



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

Tennessee Public Utility Commission

## Document Legend

### PART:

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



# 2022 Gas State Program Evaluation -- CY 2022

Gas

**State Agency:** Tennessee

**Agency Status:**

**Date of Visit:** 05/02/2023 - 05/04/2023

**Agency Representative:** Mr. Bryce Keener

Director, Gas Pipeline Safety Division

**PHMSA Representative:** Clint Stephens

State Liaison

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

**Name/Title:** Mr. Herb H. Hillard, Chairman

**Agency:** Tennessee Public Utility Commission

**Address:** 502 Deaderick Street 4th Floor

**City/State/Zip:** Nashville, Tennessee 37243

**Rating:**

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

## INSTRUCTIONS:

Complete this evaluation in accordance with the Evaluator Guidance for conducting state pipeline safety program evaluations. The evaluation should generally reflect state program performance during CY 2022 (not the status of performance at the time of the evaluation). A deficiency in any one part of a multiple-part question should be scored as "Needs Improvement." Determine the answer to the question then select the appropriate point value. If a state receives less than the maximum points, include a brief explanation in the appropriate notes/comments section. If a question is not applicable to a state, select NA. Please ensure all responses are COMPLETE and ACCURATE, and they OBJECTIVELY reflect the state's program performance for the question being evaluated. Increasing emphasis is being placed on how the state pipeline safety programs conduct and execute their pipeline safety responsibilities (their performance). This evaluation, together with selected factors reported in the state's annual progress report attachments, provide the basis for determining the state's pipeline safety grant allocation.

## Scoring Summary

### PARTS

### Possible Points Points Scored

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

0  
15  
10  
50  
15  
10  
0

0  
15  
10  
47  
15  
10  
0

### TOTALS

**100 97**

**State Rating .....**

**97.0**

## PART A - Progress Report and Program Documentation Review

Points(MAX)    Score

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

### Evaluator Notes:

- 1a. Reviewed information in Attachment 1 of progress report, data seems accurate.
- 1b. Reviewed information in Attachment 2 of progress report, data seems accurate.
- 1c. Reviewed information in Attachment 3 of progress report, data seems accurate.
- 1d. TN PUC did not have any reportable incidents in CY 2022.
- 1e. Attachment 5 of progress report ? "Number to be corrected at end of CY" should be 4. This will have to be submitted to Carrie Winslow for correction.
- 1f. Reviewed information in Attachment 6 of progress report with no issues.
- 1g. Reviewed information in Attachment 7 of progress report, Kenneth Harper not on employee list. This will have to be submitted to Carrie Winslow for correction.
- 1h. Reviewed information in Attachment 8 of progress report, data seems accurate.
- 1i. Reviewed information in Attachment 10 of progress report with 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:**

The procedures were reviewed in the TN pipeline safety procedures, section 9.33.2 ? Pre-Inspection Planning; 9.33.10 ? Inspection Activities; and 9.33.11 ? Post Inspection Activities, pages 132-133.

- |   |   |   |   |
|---|---|---|---|
| 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:**

The procedures were reviewed in the TN pipeline safety procedures, section 9.19 ? Procedures for Determining Inspection Priorities, page 59; and section 9.29.2 ? Inspection Criteria, page 106.

- |   |   |   |   |
|---|---|---|---|
| 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><li>c. Procedures regarding closing outstanding probable violations</li></ul> |   |   |

**Evaluator Notes:**

The procedures were reviewed in the TN pipeline safety procedures, section 7.3 ? Notification To Operators regarding Non-Compliance, page 33; and section 7.4 Inspectors Responsibilities, pages 33 ? 35.

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

**Evaluator Notes:**

The procedures were reviewed in the TN pipeline safety procedures, section 12.1 ? 12.11? Investigation of Incidents, pages 152-156.

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**5** General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

There were no issues identified in Part B of the program evaluation.

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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:

Each inspector and program manager has fulfilled training requirements to lead identified inspection types of inspections. No issues.

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

State pipeline safety program manager indicated adequate knowledge of PHMSA program and regulations.

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

Evaluator Notes:

There were no issues identified in Part C of the program evaluation.

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



**PART D - Program Performance****Points(MAX) Score**

- |          |   |          |          |
|----------|---|----------|----------|
| <b>1</b> | 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  | <b>5</b> | <b>3</b> |
|          | <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:**

Standard: ENGLEWOOD GAS DEPT, TOWN OF (2022 & 2019); CLIF TON GAS DEPT, CITY OF (2022 & 2019); MARTIN, CITY OF (2021 & 2017); PARIS - HENRY COUNTY PUBLIC UTIL DIST (2022 & 2019); TROY GAS SYSTEM, TOWN OF (2022 & 2019); CITY OF RED BOILING SPRINGS GAS UTILITY (2022 & 2019); KNOXVILLE UTILITIES BOARD (2022 & 2019); JAMESTOWN GAS SYSTEM (2022 & 2019); PORTLAND NATURAL GAS SYSTEM (2022 & 2019); LORETTO GAS SYSTEM, CITY OF (2022 & 2019); CROCKETT PUBLIC UTIL DIST (2022 & 2019); PIEDMONT NATURAL GAS CO INC (2022 & 2019); HORTON HIGHWAY UTILITY DISTRICT (2021 & 2017); SAVANNAH PUBLIC UTILITY DEPT (2022 & 2019); ST JOSEPH, CITY OF (2022 & 2019); POWELL VALLEY UTILITY DISTRICT INC. (2021 & 2018); HENDERSON GAS DEPT, CITY OF (2021 & 2018); CLARKSVILLE GAS & WATER DEPT (2022 & 2019); BOLIVAR GAS DEPT (2022 & 2019); PIEDMONT NATURAL GAS CO INC (Trans) (2021); JEFFERSON - COCKE CO UTIL DIST (Trans)(2022 & 2021); HUMPHREYS COUNTY UTILITY DISTRICT (Trans) (2022 & 2021); MEMPHIS LIGHT GAS & WATER DIVISION (LNG)(2022 & 2021); PIEDMONT NATURAL GAS CO INC (LNG)(2021); Eco Energy Natural Gas LLC (2022 & 2021); Southern Company (2022 & 2021)

PAP: ENGLEWOOD GAS DEPT, TOWN OF (2022 & 2018); CLIF TON GAS DEPT, CITY OF (2022 & 2018); MARTIN, CITY OF (2022 & 2018); PARIS - HENRY COUNTY PUBLIC UTIL DIST (2022 & 2018); TROY GAS SYSTEM, TOWN OF (2022 & 2017); CITY OF RED BOILING SPRINGS GAS UTILITY (2022 & 2018); KNOXVILLE UTILITIES BOARD (2022 & 2018); JAMESTOWN GAS SYSTEM (2022 & 2018); PORTLAND NATURAL GAS SYSTEM (2018); LORETTO GAS SYSTEM, CITY OF (2022 & 2018); CROCKETT PUBLIC UTIL DIST (2022 & 2018); PIEDMONT NATURAL GAS CO INC (2022 & 2018); HORTON HIGHWAY UTILITY DISTRICT ((2022 & 2018); SAVANNAH PUBLIC UTILITY DEPT (2022 & 2018); ST JOSEPH, CITY OF (2022 & 2018); POWELL VALLEY UTILITY DISTRICT INC. (2018); HENDERSON GAS DEPT, CITY OF (2018); CLARKSVILLE GAS & WATER DEPT (2022 & 2018); BOLIVAR GAS DEPT (2022 & 2018); JEFFERSON - COCKE CO UTIL DIST (2022 & 2018); HUMPHREYS COUNTY UTILITY DISTRICT (Trans) (2022 & 2018)

D&A: All performed in 2022 with the exception of PORTLAND NATURAL GAS SYSTEM; Eco Energy Natural Gas LLC (2022)

CRM: MEMPHIS LIGHT GAS & WATER DIVISION (2019) and PIEDMONT NATURAL GAS CO INC ? does not qualify <250,000 customers

LNG: MEMPHIS LIGHT GAS & WATER DIVISION (LNG)(2022 & 2021); PIEDMONT NATURAL GAS CO INC (LNG)(2021); Eco Energy Natural Gas LLC (2022 & 2021)

Construction: TN PUC did not meet the 20% total inspection person-days. (2-pt deduction)

OQ: ENGLEWOOD GAS DEPT, TOWN OF (2021); MARTIN, CITY OF (2021); PARIS - HENRY COUNTY PUBLIC UTIL DIST (2021); TROY GAS SYSTEM, TOWN OF (2021); CITY OF RED BOILING SPRINGS GAS UTILITY (2021); KNOXVILLE UTILITIES BOARD (2021); PORTLAND NATURAL GAS SYSTEM (2021); CROCKETT PUBLIC UTIL DIST (2021); HORTON HIGHWAY UTILITY (2021); SAVANNAH PUBLIC UTILITY DEPT (2021); ST JOSEPH, CITY OF (2021); POWELL VALLEY UTILITY DISTRICT INC (2021); HENDERSON GAS DEPT, CITY OF (2021); HUMPHREYS COUNTY UTILITY DISTRICT(2021); MEMPHIS LIGHT GAS & WATER DIVISION (2021)

\*Note: TN PUC did not meet the 20% total inspection person-days.

- |          |   |           |           |
|----------|---|-----------|-----------|
| <b>2</b> | 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 | <b>10</b> | <b>10</b> |
|----------|---|-----------|-----------|

- a. Standard (General Code Compliance)
- b. Public Awareness Effectiveness Reviews
- c. Drug and Alcohol
- d. Control Room Management
- e. Part 193 LNG Inspections
- f. Construction
- g. OQ (see Question 3 for additional requirements)
- h. IMP/DIMP (see Question 4 for additional requirements)

**Evaluator Notes:**

Reviewed the following inspection reports: Standard - ENGLEWOOD GAS DEPT, TOWN OF (2022); CLIF TON GAS DEPT, CITY OF (2022); PARIS - HENRY COUNTY PUBLIC UTIL DIST (2022); TROY GAS SYSTEM, TOWN OF (2022); CITY OF RED BOILING SPRINGS GAS UTILITY (2022); KNOXVILLE UTILITIES BOARD (2022); JEFFERSON - COCKE CO UTIL DIST (Trans)(2022); MEMPHIS LIGHT GAS & WATER DIVISION (LNG)(2022) ? Still open; Eco Energy Natural Gas LLC (2022) ? still open  
 PAP: CLIF TON GAS DEPT, CITY OF (2022); ENGLEWOOD GAS DEPT, TOWN OF (2022); TROY GAS SYSTEM, TOWN OF (2022); CITY OF RED BOILING SPRINGS GAS UTILITY (2022); KNOXVILLE UTILITIES BOARD (2022); and  
 D&A: CLIF TON GAS DEPT, CITY OF (2022); ENGLEWOOD GAS DEPT, TOWN OF (2022); PARIS - HENRY COUNTY PUBLIC UTIL DIST (2022); CITY OF RED BOILING SPRINGS GAS UTILITY (2022).  
 No issues.

- |          |  |   |   |
|----------|--|---|---|
| <b>3</b> | 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:**

Reviewed the following inspection reports: CLIF TON GAS DEPT, CITY OF (2022); ENGLEWOOD GAS DEPT, TOWN OF (2022); PARIS - HENRY COUNTY PUBLIC UTIL DIST (2022); CITY OF RED BOILING SPRINGS GAS UTILITY (2022); and JEFFERSON - COCKE CO UTIL DIST (Trans)(2022). No issues.

- |          |  |   |   |
|----------|--|---|---|
| <b>4</b> | 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 <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> <li>c. Are the states verifying operators are including low pressure distribution systems in their threat analysis?</li> </ul> | 2 | 2 |
|----------|--|---|---|

**Evaluator Notes:**

Reviewed DIMP inspection for BOLIVAR GAS DEPT (2022) with no non-compliance issues. TN has six large operators that are having their IMP/DIMP reviewed annually. Plastic pipe and components defects are being asked during DIMP inspections. TN has no low-pressure distribution systems. No issues.

- |          |   |   |   |
|----------|---|---|---|
| <b>5</b> | 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<br>Yes = 2 No = 0 Needs Improvement = 1 <ul style="list-style-type: none"> <li>a. Operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization and if necessary remedial action was taken;</li> <li>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);</li> </ul> | 2 | 1 |
|----------|---|---|---|



- 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:

The NTSB recommendations were not found for excavation damage near buildings and regulators located inside buildings. TN has no cast iron and low distribution systems.

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

Evaluator Notes:

The State communicates advisory bulletins on an annual basis during the TGA D&O meeting, TGA safety summit, and TGA fall management.

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|---|--|----|----|
| 7 | (Compliance Activities) Did the state follow compliance procedures (from discovery to resolution) and adequately document all probable violations, including what resolution or further course of action is needed to gain compliance? Chapter 5.1   | 10 | 10 |
|   | Yes = 10 No = 0 Needs Improvement = 1-9  |    |    |
|   | <ul style="list-style-type: none"> <li>a. Were compliance actions sent to company officer or manager/board member if municipal/government system?</li> <li>b. Were probable violations documented properly?</li> <li>c. Resolve probable violations</li> <li>d. Routinely review progress of probable violations</li> <li>e. Did state issue compliance actions for all probable violations discovered?</li> <li>f. Can state demonstrate fining authority for pipeline safety violations?</li> <li>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)</li> <li>h. Did state compliance actions give reasonable due process to all parties? Including "show cause" hearing, if necessary.</li> <li>i. Within 30 days, conduct a post-inspection briefing with the owner or operator outlining any concerns</li> <li>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)</li> </ul> |    |    |

Evaluator Notes:

Yes. Probable violations were documented properly. Currently there are two open inspections with non-compliance in CY2022. The Program manager approves compliance actions. The inspector and program manager works together to get non-compliance resolved. The post -inspection briefing and the preliminary finding are communicated to the operator at the end of the inspection.

- |   |   |    |    |
|---|---|----|----|
| 8 | (Incident Investigations) Were all federally reportable incidents investigated, thoroughly documented, with conclusions and recommendations?                                    | 10 | 10 |
|   | Yes = 10 No = 0 Needs Improvement = 1-9   |    |    |
|   | <ul style="list-style-type: none"> <li>a. Does state have adequate mechanism to receive and respond to operator reports of incidents, including after-hours reports?</li> </ul> |    |    |

- 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:

TN PUC had no reportable incidents CY2022.

- |          |   |   |   |
|----------|---|---|---|
| <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<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|---|---|---|

Evaluator Notes:

Chair Letter sent on 11/2/22; response received on 12/28/22. No issues.

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

Evaluator Notes:

TN PUC had their last pipeline safety seminar at the Safety Summit which was represented by PHMSA AID in CY2022. Suggested TN invite a person from T&Q to next summit.

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

Evaluator Notes:

The transmission operators have submitted the information into NPMS database.

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

Evaluator Notes:

TN communicates with operators through TGA (Tennessee Gas Association). There is information on the TN PUC website for pipeline safety.

- |           |   |   |   |
|-----------|---|---|---|
| <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 |
|-----------|---|---|---|

Evaluator Notes:

TN PUC has no open SRC reports.

- |           |   |   |   |
|-----------|---|---|---|
| <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 | 1 | 1 |
|-----------|---|---|---|

b. PHMSA Work Management system tasks?

Evaluator Notes:

The state has been responsive to all requests from NAPSAR and/or PHMSA. TN PUC has completed all WMS tasks. 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 |
|-----------|--|---|---|

Evaluator Notes:

TN PUC has no waivers/special permits.

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- |           |   |           |           |
|-----------|---|-----------|-----------|
| <b>16</b> | Were pipeline program files well-organized and accessible?<br>Info Only = No Points | Info Only | Info Only |
|-----------|---|-----------|-----------|

Evaluator Notes:

Yes. Pipeline program files were well organized and accessible.

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

Evaluator Notes:

Discussed with TN PUC on the accuracy of inspection day information submitted into SICT. The state has updated SICT data. No issues.

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

Evaluator Notes:

Discussion items:

- ? Inspector Qualification ? Inspectors that have completed core training has decreased from 2019 thru 2021. (2022?)  
There has been a decrease in additional training from 2019 thru 2021.  
? Leak Management ? There has been a decrease of leak repairs and scheduled from 2020 thru 2022.  
No issue with negative trends.

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- |           |  |           |           |
|-----------|--|-----------|-----------|
| <b>19</b> | 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.<br>Info Only = No Points<br>a. <a href="https://pipelinesms.org/">https://pipelinesms.org/</a><br>b. Reference AGA recommendation to members May 20, 2019 | Info Only | Info Only |
|-----------|--|-----------|-----------|

Evaluator Notes:

This question is asked as a supplemental question in the record's standard inspection form (IA equivalent).

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- |           |  |           |           |
|-----------|--|-----------|-----------|
| <b>20</b> | General Comments:<br>Info Only = No Points | Info Only | Info Only |
|-----------|--|-----------|-----------|

Evaluator Notes:

There were two issues identified in Part D of the program evaluation.  
1) TN PUC did not achieve 20% of total inspection person-days; and  
2) TN PUC did not review NTSB recommendations, "...leaks caused by excavation damage near buildings... (P-00-20 and P-00-21)", and "operator compliance with state and federal regulations for regulators located inside buildings".

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Total points scored for this section: 47  
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 inspector performed a standard field inspection. The pipeline operator was present during the inspection.

Operator: Clarksville Gas & Water

Inspector: Daniel Allen

Location: Clarksville, TN

Date: May 3, 2023

PHMSA Rep: Clint Stephens

- 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 used gas standard field inspection forms.

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

Evaluator Notes:

The inspector observed the operator perform rectifier checks, pipe-to-soil surveys, atmospheric corrosion monitoring, valve operations, marker signs, and communicate AOC's. Equipment was checked for current calibration. No issues.

- 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:

From my observation, the inspector had adequate knowledge of the pipeline safety program and regulations.

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

Evaluator Notes:

The inspector provided an exit interview after each site inspection .

- 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:

The inspection was performed in a safe, positive, and constructive manner. The inspector observed rectifier readings, pipe-to-soil surveys, marker signs, atmospheric corrosion (surface rust), valve operation, and AOC's. No issues.

7

General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

There were no issues identified in Part E of the program evaluation.

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



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

- |          |  |   |   |
|----------|--|---|---|
| <b>1</b> | 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:**

The annual reports are reviewed on annual basis for accuracy during the pre-inspection process. The data is analyzed for trends and operator issues.

- |          |  |   |   |
|----------|--|---|---|
| <b>2</b> | 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:**

The state has prepared a supplemental question set which will verify with operator that they have analyzed damages for the determining root causes and minimizing the possibility of a recurrence. This will include question on excavators that repeatedly violate one-call laws.

- |          |  |   |   |
|----------|--|---|---|
| <b>3</b> | 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:**

The state has prepared a supplemental question set that will review the operator's report pertaining to Part D ? Excavation Damage. These questions were asked during standard records inspections.

- |          |   |   |   |
|----------|---|---|---|
| <b>4</b> | 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><li>d. Has the state verified the operator is appropriately focusing damage prevention education and training to address the causes of excavation damages?</li></ol> | 2 | 2 |
|----------|---|---|---|

Evaluator Notes:

TN PUC and the Damage Prevention group have collected data and evaluated trends on the number of pipeline damages per 1,000 locate requests. The TN PUC and TN 881 will provide on-site training and education to those operators that have a large amount of excavation damages.

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**5** General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

There were no issues identified during Part F of the program evaluation.

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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:

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

- 2 If inspections were conducted independent of a PHMSA team inspection was notice of all identified probable violations provided to PHMSA within 60 days? Info Only Info Only  
Info Only = No Points

Evaluator Notes:

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

- 3 If inspections were conducted independent of a PHMSA team inspection was PHMSA immediately notified of conditions which may pose an immediate safety hazard to the public or environment? Info Only Info Only  
Info Only = No Points

Evaluator Notes:

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

- 4 If inspections were conducted independent of a PHMSA team inspection did the state coordinate with PHMSA if inspections not were not included in the PHMSA Inspection Work Plan? Info Only Info Only  
Info Only = No Points

Evaluator Notes:

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

- 5 Did the state take direction from and cooperate with PHMSA for all incident investigations conducted on interstate pipelines? Info Only Info Only  
Info Only = No Points

Evaluator Notes:

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

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

Evaluator Notes:

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

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