



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

RHODE ISLAND DIVISION OF PUBLIC UTILITIES AND CARRIERS

## Document Legend

### PART:

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



# 2023 Gas State Program Evaluation -- CY 2023

Gas

**State Agency:** Rhode Island

**Agency Status:**

**Date of Visit:** 08/26/2024 - 08/30/2024

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

**PHMSA Representative:** Agustin Lopez, State Evaluator, PHMSA

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

**Name/Title:** Ms. Linda George, Administrator

**Agency:** Rhode Island Division of Public Utilities & Carriers

**Address:** 89 Jefferson Boulevard

**City/State/Zip:** Warwick, RI 02888

**Rating:**

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

## INSTRUCTIONS:

Complete this evaluation in accordance with the Evaluator Guidance for conducting state pipeline safety program evaluations. The evaluation should generally reflect state program performance during CY 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	48
15	15
10	10
<b>100</b>	<b>98</b>

### TOTALS

**State Rating** ..... **98.0**

## PART A - Progress Report and Program Documentation Review

Points(MAX)    Score

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

### Evaluator Notes:

- a. Verified data with PDM and state files.
- b. Reviewed state files to verify inspection days. Due to doing multiple inspections daily the state classifies each day as one inspection. Inspection day count is correct but the type of inspection may not be accurate. Need to improve on keeping track of each inspector days.
- c. Verified operator data with PDM and state files.
- d. No reportable incidents in 2023.
- e. Reviewed state files to verify compliance cases.
- f. Records are kept electronically.
- g. Verified training with Blackboard.
- h. RI has adopted all regulations.
- i. Performance and initiatives are listed.

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:

Gas Pipeline Safety Manual, Section V Conducting Inspections provides guidance to inspectors on performing each type of inspection. Pre-inspection is in Section V Part B. Post-inspection activities are in Section V Part P.

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

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

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

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

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

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

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**5** General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

The RIDPUC is mainly complying with Part B of the 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:

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

- |   |  |   |   |
|---|--|---|---|
| 2 | Did state records and discussions with state pipeline safety program manager indicate adequate knowledge of PHMSA program and regulations?<br>Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 5 |
|---|--|---|---|

Evaluator Notes:

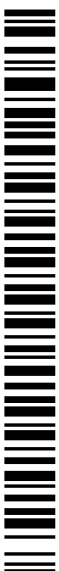
Yes, Robert Bailey is knowledgeable of the pipeline safety program and regulations.

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

Evaluator Notes:

The RIDPUC is mainly complying with Part C of the evaluation.

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



## PART D - Program Performance

Points(MAX) Score

- |   |   |   |   |
|---|---|---|---|
| 1 | Did state inspect all types of operators and inspection units in accordance with time intervals established in written procedures? Chapter 5.1<br>Yes = 5 No = 0 Needs Improvement = 1-4  | 5 | 5 |
|   | <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:

Yes, randomly selected inspection reports were reviewed to assure inspection intervals are being met. There were no issues identified.

- |   |   |    |   |
|---|---|----|---|
| 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?<br>Yes = 10 No = 0 Needs Improvement = 1-9 | 10 | 8 |
|   | <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</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:

Although the LPG and Master Meter inspection forms did improve from previous year, the forms were still missing applicable code requirements. The LPG inspection forms did not include DIMP questions to document that the operator is in compliance with the regulations. The Master Meter inspection forms did not include odorant sniff test questions nor O&M questions to document that the operators are in compliance with the regulations.

- |   |  |   |   |
|---|--|---|---|
| 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<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

There was a big improvement on conducting Protocol 9 inspections.

- |   |   |   |   |
|---|---|---|---|
| 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<br>Yes = 2 No = 0 Needs Improvement = 1  | 2 | 2 |
|   | <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></ul> |   |   |

- c. Are the states verifying operators are including low pressure distribution systems in their threat analysis?

Evaluator Notes:

Yes, the RIDPUC conducts yearly DIMP inspection if REI. Need to assure a TIMP Protocol A is performed on transmission operators that do not have HCAs.

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|---|---|---|---|
| 5 | <p>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</p> <p>Yes = 2 No = 0 Needs Improvement = 1</p> <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> <li>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;</li> <li>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;</li> <li>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;</li> <li>f. Operator procedures for considering low pressure distribution systems in threat analysis?</li> <li>g. Operator compliance with state and federal regulations for regulators located inside buildings?</li> </ul> | 2 | 2 |
|---|---|---|---|

Evaluator Notes:

The RIDPUC reviews the NTSB Recommendation and ADB reviews during DIMP inspection with RI Energy on a yearly basis and are documented in the inspection forms.

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

Evaluator Notes:

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

- |   |  |    |    |
|---|--|----|----|
| 7 | <p>(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</p> <p>Yes = 10 No = 0 Needs Improvement = 1-9</p> <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> </ul> | 10 | 10 |
|---|--|----|----|



- i. Within 30 days, conduct a post-inspection briefing with the owner or operator outlining any concerns
- j. Within 90 days, to the extent practicable, provide the owner or operator with written preliminary findings of the inspection. (Incident investigations do not need to meet 30/90-day requirement)

Evaluator Notes:

Reviewed randomly selected inspection reports and verified that compliance actions were being completed per their procedures.

- |   |  |    |    |
|---|--|----|----|
| 8 | <p>(Incident Investigations) Were all federally reportable incidents investigated, thoroughly documented, with conclusions and recommendations?</p> <p>Yes = 10 No = 0 Needs Improvement = 1-9</p> <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> <li>b. Did state keep adequate records of Incident/Accident notifications received?</li> <li>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?</li> <li>d. Were onsite observations documented?</li> <li>e. Were contributing factors documented?</li> <li>f. Were recommendations to prevent recurrences, where appropriate, documented?</li> <li>g. Did state initiate compliance action for any violations found during any incident/accident investigation?</li> <li>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?</li> <li>i. Does state share any lessons learned from incidents/accidents?</li> </ul> | 10 | 10 |
|---|--|----|----|

Evaluator Notes:

Although there were no reportable incidents in 2023 the RIDPUC does investigate incidents.

- |   |  |   |   |
|---|--|---|---|
| 9 | <p>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</p> <p>Yes = 1 No = 0 Needs Improvement = .5</p> | 1 | 1 |
|---|--|---|---|

Evaluator Notes:

Yes, the RIDPUC responded within the 60 day requirement.

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

Evaluator Notes:

Yes participate in the New England states area(NEPSR) seminar which was last conducted in 2023 in Worcester, Mass.

- |    |   |           |           |
|----|---|-----------|-----------|
| 11 | <p>Has state confirmed transmission operators have submitted information into NPMS database along with changes made after original submission?</p> <p>Info Only = No Points</p> | Info Only | Info Only |
|----|---|-----------|-----------|

Evaluator Notes:

Yes reviewed during inspections and documented on form. Have only 1 transmission operator.

- |    |   |   |   |
|----|---|---|---|
| 12 | <p>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).</p> <p>Yes = 1 No = 0 Needs Improvement = .5</p> | 1 | 1 |
|----|---|---|---|

Evaluator Notes:

The state does not make enforcement cases available to the public but does post all NOPV's on the website. The state/local LDC do participate in a statewide DigSafe Conference and shows a PowerPoint presentation. Had approx. 400+ in attendance during last conference.

13	Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.7 Yes = 1 No = 0 Needs Improvement = .5	1	1
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Evaluator Notes:  
None in 2023.

14	Was the State responsive to: Yes = 1 No = 0 Needs Improvement = .5 a. Surveys or information requests from NAPSAR or PHMSA; and b. PHMSA Work Management system tasks?	1	1
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Evaluator Notes:  
The state answers all Survey Monkeys with NAPSAR. If any tasks come up on WMS the RIDPUC will redspond to them.

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. Yes = 1 No = 0 Needs Improvement = .5	1	1
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Evaluator Notes:  
Have two waivers on PHMSA website which are not applicable due to rule changes.

16	Were pipeline program files well-organized and accessible? Info Only = No Points	Info Only	Info Only
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Evaluator Notes:  
Yes, files are kept electronically.

17	Discussion with State on accuracy of inspection day information submitted into State Inspection Day Calculation Tool (SICT). Has the state updated SICT data? Yes = 3 No = 0 Needs Improvement = 1-2	3	3
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Evaluator Notes:  
Met SICT inspection days and don't see issues meeting the days in 2024. Discussed the need to assure risks and data is entered to populate SICT if not done so already.

18	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> Info Only = No Points	Info Only	Info Only
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Evaluator Notes:  
Discussed performance metrics with RIDPUC. Hits per 1,000 tickets is trending down. Leak data seem to be improving and amount of leaks has decreased.

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 = No Points a. <a href="https://pipelinesms.org/">https://pipelinesms.org/</a> b. Reference AGA recommendation to members May 20, 2019	Info Only	Info Only
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Evaluator Notes:  
The former company, National Grid Gas, followed API RP 1173 which is now Rhode Island Energy.

20	General Comments: Info Only = No Points	Info Only	Info Only
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Evaluator Notes:  
Point Loss:

D.2- Although the LPG and Master Meter inspection forms did improve from previous year, the forms were still missing applicable code requirements. The LPG inspection forms did not include DIMP questions to document that the operator is in compliance with the regulations. The Master Meter inspection forms did not include odorant sniff test questions nor O&M questions to document that the operators are in compliance with the regulations. There was a 2 point deduction for this issue.

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Total points scored for this section: 48  
Total possible points for this section: 50



## PART E - Field Inspections

Points(MAX) Score

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

Info Only = No Points

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

### Evaluator Notes:

Rhode Island Energy

Albert Kyei-Poakwa, Lead Inspector

Providence Area

August 28, 2024

Agustin Lopez, PHMSA Evaluator

- Construction inspection of Rhode Island Energy pipeline system.
- Last inspected in 2023.
- Yes, pipeline representatives were present.
- Have not evaluated Albert Kyei-Poakwa 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, Construction forms were used during inspection and to document the inspection activities.

- 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 is familiar with operator procedures and review when necessary when compliance issues are found.
- Verified OQ records.
- Verified calibration of equipment and inspected fusions and condition of pipe, depth of cover and ROW.
- no other type of inspection.
- Yes the length of inspections were adequate.

- 4 From your observation did the inspector have adequate knowledge of the pipeline safety program and regulations? (Evaluator will document reasons if unacceptable) 2 2
- Yes = 2 No = 0 Needs Improvement = 1

### Evaluator Notes:

Yes, the inspector had knowledge of the pipeline safety program and regulations. He asked questions to verify procedures are being followed and work performed correctly. He 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, inspector concluded inspections with an exit interview with the forman.

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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.

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**7** General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

Mr. Albert Kyei-Poakwa conducted construction inspections of RIE installation of main replacement and a new service line. He performed an excellent job and is a great asset to the RIDPUC.

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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.<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

Yes, the state has reviewed Operator Annual reports, along with an Incident/Accident report for accuracies and trends. The RIDPUC meets with the operator on a yearly basis.

- |   |  |   |   |
|---|--|---|---|
| 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)<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:

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

- |   |   |   |   |
|---|---|---|---|
| 3 | 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:

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

- |   |   |   |   |
|---|---|---|---|
| 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?<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:

Yes, The Division reviews and has been tracking the data since 1985. This information is posted on the Division website.  
RIDPUC works with their distribution operator to reduce the damages and conducts damage prevention inspections annually.

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**5** General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

The RIDPUC is mainly complying with Part F of the evaluation.

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

