



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

1200 New Jersey Avenue SE
Washington DC 20590

2023 Gas State Program Evaluation

for

INDIANA UTILITY REGULATORY 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



2023 Gas State Program Evaluation -- CY 2023

Gas

State Agency: Indiana

Agency Status:

Date of Visit: 09/09/2024 - 09/13/2024

Agency Representative: Miranda Erich, Director, Pipeline Safety, Indiana URC

PHMSA Representative: Agustin Lopez, State Evaluator, PHMSA

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

Name/Title: Jim Huston, Chairman

Agency: Indiana Utility Regulatory Commission

Address: 101 West Washington Street, Suite 1500 E

City/State/Zip: Indianapolis, IN 46204

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 2023 (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

Possible Points Points Scored

0	0
15	15
10	10
50	50
15	15
10	10
100	100

TOTALS

State Rating **100.0**

PART A - Progress Report and Program Documentation Review

Points(MAX) Score

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

Evaluator Notes:

- a. Reviewed state files and PDM to verify operator information.
- b. Inspection activity is tracked in state database system, CRM. Inspection time is tracked for each inspection,
- c. Verified operator data with state files and PDM.
- d. Verified reportable incidents with PDM. Investigated all reportable incidents.
- e. Track compliance actions in CRM and are reviewed by inspectors. Inspection tracking matrix is utilized to query compliance actions thru CRM.
- f. Records are kept by the IURC.
- g. Verified inspector qualifications in TQ Blackboard.
- h. Have not made progress in adopting civil penalty amounts that are substantially the same as PHMSA's, \$100,000/\$1,000,000. Failure to correct this issue has resulted in the IN URC 60105 Certification being changed to a 60106 Certification which gives PHMSA the enforcement of pipeline safety violations.
- i. Performane and damage prevention initiatives are listed and summarized.

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



- | | | | |
|---|---|---|---|
| 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 Inspections b. TIMP and DIMP Inspections (reviewing largest operator(s) plans annually) c. OQ Inspections d. Damage Prevention Inspections e. On-Site Operator Training f. Construction Inspections (annual efforts) g. LNG Inspections | | |

Evaluator Notes:

Section B and C of the IURC procedures addresses inspection types and provides guidance to inspectors on how to conduct inspections which include pre and post inspection activities.

- | | | | |
|---|--|---|---|
| 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 inspection b. 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 B of Procedures address time intervals of every type of inspection. All inspections have a 4 year interval with 5 year max. LNG inspections have 3 year interval and master meters every other year. Procedures provide inspection priorities based on risk factors.

- | | | | |
|---|---|---|---|
| 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 identified b. Procedures to routinely review progress of compliance actions to prevent delays or breakdowns c. Procedures regarding closing outstanding probable violations | | |

Evaluator Notes:

Section D of the procedures addresses the steps taken from the discovery to the closure of probable violations. Monitoring procedures are included which is the responsibility of each inspector. CRM is used to track NOPV which are reviewed by inspectors.

- | | | | |
|---|---|---|---|
| 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 F Investigation of Incidents has guidance for inspectors on how to conduct incident investigations. Procedures has detailed mechanism on how to receive and respond to incident notifications. There is a 24 hour telephone line which is monitored by Pipeline Safety staff. Determination to go onsite is made when enough information is gathered and decision is made to go or not to go on site.

5 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

The IURC 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:

Reviewed TQ Blackboard and randomly selected inspection reports to assure lead inspectors are qualified to lead each type of 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, Ms. Miranda Erich has been with the IURC for more than 5 years has the Program Manager and previously as an inspector. She has completed the required TQ courses and is knowledgeable of the pipeline safety program and regulations.

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

Evaluator Notes:

The IURC 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 | 5 |
| | <ul style="list-style-type: none">a. Standard (General Code Compliance)b. Public Awareness Effectiveness Reviewsc. Drug and Alcohold. Control Room Managemente. Part 193 LNG Inspectionsf. Construction (did state achieve 20% of total inspection person-days?)g. OQ (see Question 3 for additional requirements)h. IMP/DIMP (see Question 4 for additional requirements) | | |

Evaluator Notes:

Reviewed randomly selected inspection reports to verify inspection intervals are being met. There were no issues identified with meeting the inspection intervals.

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

Yes, reviewed randomly selected inspection reports to assure inspection forms covered applicable regulations and for completion. No issues identified.

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

Yes, OQ Protocol 9 during construction inspections and at times during standard inspections. Recommend to IURC to conduct more Protocol 9 inspections during standard inspections to assure persons performing covered tasks perform tasks according to procedures and are indeed qualified.

- | | | | |
|---|---|---|---|
| 4 | Is state verifying operator's integrity management Programs (IMP and DIMP)? This should include a review of plans, along with monitoring progress. In addition, the review should take in to account program review and updates of operator's plan(s). 49 CFR 192 Subparts O and P
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
| | <ul style="list-style-type: none">a. Are the implementation plans of the state's large/largest operators(s) being reviewed annually to ensure they are completing full cycle of the IMP process?b. Are states verifying with operators any plastic pipe and components that have shown a record of defects/leaks and mitigating those through DIMP plan?c. Are the states verifying operators are including low pressure distribution systems in their threat analysis? | | |

Evaluator Notes:

Yes, review large operator TIMP plans annually by reviewing change management orders and track the reviews in CRM.

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:

Yes, most of these are included in inspection forms. This is thru the use of IA equivalent forms and additional questions added directly to the 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
---	--	---	---

Evaluator Notes:

Part of the annual letter that is sent to operators at the beginning of each year. Most recent ADBs are highlighted.

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:

Yes, reviewed randomly selected inspection reports to verify compliance actions are issued when probable violations are noted. There were no issues identified of break downs or delays of compliance actions.

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

- 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:

Had two reportable incidents in 2023. The IURC investigated both incidents which were documented.

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

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes the IURC responded within the 60 day requirement.

- | | | | |
|----|--|-----------|-----------|
| 10 | Did State conduct or participate in pipeline safety training session or seminar in Past 3 Years? Chapter 8.5 | Info Only | Info Only |
|----|--|-----------|-----------|

Info Only = No Points

Evaluator Notes:

Conduct seminar every 2 years. Last time was April 19-21st 2022 and July 8-10, 2024. Additionally, hosted in May 2024 a seminar directly for Master Meter Operators.

- | | | | |
|----|---|-----------|-----------|
| 11 | Has state confirmed transmission operators have submitted information into NPMS database along with changes made after original submission? | Info Only | Info Only |
|----|---|-----------|-----------|

Info Only = No Points

Evaluator Notes:

Part of the transmission O&M inspection 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:

Annual letter is sent out to operators to discuss pipeline issues or concerns. Also meet with Indiana Energy Associations and have quarterly meetings with larger operators. Website is also very informative.

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

if possible, we send someone to the site to see the repairs. Otherwise the reports are reviewed by the director and ops manager.

Had two SRCR in 2023: which are both closed.

SRC23-293924 -Indiana CRM # 12273

SRC23-289845 - Indiana CRM # 12250

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:

Complete surveys and requests by both PHMSA and NAPSR. Complete WMS tasks when notifications are received.

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:

Discussed waivers listed on PHMSA website. Only one waiver may apply but changes in rules may have made the waiver no longer in effect.

16	Were pipeline program files well-organized and accessible?	Info Only	Info Only
-----------	--	-----------	-----------

Info Only = No Points

Evaluator Notes:

Yes, CRM is utilized to track inspections reports which is very easy to navigate.

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:

Discussed SICT with IURC and no issues or concerns are foreseen.

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. Damages per 1,000 tickets is trending down, Inspector training has trended down mainly due to retirements, and leaks are on a small increase due to better technology in finding leaks.

19	Did the state encourage and promote operator implementation of Pipeline Safety Management Systems (PSMS), or API RP 1173? This holistic approach to improving pipeline safety includes the identification, prevention and remediation of safety hazards.	Info Only	Info Only
-----------	--	-----------	-----------

Info Only = No Points

- a. <https://pipelinesms.org/>
- b. Reference AGA recommendation to members May 20, 2019

Evaluator Notes:

Yes, mentioned in annual letter sent to operators as well as requested operators to participate in surveys.

20	General Comments:	Info Only	Info Only
-----------	-------------------	-----------	-----------

Info Only = No Points

Evaluator Notes:

The IURC is mainly complying with Part D of the evaluation.

Total points scored for this section: 50

Total possible points for this section: 50



PART E - Field Inspections

Points(MAX) Score

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

Info Only = No Points

- What type of inspection(s) did the state inspector conduct during the field portion of the state evaluation? (i.e. Standard, Construction, IMP, etc)
- When was the unit inspected last?
- Was pipeline operator or representative present during inspection?
- Effort should be made to observe newest state inspector with least experience

Evaluator Notes:

Citizen's Gas
R.J. Snyder, IURC Lead Inspector
Indianapolis, IN
October 2, 2024
Agustin Lopez, State Evaluator, PHMSA

- Evaluated a construction inspection of Citizen's cast iron pipe replacement.
- Unit is inspected every year.
- Yes, operator representatives were present.
- RJ Snyder 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, the inspection is documented in a form to track inspection results.

- 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 reviewed the installation of a 12" PE pipeline to replace an existing 24" cast iron pipeline. Reviewed pipeline records, OQ records of technicians and uses Gascan app to verify PE pipe specifications.

- 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 RJ demonstrated knowledge of the pipeline safety program and regulations. He has pipeline experience and performed an excellent inspection.

- 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, concluded with an exit briefing. Did not find issues.

-
- 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 inspection was conducted in a safe, positive and constructive manner. PPE was worn at all times.

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

Evaluator Notes:

RJ Snyder performed an excellent inspection while Citizen's Gas was replacing a 24" cast iron pipe by inserting a 12" PE pipe inside. He observed fusion of the PE pipe, handling and condition of the pipe. He verified OQ of technicians. He concluded with an exit briefing.

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:

Yes, Annual Reports and incidents are reviewed with the operator during inspections and as part of the pre-inspection activities. Data is reviewed for errors, unusually activity or negative trends.

- | | | | |
|---|--|---|---|
| 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, they have to do this as part of their damage reporting process. All damages to natural gas and hazardous liquids lines are required to be submitted to the IURC within 30 days of the damage and include Operator's root cause as a field for that report. The IURC has developed a compliance matrix which is applied to operators with multiply damages to try to reduce the amount of damages. The matrix has been applied to several operators.

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

For Distribution: This is reviewed by the director yearly, compared with the damage data from the mandatory reports, and compared with the operator's mandatory quarterly report numbers. Violations are issued based on a agreed penalty matrix based on number of Operator At Fault damages. For Transmission/MMO/Liquids, these are reviewed as part of the annual report review.

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

Yes, track damages and trends. Also have some good mapping software located here <https://www.in.gov/iurc/pipeline-safety-division/damage-to-underground-facilities/indiana-pipeline-damages-map/> . Mapping site has alot of damages data and is very informative.

5 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

The IURC has implemented a compliance matrix which is issued to operators with mutiple at fault damages to try and reduce reoccurrence of damages.

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

