



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

PUBLIC UTILITIES COMMISSION NEVADA

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: Nevada

Agency Status:

Date of Visit: 06/24/2024 - 06/28/2024

Agency Representative: Neil Pascual, Program Manager, Pipeline Safety Division

PHMSA Representative: Agustin Lopez, State Liaison, PHMSA

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

Name/Title: Stephanie Mullen, Executive Director

Agency: Public Utilities Commission of Nevada

Address: 1150 E. William Street

City/State/Zip: Carson City, NV 89701-3109

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 data.
- b. Verified inspection activity. State keeps data base with field hours to account for inspection days.
- c. Verified operators with state files and PDM.
- d. No reportable incidents in 2023.
- e. Yearly logs compliance actions to track on spread sheet "Operator Probable Violatin Log".
- f. Reviewed records to verify they are kept in the files.
- g. Verified training in TQ Blackboard. Inspectors enforce one call laws so time spent is not counted on Progress Report.
- h. NVPUC has adoptedd all regulations. NV has automatic adoption under NAC 704.460
- i. Past performance and iniatives are listed.

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



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

- a. Section 8 Gas Code Compliance Activities includes pre and post inspection activities. Procedures also give inspection activities which guide inspectors on performing inspections.
- b. Section 8.2 includes procedures for conducting DIMP and TIMP inspections.
- c. Section 8 includes procedures for conducting OQ inspections.
- d. Section 8.2 includes procedures for conducting Damage Prevention inspections.
- e. Section 5.4 outlines the need to provide operator training.
- f. Section 6.3 defines construction activities.
- g. There are no LNG regulated facilities in NV.

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|---|--|---|---|
| 2 | Do written procedures address inspection priorities of each operator, and if necessary each unit, based on the following elements and time frames established in its procedures? Chapter 5.1
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 8.2 outlines a review of the Risk Ranking Calculator prior to the audit. The Risk Ranking Calculator is reviewed and updated annually per section 4.7 of the manual. Procedure Manual 4.7 Operator's Risk Profile and Risk Ranking Nevada PSP procedures are to conduct audits of each jurisdictional system annually. The Compliance and Audit Tracking Spreadsheet outlines the intervals along with the SICT Spreadsheets.

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

Evaluator Notes:

Procedure Manual 8.2 Post Inspection Activities
Outlines the forms to complete, submission of forms and Audit Summary Letter, supervisory review, determination of Probable Violations and Issues of Concern, timelines, legal review, tracking and issuance to Operator.

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| 4 | (Incident/Accident Investigations) Does the state have written procedures to address state actions in the event of an incident/accident? | 3 | 3 |
|---|--|---|---|
- Yes = 3 No = 0 Needs Improvement = 1-2
- a. Mechanism to receive, record, and respond to operator reports of incidents, including after-hours reports
 - b. If onsite investigation was not made, do procedures require on-call staff to obtain sufficient information to determine the facts to support the decision not to go on-site.

Evaluator Notes:

Procedure Manual 12.0 Incident Outage Reporting and Incident Investigation

Outlines criteria for reportable events, operator reporting criteria, investigation criteria, NRC reporting, acknowledgement of the MOU between PHMSA and NTSB, and reporting documentation.

Procedure Manual 12.2 Operator Notification to PUCN Staff

a. All PUCN Pipeline Safety Personnel have cell phones (total of 7 people) and are on-call 24/7. Operators are furnished the list of phone numbers and instructed to call a primary, secondary or tertiary number to report an incident.

b. Procedure Manual 12.3 Incident and/or Outage Investigation

Circumstances that may have the Program Manager not send personnel to perform an on-site field investigation and actions to take if an on-site investigation was not done.

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

Evaluator Notes:

The NVPUC 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:

In 2023 the newest inspector (Carson Alexander) finished his core classes in 2023, therefore Seven out of the Seven (7) Nevada PSP personnel (including the Eng. Manager) had the required core classes, including OQ in 2023.
Six (6) of the Seven (7) Nevada PSP personnel have the required DIMP T&Q Class.
All seven (7) Nevada PSP personnel have the required LPG Class.
Five (5) Nevada PSP Inspector personnel have the required IMP T&Q Classes (Paul Maguire took the IMP protocols and the ILI course).
Six (6) of the Seven (7) Nevada PSP personnel have the required Control Room Classes.
Five (5) Nevada PSP Inspector personnel have the required Root Cause Training.
Nevada does not have any jurisdictional LNG facilities, but Nevada PSP does have one (1) person (Mike Evans) with the LNG Class from his time in Idaho.

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| 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 |
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Evaluator Notes:

Yes, Neil Pascual is very knowledgeable of the pipeline safety program. He is a great asset to the NVPUC.

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

The NVPUC 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

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

Yes, randomly selected inspection reports were reviewed to assure time intervals are being met.

These interval requirements are current for all operators and none of those inspection types have inspection intervals greater than 5 calendar years, and some of the intervalst the NVPUC try to meet (although the maximum duration is 5 calendar years) are as follows:

- ? SWG-SND TRIMP Field Inspection (Try to look at a Trimp field activity on 2-year interval given the amount of transmission & HCAs)
- ? LDCs, Transmission Operators (Try to do these Stander Inspections every 3, but usually do field annually for the large LDCs)
- ? LDC Field OQ Inspection (Try to do at least a field OQ once every year)
- ? LDCs, Full DIMP Inspections (3-year interval is the goal, with annual update reviews on the large operators, but 5 years is the requirement)
- ? No Intrastate LNG Operators
- ? One Full Control Room, that being SWG-SND and that was audited jointly with PHMSA in 2021 and again in 2023, two control room lights (Prospector Pipeline & Ryze) both audited in 2020 and not due again till 2025.
- ? Nevada PSP has consistently met a 40 to 50 percent construction rate inspection.
- ? Section 114 inspections have been added to this Spreadsheet.

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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 | 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 inspection reports to assure forms contain applibable regulations and are fully completed. The NVPUC utilizes PHMSA IA inspection forms.

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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:

Staff performs OQ program inspections on 5-year intervals unless there is a need to perform it earlier, and that inspection interval is current on all operators. Staff performs Field OQ inspections more often (although requirement varies per operator based on size and risk) and in 2023 Staff performed 43 Field OQ inspection

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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 | 2 |
| | 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, the NVPUC conducts IMP inspections in accordance with their procedures. Review large operator IMP programs annually for updates, field activities and ILI runs.

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| 5 | Did the state review the following (these items are NTSB recommendations to PHMSA that have been deemed acceptable response based on PHMSA reviewing these items during the evaluation process): Chapter 5.1
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
| | a. Operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization and if necessary remedial action was taken;
b. Operator procedures for surveillance of cast iron pipelines, including appropriate action resulting from tracking circumferential cracking failures, study of leakage history, or other unusual operating maintenance condition? (Note: See GPTC Appendix G-18 for guidance);
c. Operator emergency response procedures for leaks caused by excavation damage near buildings and determine whether the procedures adequately address the possibility of multiple leaks and underground migration of gas into nearby buildings Refer to 4/12/01 letter from PHMSA in response to NTSB recommendation P-00-20 and P-00-21;
d. Operator records of previous accidents and failures including reported third-party damage and leak response to ensure appropriate operator response as required by 192.617;
e. Directional drilling/boring procedures of each pipeline operator or its contractor to determine if they include actions to protect their facilities from the dangers posed by drilling and other trench less technologies;
f. Operator procedures for considering low pressure distribution systems in threat analysis?
g. Operator compliance with state and federal regulations for regulators located inside buildings? | | |

Evaluator Notes:

Yes, NTSB recommendations were sent to each operator in Nevada in a 2015 (Q:\PIPELINE-SAFETY\OPERATORS BY TYPE\NTSB) Question Letter, to get initial responses, which were then reviewed. Additionally, these questions are included on the Special PHMSA/NTSB check list Staff created and uses when inspecting each operator

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| 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:

Yes. NVPUC covers advisory bulletins during the operator pipeline seminar

7	(Compliance Activities) Did the state follow compliance procedures (from discovery to resolution) and adequately document all probable violations, including what resolution or further course of action is needed to gain compliance? Chapter 5.1	10	10
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Yes = 10 No = 0 Needs Improvement = 1-9

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

Evaluator Notes:

Yes. NVPUC maintains a Probable Violation and Compliance tracking Spreadsheet for each year, where it logs all violations, issues of concerns and compliance actions, and tracks those issues to resolution. Reviewed files to assure probable violations are corrected in accordance to procedures.

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:

Nevada did not have any reportable incidents in 2023, but we did have one in late 2022 for which the investigation continued into 2023 and the final incident report was completed. That incident involved Southwest Gas-Southern Nevada Division ("SWG-SND") in Las Vegas (SWG-SND-10-31-2022-La-Cienaga-Leak, Las Vegas). It was not reported until late Nov-2022 once the cost was identified as exceeding the \$130,000 reporting level.

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:

No response was necessary but the NVPUC did send a response within 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
Info Only = No Points

Evaluator Notes:

Yes seminars have been held in 2018, 2021 and there will be one held in September 2024.

- 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:

Yes, tracked annually during inspections.

- 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:

Yes, all enforcement actions and audit summary letters are filed on a periodic basis for public and other operator review in annual Commission Dockets. Also this information is posted on the PUCN Gas Safety website.

- 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 2023.

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

Evaluator Notes:

Yes. Nevada typically responds to the vast majority of NAPSRS survey requests and all PHMSA survey requests, these surveys are saved on the Engineering Drive at:
Q:\PIPELINE-Admin\NAPSRS\Surveys\2022

- 15** If the State has issued any waivers/special permits for any operator, has the state verified conditions of those waivers/special permits are being met? This should include having the operator amend procedures where appropriate. 1 1
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

No open waivers or permits.

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

Evaluator Notes:

Yes, files are well organized and are kept electronically in the server.

- 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:

No issues or concerns with the SICT. Data looks accurate and detailed.

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

Evaluator Notes:

Discussed metrics and no issues identified. Damages are on a downward trend, training is good and leaks are down. Minimal carry over leaks is very good.

- 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, this topic was covered at the 2018 Pipeline Safety Seminar & was again outlined at the 2021 Seminar.

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

Evaluator Notes:

The NVPUC 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:

Southwest Gas

Daniel Adesina, Lead Inspector NVPUC

Carson City, NV

June 26, 2024

Agustin Lopez, PHMSA Evaluator

- Construction inspection, Rectifier inspection, valve maintenance and regulator station inspection of Southwest Gas pipeline facilities in the Carson City area.
- Last inspected in 2023.
- Yes, pipeline representatives were present.
- Daniel has not been evaluated in the last several years.

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

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes forms were utilized to document and guide the inspector 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:

Yes, the inspector reviewed records, procedures, OQ records during the inspection. Inspector was very thorough and was knowledgeable of the regulations.

- 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, Daniel Adesina was knowledgeable 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:

Yes and exit interview was performed at the conclusion of the inspection.

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- 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 performed 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:

Daniel Adesina performed an excellent job. He is knowledgeable of the pipeline safety regulations.

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, each year each operator's annual report is reviewed and either a Distribution or Transmission Checklist is completed (See Pipeline Procedures Section 7.8 Page Manual Page 47 & 48). Completion of the checklists is logged on the "Standard-Special-Audit-Tracking" spreadsheet.

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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, both large LDCs Southwest Gas and NV Energy provide NVPUC with real time emails of all excavation damages such that PSP Staff can investigate those damages for compliance with the Nevada One-Call Law. Additionally, each LDC provides Staff quarterly with a spreadsheet of all excavation damages (including cause), and those spread sheets track repeat offenders. Staff holds quarterly, or semi-annual audit reviews of this excavation damage data with both LDCs such that data accuracy can be reviewed, and the root causes of each damage can be compared to the damage cause based upon Staff's on-site investigation

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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, NVPUC Staff meets either quarterly or semi-annually, with both large LDCs to review the accuracy of its excavation damage data before it is ever submitted to PHMSA in an annual report. Staff conducts inspections of damages as the LDC's report all damages. Part D of anual reports are reviewed and recorded on spreadsheet.

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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? | 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, damages data is gathered and analyzed by the NVPUC. Conduct quarterly meetings with large LDC's. Damage prevention education of stakeholders is also provided by NVPUC and operators.

5	General Comments: Info Only = No Points	Info Only Info Only
Evaluator Notes: The NVPUC is mainly complying with Part F of the evaluation.		

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

