



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

1200 New Jersey Avenue SE
Washington DC 20590

2009 Natural Gas State Program Evaluation

for

WISCONSIN PUBLIC SERVICE COMMISSION

Document Legend

PART:

- O -- Representative Date and Title Information
- A -- General Program Qualifications
- B -- Inspections and Compliance - Procedures/Records/Performance
- C -- Interstate Agent States
- D -- Incident Investigations
- E -- Damage Prevention Initiatives
- F -- Field Inspection
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2009 Natural Gas State Program Evaluation -- CY 2009
Natural Gas

State Agency: Wisconsin

Agency Status:

Date of Visit: 09/13/2010 - 09/17/2010

Agency Representative: Thomas Stemrich, Pipeline Safety Program Manager

PHMSA Representative: Glynn Blanton, DOT/PHMSA State Programs

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

Name/Title: Eric Callisto, Chairperson

Agency: Wisconsin Public Service Commission

Address: 610 North Whitney Way

City/State/Zip: Madison, Wisconsin 53705

Rating:

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

INSTRUCTIONS:

Complete this evaluation in accordance with the Procedures for Evaluating State Pipeline Safety Program. The evaluation should generally reflect state program performance during CY 2009 (not the status of performance at the time of the evaluation). All items for which criteria have not been established should be answered based on the PHMSA representative's judgment. 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 space provided for general comments/regional observations. If a question is not applicable to a state, select NA. Please ensure all responses are COMPLETE and ACCURATE, and OBJECTIVELY reflect state program performance. Increasing emphasis is being placed on performance. This evaluation together with selected factors reported in the state's annual certification/agreement attachments provide the basis for determining the state's pipeline safety grant allocation.

Field Inspection (PART F):

The field inspection form used will allow different areas of emphasis to be considered for each question. Question 13 is provided for scoring field observation areas. In completing PART F, the PHMSA representative should include a written summary which thoroughly documents the inspection.

Scoring Summary

PARTS

Possible Points Points Scored

A General Program Qualifications
B Inspections and Compliance - Procedures/Records/Performance
C Interstate Agent States
D Incident Investigations
E Damage Prevention Initiatives
F Field Inspection
G PHMSA Initiatives - Strategic Plan
H Miscellaneous
I Program Initiatives

26
23.5
0
7
9
12
10
3
9

26
22.5
0
7
8
10
8
3
8.5

TOTALS

99.5 93

State Rating

93.5

PART A - General Program Qualifications

Points(MAX) Score

- | | | | |
|---|--|---|---|
| 1 | Did the state submit complete and accurate information on the attachments to its most current 60105(a) Certification/60106 (a) Agreement? (NOTE: PHMSA Representative to verify certification/agreement attachments by reviewing appropriate state documentation. Score a deficiency in any one area as "needs improvement". Attachment numbers appear in parenthesis) Previous Question A.1, Items a-h worth 1 point each
Yes = 8 No = 0 Needs Minor Improvement = 3-7 Needs Major Improvement = 2 | 8 | 8 |
| <div style="display: flex; justify-content: space-between;"><div style="width: 60%;"><p>a. State Jurisdiction and agent status over gas facilities (1)</p><p>b. Total state inspection activity (2)</p><p>c. Gas facilities subject to state safety jurisdiction (3)</p><p>d. Gas pipeline incidents (4)</p><p>e. State compliance actions (5)</p><p>f. State record maintenance and reporting (6)</p><p>g. State employees directly involved in the gas pipeline safety program (7)</p><p>h. State compliance with Federal requirements (8)</p></div><div style="width: 35%; text-align: center;"><div><input checked="" type="checkbox"/></div><div><input checked="" type="checkbox"/></div><div><input checked="" type="checkbox"/></div><div><input checked="" type="checkbox"/></div><div><input checked="" type="checkbox"/></div><div><input checked="" type="checkbox"/></div><div><input checked="" type="checkbox"/></div><div><input checked="" type="checkbox"/></div></div></div> | | | |

SLR Notes:

Yes. However, Wisconsin Public Service Commission (WIPSC) does not have jurisdictional authority over LPG operators and their state damage prevention law penalty amount only applies to pipeline operators.

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|----------|---|---|---|
| 2 | Did the state have an adequate mechanism to receive operator reporting of incidents to ensure state compliance with 60105(a) Certification/60106(a) Agreement requirements (fatality, injury requiring hospitalization, property damage exceeding \$50,000 - Mechanism should include receiving "after hours" reports)? (Chapter 6) Previous Question A.2
Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

SLR Notes:

Yes, WI PSC regulation 104.05 addresses this required information. Additionally, WI PSC provides in their annual written notification to all operators at the end of the calendar year who and how to notify the Commission regarding incidents.

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|----------|---|---|---|
| 3 | Has the state held a pipeline safety TQ seminar(s) in the last 3 years? (NOTE: Indicate date of last seminar or if state requested seminar, but T&Q could not provide, indicate date of state request for seminar. Seminars must be held at least once every 3 calendar years.) (Chapter 8.5) Previous Question A.4
Yes = 2 No = 0 | 2 | 2 |
|----------|---|---|---|

SLR Notes:

Yes, WIPSC conducted a pipeline safety seminar in January 26-30, 2009 at Wisconsin Dells, WI. They anticipate having the next scheduled seminar at the same location on February 14-19, 2011. The number of participants who attend the 2009 seminar was 170 individuals.

- | | | | |
|----------|--|---|---|
| 4 | Were pipeline safety program files well-organized and accessible?(NOTE: This also includes electronic files) (Chapter 5) Previous Question A.5
Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

SLR Notes:

Yes, a review of WIPSC file folders and other relative documents found the pipeline safety program files accessible, accurate and well organized. They use the Electronic Regulatory Filing System (ERF) as a method to record all inspections performed and letters sent to operators pertaining to compliance with the pipeline safety regulations.

- | | | | |
|----------|---|---|---|
| 5 | Did state records and discussions with the state pipeline safety program manager indicate adequate knowledge of PHMSA program and regulations? (Chapter 4.1, Chapter 8.1) Previous Question A.6
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|---|---|---|

SLR Notes:

Yes, Tom Stemrich has a good understanding of the pipeline safety regulations and knowledge in submission of certification and payment agreement documents pertaining to the pipeline safety grant award.

- | | | | |
|----------|---|---|---|
| 6 | Did the state respond in writing within 60 days to the requested items in the Chairman's letter following the Region's last program evaluation? (No response is necessary if no items are requested in letter and mark "Yes") (Chapter 8.1) Previous Question A.8
Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

SLR Notes:

Yes, Chairperson Eric Callisto response letter to Ivan Huntton, PHMSA Central Region Director dated February 4, 2010 was within the 60 day requested time period.

- 7 What actions, if necessary, did the State initiate as a result of issues raised in the Chairperson's letter from the previous year? Did actions correct or address deficiencies from previous year's evaluation? (No response is necessary if no items are requested in letter and mark "Yes") (Chapter 8.1) Previous Question A.8/A.9 1 1
Yes = 1 No = 0

SLR Notes:

Yes, Chairperson Calliston understood the need to take jurisdiction over LPG pipeline facilities in order to obtain full jurisdiction over all intrastate gas system operators and if the opportunity presents itself, the organization will attempt to gain jurisdiction during next year's legislative session. In regard to inspection data being more transparent to the public, Chairperson Calliston mentioned Wisconsin has an open records law and information is available from their Electronic Records Filing system. Consideration will be taken to include summary information on the number of miles of mains, services, and leakage by operators on their web site.

Personnel and Qualifications

- 8 Has each inspector fulfilled the 3 year TQ training requirement? If No, has the state been granted a waiver regarding TQ courses by the Associate Administrator for Pipeline Safety? (NOTE: If the State has new inspectors who have not attended all TQ courses, but are in a program which will achieve the completion of all applicable courses within 3 years of taking first course (5 years to successfully complete), or if a waiver has been granted by the applicable Region Director for the state, please answer yes.) (Chapter 4.4) Previous Question A.10 3 3
Yes = 3 No = 0

SLR Notes:

Yes, all pipeline safety individuals performing inspections on operators in their state have completed the TQ training requirements within the 3 year period. Dagmar Vanek has not completed the LNG course PL4253 but does not perform LNG inspections.

- 9 Brief Description of Non-TQ training Activities: Info Only Info Only
Info Only = No Points
For State Personnel:
No activity.
For Operators:
On March 31 thru April 3, 2009, Tom Stemrich conducted a training course at Excel Energy Company for their employees on the pipeline safety regulations in New Richmond, WI. October 22 & 23, 2009, Tom attended the Utility Workers Consetntion and presentated information on the pipeline safety regulations and issues of concern on safety issues or best practices.
For Non-Operator Entities/Parties, Information Dissemination, Public Meetings:
No activity.

SLR Notes:

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- 10 Did the lead inspectors complete all required T&Q OQ courses and Computer Based Training (CBT) before conducting OQ Inspections? (Chapter 4.4.1) Previous Question A.12 1 1
Yes = 1 No = 0

SLR Notes:

Yes, a review of the OQ database and training records, the inspectors assigned to lead OQ inspections have completed the required training prior to the time inspections were conducted.

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- 11 Did the lead inspectors complete all required TQ Integrity Management (IMP) Courses/Seminars and CBT before conducting IMP Inspections? (Chapter 4.4.1) Previous Question A.13 1 1
Yes = 1 No = 0

SLR Notes:

Yes, a review of the training records indicate the inspectors assigned to lead IMP inspections have completed the required training prior to the time inspections were conducted. The lead inspectors are Tom Stemrich and Jeff Murley.

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- 12 Was the ratio acceptable of Total inspection Person-days to Total Person-days charged to the program by state inspectors? (Region Director may modify points for just cause) (Chapter 4.3) Previous Question B.12 5 5
Yes = 5 No = 0
A. Total Inspection Person Days (Attachment 2):
434.00
B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):
220 X 4.30 = 946.00
Ratio: A / B
434.00 / 946.00 = 0.46
If Ratio >= 0.38 Then Points = 5, If Ratio < 0.38 Then Points = 0

Points = 5

SLR Notes:

Yes, WIPSC had 434 inspection person days during 2009. The WIPSC is assigned 4.30 person years to the natural gas program during 2009. The resulting ratio is 0.46 which exceeds the minimum ratio of 0.38, thus a 5 point score is awarded.

- 13** Have there been modifications or proposed changes to inspector-staffing levels? (If yes, describe) Previous Info Only Info Only
Question B.13
Info Only = No Points

SLR Notes:

John Vogt, Pipeline Safety Engineer, retired on January 15, 2010 and action is being taken by the commission to hire a new individual before the end of calendar year 2010.

- 14** Part-A General Comments/Regional Observations Info Only Info Only
Info Only = No Points

SLR Notes:

Total points scored for this section: 26
Total possible points for this section: 26



PART B - Inspections and Compliance - Procedures/Records/ Performance

Points(MAX) Score

Inspection Procedures

- 1** Does the State have a written inspection plan to complete the following? (all types of operators including LNG) 6.5 6
(Chapter 5.1) Previous Question B.1 + Chapter 5 Changes + Incorporate LNG
Yes = 6.5 No = 0 Needs Improvement = 50% Deduction
- | | | | | |
|---|---|--------------------------------------|-------------------------------------|---|
| a | Standard Inspections (Including LNG) (Max points = 2) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b | IMP Inspections (Including DIMP) (Max points = .5) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c | OQ Inspections (Max points = .5) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d | Damage Prevention (Max points = .5) | Yes <input type="radio"/> | No <input checked="" type="radio"/> | Needs Improvement <input type="radio"/> |
| e | On-Site Operator Training (Max points = .5) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| f | Construction Inspections (Max points = .5) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| g | Incident/Accident Investigations (Max points = 1) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| h | Compliance Follow-up (Max points = 1) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

SLR Notes:

Damage prevention was not listed or described in the written inspection plan. Therefore, a point reduction of .5 was assessed. Total point award for this section is 6 points.

- 2** Did the written Procedures for selecting operators adequately address key concerns? (Chapter 5.1) Previous Question B.2, items a-d are worth .5 point each 2 2
Yes = 2 No = 0 Needs Improvement = 50% Deduction
- | | | | | |
|---|--|--------------------------------------|--------------------------|---|
| a | Length of time since last inspection | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b | History of Operator/unit and/or location (including leakage , incident and compliance history) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c | Type of activity being undertaken by operator (construction etc) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d | For large operators, rotation of locations inspected | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

SLR Notes:

Yes, See Wisconsin Public Service Commission, Criteria for Inspecting Natural Gas Utilities document.

- a. Yes, page 4, section 4
- b. Yes, page 4, section 4
- c. Yes, page 3, section 11
- d. Yes, page 5, section 3

Inspection Performance

- 3** Did the state inspect all types of operators and inspection units in accordance with time intervals established in its written procedures? (Chapter 5.1) Previous Question B.3 2 2
Yes = 2 No = 0

SLR Notes:

Yes, all operators and inspection units were inspected in accordance with the Wisconsin Public Service Commission, Criteria for Inspecting Natural Gas Utilities.

- 4** Did the state inspection form cover all applicable code requirements addressed on the Federal Inspection forms? (Chapter 5.1 (3)) Previous Question B.4 1 1
Yes = 1 No = 0

SLR Notes:

Yes. A review of the federal inspection form to their state forms has been verified. All questions in their database form are the same as the federal inspection questions. Consideration will be taken to design separate inspection forms for each type of inspection performed in the future.

- 5** Did state complete all applicable portions of inspection forms? (Chapter 5.1 (3)) Previous Question B.5 1 1
Yes = 1 No = 0

SLR Notes:

Yes. A review of inspections performed on July 2-4, 2009 on Midwest Natural Gas indicated the forms were completed and all portions of the items reviewed were checked.

6	Did the state initiate appropriate follow-up actions to Safety Related Condition Reports? (Chapter 6.3) Previous Question B.6 Yes = .5 No = 0	.5	NA
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SLR Notes:

NA. During calendar year 2009, there were no safety related condition reports submitted by intrastate natural gas operators located in the State of Wisconsin.

7	Did the state review operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization and if necessary remedial action was taken? (NTSB) Previous Question B.7 Yes = .5 No = 0	.5	NA
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SLR Notes:

The State of Wisconsin does not have cast-iron mains, service lines or pipelines located in their state.

8	Did the state review 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) (NTSB) Previous Question B.8 Yes = .5 No = 0	.5	NA
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SLR Notes:

The State of Wisconsin does not have cast-iron mains, service lines or pipelines located in their state.

9	Did the state review 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? (NTSB) Previous Question B.9 Yes = .5 No = 0	.5	.5
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SLR Notes:

Yes. This item is reviewed during the standard inspection and when an incident occurs on a natural gas distribution system.

10	Did the state review 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? (NTSB) Previous Question B.10 Yes = 1 No = 0	1	1
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SLR Notes:

Yes, this information is covered in the standard inspection.

Compliance - 60105(a) States

11	Did the state adequately document sufficient information on probable violations? (Chapter 5.2) Previous Question B.14 Yes = 1 No = 0 Needs Improvement = .5	1	1
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SLR Notes:

Yes, information located in the database indicates documentation is being used to monitor probable violations. This information, Violation Report, is sent to the operator.

12	Does the state have written procedures to identify the steps to be taken from the discovery to the resolution of a probable violation as specified in the "Guidelines for State Participating in the Pipeline Safety Program"? (Chapter 5.1) Previous Question D(1).1 Yes = 1 No = 0 Needs Improvement = .5	1	1
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SLR Notes:

Yes, Wisconsin Public Service Commission, Criteria for Inspecting Natural Gas Utilities, page 3, Notification & Follow-up Procedures addresses this item.

13	Does the state have written procedures to notify an operator when a noncompliance is identified as specified in the "Guidelines for States Participating in the Pipeline Safety Program"? (Chapter 5.1(4)) Previous Question D(1).2 Yes = 1 No = 0 Needs Improvement = .5	1	1
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SLR Notes:

Yes, Wisconsin Public Service Commission, Criteria for Inspecting Natural Gas Utilities, page 4, Notification & Follow-up Procedures addresses this item.

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| 14 | Does the state have a written procedure for routinely reviewing the progress of compliance actions to prevent delays or breakdowns of the enforcement process, as required by the "Guidelines for States Participating in the Pipeline Safety Program"? (Chapter 5.1(5)) Previous Question D(1).3
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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SLR Notes:

Yes, Wisconsin Public Service Commission, Criteria for Inspecting Natural Gas Utilities, page 4, Notification & Follow-up Procedures addresses this item.

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| 15 | Has the State issued compliance actions for all probable violations discovered? (Note : PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation) Previous Question D(1).4
Yes = 1 No = 0 | 1 | 1 |
|-----------|--|---|---|

SLR Notes:

Yes, a review in Electronic Regulatory Filing System (ERF) indicated all probable violations are issued and tracked for compliance until the violations have been corrected.

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|-----------|--|---|---|
| 16 | Did the state follow its written procedures for reviewing compliance actions and follow-up to determine that prompt corrective actions were taken by operators, within the time frames established by the procedures and compliance correspondence, as required by the "Guidelines for States Participating in the Pipeline Safety Program"? Previous Question D(1).5
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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SLR Notes:

Yes, this is addressed in the Wisconsin Public Service Commission, Criteria for Inspecting Natural Gas Utilities, and Electronic Regulatory Filing System.

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| 17 | If compliance could not be established by other means, did state pipeline safety program staff request formal action, such as a "Show Cause Hearing" to correct pipeline safety violations? (check each states enforcement procedures) Previous Question D(1).6
No = 0 Yes = 1 | 1 | 1 |
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SLR Notes:

Yes, WIPSC has the authority under their commission rules to issue a show cause.

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| 18 | Did the state adequately document the resolution of probable violations? (Chapter 5.1 (6)) Previous Question D(1).7
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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SLR Notes:

Yes, their written procedures and files indicate they adequately documented all probable violations.

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| 19 | Were compliance actions sent to a company officer? (manager or board member if municipal/government system) (Chapter 5.1(4)) Previous Question D(1).8
Yes = .5 No = 0 | .5 | 0 |
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SLR Notes:

No. A review of their database showed this was not done in 2009. Also, this requirement is not in the Wisconsin Public Service Commission, Criteria for Inspecting Natural Gas Utilities manual. Recommend this item be added to their written procedures manual.

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|-----------|---|---|---|
| 20 | Did the compliance proceedings give reasonable due process to all parties? (check each states enforcement procedures) Previous Question D(1).9
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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SLR Notes:

Yes, Wisconsin Public Service Commission rules 196.26 or 196.28 addresses this requirement.

Compliance - 60106(a) States

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| 21 | Did the state use the current federal inspection form(s)? Previous Question D(2).1
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
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SLR Notes:

NA.

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|-----------|--|---|----|
| 22 | Are results adequately documented demonstrating inspection units were reviewed in accordance with state inspection plan? Previous Question D(2).2
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|-----------|--|---|----|

SLR Notes:

NA.

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- | | | | |
|-----------|--|---|----|
| 23 | Were any probable violations identified by state referred to PHMSA for compliance? (NOTE: PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation.) Previous Question D(2).3
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
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SLR Notes:

NA.

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- | | | | |
|-----------|--|---|----|
| 24 | Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? Previous Question D(2).4
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
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SLR Notes:

NA.

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- | | | | |
|-----------|---|---|----|
| 25 | Did the state give written notice to PHMSA within 60 days of all probable violations found? Previous Question D(2).5
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
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SLR Notes:

NA.

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- | | | | |
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| 26 | Did the state initially submit adequate documentation to support compliance action by PHMSA on probable violations? Previous Question D(2).6
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
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SLR Notes:

NA.

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- | | | | |
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| 27 | Part B: General Comments/Regional Observations
Info Only = No Points | Info Only | Info Only |
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SLR Notes:

See questions 1 e, and 19 pertaining to recommendations or loss of points.

Total points scored for this section: 22.5
Total possible points for this section: 23.5



PART C - Interstate Agent States

Points(MAX) Score

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|---|---|---|----|
| 1 | Did the state use the current federal inspection form(s)? Previous Question D(3).1
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|---|---|---|----|

SLR Notes:

The Wisconsin Public Service Commission is not an Interstate Agent.

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|---|--|---|----|
| 2 | Are results documented demonstrating inspection units were reviewed in accordance with "PHMSA directed inspection plan"? Previous Question D(3).2
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|---|--|---|----|

SLR Notes:

The Wisconsin Public Service Commission is not an Interstate Agent.

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|---|--|---|----|
| 3 | Did the state submit documentation of the inspections within 60 days as stated in its latest Interstate Agent Agreement form? Previous Question D(3).3
Yes = 1 No = 0 | 1 | NA |
|---|--|---|----|

SLR Notes:

The Wisconsin Public Service Commission is not an Interstate Agent.

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|---|---|---|----|
| 4 | Were any probable violations identified by state referred to PHMSA for compliance? (NOTE: PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation.) Previous Question D(3).4
Yes = 1 No = 0 | 1 | NA |
|---|---|---|----|

SLR Notes:

The Wisconsin Public Service Commission is not an Interstate Agent.

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|---|--|---|----|
| 5 | Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? Previous Question D(3).5
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|---|--|---|----|

SLR Notes:

The Wisconsin Public Service Commission is not an Interstate Agent.

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|---|--|---|----|
| 6 | Did the state give written notice to PHMSA within 60 days of all probable violations found? Previous Question D(3).6
Yes = 1 No = 0 | 1 | NA |
|---|--|---|----|

SLR Notes:

The Wisconsin Public Service Commission is not an Interstate Agent.

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|---|--|---|----|
| 7 | Did the state initially submit documentation to support compliance action by PHMSA on probable violations? Previous Question D(3).7
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|---|--|---|----|

SLR Notes:

The Wisconsin Public Service Commission is not an Interstate Agent.

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|---|---|-----------|-----------|
| 8 | Part C: General Comments/Regional Observations
Info Only = No Points | Info Only | Info Only |
|---|---|-----------|-----------|

SLR Notes:

The Wisconsin Public Service Commission is not an Interstate Agent.

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

PART D - Incident Investigations

Points(MAX) Score

- | | | | |
|----------|--|---|---|
| 1 | Are state personnel following the procedures for Federal/State cooperation in case of an incident? (See Appendix in "Guidelines for States Participating in the Pipeline Safety Program") (Chapter 6.1) Previous Question E.1
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

SLR Notes:

Yes. Procedures were followed for Federal/State cooperation during the incident that occurred on January 31, 2009 in Milwaukee, WI involving Wisconsin Gas Company.

- | | | | |
|----------|---|----|----|
| 2 | Are state personnel familiar with the jurisdictional authority and Memorandum of Understanding between NTSB and PHMSA? (See Appendix in "Guidelines for States Participating in the Pipeline Safety Program") (Chapter 6 ? Appendix D) Previous Question E.2
Yes = .5 No = 0 | .5 | .5 |
|----------|---|----|----|

SLR Notes:

Yes. Consideration should be taken to include this memorandum of understanding between NTSB and PHMSA in the Wisconsin Public Service Commission, Criteria for Inspecting Natural Gas Utilities.

- | | | | |
|----------|--|---|---|
| 3 | Did the state keep adequate records of incident notifications received? Previous Question E.3
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

SLR Notes:

Yes, Wisconsin Public Service Commission keeps telephonic incident reports by year in a file folder and in an electronic data base program located on the commission's computer system.

- | | | | |
|----------|--|---|---|
| 4 | If an onsite investigation of an incident was not made, did the state obtain sufficient information by other means to determine the facts and support the decision not to go on-site? Previous Question E.4
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

SLR Notes:

Yes. Wisconsin Public Service Commission policy is to response to all potential incidents.

- | | | | |
|----------|---|--------------------------------------|--|
| 5 | Were investigations thorough and conclusions and recommendations documented in an acceptable manner? Previous Question E.5, comprehensive question worth 2 points total
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
| a. | Observations and Document Review | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| b. | Contributing Factors | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| c. | Recommendations to prevent recurrences where appropriate | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |

SLR Notes:

Yes, a review of the Wisconsin Gas Company incident in Milwaukee, WI on January 1, 2009 indicated the investigation was thorough and conclusions were made in an acceptable manner. The commission recommended the company accelerate the existing replacement PVC program from 15 years to 5 years.

- | | | | |
|----------|---|---|---|
| 6 | Did the state initiate enforcement action for violations found during any incident investigation(s)? Previous Question E.6 Variation
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|---|---|---|

SLR Notes:

Yes. It was suggested by the commission additional awareness programs be adopted by the company to keep individuals informed about the presence of natural gas.

- | | | | |
|----------|--|----|-----|
| 7 | Did the state assist region office by taking appropriate follow-up actions related to the operator incident reports to ensure accuracy and final report has been received by PHMSA? (validate annual report data from operators concerning incidents/accidents and investigate discrepancies) (Chapter 6) Previous Question E.7/E.8
Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

Yes. Wisconsin Public Service Commission has been responding to the PHMSA Central Region within ten days of an accident or information pertaining to DOT Form 7100.

- | | | | |
|----------|---|-----------|-----------|
| 8 | Part D: General Comments/Regional Observations
Info Only = No Points | Info Only | Info Only |
|----------|---|-----------|-----------|

SLR Notes:

Total points scored for this section: 7
Total possible points for this section: 7



PART E - Damage Prevention Initiatives

Points(MAX) Score

- | | | | |
|----------|--|---|---|
| 1 | Has the state reviewed 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? Previous Question B.11
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

SLR Notes:

This requirement is reviewed by the inspector during a damage prevention review of the operator's O & M Plan.

- | | | | |
|----------|--|---|---|
| 2 | Did the state inspector check to assure the pipeline operator is following its written procedures pertaining to notification of excavation, marking, positive response and the availability and use of the one call system? New 2008
Yes = 2 No = 0 | 2 | 2 |
|----------|--|---|---|

SLR Notes:

Yes, this is reviewed during the standard inspection being performed on all operators.

- | | | | |
|----------|---|---|---|
| 3 | Did the state encourage and promote the adoption of the Common Ground Alliance Best Practices document to its regulated companies as a means of reducing damages to all underground facilities? Previous Question A.7
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|---|---|---|

SLR Notes:

Yes, Wisconsin Public Service Commission has been working with other organizations in promoting best practices through the Committee for Damage Prevention for the adoption of the Common Ground Alliance Best Practices Version 7 document. In the commission's proposed rules they will require all operators to report their damages via the DIRT program.

- | | | | |
|----------|---|---|---|
| 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? New 2008
Yes = 1 No = 0 | 1 | 0 |
|----------|---|---|---|

SLR Notes:

No. Consideration is being developed to have all operators report data and trends on the number of pipeline damages per 1,000 locate request into DIRT. This requirement will be in the form of a commission rule.

- | | | | |
|----------|--|---|---|
| 5 | Did the state review operators' records of accidents and failures due to excavation damage to ensure causes of failure are addressed to minimize the possibility of recurrence as required by 192.617?
Yes = 2 No = 0 | 2 | 2 |
|----------|--|---|---|

SLR Notes:

Yes, this item is reviewed on their standard inspection.

- | | | | |
|----------|---|-----------|-----------|
| 6 | Part E: General Comments/Regional Observations
Info Only = No Points | Info Only | Info Only |
|----------|---|-----------|-----------|

SLR Notes:

See question 4 pertaining to recommendations or loss of points.

Total points scored for this section: 8
Total possible points for this section: 9

PART F - Field Inspection

Points(MAX) Score

- 1 Operator, Inspector, Location, Date and PHMSA Representative Info Only Info Only
Info Only = No Points

Name of Operator Inspected:

Wisconsin Power and Light Company (Alliant Energy)

Name of State Inspector(s) Observed:

Tom Reisdorf, Pipeline Safety Engineer

Location of Inspection:

Mauston, Wisconsin

Date of Inspection:

September 15, 2010

Name of PHMSA Representative:

Glynn Blanton, USDOT/PHMSA State Programs

SLR Notes:

Tom Stemrich, Pipeline Safety Program Manager, was present during the inspection visit. A construction and records review was performed in the Mauston office. A meeting was conducted in Alliant Energy's office with Ms. Rosanne Rogers, Gas Compliance and Operation Support Manager and Mr. Matthew Weir, Engineering Department. An overview of the construction project located in the Castle Rock area was reviewed. The proposed project consist of installation of 4 & 6 inch PE pipelines and service lines along 32nd Avenue in Castle Rock to serve the existing and new homeowners in Half Moon Bay, Bay view Estates, Three Rivers, O'Dells Bay and Pine Lake subdivisions. A review of the leakage survey performed by Alliant Energy in the Mauston, Tomah and Wisconsin Rapids was reviewed by Tom Reisdorf. No leaks were found in the areas during the surveys and the operator is required under the Wisconsin Public Service Commission rules to perform two leakage surveys within a seven and one half month period during the calendar year.

- 2 Was the operator or operator's representative notified and/or given the opportunity to be present during inspection? New 2008 1 1
Yes = 1 No = 0

SLR Notes:

Yes, the operator Wisconsin Power and Light Company was notified by Tom Stemrich ten days prior to the inspection performed on September 15th.

- 3 Did the inspector use an acceptable inspection form/checklist and was the form/checklist used as a guide for the inspection? (New regulations shall be incorporated) Previous Question F.2 2 0
Yes = 2 No = 0

SLR Notes:

No. The inspector did not use a guideline document to perform the office and field inspection. Notes were taken by the inspector on the items observed and found during the inspection. WI PSC does not use an established form for their inspections except for the standard inspection.

- 4 Did the inspector thoroughly document results of the inspection? Previous Question F.3 2 2
Yes = 2 No = 0

SLR Notes:

Yes, Tom Reisdorf, Pipeline Safety Engineer was very thorough in the review of the operator's records and field activities being conducted by contractor personnel in the installation of the PE pipelines in Castle Rock, WI.

- 5 Did the inspector check to see if the operator had necessary equipment during inspection to conduct tasks viewed? (Maps, pyrometer, soap spray, CGI, etc.) New 2008 1 1
Yes = 1 No = 0

SLR Notes:

Yes, the operator had all necessary equipment available at the construction site and during the office review records.

- 6 What type of inspection(s) did the state inspector conduct during the field portion of the state evaluation? (i.e. Standard, Construction, IMP, etc) New 2008 Info Only Info Only
Info Only = No Points

SLR Notes:

Office review of leakage survey and new construction inspection was performed.

- 7 Did the inspector adequately review the following during the field portion of the state evaluation? (check all that apply on list) New 2008, comprehensive question worth 2 points total 2 2
Yes = 2 No = 0 Needs Improvement = 1

- | | | |
|----|-----------------------------|-------------------------------------|
| a. | Procedures | <input checked="" type="checkbox"/> |
| b. | Records | <input checked="" type="checkbox"/> |
| c. | Field Activities/Facilities | <input checked="" type="checkbox"/> |
| d. | Other (Please Comment) | <input type="checkbox"/> |

SLR Notes:

Yes. The inspector reviewed the operator's procedures, records and field activities.

- | | | | |
|----------|---|---|---|
| 8 | Did the inspector have adequate knowledge of the pipeline safety program and regulations? (Liaison will document reasons if unacceptable) Previous Question F.8 | 2 | 2 |
| | Yes = 2 No = 0 | | |

SLR Notes:

Yes, Tom Reisdorf demonstrated adequate knowledge about the pipeline safety regulations and items to review during the inspection performed on September 15th in Mauston, WI.

- | | | | |
|----------|--|---|---|
| 9 | Did the inspector conduct an exit interview? (If inspection is not totally complete the interview should be based on areas covered during time of field evaluation) Previous Question F.10 | 1 | 1 |
| | Yes = 1 No = 0 | | |

SLR Notes:

Yes, an exit interview was performed by Tom Reisdorf with Rosanne Rogers, Alliant Energy Gas Compliance and Operations Support Manager, after the inspection was completed.

- | | | | |
|-----------|--|---|---|
| 10 | During the exit interview, did the inspector identify probable violations found during the inspections? Previous Question F.11 | 1 | 1 |
| | Yes = 1 No = 0 | | |

SLR Notes:

Yes, the inspector did note and explain during the exit interview two areas of concern. The areas of concerns were notation of leakage survey dates on the leakage survey map and patrolling information on the bridge crossing located on North Union Street in Mauston, WI.

- | | | | |
|-----------|--|-----------|-----------|
| 11 | What did the inspector observe in the field? (Narrative description of field observations and how inspector performed) | Info Only | Info Only |
| | Info Only = No Points | | |

SLR Notes:

Observed the installation of PE pipelines in the Castel Rock, WI areas by Alliant Energy contract construction crews. A records review was conducted in the Mauston, WI office on the leakage surveys performing in the last twelve months.

- | | | | |
|-----------|---|-----------|-----------|
| 12 | Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices) | Info Only | Info Only |
| | Info Only = No Points | | |

SLR Notes:

No best practices were found or observed that could be shared with other states during the field inspection.

- | | | | |
|-----------|---|-------------------------------------|-----------|
| 13 | Field Observation Areas Observed (check all that apply) | Info Only | Info Only |
| | Info Only = No Points | | |
| a. | Abandonment | <input type="checkbox"/> | |
| b. | Abnormal Operations | <input type="checkbox"/> | |
| c. | Break-Out Tanks | <input type="checkbox"/> | |
| d. | Compressor or Pump Stations | <input type="checkbox"/> | |
| e. | Change in Class Location | <input type="checkbox"/> | |
| f. | Casings | <input type="checkbox"/> | |
| g. | Cathodic Protection | <input type="checkbox"/> | |
| h. | Cast-iron Replacement | <input type="checkbox"/> | |
| i. | Damage Prevention | <input type="checkbox"/> | |
| j. | Deactivation | <input type="checkbox"/> | |
| k. | Emergency Procedures | <input type="checkbox"/> | |
| l. | Inspection of Right-of-Way | <input type="checkbox"/> | |
| m. | Line Markers | <input checked="" type="checkbox"/> | |
| n. | Liaison with Public Officials | <input type="checkbox"/> | |

o.	Leak Surveys	<input checked="" type="checkbox"/>
p.	MOP	<input type="checkbox"/>
q.	MAOP	<input type="checkbox"/>
r.	Moving Pipe	<input type="checkbox"/>
s.	New Construction	<input checked="" type="checkbox"/>
t.	Navigable Waterway Crossings	<input type="checkbox"/>
u.	Odorization	<input type="checkbox"/>
v.	Overpressure Safety Devices	<input type="checkbox"/>
w.	Plastic Pipe Installation	<input type="checkbox"/>
x.	Public Education	<input type="checkbox"/>
y.	Purging	<input type="checkbox"/>
z.	Prevention of Accidental Ignition	<input type="checkbox"/>
A.	Repairs	<input type="checkbox"/>
B.	Signs	<input checked="" type="checkbox"/>
C.	Tapping	<input type="checkbox"/>
D.	Valve Maintenance	<input type="checkbox"/>
E.	Vault Maintenance	<input type="checkbox"/>
F.	Welding	<input type="checkbox"/>
G.	OQ - Operator Qualification	<input type="checkbox"/>
H.	Compliance Follow-up	<input type="checkbox"/>
I.	Atmospheric Corrosion	<input checked="" type="checkbox"/>
J.	Other	<input checked="" type="checkbox"/>

SLR Notes:

Plastic fusion & welder cards were checked and verified by inspector. Bridge crossing at North Union Street was checked for atmospheric corrosion.

14 Part F: General Comments/Regional Observations

Info Only Info Only

Info Only = No Points

SLR Notes:

See question 3 pertaining to recommendations or loss of points.

Total points scored for this section: 10
Total possible points for this section: 12



PART G - PHMSA Initiatives - Strategic Plan

Points(MAX) Score

Risk base Inspections - Targeting High Risk Areas

1 Does state have process to identify high risk inspection units? 1.5 1.5

Yes = 1.5 No = 0

Risk Factors (criteria) to consider may include:

Miles of HCA's, Geographic area, Population Density

Length of time since last inspection

History of Individual Operator units (leakage, incident and compliance history, etc.)

Threats - (Excavation Damage, Corrosion, Natural Forces, Other Outside Forces, Material or Welds, Equipment, Operations, Other)

SLR Notes:

Yes, Wisconsin Public Service Commission's Criteria for Inspecting Natural Gas Utilities address a few of these items on page 2, section 7. However, additional language or process needs to be developed that includes the following risk rank items of population density, geographic area, length of time since last inspected, history of individual operator units on leakage, incident and compliance history and threats.

2 Are inspection units broken down appropriately? (see definitions in Guidelines) .5 0.5

Yes = .5 No = 0

SLR Notes:

Yes. Inspection units are broken down appropriately using the guidelines for states participating in the pipeline safety program and other information available to them. Consideration should be taken by the program manager to add the definition of "inspection unit" to the Wisconsin Public Service Commission Criteria for Inspecting Natural Gas Utilities.

3 Consideration of operators DIMP Plan? (if available and pending rulemaking) Info Only Info Only

Info Only = No Points

SLR Notes:

Wisconsin Public Service Commission has contacted their operators inquiring about the status of the operator's DIMP plan.

4 Does state inspection process target high risk areas? .5 0.5

Yes = .5 No = 0

SLR Notes:

Yes, Wisconsin Public Service Commission's Criteria for Inspecting Natural Gas Utilities page 2, section 7 addresses this item.

Use of Data to Help Drive Program Priority and Inspections

5 Does state use data to analyze effectiveness of damage prevention efforts in the state? (DIRT or other data, etc) .5 0

Yes = .5 No = 0

SLR Notes:

No. Steps are being taken to require all gas operators under the Wisconsin Public Service Commission jurisdiction to participate in the CGA DIRT Program. This rulemaking process is in the "Notice of Hearing" stage as of September 14, 2010.

6 Has state reviewed data on Operator Annual reports for accuracy? .5 0.5

Yes = .5 No = 0

SLR Notes:

Yes. This is a requirement in Wisconsin Public Service Commission PSC rules and regulations Section 135.016.

7 Has state analyzed annual report data for trends and operator issues? .5 0.5

Yes = .5 No = 0

SLR Notes:

Yes, this is reviewed annually to see if the operator has an increase in leakage or removal of bare or plastic pipelines.

8 Has state reviewed data on Incident/Accident reports for accuracy? .5 0.5

Yes = .5 No = 0

SLR Notes:

9	Does state do evaluation of effectiveness of program based on data? (i.e. performance measures, trends, etc.)	.5	0.5
	Yes = .5 No = 0		

SLR Notes:

Yes, this is accomplished through the Pipeline Safety Program Performance Measures filed in the Bi-Annual Financial Report to the Governor's Office. Consideration should be taken to add information about the effectiveness of the pipeline safety program on the Commission's web site.

10	Did the State input all operator qualification inspection results into web based database provided by PHMSA in a timely manner upon completion of OQ inspections? Previous Question B.15	.5	0
	Yes = .5 No = 0		

SLR Notes:

No. This information was not submitted into the web based database provided by PHMSA. A loss of 0.5 was accessed.

11	Did the State submit their replies into the Integrity Management Database (IMDB) in response to the Operators notifications for their integrity management program? Previous Question B.16	.5	0
	Yes = .5 No = 0		

SLR Notes:

No. They have not submitted their replies into the Integrity Management Database.

12	Have the IMP Federal Protocol forms been uploaded to the IMDB? Previous Question B.17	.5	0
	Yes = .5 No = 0		

SLR Notes:

No. The IMP Federal Protocol forms have not been uploaded to the IMDB.

13	Did the State ask Operators to identify any plastic pipe and components that has shown a record of defects/leaks and what those operators are doing to mitigate the safety concerns? Previous Question B.18	.5	0.5
	Yes = .5 No = 0		

SLR Notes:

Yes, a letter was sent to all operators on February 18, 2009 requesting information about certain plastic pipe materials that have a greater risk of failure than is normally experienced.

14	Has state confirmed transmission operators have submitted information into National Pipeline Mapping System (NPMS) database along with any changes made after original submission?	.5	0.5
	Yes = .5 No = 0		

SLR Notes:

Yes, this was accomplished by the program manager accessing the National Pipeline Mapping System and checking each of their transmission operator's information.

Accident/Incident Investigation Learning and Sharing Lessons Learned

15	Has state shared lessons learned from incidents/accidents? (i.e. NAPSIR meetings and communications)	.5	0.5
	Yes = .5 No = 0		

SLR Notes:

Yes, this information has been shared during NAPSIR Regional Meetings and informal meetings with operators during their inspection visits.

16	Does the State support data gathering efforts concerning accidents? (Frequency/Consequence/etc)	.5	0.5
	Yes = .5 No = 0		

SLR Notes:

Yes, program manager is trying to have all operators submit damage reporting data to their agency or through the CGA DIRT Program.

17	Does state have incident/accident criteria for conducting root cause analysis?	Info Only	Info Only
	Info Only = No Points		

SLR Notes:

No criterion is written but they do conduct root cause analysis on all incidents.

18 Does state conduct root cause analysis on incidents/accidents in state?

Info Only Info Only

Info Only = No Points

SLR Notes:

Yes, a root cause analysis is performed but this item is mentioned in the Wisconsin Public Service Commission Criteria for Inspecting Natural Gas Utilities.

19 Has state participated on root cause analysis training? (can also be on wait list)

.5

0.5

Yes = .5 No = 0

SLR Notes:

Tom Stemrich, Jeff Murley and Dagmar Vanek are currently on the waiting list for the root cause analysis training course at T&Q in Oklahoma City, OK.

Transparency - Communication with Stakeholders

20 Other than pipeline safety seminar does State communicate with stakeholders? (Communicate program data, pub awareness, etc.)

.5

0.5

Yes = .5 No = 0

SLR Notes:

Yes, this is accomplished through the Wisconsin Utility Association, Utility Workers Coalition, Diggers Hot Line Committee and Common Ground Alliance Committee meetings.

21 Does state share enforcement data with public? (Website, newsletters, docket access, etc.)

.5

0.5

Yes = .5 No = 0

SLR Notes:

Yes. Wisconsin Electronic Records File has limited access to the public to review enforcement reports and letters from operators pertaining to compliance with the pipeline safety regulations. Steps need to taken to post violations cited, inspection person-days and other relative data on pipeline safety enforcement on Wisconsin PSC web site.

22 Part G: General Comments/Regional Observations

Info Only Info Only

Info Only = No Points

SLR Notes:

See questions 1, 2, 5, 8, 10, 11, 12 & 21 pertaining to recommendations or loss of points.

Total points scored for this section: 8
Total possible points for this section: 10



PART H - Miscellaneous

Points(MAX) Score

- | | | | |
|----------|---|----|-----|
| 1 | What were the major accomplishments for the year being evaluated? (Describe the accomplishments, NAPSR Activities and Participation, etc.)
Yes = .5 No = 0 | .5 | 0.5 |
|----------|---|----|-----|

SLR Notes:

During calendar year 2009, North State Power Company removed all of the EXTRON pipelines located in the Central and Northern areas of the State of Wisconsin. Tom Stemrich was elected as Vice-Chairman of the NAPSR Central Region. Plastic pipe data was collected from all operators on certain plastic pipe materials that have a greater risk of failure than is normally experienced.

- | | | | |
|----------|--|----|-----|
| 2 | What legislative or program initiatives are taking place/planned in the state, past, present, and future? (Describe initiatives (i.e. damage prevention, jurisdiction/authority, compliance/administrative, etc.)
Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

During calendar year 2009, Wisconsin PSC developed proposed changes to their pipeline safety regulations. The agency established a docket number, participated in discussions with operator representatives about these changes, made modifications to the proposed rule and finalized the proposed draft rules on September 24, 2009. The proposed rules have been approved by the Commissioners and Legal Staff members.

- | | | | |
|----------|--|----|-----|
| 3 | Any Risk Reduction Accomplishments/Projects? (i.e. Cast iron replacement projects, bare steel, third-party damage reductions, etc.)
Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

North State Power Company removed all of the EXTRON pipelines located in the Central and Northern areas of the State of Wisconsin.

- | | | | |
|----------|--|---|---|
| 4 | Did the state participate in/respond to surveys or information requests from NAPSR or PHMSA?
Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

SLR Notes:

Yes, WI PSC participated and provided information to all NAPSR & PHMSA surveys and questionnaires.

- | | | | |
|----------|---|----|-----|
| 5 | Sharing Best Practices with Other States - (General Program)
Yes = .5 No = 0 | .5 | 0.5 |
|----------|---|----|-----|

SLR Notes:

Sharing best practices was accomplished during the "State of The States Report" at the NAPSR Central Region Meeting. Tom Stemrich several times during the year will call and discuss best practices issues with the neighbor state program managers.

- | | | | |
|----------|---|-----------|-----------|
| 6 | Part H: General Comments/Regional Observations
Info Only = No Points | Info Only | Info Only |
|----------|---|-----------|-----------|

SLR Notes:

Total points scored for this section: 3
Total possible points for this section: 3

PART I - Program Initiatives

Points(MAX) Score

Drug and Alcohol Testing (49 CFR Part 199)

- | | | | |
|----------|---|---|---|
| 1 | Has the state verified that operators have drug and alcohol testing programs?
Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

SLR Notes:

Yes, this is performed during the standard inspection visit. A review of Wisconsin Public Service Commission Criteria for Inspecting Natural Gas Utilities indicated additional description on the use of PHMSA Alcohol & Drug Testing Form needs to be added to the document.

- | | | | |
|----------|--|----|-----|
| 2 | Is the state verifying that operators are conducting the drug and alcohol tests required by the operators program (random, post-incident, etc.)
Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

Yes, this requirement is accomplished in the PHMSA forms No 3.1.9 and 3.1.10 used by the inspector.

- | | | | |
|----------|---|----|-----|
| 3 | Is the state verifying that any positive tests are responded to in accordance with the operator's program?
Yes = .5 No = 0 | .5 | 0.5 |
|----------|---|----|-----|

SLR Notes:

Yes, this is accomplished by the PHMSA Field Inspection Form no. 3.1.9.

Qualification of Pipeline Personnel (49 CFR Part 192 Subpart N)

- | | | | |
|----------|---|---|---|
| 4 | Has the state verified that operators have a written qualification program?
Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

SLR Notes:

Yes, this is accomplished by using PHMSA Operator Qualifications Form 14.

- | | | | |
|----------|--|----|-----|
| 5 | Has the state reviewed operator qualification programs for compliance with PHMSA rules and protocols?
Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

Yes, this is accomplished during construction or standard inspections.

- | | | | |
|----------|--|----|-----|
| 6 | Is the state verifying that persons who perform covered tasks for the operator are qualified in accordance with the operator's program?
Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

Yes, this is accomplished during construction or standard inspections.

- | | | | |
|----------|--|----|-----|
| 7 | Is the state verifying that persons who perform covered task for the operator are requalified at the intervals specified in the operator's program?
Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

Yes, this is reviewed during the field inspection visits and operator's OQ Qualification List provided to the Wisconsin PSC on a quarterly schedule.

Gas Transmission Pipeline Integrity Management (49 CFR Part 192 Subpart O)

- | | | | |
|----------|--|---|---|
| 8 | Has the state verified that all operators with transmission pipelines have either adopted an integrity management program (IMP), or have properly determined that one is not required?
Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

SLR Notes:

Yes, this was accomplished by the Wisconsin PSC staff members reviewing the operator's transmission pipeline system and contacting the operator request a copy of their IMP document.

- | | | | |
|----------|--|----|---|
| 9 | Has the state verified that in determining whether a plan is required, the operator correctly calculated the potential impact radii and properly applied the definition of a high consequence area?
Yes = .5 No = 0 | .5 | 0 |
|----------|--|----|---|

SLR Notes:

Documentation needs to be recorded about the operator's impact radii calculations and how it is applied to their HCA's when performing an IMP inspection.

- | | | | |
|-----------|---|----|-----|
| 10 | Has the state reviewed operator IMPs for compliance with Subpart O? (In accordance with State Inspection plan)
Yes = .5 No = 0 | .5 | 0.5 |
|-----------|---|----|-----|

SLR Notes:

Yes. Wisconsin Public Service Commission Criteria for Inspecting Natural Gas Utilities page 3, section 2.

- | | | | |
|-----------|--|----|-----|
| 11 | Is the state monitoring operator progress on the inspections, tests and remedial actions required by the operator's IMP, including that they are being done in the manner and schedule called for in its IMP?
Yes = .5 No = 0 | .5 | 0.5 |
|-----------|--|----|-----|

SLR Notes:

Yes. Wisconsin PSC staff members are monitoring the operator's progress during their inspection visits.

- | | | | |
|-----------|--|----|-----|
| 12 | Is the state verifying that operators are periodically examining their transmission line routes for the appearance of new HCAs?
Yes = .5 No = 0 | .5 | 0.5 |
|-----------|--|----|-----|

SLR Notes:

Yes. Wisconsin PSC staff members are monitoring the operator's progress in this area during their normal inspection visits.

Public Awareness (49 CFR Section 192.616)

- | | | | |
|-----------|--|----|-----|
| 13 | Has the state verified that each operator has developed a continuing public awareness program? (due date was 6/20/06 for most operators, 6/20/07 for certain very small operators, 6/13/08 for master meters)
Yes = .5 No = 0 | .5 | 0.5 |
|-----------|--|----|-----|

SLR Notes:

Yes. This is listed in their standard inspection form pages 46 and 47 under section 192.616.

- | | | | |
|-----------|--|----|-----|
| 14 | Has the state reviewed the content of these programs for compliance with 192.616 (by participating in the Clearinghouse or by other means)?
Yes = .5 No = 0 | .5 | 0.5 |
|-----------|--|----|-----|

SLR Notes:

Yes. Wisconsin PSC verified this information through the Clearinghouse and performed a follow-up with the operator via the standard inspection format.

- | | | | |
|-----------|--|----|-----|
| 15 | Is the state verifying that operators are conducting the public awareness activities called for in its program?
Yes = .5 No = 0 | .5 | 0.5 |
|-----------|--|----|-----|

SLR Notes:

Yes, this is verified via standard inspection visits and a review of the operator's public awareness printed documents.

- | | | | |
|-----------|---|-----------|-----------|
| 16 | Is the state verifying that operators have evaluated their Public Awareness programs for effectiveness as described in RP1162?
Info Only = No Points | Info Only | Info Only |
|-----------|---|-----------|-----------|

SLR Notes:

Yes, Wisconsin PSC staff members are working with their operators in reviewing the surveys and other educational campaigns on the effectiveness of their programs.

- | | | | |
|-----------|---|-----------|-----------|
| 17 | Part I: General Comments/Regional Observations
Info Only = No Points | Info Only | Info Only |
|-----------|---|-----------|-----------|

SLR Notes:

See questions 1 & 9 for recommendations or loss of points.

Total points scored for this section: 8.5
Total possible points for this section: 9