



U.S. Department
of Transportation
**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue SE
Washington DC 20590

2021 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



2021 Gas State Program Evaluation -- CY 2021

Gas

State Agency: Pennsylvania

Agency Status:

Date of Visit: 06/21/2022 - 06/30/2022

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 2021 (not the status of performance at the time of the evaluation). A deficiency in any one part of a multiple-part question should be scored as "Needs Improvement." Determine the answer to the question then select the appropriate point value. If a state receives less than the maximum points, include a brief explanation in the appropriate notes/comments section. If a question is not applicable to a state, select NA. Please ensure all responses are COMPLETE and ACCURATE, and they OBJECTIVELY reflect the state's program performance for the question being evaluated. Increasing emphasis is being placed on how the state pipeline safety programs conduct and execute their pipeline safety responsibilities (their performance). This evaluation, together with selected factors reported in the state's annual progress report attachments, provide the basis for determining the state's pipeline safety grant allocation.

Scoring Summary

PARTS

Possible Points Points Scored

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

0
15
10
50
15
10
0

0
15
10
48
15
10
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. Data in Attachment 1 of Progress Report needs to be corrected to show 49 gathering line inspection units instead of 50. Has been corrected by Carrie Winslow.
- 1b. Data in Attachment 2 of Progress Report seems accurate.
- 1c. Data in Attachment 3 of Progress Report seems accurate.
- 1d. Data in Attachment 4 of Progress Report was verified through PDM.
- 1e. Data in Attachment 5 of Progress Report seems accurate.
- 1f. Information in Attachment 6 of Progress Report seems accurate.
- 1g. Data 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 seems accurate.

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



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|---|---|---|---|
| 1 | Do written procedures address pre-inspection, inspection and post inspection activities for each of the following inspection types: Chapter 5.1
Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 5 |
| | <ul style="list-style-type: none"> a. Standard Inspections, which include Drug/Alcohol, CRM and Public Awareness Effectiveness 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 | | |

Evaluator Notes:

Standard Inspection procedures are found in Section 9.16, Construction inspection procedures are found in Section 9.19, OQ inspection procedures are found in Section 9.20, Damage prevention procedures are found in Section 9.21, IM inspection procedures are found in Section 9.22, DIMP inspection procedures are found in Section 9.23, LNG inspection procedures are found in Section 9.24, and On-Site Operator Training procedures are found in Section 9.6 (c).

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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 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? | | |

Evaluator Notes:

The written procedures that address inspection priorities are found in Sections 7.6 and 9.14.

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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 identified b. Procedures to routinely review progress of compliance actions to prevent delays or breakdowns c. Procedures regarding closing outstanding probable violations | | |

Evaluator Notes:

The procedures to identify steps to be taken from discovery to resolution of a probable violation is found in Sections 7.3, the process to routinely review progress of compliance actions is included in each type of inspection procedure (recommend using as a general process in procedures); and procedures regarding closing outstanding probable violations is found in Section 7.4.

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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:

Recommend the PA PUC include in their procedures a process for after hours reports. The PA PUC reports onsite to all reported incidents is found in Section 12.2. Investigation of incident procedures is found in Section 12.0.

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.

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 4.3
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:

Numerous inspectors and program manager have completed the Root Cause training. The new inspectors completed Energy World Net training (on-line based task training, such as OQ) in 2021. Inspectors have completed the required training to lead different types of inspections.

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

The pipeline safety program manager indicated 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 program 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:

See Attachment

- | | | | |
|---|---|----|---|
| 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 |
| | <ul style="list-style-type: none">a. Standard (General Code Compliance)b. Public Awareness Effectiveness Reviewsc. Drug and Alcohold. Control Room Managemente. Part 193 LNG Inspectionsf. Constructiong. OQ (see Question 3 for additional requirements)h. IMP/DIMP (see Question 4 for additional requirements) | | |

Evaluator Notes:

Reviewed the following inspection reports: Philadelphia Gas Works - Corrosion (6/2/21), Penn Valley Gas Inc. (12/20/21), Columbia Gas Transmission, LLC ? O&M (4/16/21), DTE APPALACHIA GATHERING, LLC (12/2/21), INR OPERATING, LLC. (9/10/21), Valley Energy Inc. Transmission (8/13/21), EQT PRODUCTION (8/2/21), Philadelphia Gas Works ? DIMP (12/9/21 form not filled out completely), National Fuel Gas Distr. Corp. (9/14/21), Knox Energy Coop Assn. (10/7/21), Valley Energy Inc. Transmission (10/18/21), DOUGLAS PIPELINE CO (11/8/21), and PHILADELPHIA GAS WORKS Transmission (10/14/21).

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

Yes. Reviewed the following inspection reports: Valley Energy Inc. Transmission (8/13/21), INR OPERATING, LLC. (9/10/21), and EQT PRODUCTION (8/2/21).

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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 Subparts O and P
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
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- a. Are the implementation plans of the state's large/largest operators(s) being reviewed annually to ensure they are completing full cycle of the 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. Reviewed the following inspections: Philadelphia Gas Works (12/9/21), National Fuel Gas Distr. Corp. (9/14/21), Knox Energy Coop Assn. (10/7/21), Valley Energy Inc. Transmission (10/18/21), and DOUGLAS PIPELINE CO (11/8/21).

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

Yes. The PAPUC emailed data request FL-3-18, FL-1-21 to operators on April 26, 2021, 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.

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| 6 | <p>Did the State verify Operators took appropriate action regarding advisory bulletins issued since the last evaluation? (Advisory Bulletins Current Year)</p> <p>Yes = 1 No = 0 Needs Improvement = .5</p> | 1 | 1 |
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Evaluator Notes:

Yes. The PAPUC is including ADBs being communicated in their FL-1-21 to the operator. An ADB was sent to the operators on 7/9/21.

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

- 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. The state did follow compliance procedures from (discovery to resolution) and adequately documented all probable violations.

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. Reviewed the following incident reports: PEOPLES NATURAL GAS COMPANY LLC (1/5/21), UGI UTILITIES, INC (2/21/21 waiting on final lab results), PECO ENERGY CO. (8/12/21), and UGI UTILITIES, INC (8/18/21). The PA PUC did not have to assist AID in 2021.

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. Letter sent July 26, 2021; Chair letter received September 9, 2021. No issue.

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. The PA PUC had a pipeline safety seminar on September 2021. These are done on an annual basis.

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 PA PUC is requesting this information on the FL ? 1-21 email to each operator.

- 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
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes. The PA PUC has all files available on their website, along with pipeline safety seminar information.

- 13 Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.7 1 1
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

The PA PUC has no open SRC reports.

- 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?

Evaluator Notes:

Yes. The PA PUC is responding to all survey requests from NAPSRS and PHMSA. The PA PUC has a system in place to work in WMS. Reviewed task in WMS with PA PUC. No issues.

- 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

Evaluator Notes:

The PA PUC has two open waivers/special permits. Verified the PA PUC is monitoring the status of the waiver with Johnstown Regional Energy.

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

Evaluator Notes:

Yes. The pipeline program files were well-organized and accessible and stored in their pipeline database.

- 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

Evaluator Notes:

Discussed with State accuracy of inspection day information, and State is preparing data for this Year's SICT submission.

- 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 PA PUC and determined there were no negative trends.

- 19 Did the state encourage and promote operator implementation of Pipeline Safety Management Systems (PSMS), or API RP 1173? This holistic approach to improving pipeline safety includes the identification, prevention and remediation of safety hazards. Info Only Info Only
Info Only = No Points
a. <https://pipelinesms.org/>
b. Reference AGA recommendation to members May 20, 2019

Evaluator Notes:

Yes. The PA PUC has confirmed that all their larger operators have adopted some type of Safety Management System. The PA PUC is continually having conversation with the operator on SMS.

20 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

The following issues were identified in Part D of the program evaluation: (1) The PA PUC did inspect all types of operators and inspection units in accordance with time intervals in written procedures; and (2) the PA PUC did complete all applicable portions of the inspection form.

Total points scored for this section: 48
Total possible points for this section: 50



Part D question 1 comments from State Evaluator:

Reviewed the following records: **Standard:** Philadelphia Gas Works - Corrosion (6/2/21 & 7/23/20), National Fuel Gas Distr. Corp. – O&M (12/29/19 & 10/25/18), Valley Energy Inc. – Regulator (4/22/20 & 3/20/18), Penn Valley Gas Inc. (12/20/21 & CP installed in March 2020 for tanks), Knox Energy Coop Assn. – O&M (10/7/21 & 5/12/20), Columbia Gas Transmission, LLC – O&M (4/16/21 & 9/20/16), INR OPERATING, LLC. – O&M (9/28/21 & 9/22/20), VALLEY ENERGY, INC. Transmission – O&M (10/5/21 & 11/8/17), CNX RESOURCES CORPORATION – O&M (6/28/21 & 11/16/20), JOHNSTOWN REGIONAL ENERGY - O&M (12/22/21 & 10/24/16), DOUGLAS PIPELINE CO – O&M (11/18/21 & 12/17/19), BRUNNER ISLAND LLC – O&M (7/20/20 effective 3/22/16), PEOPLES GAS COMPANY LLC – O&M (11/18/21 & 10/7/20), WILLIAMS FIELD SERVICES (9/28/21 & 10/26/20), PHILADELPHIA GAS WORKS Transmission – O&M (11/4/19 & 6/11/19), PECO ENERGY CO. LNG (10/26/21 & 11/3/20), PHILADELPHIA GAS WORKS LNG (10/29/21, 10/28/21 & 11/24/20), UGI ENERGY SERVICES LNG (12/23/21 & 12/18/20), HILCORP ENERGY COMPANY (1/5/21 no longer jurisdictional), REPSOL OIL & GAS USA, LLC (11/24/21 & 8/25/20 effective 3/29/17), SW GATHERING - O&M (11/15/21 & 12/14/20), KC MIDSTREAM SOLUTIONS, LLC (6/21/21 & 12/2/20), DTE APPALACHIA GATHERING, LLC (12/2/21 effective date 4/19/18), ARD OPERATING, LLC – O&M (6/16/21 & 10/3/18), EQT PRODUCTION (10/25/21 & 11/25/20), NORTHEAST NATURAL ENERGY LLC (effective date 3/31/20 – Murphy Production – 12/7/21 & 9/6/13), Pennsylvania State University (5/16/18 effective 5/22/18), Slippery Rock University (12/18/20 & 12/5/16), The Meadows (10/28/20), Westminster College (found non-jurisdictional 4/12/21

PA: Philadelphia Gas Works (1/30/19 & 12/5/17), National Fuel Gas Distr. Corp. (11/9/21 & 1/12/17), Valley Energy Inc. (8/9/21 & 7/21/17), Penn Valley Gas Inc. (8/4/20 & no previous inspection), Knox Energy Coop Assn. (3/26/21 & 6/2/20), Columbia Gas Transmission, LLC (10/20/21 & 10/21/20), INR OPERATING, LLC. (9/21/21 & 9/10/20), VALLEY ENERGY, INC. Transmission (8/9/21 & 7/21/17), CNX RESOURCES CORPORATION (6/8/21 & 8/19/20), JOHNSTOWN REGIONAL ENERGY (12/16/21 & 9/4/14 did not meet 5 yr interval), DOUGLAS PIPELINE CO (4/2/21 & 8/4/20), BRUNNER ISLAND LLC (7/21/20), PEOPLES GAS COMPANY LLC (10/15/21 & 5/15/20), WILLIAMS FIELD SERVICES (7/14/21 & 7/24/20), PHILADELPHIA GAS WORKS Transmission (1/30/19 & 12/5/17), PECO ENERGY CO. LNG (10/26/21), PHILADELPHIA GAS WORKS LNG (10/29/21, 10/28/21 & 11/24/20), UGI ENERGY SERVICES LNG (12/23/21 & 12/18/20), REPSOL OIL & GAS USA, LLC (10/1/21 & 2/19/16), SW GATHERING (10/8/21 & 9/22/20), KC MIDSTREAM SOLUTIONS, LLC (7/12/21 & 12/3/20), DTE APPALACHIA GATHERING, LLC (11/17/21), ARD OPERATING, LLC (6/16/21 effective 10/3/18), EQT PRODUCTION (10/13/21 & 11/23/20), NORTHEAST NATURAL ENERGY LLC (12/6/21), The Meadows (10/28/20)

D&A: Philadelphia Gas Works (10/1/20 & 11/1/19), National Fuel Gas Distr. Corp. (11/16/21 & 10/31/19), Valley Energy Inc. (6/30/21 & 6/4/19), Knox Energy Coop Assn. (3/19/21 & 5/13/20), Columbia Gas Transmission, LLC (10/19/21 & 11/20/20), INR OPERATING, LLC. (9/20/21 & 9/3/20), VALLEY ENERGY, INC. Transmission (6/30/21 & 6/4/19), CNX RESOURCES CORPORATION (8/24/21 & 10/7/20), JOHNSTOWN REGIONAL ENERGY (12/15/21 & 5/11/21 no previous inspection), DOUGLAS PIPELINE CO (4/21/21 & no previous inspection), BRUNNER ISLAND LLC (7/21/20), PEOPLES GAS COMPANY LLC (11/9/21 & 1/21/20), WILLIAMS FIELD SERVICES (6/28/21 & 9/30/20), PHILADELPHIA GAS WORKS Transmission (10/1/20 & 11/1/19), PECO ENERGY CO. LNG (11/10/21 & 1/25/18), PHILADELPHIA GAS WORKS LNG (10/1/20 & 11/1/19), UGI ENERGY SERVICES LNG (12/7/20 & 7/9/19), REPSOL OIL & GAS USA, LLC (12/21/21 & 9/15/20), SW GATHERING (12/13/21

& 12/15/20), KC MIDSTREAM SOLUTIONS, LLC (6/14/21 & 12/22/20), DTE APPALACHIA GATHERING, LLC (11/16/21), ARD OPERATING, LLC (6/16/21), EQT PRODUCTION (8/20/21 & 12/23/20), NORTHEAST NATURAL ENERGY LLC (12/6/21)

CRM: Philadelphia Gas Works (5/26/21 & 12/19/19), National Fuel Gas Distr. Corp. (11/5/21 & 10/7/20)

Construction: Philadelphia Gas Works (10/27/21), National Fuel Gas Distr. Corp. (5/21/21), Valley Energy Inc. (12/17/19), Penn Valley Gas Inc. (12/20/21), CNX RESOURCES CORPORATION (7/20/21 & 12/16/20), PEOPLES GAS COMPANY LLC (10/21/21 & 1/30/20), WILLIAMS FIELD SERVICES (12/3/21 & 7/24/20), PHILADELPHIA GAS WORKS Transmission (5/26/21 & 12/19/19), PECO ENERGY CO. LNG (12/14/21 & 12/10/19), PHILADELPHIA GAS WORKS LNG (5/26/21 & 12/19/19), UGI ENERGY SERVICES LNG (12/22/20 & 11/26/19)

OQ: Philadelphia Gas Works (3/2/21 & 12/9/19), National Fuel Gas Distr. Corp. (11/19/21 & 3/5/19), Valley Energy Inc. (8/13/21 & 12/27/17), Penn Valley Gas Inc. (8/23/21 & 10/7/20), Knox Energy Coop Assn. (3/24/21 & 7/29/20), Columbia Gas Transmission, LLC (10/18/21 & 10/22/20), INR OPERATING, LLC. (9/10/21 & 8/27/20), Valley Energy Inc. Transmission (8/13/21 & 12/27/17), CNX RESOURCES CORPORATION (9/15/21 & 8/28/20), JOHNSTOWN REGIONAL ENERGY (12/14/21 & 5/12/21 & 10/24/16), DOUGLAS PIPELINE CO (11/12/21 & 10/9/18), BRUNNER ISLAND LLC (8/2/21 & 10/14/20), PEOPLES GAS COMPANY LLC (11/10/21 & 9/17/20), WILLIAMS FIELD SERVICES (7/8/21 & 10/2/20), PHILADELPHIA GAS WORKS Transmission (3/2/21 & 12/9/19), PECO ENERGY CO. LNG (10/26/21 & 11/3/20), PHILADELPHIA GAS WORKS LNG (10/29/21, 10/28/21 & 11/24/20), UGI ENERGY SERVICES LNG (12/23/21 & 12/18/20), REPSOL OIL & GAS USA, LLC (11/4/21 effective date 2017 name change – prior inspection 10/16/12), SW GATHERING (10/12/21 & 11/24/20), KC MIDSTREAM SOLUTIONS, LLC (6/9/21 & 12/1/20), DTE APPALACHIA GATHERING, LLC (9/1/21), ARD OPERATING, LLC (6/16/21), EQT PRODUCTION (8/2/21 & 11/16/20), NORTHEAST NATURAL ENERGY LLC (12/6/21), Pennsylvania State University (10/13/21 effective 4/14/18), Slippery Rock University (12/18/20), The

DIMP: Philadelphia Gas Works (12/9/21 & 9/30/19), National Fuel Gas Distr. Corp. (9/14/21 & 11/3/20), Valley Energy Inc. (8/11/21 & 11/13/18), Penn Valley Gas Inc. (8/16/21 & 1/21/21), Knox Energy Coop Assn. (10/7/21 & 12/1/20), Slippery Rock University (12/21/20), The Meadows (10/28/20)

IMP: Columbia Gas Transmission, LLC (5/19/22 & 3/13/19), INR OPERATING, LLC. (2/18/22 & 12/2/21), Valley Energy Inc. Transmission (8/18/21 & 1/31/18), CNX RESOURCES CORPORATION (11/2/21 & 12/15/20), JOHNSTOWN REGIONAL ENERGY (12/21/21 & 8/16/21 & 10/24/16), DOUGLAS PIPELINE CO (11/8/21 & no previous inspection), BRUNNER ISLAND LLC (12/17/21), PEOPLES GAS COMPANY LLC (12/15/21 & 10/15/20), WILLIAMS FIELD SERVICES (10/13/21 & 12/9/20), PHILADELPHIA GAS WORKS Transmission (10/14/21 & 12/15/20)

- 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:

- 1) Operator: Peoples Natural Gas Co.

Inspector(s): Lassine Niambele (L), Israel Gray, Jason Harvey

Location: Pittsburgh, PA

Date: June 21, 2022

PHMSA Rep.: Clint Stephens

The PAPUC performed a construction inspection. The pipeline operator was present during the inspection.

- 2) Operator: Columbia Gas of Pennsylvania

Inspectors: Tyler Merritt (L), Matthew Matse, Jason Harvey, David Kline

Location: Pittsburgh, PA

Date: June 22, 2022

PHMSA Rep.: Clint Stephens

The PAPUC performed an inspection on the operator's district regulator stations reviewing records and field 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:

- The inspector utilized the PAPUC Steel Pipeline Construction inspection form. The form was used as a guide for the inspection.
- The inspector utilized the PAPUC District Regulator Inspection form. The form was used as a guide for 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 reviewed construction specification procedures, welding specification procedures, pipeline construction design records, and OQ records. In the field the inspector observed welding of tap tee, PE butt fusion, coating application, and equipment calibration records. The inspection was of adequate length to properly perform the inspection.
- The inspector reviewed station equipment inspection records, O&M procedures, inlet/outlet pressures, regulator tear down, operator mainline valves, and checked set points on worker/monitor opp systems.

- 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:

The inspector did not conduct an exit interview due to the inspections not being completed at the time of the evaluation. However, the operator was made aware of any issues at the time of discovery.

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

Info Only = No Points

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

Evaluator Notes:

Yes. The inspection was performed in a safe, positive, and constructive manner. The following items were observed in the field; welding of tap tee, PE butt fusion, coating application, equipment calibration records, inlet/outlet pressures, regulator tear down, operator mainline valves, and checked set points on worker/monitor opp systems.

- 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.

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 2021 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. The PA PUC has added this question for discussion 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 has formulated charts showing root causes, such as "One-Call Notifications Practices not Sufficient", "Locating Practices Not Sufficient", mismarks, mapping inaccuracies, and "Excavation Practices Not Sufficient".

- | | | | |
|----------|--|---|---|
| 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. | 2 | 2 |
|----------|--|---|---|

- 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. The PA PUC and the Damage Prevention group have collected data and evaluated trends on the number of pipeline damages per 1,000 locate requests. The PA PUC has determined that contractors are causing the highest number of damages to the pipelines. The large operators have provided training for those stakeholders that perform excavation and cause the most damages. The PA PUC has evaluated trends to determine the root cause of most excavation damages.

5 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

There were no issues identified in Part F of the program 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 PA PUC 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 PA PUC 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 PA PUC 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 PA PUC 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 PA PUC is not an interstate agent.

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

Evaluator Notes:

The PA PUC is not an interstate agent.

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