



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

MISSISSIPPI 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: Mississippi

Agency Status:

Date of Visit: 07/18/2023 - 07/20/2023

Agency Representative: Rickey Cotton, Director of Pipeline Safety

PHMSA Representative: Don Martin

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

Name/Title: Dane Maxwell, Chairman

Agency: Mississippi Public Service Commission

Address: 401 North West Street, Suite 201 A

City/State/Zip: Jackson, Mississippi 39201

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

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	49
15	15
10	10
0	0
100	99

TOTALS

State Rating **99.0**

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. No issues that could not be explained.
- b. The MPSC provided information in spreadsheets that supported the information entered into Attachment 2.
- c. No issues.
- d. No issues.
- e. The MPSC provided documentation that supported the information entered into Attachment 5.
- f. No issues.
- g. No issues.
- h. No issues. The MPSC has automatic adoption authority for Part 192 minimum federal safety standards.
- 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
Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 5 |
| | <ul style="list-style-type: none">a. Standard Inspections, which include Drug/Alcohol, CRM and Public Awareness Effectiveness Inspectionsb. TIMP and DIMP Inspections (reviewing largest operator(s) plans annually)c. OQ Inspectionsd. Damage Prevention Inspectionse. On-Site Operator Trainingf. Construction Inspections (annual efforts)g. LNG Inspections | | |

Evaluator Notes:

The MPSC's procedures were reviewed. Pre‐inspection, inspection and post inspection activities are described in the procedures. The CY2021 program evaluation identified a deficiency whereby the procedures should be more specific. The MPSC did revise the procedures to add specificity to an acceptable level.

- | | | | |
|---|---|---|---|
| 2 | Do written procedures address inspection priorities of each operator, and if necessary each unit, based on the following elements and time frames established in its procedures? Chapter 5.1
Yes = 4 No = 0 Needs Improvement = 1-3 | 4 | 4 |
| | <ul style="list-style-type: none">a. Length of time since last inspectionb. Operating history of operator/unit and/or location (includes leakage, incident and compliance activities)c. Type of activity being undertaken by operators (i.e. construction)d. Locations of operator's inspection units being inspected - (HCA's, Geographic area, Population Centers, etc.)e. Process to identify high-risk inspection units that includes all threats - (Excavation Damage, Corrosion, Natural Forces, Outside Forces, Material and Welds, Equipment, Operators and any Other Factors)f. Are inspection units broken down appropriately? | | |

Evaluator Notes:

The MPSC's procedures were reviewed. Inspection intervals are contained in the the procedures. Although the MPSC inspects each operator annually, it does assess risks for each operator for use in the SICT. Inspection units appear to be reasonable.

- | | | | |
|---|---|---|---|
| 3 | (Compliance Procedures) Does the state have written procedures to identify steps to be taken from the discovery to resolution of a probable violation? Chapter 5.1
Yes = 3 No = 0 Needs Improvement = 1-2 | 3 | 3 |
| | <ul style="list-style-type: none">a. Procedures to notify an operator (company officer) when a noncompliance is identifiedb. Procedures to routinely review progress of compliance actions to prevent delays or breakdownsc. Procedures regarding closing outstanding probable violations | | |

Evaluator Notes:

The MPSC's procedures were reviewed. Procedures for steps from the discovery to resolution of a probable violation are contained in the procedures.

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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:

The MPSC's procedures were reviewed. The procedures provide mechanism to receive, record and respond to reported incidents. Operators are provided with a contact list for MPSC pipeline safety inspectors and program manager. The listing contains cell phone numbers which provide a method for after hour contact with the MPSC. The MPSC has methods to collect information if an on-site is not required; however, the MPSC investigates all reportable incidents.

5 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

There were no issues found resulting in the loss of points for Part B of this 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:

Training records in TnQ's Blackboard training database were reviewed.

- a. All inspectors except Jacqueline Profitt and Rickey Cotton have completed the required OQ courses.
- b. John Thompson is only inspector completing IMP/DIMP courses.
- c. There are no LNG facilities in Mississippi.
- d. Root cause training requirement has been met.
- e. No outside training noted.
- f. All inspectors has completed the core courses to lead a Standard Inspection except for Wyatt Welch.

Note: All have completed failure investigation path except for Wyatt Welch.

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

Evaluator Notes:

The program manager has considerable work experience in gas distribution systems operations and as a state program manager. He has completed all of the required courses to lead Standard Inspections of gas pipeline and LNG facilities.

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|---|--|-----------|-----------|
| 3 | General Comments:
Info Only = No Points | Info Only | Info Only |
|---|--|-----------|-----------|

Evaluator Notes:

There were no issues found in Part C of this evaluation.

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
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:

- a. Intervals were met for Standard Inspections.
- b. Northeast MS Natural Gas District and Tucker Energy Solutions exceeded the five-year interval for Public Awareness Effectiveness.
- c. Laurel Fuels exceeded the five-year interval for Drug and Alcohol.
- d. Intervals were met for Control Room Management.
- e. There are no LNG facilities in Mississippi.
- f. The MPSC had a total of 210 inspection person days for Design, Construction and Testing which equated to 29% of the 721 total days in the SICT.
- g. Laurel Fuels exceeded the five-year interval but was during time period prior to requirement.
- h. Intervals were met for IMP/DIMP.

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

- Inspection Reports conducted in CY2022 for operators that were randomly selected were reviewed.
- a. The MPSC utilized legacy Form 2 Gas Distribution for Standard Comprehensive Inspections revised January 2015. The MPSC should use IA equivalent Form 2 that was revised January, 2022. The MPSC utilized IA Equivalent Form Form 1 Standard Inspection Report for Gas Transmission revised August, 2013. The MPSC should use IA equivalent Form 1 that was revised July, 2021.
 - b. The MPSC utilized IA Equivalent Form 21 revised May 2015. The MPSC should use IA Equivalent Form 21 revised January 2022.
 - c. - Forms supported by PHMSA were utilized for these inspections. No issues found.
 - d. There were no Control Room Management inspections conducted on randomly selected operators. e. - There are no LNG facilities in Mississippi.
 - f. - There were no construction inspections conducted on the randomly selected operators during CY2021.
 - g. - Forms supported by PHMSA were utilized for these inspections. No issues found.
 - h. - Forms supported by PHMSA were utilized for DIMP inspections. No issues found. There were no IMP inspections conducted on the randomly selected operators during CY2022.

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

Evaluator Notes:

OQ Inspection Reports conducted in CY2022 for operators that were randomly selected were reviewed. No issues with Protocol 9 requirements.

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

Evaluator Notes:

A random selection of IMP/DIMP inspection reports were reviewed. a. Largest operators were inspected in 2021 and 2022.
b. Yes, this is covered during DIMP inspections. c. There are no low pressure systems in Mississippi.

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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 <ul 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 |
|---|--|---|---|

Evaluator Notes:

- a. Covered in Standard inspection form under section 605(b)(2) 192.459.
- b. Covered in the DIMP inspection form
- c. Covered in the Standard inspection form under section 605(b)(1) 192.615(a)(7).
- d. Covered in the Standard inspection form under section 605(b)(1) 192.615 (b) (3).
- e. Covered during Damage Prevention inspections.
- f. The MS PSC is not aware of any low pressure systems in MS.
- g. The MS PSC is not aware of any service regulators located inside buildings in MS.

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:

The MPSC conducts pipeline safety seminars with operators. Advisory bulletins issued since the last seminar are discussed. In addition to seminars, recent advisory bulletins are communicated in conferences attended by operators. It is mandatory that operators attend to obtain required Continuing Education Units. Verification of action occurs during Standard inspections.

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	10	10
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Yes = 10 No = 0 Needs Improvement = 1-9

- a. Were compliance actions sent to company officer or manager/board member if municipal/government system?
- b. Were probable violations documented properly?
- c. Resolve probable violations
- d. Routinely review progress of probable violations
- e. Did state issue compliance actions for all probable violations discovered?
- f. Can state demonstrate fining authority for pipeline safety violations?
- g. Does Program Manager review, approve and monitor all compliance actions? (note: Program Manager or Senior Official should sign any NOPV or related enforcement action)
- h. Did state compliance actions give reasonable due process to all parties? Including "show cause" hearing, if necessary.
- i. Within 30 days, conduct a post-inspection briefing with the owner or operator outlining any concerns
- j. Within 90 days, to the extent practicable, provide the owner or operator with written preliminary findings of the inspection. (Incident investigations do not need to meet 30/90-day requirement)

Evaluator Notes:

Inspection Reports conducted in CY2021 for operators that were randomly selected were reviewed. Files for inspections that identified non-compliance issues were examined for non-compliance notification correspondence to operators, responses from operators stating corrective actions, MPSC's review of corrective actions and documentation of the MPSC's acceptance of corrective action.

- a. - e. - No issues found.
- f. - The MPSC issued a civil penalty in 2019.
- g. - j. - No issues.

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:

There was one gas distribution incident and one storage field incident.

- a. Yes, the MPSC has a procedure and process to receive incident notifications from operators. After hour reporting is available to operators. The MPSC provides a contact list of all pipeline inspectors and program manager. The list includes cell phone numbers which can reach anytime of the day.
- b. No issues.
- c. All investigations were on-site.
- d. - f. No issues.
- g. No probable violations were found in the investigation.
- h. No issues.
- i. - When incidents occur the MSPSC shares information at NAPSRS Southern Region meeting.

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

The MPSC responded in 56 days. The written response covered all the deficiencies in the program evaluation letter. For those issues under the direct control of the MPSC, corrective actions were described.

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

The MPSC usually conducts a pipeline safety training seminar annually. Due to Covid-19, the seminars were cancelled during 2020 and 2021. A seminar was conducted for August, 2022.

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

A question is contained in the MPSC's Transmission Standard inspection form. The MPSC verifies operators' submittal when covering the question during a Standard inspection.

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

The MPSC maintains a website that includes pipeline safety. The section on pipeline safety provides contact information for pipeline safety staff, links to pipeline safety rules and regulations, forms, link to National Pipeline Mapping System and numerous other links to pipeline safety related sites. MPSC staff attends the 811 Summit, MS Gas Association Seminars and trade shows.

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

No issues were found where the MSPSC was not responsive.

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

a. - b. - No issues were found where the MSPSC was not responsive.

- 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:

No issues found. A change in regulations allows for the use of polyamide pipe material which caused the one waiver by the MSPC to be moot.

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

Evaluator Notes:

There were no issues in acquiring the needed information in a timely manner.

- 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:

There were no comments or inaccuracies in the Peer review notes for the 2023 SICT submittal. Submitted in 2022.

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

Evaluator Notes:

The performance metrics in PRIMIS were reviewed. Excavation damages have trended downward from 8 damages per 1000 tickets in CY2015 to approximately 3.6 damages per 1000 tickets in CY2021; however, there was an increase to 4.0 damages per 1000 tickets in CY2022. The national average in CY2022 was 2.55 damages per 1000 tickets. Inspection days per 1000 trended in a positive direction from 16.26 inspection person days per 1000 miles achieved in CY2012 to a peak of 38.86 inspection person days per 1000 miles achieved in CY2019 however, it has trended negatively the last three years to 28.03 in CY2022. Inspection person days per Master Meter/LPG operator has relatively constant over the last four years at approximately 1.6 to 2.55 inspection person day per Master Meter/LPG operator. Inspection person days per Master Meter/LPG operator has dropped since CY2018 but it is a result of the MPSC assigning inspection resources based on risk. The percentage of staff completing required qualification training appears positive considering a new employee was onboarded in CY2022. Total leak repairs per 1000 miles have trended in a positive direction since CY2018. Hazardous leaks which require immediate repair has trended downward since CY2015. Enforcement and Incident Investigation dropped considerably (negative result) in CY2021 resulting from issues found in the CY2020 Program Evaluation. The MPSC has implemented corrections prior to CY2021. Incident investigations have score 100% for the last 5 years.

- 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:

The three largest private distribution operators in the state has initiated Pipeline Safety Management Systems (PSMS). The MPSC promotes the use of PSMS to operators. PSMS was promoted and discussed at the Pipeline Safety Seminar in August, 2022.

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

Evaluator Notes:

The MSPC did not meet the five-year inspection interval for two operators on Public Awareness Effectiveness inspections and one operator on Drug and Alcohol inspections. One point was deducted.

Total points scored for this section: 49
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:

- The MPSC conducted field portion of a Comprehensive Standard inspection on Atmos Energy's system in Greenville, MS on July 20, 2023. The MPSC inspector, Jacqueline Profitt, observed testing activity for cathodic protection rectifiers and pressure control stations on a portion of the system. Cathodic test point and gas odorization readings were observed.
- The last inspection occurred in 2022.
- Jay Woods, Area Manager, represented Atmos during the inspection.
- Inspector has been with the MPSC for approximately four years.

- 2 Did the inspector use an appropriate inspection form/checklist and was the form/checklist used as a guide for the inspection? (New regulations shall be incorporated) 2 2

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes, the inspector utilized the MPSC's Standard inspection form and utilized during the time she was inspecting activities. No issues were found.

- 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, procedures for cathodic protection, pressure control and odorization were reviewed.
- Yes, appropriate records, including equipment calibration, for the activities were reviewed by the inspector.
- Yes.
- Other items such as excavation, signs, markers, damage prevention notifications, etc. were reviewed.
- The length of time spent during the inspection was appropriate for the activity that was taking place.

- 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:

No issues were identified.

- 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, at the end of the inspection visit, the inspector provided a summary of her review. She pointed out that calibration of an

odorometer could not be confirmed but another unit was brought on site with proper calibration records. A customer meter opening did not have a sealing plug and a couple of sealing plugs were missing at two district regulator stations. She recommended that additional protection should be considered for the district regulator station that was almost hit by a tractor bush-hog.

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:

- a. Yes, the inspector was attentive during the contractor's presentation of the work hazards during the construction activities planned for the day. She wore all personal protection equipment that was required and appropriate for the day's activities.
- b. The MPSC inspector observed testing activity for cathodic protection rectifiers and pressure control stations on a portion of the system. Cathodic test point and gas odorization readings were observed.
- c. None observed.
- d. None

7 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

There were no issues found that resulted in a loss of points for Part E of this 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:

The MPSC reviews operators annual reports each year. The annual report analysis results are covered during inspection visits with operators. Several items of data are entered into an Excel Workbook to trend the data and supply information to the operator risk ranking model. Pipeline damages, lost and unaccounted for gas, and leak repair information is some of the key data that the MPSC trends for analysis. The data covers CY2015 to the latest calendar year of the annual report.

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

The MPSC verifies operator's actions related to damage prevention during DIMP and IMP inspection. The MPSC completes an additional checklist for damage prevention while conducting Standard Comprehensive Inspections. This question is included on the checklist.

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

The MPSC reviews Part D of each operator's annual report and transfer the data into its Excel Workbook.

a. - i. - The MPSC's damage prevention checklist covers a. - j. The MPSC will schedule meetings with operators whose data or information causes concern, especially if exceeding national averages for insufficiency of One Call Notification System, Locating Practices, Excavation Practices or use of the cause category - Other. The MPSC verifies operator's planned actions to mitigate damages in cause categories exceeding the national average.

- | | | | |
|----------|---|---|---|
| 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 MPSC collects the damage data and calculates damages per 1000 locates. The MPSC views trending of the data statewide or operator specific.

- a. Fiber installation contractors.
- b. The MPSC verifies operator compliance with Part 192.614, 192.617 and applicable regulatory requirements in Subparts O and P of Part 192 during Standard Comprehensive Inspections and IMP or DIMP Inspections.
- c. Yes, the MPSC reviews major reasons for excavation damage.
- d. Yes, it included in the damage prevention checklist that the MPSC utilizes to document Damage Prevention reviews with operators.

5 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

There were no issues found that resulted in the loss of points for Part F of this 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:

MS 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:

MS 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:

MS 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:

MS 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:

MS 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:

MS 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