193 LNG Inspectionsf. Construction (did state achieve 20% of total inspection person-days?)g. OQ (see Question 3 for additional requirements)h. IMP/DIMP (see Question 4 for additional requirements) | | |

Evaluator Notes:

The following inspection intervals were reviewed for Peco Energy Co. ? Standard (Odorization 10/6/20 & 8/2/19), OQ (8/6/20 & 12/16/19), DIMP (12/2/20 & 10/01/19), Construction (11/19/20 & 9/24/20); Sharp Gas Inc. ? Standard (O&M 9/16/20 & 3/27/19), PA (10/20/20 No previous inspection); Construction (11/3/20), OQ (9/29/20 No previous inspection), DIMP (10/26/20 No previous inspection); Sigel Gas ? Standard (O&M 12/4/20 & 10/3/19), PA (7/6/20 No previous inspection), DA (7/15/20 No previous inspection), OQ (7/7/20 No previous inspection), DIMP (9/18/20 & 10/3/19); Peoples Gas Co. ? Standard (O&M 1/22/20 & 4/19/17), PA (5/15/20 No previous inspection), DA (1/21/20 No previous inspection), Construction (5/16/19 & 1/9/19), OQ (6/4/20 & 10/25/16), DIMP (12/1/20 & 10/24/19); Herman Oil & Gas Co. ? Standard (O&M 8/20/20 & 10/4/19), PA (8/14/20 & 9/22/15 did not meet interval 3 yrs), DA (8/10/20 No previous inspection), OQ (8/21/20 No previous inspection), DIMP (8/10/20 No previous inspection); PIKE COUNTY LIGHT & POWER CO. ? Standard (O&M 12/16/20 & 12/05/16 did not meet interval 3 yrs), PA (9/11/20 & 12/15/17), DA (11/16/20 & 12/15/17), OQ (9/11/20 No previous inspection), DIMP (11/19/20 & 1/3/19); US Steel ? Standard (O&M 9/3/20 No previous inspection), PA (2/26/20 No previous inspection), DA (9/2/20 No previous inspection), OQ (9/1/20 No previous inspection), IMP (2/26/20 No previous inspection), CRM (10/26/20 No previous inspection); Seneca Landfill ? Standard (O&M 7/27/20 & 5/18/15 did not meet interval 3 yrs), PA (7/8/20 no previous inspection), DA (6/17/20 No previous inspection), OQ (7/10/20 No previous inspection), IMP (9/25/20 No previous inspections); Contura Pennsylvania Land ? Standard (O&M 10/19/20 came aboard 2017), PA (8/25/20), DA (8/26/20), OQ (8/24/20), IMP (8/24/20); SUSQUEHANNA GATHERING COMPANY I, LLC ? Standard (O&M 11/17/20 & 7/9/19), PA (2/11/20 No previous inspection), DA (2/11/20 No previous inspection), OQ (9/9/20 No previous inspection), IMP (12/3/20 No previous inspection); UNITED STATES GYPSUM CO. ? Standard (O&M 9/29/20 & 8/24/18), PA (8/20/20 No previous inspection), DA (8/19/20 No previous inspection), OQ (8/19/20 No previous inspection), IMP (8/18/20 No previous inspection), COMPASS NATURAL GAS PARTNERS, LP (CNG Quaker) ? Standard (O&M 7/22/20 No previous inspection), PA (7/23/20 No previous inspection), DA (12/23/20 No previous inspection), OQ (12/28/20 No previous inspection), IMP (12/24/20 No previous inspection); CHESAPEAKE OPERATING, L.L.C. inactive since 2015 ? Standard (O&M 12/14/20 & 3/13/19), PA (12/16/20 No previous inspection), DA (12/18/20 No previous inspection), OQ (12/17/20 No previous inspection), IMP (No HCAs); GREYLOCK MIDSTREAM, L.L.C. ? Standard (O&M 12/15/20 added to program in 2018), PA (6/9/20), DA (6/24/20), OQ (6/23/20), IMP (6/25/20); UGI UTILITIES, INC. ? Standard (O&M 4/1/20 & 7/17/19), PA (11/30/20 & 12/19/17), DA (12/7/20 & 7/9/19), CRM (11/18/20 & 10/24/19), Construction (11/12/20 & 10/3/19), OQ (11/20/20 & 8/16/18), IMP (11/13/20 & 10/24/19); PECO ENERGY CO. LNG ? Standard (O&M 11/3/20 & 10/23/19), DA (1/25/18), CRM (12/10/19), OQ (11/3/20); PHILADELPHIA GAS WORKS ? Standard (O&M 11/24/20 & 12/5/19), DA (10/1/20 & 11/1/19), PA (1/13/19 & 12/5/17), CRM (12/19/19), OQ (12/24/20); UGI ENERGY SERVICES ? Standard (O&M 12/18/20 added to program in 2018), PA (8/7/20), DA (12/7/20), CRM (12/22/20), OQ (12/18/20); STONEHENGE LAUREL GATHERING, L.L.C. ? Standard (O&M 7/24/20 added to program in 2018), PA (6/17/20), DA (7/23/20), OQ (6/18/20); UGI ENERGY SERVICES ? Gathering (Standard O&M 11/2/20 & 12/3/19), PA (8/7/20 No previous inspection), DA (12/7/20 No previous inspection), OQ (10/8/20 No previous inspection); ENERGY TRANSFER COMPANY ? Standard (O&M 10/21/20 & 10/6/16 did not meet interval 3 yrs), PA (10/21/20 No previous inspection), DA (10/20/20 No previous inspection), OQ (10/23/20 No previous inspection); EMKEY GATHERING L.L.C. ? Standard (O&M 1/14/20 & 11/17/17), PA (7/20/20 No previous inspection), DA (7/21/20 No previous inspection), OQ (7/13/20 No previous inspection); HYPERION MIDSTREAM, L.L.C. ? Standard (O&M 12/18/20 added to program in 2019), PA (9/9/20), DA (9/30/20), OQ (9/8/20); ALLEGHENY LAND AND EXPLORATION - Standard (O&M 8/5/2020 No previous inspection), PA (8/5/20 No previous inspection), DA (8/3/20 No previous inspection), OQ (11/20/20 No previous inspection); MOUNTAIN GATHERING, L.L.C. ? Standard (O&M 12/9/20 No previous inspection), PA (9/3/20 No previous inspection), DA (9/1/20 No previous inspection), OQ (9/2/20 No previous inspection); EQUITRANS MIDSTREAM CORP. ? Standard (O&M 9/17/20 & 8/13/15 Did not meet intervals 3 yrs), PA (9/16/20 No previous inspection), DA (9/16/20 No previous inspection), OQ (9/14/20 No

previous inspection), CRM (12/8/20 No previous inspection);

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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 | 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) | | |

Evaluator Notes:

Reviewed the following inspection reports: (1) Peco Energy Co (OQ & DIMP did not explain N/C in form based on information from IA equivalent to PAPUC inspection form) DIMP non-compliance issues still open ? rate case; Sharp Gas Inc. (PA N/A not explained in inspection form)(Construction N/A not explained in inspection form); Sigel Gas (DA); US Steel (CRM); Philadelphia Gas Works ? LNG (O&M N/A and N/C not explained in inspection form); Contura Pennsylvania Land (OQ); UNITED STATES GYPSUM CO. (IMP); COMPASS NATURAL GAS PARTNERS, LP (CNG Quaker) (IMP N/A and N/A not explained in inspection form); Herman Oil & Gas Co. (DIMP)

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

Evaluator Notes:

Reviewed the following inspection reports: (1) Peco Energy Co (OQ), Contura Pennsylvania Land (OQ); and PHILADELPHIA GAS WORKS (OQ). The plan was updated and the persons performing task were properly qualified and requalified at established intervals. There were no issues.

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|---|---|---|---|
| 4 | Is state verifying operator's integrity management Programs (IMP and DIMP)? This should include a review of plans, along with monitoring progress. In addition, the review should take in to account program review and updates of operator's plan(s). 49 CFR 192 Subpart P
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
| | a. Are the state's largest operator(s) plans being reviewed annually to ensure they are completing the full cycle of the DIMP/IMP process?
b. Are states verifying with operators any plastic pipe and components that have shown a record of defects/leaks and mitigating those through DIMP plan?
c. Are the states verifying operators are including low pressure distribution systems in their threat analysis? | | |

Evaluator Notes:

Yes. The PAPUC performed DIMP and IMP inspections annually for the large operators. The PAPUC utilizes the IA equivalent for its DIMP inspections which includes question for plastic pipe components which show defects/leaks. The PAPUC is verifying operators are including low pressure distribution system in their threat analysis.

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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. The PAPUC sent out data request FL-3-18, FL-1-20 to operators in 2020 to communicate NTSB recommendations to the operator which analyzes the data for trends or risk factors associated with threats in included in their DIMP/IMP programs. The PAPUC has state code 59.18 to remove regulators outside buildings.

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. The PAPUC is including ADBs being communicated in their FL-1-20 to the operator.

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
	<ol style="list-style-type: none"> 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. Upon review of the inspection reports it was determined the PAPUC has sent compliance actions to company officer; probable violations were documented properly; progress was routinely reviewed, and compliance actions were given reasonable due process. The PAPUC did meet 30/90 day requirement.

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:

Yes. Reviewed incident report for Peoples Natural Gas Co. and Columbia Gas of Pennsylvania and it was determined the State has thoroughly documented the incidents; onsite observations were documented; and recommendations were made to prevent reoccurrence. PAPUC goes on site to all reportable incidents. The PAPUC did assist AID when contacted. The PAPUC share lessons learned at annual pipeline safety seminar, Energy Association of Pennsylvania (EAP) conference; and NAPSR Regional meetings.

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. Chair letter sent on August 14, 2020 response received on October 8, 2020.

10	Did State conduct or participate in pipeline safety training session or seminar in Past 3 Years? Chapter 8.5	Info Only	Info Only
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Info Only = No Points

Evaluator Notes:

The PAPUC had the pipeline safety seminar (virtual) on September 10, 2020.

11	Has state confirmed transmission operators have submitted information into NPMS database along with changes made after original submission?	Info Only	Info Only
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Info Only = No Points

Evaluator Notes:

The PAPUC confirms the NPMS submissions have been submitted and are accurate during the pre-inspection process.

12	Does the state have a mechanism for communicating with stakeholders - other than state pipeline safety seminar? (This should include making enforcement cases available to public).	1	1
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Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

The PAPUC sent out letter on plastic failures due to butt fusions, having weekly/biweekly virtual meeting with operators, the annual EAP meeting, and information (such as enforcement cases) on the PAPUC website.

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

Evaluator Notes:

There are no open SRCRs for 2020.

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

The PAPUC has been responsive to surveys or information request from NAPSRS or PHMSA. The did respond to WMS as requested from PHMSA.

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| 15 | If the State has issued any waivers/special permits for any operator, has the state verified conditions of those waivers/special permits are being met? This should include having the operator amend procedures where appropriate. | 1 | 1 |
| | Yes = 1 No = 0 Needs Improvement = .5 | | |
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Evaluator Notes:

The PAPUC has one open waiver with Johnstown Regional Energy since 2015. They have verified conditions of the waiver have been met.

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

Yes. The pipeline program files were well organized and accessible for the virtual inspection.

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| 17 | Discussion with State on accuracy of inspection day information submitted into State Inspection Day Calculation Tool (SICT). Has the state updated SICT data? | 3 | 3 |
| | Yes = 3 No = 0 Needs Improvement = 1-2 | | |
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Evaluator Notes:

Yes. The information submitted into State Inspection Day Calculation Tool seems accurate, and data has been updated.

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

Discussed State Program Performance Metrics which indicated negative trends damage Prevention Program ? excavation damages per 1,000 tickets has increased slightly from 2019 to 2020. Inspector Qualification ? Gas inspectors with core training, additional training, and 5-yr retention decreased from 2019 to 2020. Leak Management ? Gas distribution system leaks based on total leaks eliminate/repaired per 1,000 miles; hazardous leaks eliminated/repaired per 1,000 miles; and leaks scheduled for repair at end of year per 1,000 miles have decreased continuously from 2018 to 2020.

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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 | | |
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Evaluator Notes:

Yes. The PAPUC is discussing the topic during the annual pipeline safety conference.

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| 20 | General Comments: | Info Only | Info Only |
| | Info Only = No Points | | |
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Evaluator Notes:

The PAPUC had following issues identified in Part D of the evaluation:

- (1) The state did not inspect all types of operators and inspection units in accordance with time intervals established in

written procedures;

(2) The PAPUC did not document N/As, N/Cs in all of its inspection forms

Total points scored for this section: 48

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:

Operator: Peoples Natural Gas

Inspector: Matthew Matse (Lead) and Melissa McFeaters (Lead), David Kline, and Jason Harvey

Location: Home, PA (Virtual)

Date: May 25-26, 2021

PHMSA Rep.: Clint Stephens

The inspector performed a Standard Inspection for emergency valves and plastic pipe construction procedures, records, and field inspections. The pipeline representative was present during the inspection.

- 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. The inspector used the PA PUC Emergency Valve Inspection and GD-Plastic Pipeline Construction forms as guides 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:

The inspector adequately reviewed emergency valve procedures, records, and had the operator turn valves in the field. The inspector reviewed construction procedures and performed a construction inspection on the installation of 4" plastic pipe. The operator performed electrofusion during the inspection. The inspector ensured procedures were being followed and the equipment used was calibrated. OQ records were reviewed and found to be acceptable. The inspection was of adequate length to properly perform the inspection.

- 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. From my observation, the inspectors had adequate knowledge of the pipeline safety 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) 1 1
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes. The inspectors conducted an exit interview, with one concern being identified during the construction inspection.

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

Info Only = No Points

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

Evaluator Notes:

The inspector performed the inspection in a safe manner. The inspector observed the operation of critical valves, ROW conditions, marker signs, atmospheric corrosion, plastic pipe fusion, and tapping tee installation.

7 General Comments: Info Only Info Only

Info Only = No Points

Evaluator Notes:

There were no issues identified in Part E of the 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**

- | | | | |
|----------|--|---|---|
| 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. The PAPUC has reviewed operator annual reports, along with incident/accident reports utilizing charts to analyze data for trends and operator trends.

- | | | | |
|----------|--|---|---|
| 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. The PAPUC pipeline safety and damage prevention program have met with operators to discuss any problems with those excavators that cause the most damages and repeat violators. Issues also discussed during the DIMP inspections.

- | | | | |
|----------|---|---|---|
| 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 PAPUC is capturing the data from One-Call field investigations, non-compliance letters, and analyzing data from annual reports formatted on charts. The PAPUC investigates facility damages to determine causes of excavation.

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

Yes. The PAPUC has reviewed operator annual reports, along with incident/accident reports utilizing charts to analyze data for trends and operator trends. The PAPUC pipeline safety and damage prevention program have met with operators to discuss any problems with those excavators that cause the most damages and repeat violators. Issues also discussed during the DIMP inspections. The PAPUC is capturing the data from One-Call field investigations, non-compliance letters, and analyzing data from annual reports formatted on charts. The PAPUC investigates facility damages to determine causes of excavation.

5 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

There were no issues identified in 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:

The PAPUC is not an interstate agent.

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

Evaluator Notes:

The PAPUC is not an interstate agent.

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

Evaluator Notes:

The PAPUC is not an interstate agent.

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

Evaluator Notes:

The PAPUC is not an interstate agent.

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

Evaluator Notes:

The PAPUC is not an interstate agent.

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

Evaluator Notes:

The PAPUC is not an interstate agent.

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