



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

1200 New Jersey Avenue SE
Washington DC 20590

2022 Gas State Program Evaluation

for

IDAHO PUBLIC UTILITIES 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



2022 Gas State Program Evaluation -- CY 2022

Gas

State Agency: Idaho

Agency Status:

Date of Visit: 04/18/2023 - 04/20/2023

Agency Representative: Jeff Brooks, Program Manager - Idaho PUC

PHMSA Representative: David Lykken, Transportation Specialist - PHMSA State Programs

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

Name/Title: Eric Anderson, President

Agency: Idaho Public Utilities Commission

Address: 11331 W. Chinden Blvd, Building 8, Suite 201-A

City/State/Zip: Boise, ID 83714

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 2022 (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
50
15
10
0

TOTALS

100 100

State Rating **100.0**

PART A - Progress Report and Program Documentation Review

Points(MAX) Score

- 1 Were the following Progress Report Items accurate? (*items not scored on progress report) Info Only Info Only
- Info Only = No Points
- a. Stats On Operators Data - Progress Report Attachment 1
 - b. State Inspection Activity Data - Progress Report Attachment 2
 - c. List of Operators Data - Progress Report Attachment 3*
 - d. Incidents/Accidents Data - Progress Report Attachment 4*
 - e. Stats of Compliance Actions Data - Progress Report Attachment 5*
 - f. List of Records Kept Data - Progress Report Attachment 6 *
 - g. Staff and TQ Training Data - Progress Report Attachment 7
 - h. Compliance with Federal Regulations Data - Progress Report Attachment 8
 - i. Performance and Damage Prevention Question Data - Progress Report Attachment 10*

Evaluator Notes:

a. Operator/Inspection Unit totals on Attachment 1 are consistent with the Operator/Inspection Unit totals on Attachment 3. b. No issues. C. No issues. Breakdown of Operators consistent with information found in the PDM. D. Two originally reported but rescinded. Did not meet reporting thresholds. e & f No issues. g. Information verified through T&Q Blackboard training site. Training for personnel found to be complete and accurate. h. Four points again deducted on PR scoring for not having civil penalty amounts essentially the same as PHMSA. PR score is 46. New amendments adopted up through 10/2022.

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:

Program Operations Procedures (POP) Revision 2023. Pre and Post inspection activities for each inspection type discussed under Attachment 'E' (Inspector Actions for Inspection Activities) Pgs. 32-33. Sections 1.5.1 and 3.0. O&M 3.4, Std Insp 3.8, D&A 3.14, CRM 3.18, PAPEI 3.16. b: IMP 3.10, DIMP 3.17 c: Section 3.9 d: Sections 2.5/2.5.1 and 3.12 e: Section 3.13 f: Section 3.11 g: Section 4.0

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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:

Yes. All elements addressed under Section 1.0 Program Overview. Inspection frequencies listed under 1.2.2. Risked Based Inspection procedures under Section 8.0. Operators/Units typically visited annually.

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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:

a. Sub-Section 1.6 (Compliance Action) and Section 5.0 (Compliance 601050(a)). Sub-Section 5.7. Page 19 b & c: Sub-Section 5.7. Page 20.

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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 reportsb. 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:

Yes. a & b: Section 6.0 - Accident/Incident Investigation.

5 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

No point deductions under Part B.

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



PART C - State Qualifications

Points(MAX) Score

- | | | | |
|---|---|---|---|
| 1 | Has each inspector and program manager fulfilled training requirements? (See Guidelines Appendix C for requirements) Chapter 4.3
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:

No issues. Bruce Perkins has completed all necessary courses to conduct all inspection types as lead. Jeff Brooks has completed the T&Q Gas Inspector and Failure paths, and the LNG course. He is working to complete the Gas IM courses (ECDA & Gas IM). Matt Galli is working to complete the gas core path.

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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:

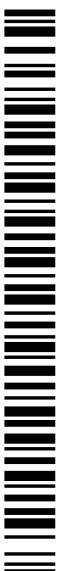
Jeff Brooks was appointed Program Manager effective 12-13-2021. He has been with the pipeline program since November 2020. Jeff has experience with refinery processing and pressure piping and is a qualified NDE and certified welding inspector. Jeff has fully completed the Gas Inspector and Failure Paths and the LNG course. He only requires the ECDA (3306) and Gas IM (1297) to complete the Gas IM path.

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

No point deductions under Part C.

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



PART D - Program Performance

Points(MAX) Score

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

Evaluator Notes:

Yes. No issues. The program has also completed all Section 114 inspections either conducted in house or acceptance of another outside agency such as PHMSA or other state pipeline safety program.

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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 | 10 |
| | <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:

The program utilizes the IA in CY2022 to document inspection results. Also, IPUC Form 1 (Inspection Summary), Form 2 (Supplemental Checklist), Form 3 (Exit Interview Inspection Summary), and Form 4 (DT&C inspections).

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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. 16 days devoted to OQ plan and field verification activities in 2022. Reviewed instances where the OQ Form 15 field validation form was utilized. The IA OQ question set is typically added during the inspection planning phase in the IA.

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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 |
| | <ul style="list-style-type: none">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. 19 days devoted to DIMP/TIMP plan updates and field implementation activities. b. Covered under IPUC Supplemental Form 2. c: There are no low-pressure distribution systems in the state.

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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. a & b: No known cast iron. Only 1.3 miles of protected bare steel remaining. c thru g. IPUC form 2 (Supplemental Checklist) used to document these items. No low-pressure gas systems.

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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)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

Documented on IPUC Form 2. One advisory bulletin issued in CY2022 related to potential damage to pipelines/facilities resulting from land subsidence issues.

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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 | 10 |
| | 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:

Section 5.0 of written procedures. Yes. No issues noted for a thru j. Reviewed 10 compliance letters (5 NOPV/5 LOC) sent to appropriate company/government officials. Reviewed IPUC Form 3 Exit Interview Inspection Summary's and IA Post Inspection Written Findings reports utilized for post-inspection briefings. Written notices typically sent to operators via email usually within a day or two after completion of the exit interview meeting the 30 & 90-day requirement. f: Case No. INT-G-22-01 filed in 2022 concerning an operator's practice of allowing un-qualified staff to perform "live meter exchanges". Staff recommended a civil penalty in the amount of \$200,000. The Commission issued a final order on 8/5/2022 approving abeyance and waiver of penalties subject to the operator's successful implementation of corrective actions items outlined in the order.

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| 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:

Section 6 (Accident/Incident Investigations) of program procedures. a: Telephone Notice of Gas Incidents mechanism in place to receive calls. b: Yes. IPUC Inspection Form 1 utilized to document initial notifications. c: N/A. No reportable incidents in CY2022. d thru h: N/A. The program has in the past demonstrated maintaining good communications with both PHMSA AID and the WR office. I: State of the State presentation at NAPS Regional meetings and annual state operator seminar. Also, annual "Fireside Chats" held annually with each operator.

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

Evaluator Notes:

Yes. Letter to IDPUC President sent out June-2022. President's response received 7/11/2022. The PUC continues to work with the legislature on raising civil penalty amounts. Program Manager has now fully completed the Gas Inspector and Failure Paths and the LNG course.

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

Evaluator Notes:

Yes. An operator seminar was held in Boise, ID Nov 4, 2022. Reviewed agenda and participant roster.

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

Evaluator Notes:

Yes. IPUC Form 2 - Supplemental Form.

- 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:

No additions or other changes in CY2022. The IDPUC web site provides information on operator annual report data, Compliance Enforcement including compliance letters, operator responses, and close-out letters, and PHMSA State Program evaluation results and Progress Reports for the corresponding year.

- 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:

One SRCR reported and closed in CY2022. Follow-up was timely and updates provided within the 10 and 30-day timeframes established by PHMSA policy.

- 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 program responded to 9 of 16 NAPSRS surveys. No IM notifications in CY2022. No other WMS tasks assigned other than the one SRCR.

- 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:

None requested or approved in CY2022. Currently there are no open waivers/special permits.

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

Evaluator Notes:

No issues. Documents were readily available.

- 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:

SICT minimum estimated at 324 days. Actual for CY2021 was 328. DT&C inspections 32.25% of SICT minimum total days. Tool updated annually. No significant changes.

- 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:

Damages per 1000 tickets up for the first time since CY2016. Ratio is approximately 5.8 damages per which is well above the national average of 2.55. Refer to Part F of the evaluation form for additional details. Inspection days averaging 19 days per 1K miles of pipe (2021 data). Inspector qualification core training average down to 50% due to staff turnover in 2022. Total leaks, Hazardous Leaks, and Leaks Scheduled for Repair still trending downward due to ongoing Aldyl-A pipe replacement program resulting in fewer active leaks.

- 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 program does promote implementation of PSMS via operator meetings. One has adopted API RP-1173. Also promotes at "Fireside Chats" conducted annually with individual operators.

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

Evaluator Notes:

No point deductions under Part D.

Damages per 1000 tickets up for the first time since CY2016. Ratio is approximately 5.5 damages per which is well above the national average of 2.55. The program needs to identify and implement additional accelerated actions needed to drive down these numbers.

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



PART E - Field Inspections

Points(MAX) Score

- 1 Operator, Inspector, Location, Date and PHMSA Representative (enter specifics into the comments box below) Info Only 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:

- a. A Standard records review and facilities check of the Intermountain Gas Company - Nampa LNG Facility on 4/17-18/2023. b. The unit is inspected annually. Last O&M review on 5/18-19/22. Last records and facility check was 5/16-17/22. c. Yes, the operator was present. d. Bruce Perkins has been with the ID-PUC pipeline program since 2016.
- a. A DT&C inspection of a 4500' 6" PE extension project was conducted on 3/19/23. b. This is an on-going project. c. Yes. d. Bruce Perkins

- 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 IPUC utilizes the IA to document inspection results for all inspection types except for DT&C inspections. The IA LNG Form 4 Baseline Record & Form 4 Baseline Field Inspection directives were used for this inspection.
- Yes. The inspector utilized the IPUC Form 4 - New Construction Inspection Report and PHMSA Form 15 OQ Protocol 9 (Field 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:

- Yes. 1. a & b: A written procedures review was not conducted as part of the inspection. Mr. Perkins review of the operator's records was thorough and sufficient to determine compliance. c: The standard field facilities check of the LNG plant included inspection of associated plant facilities including station valves, Atmospheric corrosion, facility signage, operator training, fire equipment, control room, Security, and instrument calibration. The operator provided some requested documentation ahead of the scheduled face to face meeting. The inspection was of adequate length to determine compliance.
- Yes. Construction crew performing directional drilling pull-back operation of 6-inch pe pipe operation. Mr. Perkins reviewed project documentation, OQ training records, one-call request tickets, and pipe material specifications. Previously completed PE fusion joints, pipe placement in ditch, the general condition of pipe, and exposure of other underground utilities by contractor were inspected and observed. The inspection was of adequate length.

- 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. 1 & 2 Mr. Perkins demonstrated very good knowledge of LNG regulations, program specifics, and distribution gas construction practices.

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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:

Yes. A verbal exit was conducted in both instances. For the LNG inspection a IA Post-Inspection Preliminary Findings report was sent to the operator via email on 4/19/23 by Jeff Brooks, IPUC Program Manager.

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

Evaluator Notes:

No unsafe acts were observed. Mr. Perkins conducted himself in a courteous and professional manner.

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

Evaluator Notes:

No point deductions under Part E.

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



PART F - Damage prevention and Annual report analysis**Points(MAX) Score**

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

Evaluator Notes:

Yes. Again, discussed above average percent of One-Call Notification Practice root cause excavation damages as reported by the States two largest LDC's for CY2022. Provided a copy of CY2022 GD Excavation Damage data by Root Cause to be used for more discussion.

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

Discussed above average percent of One-Call Notification Practice root cause excavation damages as reported by the States two largest LDC's for CY2022. The program does conduct a thorough review and analysis of annual reports but needs to have a more serious discussion with these operators on how they intend to drive these high percentages down. Refer to question #3 below.

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|----------|---|---|---|
| 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 |
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Evaluator Notes:

Yes. Reviewed annually. The program needs to pay particular attention to root cause statistics reported by the operators and ensure that data reported is accurate and that the operators are taking measures to reduce these numbers. CY2022 data reported by one LDC for damages related to One-Call Notification Practices at 52%, the other at 43%. Excavation damages per 1000 tickets for the two largest operators (6.36 & 3.83) above the national average of 2.55. As noted under question F3 & F4, the program needs to identify and implement additional measures to reduce the numbers being reported.

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

- c. Has the state evaluated which of the following best describes the reason for the excavation damages; i.e., operator or contractor not following written procedures, failure to maintain marks, failure to support exposed facilities, failure to use hand tools were required, failure to test-hole (pot hole), improper backfilling practices, failure to maintain clearance or insufficient excavation practices.
- d. Has the state verified the operator is appropriately focusing damage prevention education and training to address the causes of excavation damages?

Evaluator Notes:

The program needs to identify and implement accelerated actions they can take to help reduce the number of damages occurring in the state. Damages per 1000 tickets up for the first time since CY2016. Ratio is now approximately 5.8 damages per which is higher than the national average of 2.5. A frank discussion with the state's two largest operators needs to take place to identify what measures these operators intend to take to reduce these above average numbers.

In CY2022, the Idaho Damage Prevention Board investigated 119 cases involving damages to gas pipeline facilities. Action was taken in 93 of these cases. Penalties assessed \$69,100 (24 Excavators & 1 Pipeline Operator). Penalties collected \$63,000.

Civil penalties are minimal, however. Violators are subject to a civil penalty of not more than one thousand dollars (\$1,000) for a second offense and a civil penalty of not more than five thousand dollars (\$5,000) for each offense that occurs thereafter within eighteen (18) months from an earlier violation, and where facility damage has occurred.

5 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

No point deductions under Part F.

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



PART G - Interstate Agent/Agreement States

Points(MAX) Score

- 1 Were all inspections of interstate pipelines conducted using the Inspection Assistant program for documenting inspections? Info Only Info Only
Info Only = No Points

Evaluator Notes:

ID PUC is not an interstate agent and does not have a 60106 agreement with PHMSA.

- 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:

ID PUC is not an interstate agent and does not have a 60106 agreement with PHMSA.

- 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:

ID PUC is not an interstate agent and does not have a 60106 agreement with PHMSA.

- 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:

ID PUC is not an interstate agent and does not have a 60106 agreement with PHMSA.

- 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:

ID PUC is not an interstate agent and does not have a 60106 agreement with PHMSA.

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

Evaluator Notes:

ID PUC is not an interstate agent and does not have a 60106 agreement with PHMSA.

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