



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

RHODE ISLAND DIVISION OF PUBLIC UTILITIES AND CARRIERS

### 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:** Rhode Island

**Agency Status:**

**Date of Visit:** 07/27/2021 - 07/29/2021

**Agency Representative:** Mr. Robert Bailey  
State Programs Manager

**PHMSA Representative:** Clint Stephens  
State Liaison

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

**Name/Title:** Ms. Linda George, Administrator  
**Agency:** Rhode Island Division of Public Utilities & Carriers  
**Address:** 89 Jefferson Blvd.  
**City/State/Zip:** Warwick, RI 02888

**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 44  
15 15  
10 5  
0 0

### TOTALS

**100 89**

**State Rating** ..... **89.0**

## 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. Attachment 1 ? Progress Report need to add one unit to Transmission intrastate. Will contact Carrie Winslow.
- 1b. Attachment 2 ? Progress Report could not verify accuracy data with RIDPUC.
- 1c. Attachment 3 ? Progress Report information seems accurate.
- 1d. Attachment 4 ? Progress Report there no reportable incidents in CY 2020.
- 1e. Attachment 5 ? Progress Report in the added notes need to add process for compliance actions in SOP.
- 1f. Attachment 6 ? Progress Report information seems accurate.
- 1g. Attachment 7 ? Progress Report information seems accurate.
- 1h. Attachment 8 ? Progress Report the RIDPUC automatically adopts regulations.
- 1i. Attachment 10 ? Progress Report highlighting present and past performance.

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<br>Yes = 5 No = 0 Needs Improvement = 1-4   | 5 | 5 |
|   | <ul style="list-style-type: none"><li>a. Standard Inspections, which include Drug/Alcohol, CRM and Public Awareness Effectiveness Inspections</li><li>b. TIMP and DIMP Inspections (reviewing largest operator(s) plans annually)</li><li>c. OQ Inspections</li><li>d. Damage Prevention Inspections</li><li>e. On-Site Operator Training</li><li>f. Construction Inspections (annual efforts)</li><li>g. LNG Inspections</li></ul> |   |   |

**Evaluator Notes:**

The pre-inspection process is found on page 10, section B ? "Preparation for Inspection". The inspection process is found on pages 10-17, section C ? O. The post-inspection process is found on page 17-19, section P ? U.

- |   |   |   |   |
|---|---|---|---|
| 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<br>Yes = 4 No = 0 Needs Improvement = 1-3  | 4 | 4 |
|   | <ul style="list-style-type: none"><li>a. Length of time since last inspection</li><li>b. Operating history of operator/unit and/or location (includes leakage, incident and compliance activities)</li><li>c. Type of activity being undertaken by operators (i.e. construction)</li><li>d. Locations of operator's inspection units being inspected - (HCA's, Geographic area, Population Centers, etc.)</li><li>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)</li><li>f. Are inspection units broken down appropriately?</li></ul> |   |   |

**Evaluator Notes:**

The RIDPUC SOP states that each unit will be inspected on an annual basis. The procedures are contained on page 9, section C ? "Time Intervals for Inspections (including LNG facilities).

- |   |   |   |   |
|---|---|---|---|
| 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<br>Yes = 3 No = 0 Needs Improvement = 1-2  | 3 | 3 |
|   | <ul style="list-style-type: none"><li>a. Procedures to notify an operator (company officer) when a noncompliance is identified</li><li>b. Procedures to routinely review progress of compliance actions to prevent delays or breakdowns</li><li>c. Procedures regarding closing outstanding probable violations</li></ul> |   |   |

**Evaluator Notes:**

The RIPUC SOP process for discovery to resolution is found on page 17-19, section P ? U.

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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?<br>Yes = 3 No = 0 Needs Improvement = 1-2   | 3 | 3 |
|   | <ul style="list-style-type: none"><li>a. Mechanism to receive, record, and respond to operator reports of incidents, including after-hours reports</li><li>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.</li></ul> |   |   |

**Evaluator Notes:**

The procedures for incident/accident investigations is found on pages 20-23, "Investigation of incidents".

5 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

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

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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<br>Yes = 5 No = 0 Needs Improvement = 1-4   | 5 | 5 |
|   | a. Completion of Required OQ Training before conducting inspection as lead<br>b. Completion of Required DIMP/IMP Training before conducting inspection as lead<br>c. Completion of Required LNG Training before conducting inspection as lead<br>d. Root Cause Training by at least one inspector/program manager<br>e. Note any outside training completed<br>f. 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:

Robert Bailey and Ken McCarthy are only qualified active gas inspectors in TQ blackboard. Both have completed root cause course. Ken McCarthy has completed DIMP/OQ course. Don Ledversis is qualified to lead IM/CRM/LNG inspections.

- |   |  |   |   |
|---|--|---|---|
| 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<br>Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 5 |
|---|--|---|---|

Evaluator Notes:

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

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|---|--|-----------|-----------|
| 3 | General Comments:<br>Info Only = No Points | Info Only | Info Only |
|---|--|-----------|-----------|

Evaluator Notes:

There were no issues identified in Part C of the program evaluation.

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



**PART D - Program Performance****Points(MAX) Score**

- |          |   |   |   |
|----------|---|---|---|
| <b>1</b> | Did state inspect all types of operators and inspection units in accordance with time intervals established in written procedures? Chapter 5.1<br>Yes = 5 No = 0 Needs Improvement = 1-4  | 5 | 3 |
|          | <ul style="list-style-type: none"><li>a. Standard (General Code Compliance)</li><li>b. Public Awareness Effectiveness Reviews</li><li>c. Drug and Alcohol</li><li>d. Control Room Management</li><li>e. Part 193 LNG Inspections</li><li>f. Construction (did state achieve 20% of total inspection person-days?)</li><li>g. OQ (see Question 3 for additional requirements)</li><li>h. IMP/DIMP (see Question 4 for additional requirements)</li></ul> |   |   |

**Evaluator Notes:**

Reviewed inspection interval for Niagara Mohawk Power Corp. ? Standard (Welding 12/10/20, 11/14/19), PA (6/3/20, 9/5/19), D&A (2/27/20, ?), Construction (6/22/20), OQ (10/21/20, 11/8/19), DIMP (12/4/20, 11/13/19); Douglas Pipeline Co. (Broadrock Landfill Gas) ? Standard (Rectifier 1/8/20, 12/27/19), PA(11/6/20, 12/13/19), D&A (not performed in 2020, 2019), OQ (10/21/20, 11/8/19), IMP (do not have HCAs); Niagara Mohawk Power Corp. LNG ? Standard ( 12/11/20, 12/5/19), PA (6/3/20, ?), D&A (3/11/20, ?), OQ (Training 12/11/20, 12/5/19); Ferrell Gas Shoreline Plaza? Standard (10/27/20, 10/24/19), PA (not performed), OQ (not performed), DIMP (not performed); Casey's Oil and Propane ? Standard (1/30/20, 10/24/19), PA (Became jurisdictional in 11/2019), OQ (1/30/20, 11/25/19), DIMP (Became jurisdictional in 11/2019); Consumers Propane ? Standard (Main St Plaza (10/28/20, 10/28/19), PA (not performed), OQ (not performed), DIMP (not performed); Bilotti Group ? Pocasset Village Apts. ? Standard (Not performed 2020, 12/23/19), PA (not performed), OQ (not performed), DIMP (Not performed); Bryant University (Closed 2020, 11/5/19), PA (11/5/19), OQ (11/5/19), DIMP (not performed); Bullocks Point Village (not performed, 12/30/19), PA (not performed in 2020), OQ (not performed in 2020), DIMP (not performed 2020); Cedar Crest Condos - Standard (12/29/20, 12/19/19), PA (12/29/20, 12/19/19), OQ (12/29/20, 12/19/19), DIMP (Reviewed 2011 Plan); Cherry Hill Apts. ? Standard (12/15-16, 2020, 12/30/19), OQ (12/15-16, 2020), PA (12/15-16, 2020), DIMP (12/15-16, 2020).

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|----------|---|----|---|
| <b>2</b> | 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?<br>Yes = 10 No = 0 Needs Improvement = 1-9 | 10 | 9 |
|          | <ul style="list-style-type: none"><li>a. Standard (General Code Compliance)</li><li>b. Public Awareness Effectiveness Reviews</li><li>c. Drug and Alcohol</li><li>d. Control Room Management</li><li>e. Part 193 LNG Inspections</li><li>f. Construction</li><li>g. OQ (see Question 3 for additional requirements)</li><li>h. IMP/DIMP (see Question 4 for additional requirements)</li></ul>  |    |   |

**Evaluator Notes:**

Reviewed inspection reports Niagara Mohawk Power Corp. ? Standard (Welding 12/10/20 ? inspection forms did not include U, N/A, N/C); Niagara Mohawk Power Corp. OQ (10/21/20 ? inspection forms did not include U, N/A/ N/C); Niagara Mohawk Power Corp. LNG ? Standard ( 12/11/20 ? no follow-up to Unsats in inspection form); Douglas Pipeline Co. (Broadrock Landfill Gas) ? Standard (Rectifier 1/8/20); Ferrell Gas Shoreline Plaza? Standard (10/27/20); Casey's Oil and Propane ? Standard (10/27/20); Consumers Propane ? Standard (Main St Plaza (10/28/20)); Cedar Crest Condos - Standard (12/29/20); Cherry Hill Apts. ? Standard (12/15-16, 2020).

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|----------|--|---|---|
| <b>3</b> | 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<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 1 |
|----------|--|---|---|

Evaluator Notes:

Reviewed inspection reports for Niagara Mohawk Power Corp. OQ (10/21/20 ? inspection forms did not include U, N/A/ N/C); Niagara Mohawk Power Corp. LNG - OQ (Training 12/11/20); Casey's Oil and Propane ? OQ (1/30/20 ? did not right up operator for no plan); Cedar Crest Condos -OQ (12/29/20); Cherry Hill Apts. - OQ (12/15-16, 2020).

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|---|---|---|---|
| 4 | Is state verifying operator's integrity management Programs (IMP and DIMP)? This should include a review of plans, along with monitoring progress. In addition, the review should take in to account program review and updates of operator's plan(s). 49 CFR 192 Subpart P<br>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?<br>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?<br>c. Are the states verifying operators are including low pressure distribution systems in their threat analysis? |   |   |

Evaluator Notes:

Reviewed inspection reports for Niagara Mohawk Power Corp. ? DIMP (12/4/20 - inspection forms did not include U, N/A/ N/C). The RIDPUC is verifying plastic pipe and components with defects/leaks is included in DIMP plan and low pressure systems are in 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<br>Yes = 2 No = 0 Needs Improvement = 1  | 2 | 1 |
|   | a. Operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization and if necessary remedial action was taken;<br>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);<br>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;<br>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;<br>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;<br>f. Operator procedures for considering low pressure distribution systems in threat analysis?<br>g. Operator compliance with state and federal regulations for regulators located inside buildings? |   |   |

Evaluator Notes:

- a. & b. ? RIDPUC has a accelerated main replacement program for National Grid.  
c. The RIDPUC has not reviewed operator response procedures for leaks caused by excavation damage near buildings.  
d. Question is included in the Standard Gas Distribution inspection form.  
e. National Grid sends out in the Public Awareness pamphlet information to sewer companies about protecting their pipelines from cross bores and trenchless technologies.  
f. Low pressure distribution systems are included in the National Grid DIMP risk model.  
g. The RIDPUC has not verified National Grid has a policy that all regulators inside building must be vented to the outdoors or moved outside of building. National Grid has been identified by the state as the largest operator in the state with the possibility of having numerous service line regulators located inside buildings.

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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:

There were no ADBs since the last program evaluation.

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7	(Compliance Activities) Did the state follow compliance procedures (from discovery to resolution) and adequately document all probable violations, including what resolution or further course of action is needed to gain compliance? Chapter 5.1 Yes = 10 No = 0 Needs Improvement = 1-9	10	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:

The RIDPUC did not follow compliance procedures from discovery to resolution for Niagara Mohawk Power Corp. LNG ? Standard ( 12/11/20 ? no follow-up to Unsats in inspection form) and Casey's Oil and Propane ? OQ (1/30/20 ? did not right up operator for no plan).

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8	(Incident Investigations) Were all federally reportable incidents investigated, thoroughly documented, with conclusions and recommendations? Yes = 10 No = 0 Needs Improvement = 1-9	10	10
	a. Does state have adequate mechanism to receive and respond to operator reports of incidents, including after-hours reports?		
	b. Did state keep adequate records of Incident/Accident notifications received?		
	c. If onsite investigation was not made, did the state obtain sufficient information from the operator and/or by means to determine the facts to support the decision not to go on site?		
	d. Were onsite observations documented?		
	e. Were contributing factors documented?		
	f. Were recommendations to prevent recurrences, where appropriate, documented?		
	g. Did state initiate compliance action for any violations found during any incident/accident investigation?		
	h. Did state assist Region Office or Accident Investigation Division (AID) by taking appropriate follow-up actions related to the operator incident reports to ensure accuracy and final report has been received by PHMSA?		
	i. Does state share any lessons learned from incidents/accidents?		

Evaluator Notes:

There were no reportable indents in CY 2020.

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9	Did state respond to Chairman's letter on previous evaluation within 60 days and correct or address any noted deficiencies? (If necessary) Chapter 8.1 Yes = 1 No = 0 Needs Improvement = .5	1	1
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Evaluator Notes:

Yes. Letter sent September 30, 2020; response received November 25, 2020. No issues.

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|-----------|---|-----------|-----------|
| <b>10</b> | Did State conduct or participate in pipeline safety training session or seminar in Past 3 Years? Chapter 8.5<br>Info Only = No Points | Info Only | Info Only |
|-----------|---|-----------|-----------|
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Evaluator Notes:

Yes. The RIDPUC attended MUST (Managing Underground Safety Training) in February 2021 and New England state pipeline seminar in 2019.

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|-----------|--|-----------|-----------|
| <b>11</b> | Has state confirmed transmission operators have submitted information into NPMS database along with changes made after original submission?<br>Info Only = No Points | Info Only | Info Only |
|-----------|--|-----------|-----------|
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Evaluator Notes:

Yes. The transmission operator (Broadwalk Landfill Gas) has submitted information into NPMS database.

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|-----------|--|---|---|
| <b>12</b> | 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).<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|--|---|---|
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Evaluator Notes:

Yes. The RIDPUC has civil penalties listed on their State website not enforcement cases. The MUST training which is provided on annual basis.

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

There were no open SRCRs for the RIDPUC.

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

Evaluator Notes:

Yes. The State is responsive to surveys or information requests from NAPSRS or PHMSA. There were no WMS tasks in CY 2020.

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|-----------|--|---|---|
| <b>15</b> | 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.<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|--|---|---|
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Evaluator Notes:

The RIDPUC has not issued any waivers/special permits.

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

Yes. There has been improvement with files being organized and accessible.

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

Discussed with the State on accuracy of inspection day information in CY2020 SICT days was 145 person days required.

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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 State program performance metrics with the RIDPUC - Damage Prevention Program - excavation damages per 1,000 tickets for natural gas distribution has increased from 2016 ? 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

Evaluator Notes:

Recommend the RIDPUC discuss the Pipeline Safety Management Systems with its largest operator (National Grid).

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

Evaluator Notes:

The following issues were identified in Part of the program evaluation:

(1) The RIDPUC did not inspect all types of operators and inspection units in accordance with time intervals established in written procedures; (2) the RIDPUC did not complete all applicable portions of the inspection forms; (3) the RIDPUC did not verify OQ programs are updated; (4) the RIDPUC did not review with the operators all the NTSB recommendations to PHMSA; and (5) the RIDPUC did not follow compliance procedures from discovery to resolution.

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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:

Operator: National Grid (AGI contractor)  
Inspector(s): Robert Bailey, Ken McCarthy, Don Ledversis  
Location: Warwick, RI and North Kingstown, RI  
Date: July 29, 2021  
PHMSA Rep.: Clint Stephens

The RIDPUC observed construction of the replacement of main and service lines with PE.

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

### Evaluator Notes:

The RIDPUC utilized construction plastic/steel pipe report as a guide for the inspection.

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- 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 inspectors reviewed service line and meter set construction procedures. Reviewed OQ records for contractors performing plastic pipe fusion and service line pressure testing. Checked calibration on electrofusion equipment.

- 
- 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:

From my observation the inspectors had knowledge of the pipeline safety program and regulations.

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- 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:

The inspectors did not conduct an exit interview due to the construction projects not being completed at the time of the evaluation.

- 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 inspections were performed in a safe, positive, and constructive manner. The inspectors observed the installation of service lines and meter sets, plastic pipe electrofusion, line locate markings, and equipment calibration.

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

Evaluator Notes:

There were no issues identified in Part E of the program evaluation.

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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**

- |          |  |          |          |
|----------|--|----------|----------|
| <b>1</b> | Has the state reviewed Operator Annual reports, along with Incident/Accident reports, for accuracy and analyzed data for trends and operator issues.<br>Yes = 2 No = 0 Needs Improvement = 1 | <b>2</b> | <b>1</b> |
|----------|--|----------|----------|

**Evaluator Notes:**

The RIDPUC is reviewing the operator annual reports for accuracy but is not analyzing the data for trends and operator issues for CY 2020.

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| <b>2</b> | 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)<br>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)<br>Yes = 2 No = 0 Needs Improvement = 1 | <b>2</b> | <b>1</b> |
|----------|--|----------|----------|

**Evaluator Notes:**

Yes. The RIDPUC discussed with National Grid issues with excavator that repeatedly violate one-call laws and damaged their facilities. The RIDPUC needs to analyze data for all operators to determine which excavators are doing the most damages to their pipeline system.

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| <b>3</b> | Has the state reviewed the operator's annual report pertaining to Part D - Excavation Damage?<br>Yes = 4 No = 0 Needs Improvement = 1-3 <ol style="list-style-type: none"><li>a. Is the information complete and accurate with root cause numbers?</li><li>b. Has the state evaluated the causes for the damages listed under "One-Call Notification Practices Not Sufficient" (Part D.1.a.)?</li><li>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?</li><li>d. Is the operator or its locating contractor(s) qualified and following written procedures for locating and marking facilities?</li><li>e. Is the operator appropriately requalifying locators to address performance deficiencies?</li><li>f. What is the number of damages resulting from mismarks?</li><li>g. What is the number of damages resulting from not locating within time requirements (no-shows)?</li><li>h. Is the operator appropriately addressing discovered mapping errors resulting in excavation damages?</li><li>i. Are mapping corrections timely and according to written procedures?</li><li>j. Has the state evaluated the causes for the damages listed under "Excavation Practices Not Sufficient" (Part D.1.c.)?</li></ol> | <b>4</b> | <b>2</b> |
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**Evaluator Notes:**

The RIDPUC has not reviewed annual report data pertaining to Part D ? Excavation Damage for CY 2020. The data was analyzed for 2019.

- |          |   |          |          |
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| <b>4</b> | 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?<br>Yes = 2 No = 0 Needs Improvement = 1 <ol style="list-style-type: none"><li>a. What stakeholder group is causing the highest number of damages to the pipelines? Operator, contractor, locating company or public.</li><li>b. Has the state verified the operator is appropriately focusing damage prevention education and training to stakeholders causing the most damages?</li><li>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.</li><li>d. Has the state verified the operator is appropriately focusing damage prevention education and training to address the causes of excavation damages?</li></ol> | <b>2</b> | <b>1</b> |
|----------|---|----------|----------|

Evaluator Notes:

The RIDPUC provides the MUST (Managing Underground Safety Training) is done an annual basis providing dig safe information to excavators, operators, and regulators. The RIDPUC needs to collect data and evaluate trends on the number of pipeline damages per 1,000 locate requests.

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**5** General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

These were the following issues identified during the program evaluation: (1) The RIDPUC did not analyze data for trends and operator issues from the Operator Annual reports; (2) the RIDPUC has not verified that all the operators have analyzed excavation damages for the purpose of determining root causes; (3) the RIDPUC did not review the operator's annual report pertaining to Part D - Excavation Damage; and (4) the RIDPUC did not collect data and evaluated trends on the number of pipeline damages per 1,000 locate tickets.

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Total points scored for this section: 5  
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 RIDPUC 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 RIDPUC 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 RIDPUC 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 RIDPUC 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 RIDPUC is not an interstate agent.

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

Evaluator Notes:

The RIDPUC is not an interstate agent.

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