



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

RHODE ISLAND DIVISION OF PUBLIC UTILITIES AND CARRIERS

Document Legend

PART:

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



2022 Gas State Program Evaluation -- CY 2022

Gas

State Agency: Rhode Island

Agency Status:

Date of Visit: 06/12/2023 - 06/16/2023

Agency Representative: Robert Bailey, P.E., Program Manager

PHMSA Representative: Agustin Lopez, State Evaluator

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

Name/Title: Ms. Linda George, Administrator

Agency: Rhode Island Division of Public Utilities & Carriers

Address: 89 Jefferson Boulevard

City/State/Zip: Warwick, RI 02888

Rating:

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

INSTRUCTIONS:

Complete this evaluation in accordance with the Evaluator Guidance for conducting state pipeline safety program evaluations. The evaluation should generally reflect state program performance during CY 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	45
15	15
10	10
0	0
100	95

TOTALS

State Rating **95.0**

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. Verified operator data with Attachment 3 and PDM.
- b. Reviewed state data to verify inspection days submitted on Attachment 2.
- c. Verified operators with PDM. Rhode Island LFG Genco also goes by Douglas Pipeline. Douglas Pipeline operates the pipeline and RI LFG Genco is the owner.
- d. Had one incident which was investigated by the RIDPUC.
- e. Reviewed RI files and spreadsheets to verify stats on compliance actions data.
- f. Reviewed records kept by RI.
- g. Verified staff training in Blackboard.
- h. RI has adopted all regulations and amendments within the 2 year limit.
- i. Performance and damage prevention initiatives are described in Attachment 10.

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:

Gas Pipeline Safety Manual, Section V Conducting Inspections provides guidance to inspectors on performing each type of inspection. Pre-inspection is in Section V Part B. Post-inspection activities are in Section V Part P. Procedures were amended to include LPG and Transmission operators.

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

Section V Part C addresses time intervals between each type of inspection. Each type of inspection will be conducted on a yearly basis. LNG is also mentioned in Part O, yearly inspection of LNG facilities. Master Meter and LPG units will be inspected every 5 years. Section IV(B). has risk based prioritization of inspections which include knowledge of system, incidents, compliance history, and time since last inspection.

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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:

Section V Part Q provides procedures for any findings and issuing probable violations. Procedures addresses issuing compliance letters to company official. Section V Parts S-U provides procedures for tracking compliance cases.

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|---|--|---|---|
| 4 | (Incident/Accident Investigations) Does the state have written procedures to address state actions in the event of an incident/accident?
Yes = 3 No = 0 Needs Improvement = 1-2 | 3 | 3 |
| | <ul style="list-style-type: none">a. Mechanism to receive, record, and respond to operator reports of incidents, including after-hours reports | | |

- b. If onsite investigation was not made, do procedures require on-call staff to obtain sufficient information to determine the facts to support the decision not to go on-site.

Evaluator Notes:

Section VI Investigation of Incidents provides guidance to inspectors on how to conduct incident investigations. Need to change the monetary reporting criteria since RI law adopts PHMSA rules. Have dedicated phone number which is monitored on a rotating basis by inspectors at all times. Procedures address if no onsite is made the enough information will be gathered to make decision.

5 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

RIDPUC is mainly complying with Part B of the 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:

- a. Verified OQ training to assure lead inspectors are qualified to lead each type of inspection.
- b. Only DIMP inspector qualified is Don Levernis.
- c. LNG lead inspectors were qualified to lead inspections.
- d. Inspectors have attended Root Cause course.
- e. No outside training.
- f. Verified qualifications of lead inspectors for each applicable inspection.

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

Yes, Robert Bailey is knowledgeable of the pipeline safety program.

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

Evaluator Notes:

The RIDPUC is mainly complying with Part C of the 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:

The only issue identified was on the Master Meter inspections. There was no documentation of any OQ and O&M procedures being reviewed during inspections. The form utilized by the RIDPUC does not include an OQ or O&M procedures review questions so documentation could not be provided that these items have been reviewed. The RIDPUC must amend their form or incorporate new forms to include OQ and O&M procedures review questions. There is a one point deduction for this issue.

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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 | 8 |
| | <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:

In reviewing inspection reports it was found that some forms did not cover all the applicable code requirements. In particular, Master Meter inspection forms did not include any odorant sniff testing question as required by the regulations. The RIDPUC has to make sure all applicable code requirements are in each inspection form that pertain to the type of inspection being performed. There is a two point deduction for this issue.

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

Evaluator Notes:

There were several Protocol 9 of operators to assure personnel is qualified and can perform the tasks. There is still a need for improvement and recommend to conduct more Protocol 9 inspections.

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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 | 0 |
| | <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:

Reviewed randomly selected inspections and found that there were no DIMP questions in the LPG Inspection form. The RIDPUC needs to review and document the LPG operators DIMP program to assure they are in compliance with the regulations. In addition, there has not been a TIMP inspection conducted on Rhode Island Gen Co's transmission pipeline to assure the operator has HCA identification procedures and to verify for newly identified HCA's. This would only include Protocol A of the TIMP Protocols. There is a two point deduction for these issues.

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
	<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? 		

Evaluator Notes:

RIDPUC reviews the NTSB Recommendation and ADB reviews during DIMP inspection with RI Energy and are documented in the inspection forms.

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:

RIDPUC reviews the NTSB Recommendation and ADB reviews during DIMP inspection with RI Energy and are documented in the inspection forms.

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
	<ul style="list-style-type: none"> a. Were compliance actions sent to company officer or manager/board member if municipal/government system? b. Were probable violations documented properly? c. Resolve probable violations d. Routinely review progress of probable violations e. Did state issue compliance actions for all probable violations discovered? f. Can state demonstrate fining authority for pipeline safety violations? 		

- 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:

Reviewed randomly selected inspection reports and verified that compliance actions were being completed per their procedures. There were no delays or breakdowns found during the reviews. All issued compliance actions were closed within reasonable time. An exit is conducted at the conclusion of the inspection in which a document is given to the operator if any issues are identified.

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 reportable incident that was investigated by the RIDPUC. Still working on completing the Incident Investigation report. Reviewed RIE analysis report and compliance request from the RIDPUC.

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, the RIDPUC responded within the 60 days.

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:

NEPSR has seminar for operators in the New England region every year.

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 reviewed during inspections and documented on 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:

Webpage has pipeline safety information which also includes civil penalties issued to operators.

- 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:

No SRCR in PDM. Recommend to add SRCR response procedures into their Pipeline Safety Program Manual.

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

Evaluator Notes:

Yes, RI responds to surveys and information requests from PHMSA.

Have not received WMS tasks in last couple of years.

- 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:

Two waivers in PHMSA website. One dealing with temporary LNG facilities and not having to meet 193. The other is dealing with stainless steel fittings. Due to changes in regulations waivers should be closed.

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

Evaluator Notes:

Yes, files are kept electronically and organization has greatly improved.

- 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:

Met SICT inspection days and don't see issues meeting the days in 2023. Discussed the need to assure risks and data is entered to populate SICT.

- 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:

Discussed performance metrics with RIDPUC. Damages per 1,000 are ticking higher but RIDPUC is working with operator to reduce. Inspector turnover caused training to trend downward but is improving. Leak trend looks like its heading in a positive trend.

- 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 former gas distribution Company, National Grid Gas from January 2022 ? May 25, 2022 utilized API RP 1173, the new Company Rhode Island Energy lists API RP 1173 in their current DIMP Plan.

20 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

Issues identified during evaluation:

D.1- The only issue identified was on the Master Meter inspections. There was no documentation of any OQ and O&M procedures being reviewed during inspections. The form utilized by the RIDPUC does not include an OQ or O&M procedures review questions so documentation could not be provided that these items have been reviewed. The RIDPUC must amend their form or incorporate new forms to include OQ and O&M procedures review questions. There is a one point deduction for this issue.

D.2- In reviewing inspection reports it was found that some forms did not cover all the applicable code requirements. In particular, Master Meter inspection forms did not include any odorant sniff testing question as required by the regulations. The RIDPUC has to make sure all applicable code requirements are in each inspection form that pertain to the type of inspection being performed. There is a two point deduction for this issue.

D.4- Reviewed randomly selected inspections and found that there were no DIMP questions in the LPG Inspection form. The RIDPUC needs to review and document the LPG operators DIMP program to assure they are in compliance with the regulations. In addition, there has not been a TIMP inspection conducted on Rhode Island Gen Co's transmission pipeline to assure the operator has HCA identification procedures and to verify for newly identified HCA's. This would only include Protocol A of the TIMP Protocols. There is a two point deduction for these issues.

Total points scored for this section: 45
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:

- Rhode Island Energy
Collin Slade, P/L Safety Inspector II
Providence, RI
June 14, 2023
Agustin Lopez, Evaluator
a. Construction inspection of 12" Cast Iron replacement
b. 2022
c. Yes, representatives were present.
d. Collin Slade has not been evaluated in the past.

- Bay View LPG System
Collin Slade P/L Safety Inspector II
Jamestown, RI
June 14, 2023
Agustin Lopez, Evaluator
a. LPG Standard inspection
b. 2022
c. Representative not required to be present for a standard LPG inspection.
d. Collin Slade has not been evaluated in the past.

- 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, inspector utilized LPG inspection form 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:

- Construction inspection of RI Energy. Inspector reviewed fusion procedures and qualification of technicians who performed the fusion. Inspected equipment and calibration dates. Inspector was very observant during the inspection.
- Inspector conducted a field standard inspection of the Bay View LPG system. He inspected the tanks, above ground piping, relief valves and vents. He was very observant of the piping and location of vents.

- 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, the inspector demonstrated knowledge of 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:

Inspector conducted an exit interview after completing the construction inspection. No exit briefing was conducted during the LPG inspection due to the operator not being present. The inspector emails the operator letting him know of any questions or findings. No issues were identified.

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

Evaluator Notes:

Yes the inspections was conducted in a safet, prositive and constructive manner

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

Evaluator Notes:

Mr. Collin Slade peformed a very well job during the inspections. He asked plenty of questions and reviewed documents, procedures and field piping in great detail.

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, the state has reviewed Operator Annual reports, along with an Incident/Accident report for an incident that occurred in Cumberland, RI in 2022 on an oxy-acetylene weld failure, steel main operating at 60 psi, for accuracy. All annual report data is analyzed in the states \$200M Gas ISR program for cast iron/bare steel main leak prone pipe (LPP) replacement. The Division has found errors on the annual F7100 form resulting in a supplemental filing by the company.

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

Evaluator Notes:

Yes, the RIDPUC conducts yearly inspection of their only distribution operator on a yearly basis. Indicents and damages are reviewed with the operator to verify root cause and minimize the possibility of the recurrence.

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

Evaluator Notes:

Yes, The Division reviews and tracks the data and has found errors on the annual F7100 form resulting in a supplemental filing by the company. Annual report Part D data is tracked by the RIDPUC and discussed with RI Energy on an annual basis.

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|----------|--|---|---|
| 4 | Has the agency or another organization within the state collected data and evaluated trends on the number of pipeline damages per 1,000 locate requests?
Yes = 2 No = 0 Needs Improvement = 1 <ol style="list-style-type: none">a. What stakeholder group is causing the highest number of damages to the pipelines? Operator, contractor, locating company or public.b. Has the state verified the operator is appropriately focusing damage prevention education and training to stakeholders causing the most damages?c. Has the state evaluated which of the following best describes the reason for the excavation damages; i.e., operator or contractor not following written procedures, failure to maintain marks, failure to support exposed facilities, failure to use hand tools were required, failure to test-hole (pot hole), improper backfilling practices, failure to maintain clearance or insufficient excavation practices. | 2 | 2 |
|----------|--|---|---|

- d. Has the state verified the operator is appropriately focusing damage prevention education and training to address the causes of excavation damages?

Evaluator Notes:

Yes, The Division reviews and has been tracking the data since 1985. Hits per 1000 are as follows: 2017 - 2.16, 2018 - 2.6, 2019 ? 2.3, 2020 ? 2.55, 2021 ? 2.14, and 2022 ? 2.31. This information is posted on the Division website. RIDPUC works with their distribution operator to reduce the damages and conducts damage prevention inspections annually.

5 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

The RIDPUC is mainly complying with Part F of the 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:

RI DPUC 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:

RI DPUC 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:

RI DPUC 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:

RI DPUC 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:

RI DPUC 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:

RI DPUC 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