



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

MISSOURI PUBLIC SERVICE 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:** Missouri

**Agency Status:**

**Date of Visit:** 08/14/2023 - 08/18/2023

**Agency Representative:** Kathleen McNelis

**PHMSA Representative:** David Appelbaum

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

**Name/Title:** Scott T. Rupp, Chairman

**Agency:** Missouri Public Service Commission

**Address:** 200 Madison Street, Suite 900

**City/State/Zip:** Jefferson City, MO 65101

**Rating:**

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

## 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

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	50
15	15
10	10
0	0

### TOTALS

**100 100**

**State Rating** ..... **100.0**

## PART A - Progress Report and Program Documentation Review

Points(MAX) Score

- 1 Were the following Progress Report Items accurate? (\*items not scored on progress report) Info Only 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. No jurisdiction over LPG operators.
- b. No issues. Construction inspections at 23%
- c: No issues. Breakdown of Operators consistent with information found in the PDM.
- d. PDM shows 1 GD incidents reported. Matches PR under Attachment 4.
- e The program references state rules in their count. Suggested they make a note under attachment 5 denoting this practice.
- f. No issues.
- g. Information verified through T&Q Blackboard training site. No issues.
- h. Current rulemaking underway to adopt Gas Pipeline Regulatory Reform amendments. Progress Report scoring -2 for no LPG Jurisdiction, -4 Points for civil penalties deficiency. Currently penalties at \$20K/\$200K. 44 of possible 50 pts scored.
- i: No issues.

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:

No change from prior year. Latest revision is Rev. 10 dated 1/11/2023

- a. Standard inspection procedure - Section 4.2.1 of MO Pipeline Safety Program Plan. Section 4.2.2 O&M and Emergency Plans, Section 4.2.3 Public Awareness. D&A Section 4.2.6, CRM Section 4.2.7. Pre-inspection activities for all inspection types addressed under Section 5 "Conducting Inspections". Post Inspection activities under Section 5.6.
- b. Pipeline Safety Program Plan Section 4.2.5. Pre-inspection activities for all inspection types addressed under Section 5 "Conducting Inspections". Post Inspection activities under Section 5.6.
- c. Pipeline Safety Program Plan Section 4.2.4. Pre-inspection activities for all inspection types addressed under Section 5 "Conducting Inspections". Post Inspection activities under Section 5.6. d: Pipeline Safety Program Plan Section 10 Damage Prevention Program and One-Call Notification. e: Pipeline Safety Program Plan Section 5.5.16 Onsite Operator Training Provided by MO PSC.
- f. Pipeline Safety Program Plan Section 4.2.9.
- g. Pipeline Safety Program Plan Section 4.2.11. Denotes requirement to conduct Standard Inspections within a 3-year time interval. Also Section 5.5.11 for "Temporary/Mobile" facilities.

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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<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:

Recent change: Plan (Rev 9 3/24/2022) Section 4 - Inspection Planning. Inspection Priorities - Section 4.2 identifies riskier and problematic aspects for each operator for determining inspection priorities. Time Intervals for Inspections under Section 4.2. The program's Priority List accounts for large operators with multiple units to ensure an adequate rotation is performed. Unit breakdown for Spire East & West broken down by Inspection Checklist Parts 1 thru 4. New this year. MO PSC intends to use the Date-to-Date planning approach in CY2022 with a Calendar Year Planning with Grace Period Approach for extreme circumstances (Detailed under Section 4.2 Footnote 4) with potential scenarios.

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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<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></ul> |   |   |

- c. Procedures regarding closing outstanding probable violations

Evaluator Notes:

- a: Procedure to notify company officer contained in section 2.5.5.  
b: Section 5.6.1 (Post Inspection Process) contains process for reviewing progress of and documenting of compliance actions (POV's and AOC's).  
c: Sections 5.6.2 (Follow-up Procedures), 5.6.3 (Further Enforcement), 5.6.4 (Complaints and Penalties) contain process regarding closing outstanding probable violations.

PHMSA recommends the PSC better articulate the process for closing outstanding probable violations, specifically, and the extent possible, timelines for resolution. There were instances where concerns identified in inspections remained open beyond reasonable timelines.

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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? | 3 | 3 |
|---|--|---|---|
- Yes = 3 No = 0 Needs Improvement = 1-2
- 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:

Section 6 - Failure Investigation and Safety Related Conditions. Appendix G - MOPSC Staff Notification Procedures for NG Incidents. Minimum PHMSA Incident Report Form, "Staff Records" and PHMSA Failure Investigation Report (FIR) template. Appendix I. b: Yes, Section 6 - Failure Investigation and Safety Related Conditions.

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| 5 | General Comments: |  | Info Only Info Only |
|---|-------------------|--|---------------------|
- Info Only = No Points

Evaluator Notes:

No issues. No point deductions under Part B.

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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 4.3<br>Yes = 5 No = 0 Needs Improvement = 1-4  | 5 | 5 |
|   | <ul style="list-style-type: none"><li>a. Completion of Required OQ Training before conducting inspection as lead</li><li>b. Completion of Required DIMP/IMP Training before conducting inspection as lead</li><li>c. Completion of Required LNG Training before conducting inspection as lead</li><li>d. Root Cause Training by at least one inspector/program manager</li><li>e. Note any outside training completed</li><li>f. Verify inspector has obtained minimum qualifications to lead any applicable standard inspection as the lead inspector (Reference State Guidelines Section 4.3.1)</li></ul> |   |   |

Evaluator Notes:

Yes. All lead inspectors and Program Manager have met the requisite training requirements.

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

Evaluator Notes:

Yes. As in past evaluation years, Kathleen has demonstrated proficient knowledge of PHMSA program and regulations. Kathleen has been with the pipeline safety program in 2008.

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

No issues. No point deductions under Part C.

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



## PART D - Program Performance

Points(MAX) Score

- |   |   |   |   |
|---|---|---|---|
| 1 | Did state inspect all types of operators and inspection units in accordance with time intervals established in written procedures? Chapter 5.1<br>Yes = 5 No = 0 Needs Improvement = 1-4  | 5 | 5 |
|   | <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:**

Yes. No issues noted. All inspection types completed within established timeframes. The program's DT&C days were 23.3% of SICT total estimated inspection person-days.

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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?<br>Yes = 10 No = 0 Needs Improvement = 1-9 | 10 | 10 |
|   | <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:**

The program utilizes a combination of PHMSA legacy inspection forms for most inspection types which are reviewed and updated annually to ensure minimum content. Updated information on recent PHMSA Advisory Bulletins as well as IA question consideration content are also incorporated. For construction - one form is utilized for Plastic installation and one for Steel installations.

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

**Evaluator Notes:**

Yes. 86,875 days devoted to OQ activities. Protocol 9 inspections typically done as part of standard inspections, and during larger construction projects. Reviewed both OQ plan review and Protocol 9 field verification inspection documentation.

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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<br>Yes = 2 No = 0 Needs Improvement = 1  | 2 | 2 |
|   | <ul style="list-style-type: none"><li>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?</li><li>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?</li></ul> |   |   |

- c. Are the states verifying operators are including low pressure distribution systems in their threat analysis?

Evaluator Notes:

Yes. 72.875 days devoted to TIMP/DIMP activities. Reviewed the nine DIMP and nine TIMP plan and field implementation inspections conducted in CY2021. As noted in prior years, per state law operators are required to submit plan changes no later than 20 days after the change is made. B. Yes. c: Yes. No changes. Letter sent to operators in 2020 advising them and providing copies of PHMSA Advisory Notices ADB-2020-01 (Inside Meters) and ADB-2020-02 (Low Pressure Systems). Also these items incorporated into inspection checklists.

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 to all. Covered under O&M Procedures Review, Standard Inspection, O&M & Emergency Plan inspection forms. There is a 10/06/2020 letter to operators advising them and providing copies of PHMSA Advisory Notices ADB-2020-01 (Inside Meters) and ADB-2020-02 (Low Pressure Systems). The program has a checklist for both Distribution & Transmission operators for reviewing operator annual reports accuracy and for analyzing that data for trends and operator issues. The program also sends out an annual operator letter covering the above items and other items of interest or focus including new PHMSA advisory bulletins, new Federal and State Rulemakings, upcoming inspections, etc.

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:

ADB's incorporated into the program's inspection forms and included in the annual operator letter.

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:**

Correspondence sent to appropriate company officials in all cases reviewed. Violations properly documented in correspondence and match totals note under Attachment 5 of PR. One civil penalty assessed in CY2022 for \$20k. Use of civil penalties evaluated on a case-by-case bases. PM reviews, approves and signs compliance actions taken. Reviewed program's "Attachment 5 backup" spreadsheet used to monitor compliance activities. 33.313 days devoted to compliance follow-up inspections. Program goal is to send out written correspondence within one month of completion of inspection.

<b>8</b>	(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:**

- a: 800 Number or use Telephone Notice of Gas Incidents (staff contact list).
- b: Yes. Gas Incident Notification Form utilized to document notifications.
- c: N/A. On-site visit conducted for the one reportable incident in CY2022.
- d/e: Yes. Reviewed Spire Incident NRC 20220025 including investigation report.
- f/h: No non-compliance identified. The program has demonstrated maintaining good communications with both AID and CR office.
- I: State of the State presentation at NAPS Regional meetings and annual state operator seminar. Also letter to operators on occasions when issue comes up that should communicated.

<b>9</b>	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:**

Outbound 8/17/2022, reply sent 8/22/2022 - no issues.

<b>10</b>	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:**

Program attempts to do one every year. The last annual Missouri Association of Natural Gas Operators (MANGO) seminar was held 6/29-7/1,2022.

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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:

Confirmed under MOPSC Reporting Procedures of the O&M and Emergency Procedures Inspection checklist and MOPSC Gas Safety Standard Inspection Checklist. Verified annually via email request from Program Manager.

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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:

MOPSC website. All Operators Letter (email). Open and closed cases accessed through the public website Electronic Filing and Information System. Link provided to Missouri One-Call. Also All-Operator letter issued annually.

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|-----------|---|---|---|
| <b>13</b> | Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.7<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

No SRCR's submitted by operators in CY2022. Verified in WMS and PDM.

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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 NAPS or PHMSA; and<br>b. PHMSA Work Management system tasks? | 1 | 1 |
|-----------|---|---|---|
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Evaluator Notes:

No issues

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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:

Waivers for electrofusion and mechanical fittings noted in MOPSC Gas Safety Inspection Checklist for certain LDC's and municipalities to ensure conditions are being met. Three waivers issued in CY2020 with PHMSA approval. GE-2020-0295 (Farm Tap inspections included in company's DIMP program), GE-2020-0373 (Temporary extension of company atmospheric corrosion inspections and leak surveys by no later than 12/31/20), GE-2020-0373 (granting extension for completing prior corrosion and leak surveys to 3/31/2021), and GE-2020-0373 granting third extension to be completed no later than 7/31/2021. All of these are no longer in effect. Reviewed with the program six waivers posted on the PHMSA web site going back as far as 1996. The program will review and determine if each are still relevant.

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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:

Documentation readily available. No issues or concerns noted.

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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:

A review of the SICT program was discussed and reviewed with staff. PM is well versed in the mechanics of the SICT.

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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:

Reviewed the state performance metrics found in the PHMSA website and discussed the changes and trending for each metric with the program manager.

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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:

Has been discussed at past MANGO seminars.

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

Evaluator Notes:

No point deductions under Part D.

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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:

MO PSC conducted an OQ and Standard field inspection on Ameren in Colombia and Moberly, MO. Greg Williams was lead inspector and Nick O'Neal, Robert Clay and Brian Buchanan assisted.

- 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:

Inspectors used appropriate forms as a guide during the inspection.

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

Evaluator Notes:

Inspector was very thorough in all aspects of these audits. They were observed asking multiple questions about the operator's records and recording their response on the inspection (notes) form. A sufficient records review was performed on all operators including the name of the person(s) performing the work and their OQ tasks.

- 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:

Inspectors were competent with the pipeline safety regulations and inspection protocols. They conducted the inspections in a professional manner. Additionally, he asked excellent questions and insured the operator's records, procedures, and alike, reflected compliance with the pipeline safety regulations.

- 5 Did the inspector conduct an exit interview, including identifying probable violations? (If inspection is not totally completed the interview should be based on areas covered during time of field evaluation) 1 1  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes - no issues

- 6 Was inspection performed in a safe, positive, and constructive manner ? Info Only Info Only  
Info Only = No Points
- 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 Mr. Williams performed the inspection in a safe, positive, and professional manner. He observed the condition of pipeline facilities to assure compliance with both state and federal regulations and did not hesitate to communicate to the operator concerns observed when necessary.

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7 General Comments:  
Info Only = No Points

Info Only Info Only

Evaluator Notes:

No issues noted. No point deductions under Part E.

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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

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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.<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

PSC reviews the Operator Annual reports for accuracy and analyzed data for trends and operator issues. Utilizing the data provided by all corresponding utility companies, both the Total Number of Excavation Damages by Apparent Root Cause and Total Excavation Tickets are calculated to produce the metrics for damages per thousand tickets.

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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)<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 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

Yes, the Program verifies that the operators analyze excavation damages for the purpose of determining root causes and minimizing the possibility of a recurrence.

- |   |   |   |   |
|---|---|---|---|
| 3 | 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> | 4 | 4 |
|---|---|---|---|

Evaluator Notes:

Yes to all. Also, in conjunction with other departments of the MO PSC, Safety Engineering Staff worked to develop the scope for a quality assurance study into pipeline locating practices. This scope was submitted to PHMSA in Missouri's 2020 One Call Grant application. The study has been completed and a report issued and made available via the MO-PSC web site. A copy of the report was reviewed during this program evaluation.

- |   |  |   |   |
|---|--|---|---|
| 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?<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></ol> | 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:

Program has excelled in collecting data to understand causes of excavation damage.

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**5** General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

No point deductions under Part F.

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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:

MO PSC 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:

MO PSC 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:

MO PSC 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:

MO PSC 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:

MO PSC 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:

MO PSC 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