



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

1200 New Jersey Avenue SE
Washington DC 20590

2010 Natural Gas State Program Evaluation

for

WISCONSIN PUBLIC SERVICE COMMISSION

Document Legend

PART:

- O -- Representative Date and Title Information
- A -- General Program Qualifications
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2010 Natural Gas State Program Evaluation -- CY 2010
Natural Gas

State Agency: Wisconsin

Agency Status:

Date of Visit: 09/12/2011 - 09/16/2011

Agency Representative: Thomas Stemrich, Pipeline Safety Program Manager

PHMSA Representative: Glynn Blanton, US DOT/PHMSA State Programs

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

Name/Title: Phil Montgomery, Chairman

Agency: Public Service Commission of Wisconsin

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 2010 (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	26	25
B	Inspections and Compliance - Procedures/Records/Performance	23.5	23.5
C	Interstate Agent States	0	0
D	Incident Investigations	7	7
E	Damage Prevention Initiatives	9	8
F	Field Inspection	12	12
G	PHMSA Initiatives - Strategic Plan	10	8
H	Miscellaneous	3	3
I	Program Initiatives	9	9

99.5 95.5

TOTALS

State Rating **96.0**

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>a. State Jurisdiction and agent status over gas facilities (1)</div><div style="text-align: right;"><input checked="" type="checkbox"/></div></div> <div style="display: flex; justify-content: space-between;"><div>b. Total state inspection activity (2)</div><div style="text-align: right;"><input checked="" type="checkbox"/></div></div> <div style="display: flex; justify-content: space-between;"><div>c. Gas facilities subject to state safety jurisdiction (3)</div><div style="text-align: right;"><input checked="" type="checkbox"/></div></div> <div style="display: flex; justify-content: space-between;"><div>d. Gas pipeline incidents (4)</div><div style="text-align: right;"><input checked="" type="checkbox"/></div></div> <div style="display: flex; justify-content: space-between;"><div>e. State compliance actions (5)</div><div style="text-align: right;"><input checked="" type="checkbox"/></div></div> <div style="display: flex; justify-content: space-between;"><div>f. State record maintenance and reporting (6)</div><div style="text-align: right;"><input checked="" type="checkbox"/></div></div> <div style="display: flex; justify-content: space-between;"><div>g. State employees directly involved in the gas pipeline safety program (7)</div><div style="text-align: right;"><input checked="" type="checkbox"/></div></div> <div style="display: flex; justify-content: space-between;"><div>h. State compliance with Federal requirements (8)</div><div style="text-align: right;"><input checked="" type="checkbox"/></div></div> | | | |

SLR Notes:

Yes, all information was submitted correctly. Wisconsin Public Service Commission (WIPSC) does not have jurisdictional authority over LPG operators and their state damage prevention law penalty only applies to pipeline operators. Minor corrections to attachments 1, 7 & 10 of the annual certification document were suggested to the Program Manager.

- | | | | |
|----------|---|---|---|
| 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. At the end of each calendar year, WI PSC provides an annual written notification to all operators on who and how to notify the Commission regarding incidents.

- | | | | |
|----------|---|---|---|
| 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, WI PSC held their pipeline safety seminar on February 15-18, 2011 in Wisconsin Dells, WI. They had 147 participants at the seminar.

- | | | | |
|----------|--|---|---|
| 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 their inspection file folders and other related documents found them accessible and well organized. The use of the agency's Electronic Regulatory Filing (ERF) system is a method they use to record and monitor their letters, inspection reports and response from the company officer 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 regulations, compliance action the operator needs to take in making corrections to violations cited and submittal of certification and payment agreements pertaining to the pipeline safety grant.

- | | | | |
|----------|---|---|---|
| 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 Zach Barrett, PHMSA State Programs, dated November 22, 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, in Chairperson Callisto letter he mentioned if the opportunity presents itself, we will again attempt to gain jurisdictional authority over LPG pipeline facilities. This opportunity has not be available during the latest legislative session. In regard to data being more transparent to the public, a hearing was conducted on December 7, 2010, for adoption of new state pipeline safety rules. One of the rules would require the operators to either participate in the CGA DIRT Program or submit their data through the Commission. No objections were submitted by the operators on the new proposed rules and the Commission is concerning adopting the rules.

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 sucessfully 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 personnel have completed the T&Q training courses except for Jeff Kluge who was hired on September 27, 2010. Jeff Kluge attended the PL1250, Safety Evaluation course on May 6, 2010 and is scheduled to attend two T&Q courses in calendar year 2011. As a reminder, Tom Stemrich and other individuals need to complete Int Corrosion Web Base Course (PL31C) in order to be qualified to perform Integrity Management Inspections.

- 9 Brief Description of Non-TQ training Activities: Info Only Info Only
Info Only = No Points
For State Personnel:
No activity performed for calendar year 2010.
For Operators:
On October 21 & 22, 2010, Tom Stemrich presented information about pipeline safety regulations and new initiatives at PHMSA before the Utility Workers Coalition members at their meeting in Wisconsin Rapids, WI.
For Non-Operator Entities/Parties, Information Dissemination, Public Meetings:
No activity performed for calendar year 2010.

SLR Notes:

- 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 training records indicate the lead inspectors have completed the required training prior to the time inspections were conducted in calendar year 2010.

- 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 0
Yes = 1 No = 0

SLR Notes:

No, a review of T&Q training records indicate lead inspectors Tom Stemrich and Jeff Murley have not completed the Int Corrosion WBT course PL31C. Therefore, a loss of one point was assessed.

- 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):
380.00
B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):
220 X 3.83 = 843.33
Ratio: A / B
380.00 / 843.33 = 0.45
If Ratio >= 0.38 Then Points = 5, If Ratio < 0.38 Then Points = 0
Points = 5

SLR Notes:

A. Total Inspection Person Days (Attachment 2) = 380

B. Total Inspection Person Days Charged to the program (220*Number of Inspection person years (Attachment 7) =842.6

Formula:- Ratio = A/B = 380/843.33 = 0.450985

Rule:- (If Ratio >=.38 then points = 5 else Points = 0.)

Thus Points = 5 Yes, WIPSC had 380 inspection person days during 2010. The resulting ratio is 0.45 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:

Yes, on September 27, 2010, WI PSC hired a new pipeline safety inspector, Mr. Jeff Kluge. Mr. Kluge has a mechanical engineering degree and graduated from Marquette University in May, 2010.

14 Part-A General Comments/Regional Observations

Info Only Info Only

Info Only = No Points

SLR Notes:

See question 11. Lose of one point due to lead inspectors not completing all Integrity Management courses prior to performing inspections. Tom Stemrich and Jeff Murley have not completed the Int Corrosion WBT course PL31C.

Total points scored for this section: 25
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 6.5
(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 checked="" type="radio"/> | No <input 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:

The revised and updated written procedures manual is titled, "Public Service Commission of Wisconsin, Policy for Conducting Pipeline Safety Inspections. Several new items have been added to the document.

A: Yes, page 1, item 1

B: Yes, page 4

C: Yes, page 4

D: Yes, page 1, item 1 and page 3

E: Yes, page 3

F: Yes, page 1, item 1

G: Yes, page 7 & 8

H: Yes, page 4

- 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:

A: Yes, page 1, item 1

B: Yes, page 4

C: Yes, page 4

D: Yes, page 1, item 1 and page 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
- 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, all operators and inspection units were inspected in accordance with the Public Service Commission of Wisconsin, Policy for Conducting Pipeline Safety Inspections.

Yes. All questions in their database form are the same as the federal inspection questions. A review of the federal inspection form to their state forms was checked by this writer.

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 several inspection reports found all information was complete and accurate with items found or noted.

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

SLR Notes:

NA. During calendar year 2010, 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 .5 NA
Yes = .5 No = 0

SLR Notes:

NA. 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 .5 NA
Yes = .5 No = 0

SLR Notes:

NA. 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 .5 .5
Yes = .5 No = 0

SLR Notes:

Yes. This item is reviewed during the standard inspection 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 1 1
Yes = 1 No = 0

SLR Notes:

Yes, this information is addressed 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 1 1
Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

Yes, information located in their Electronic Regulatory Filing (ERF) system database indicates documentation is being used to monitor probable violations.

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 1 1
Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

Yes, Public Service Commission of Wisconsin, Policy for Conducting Pipeline Safety Inspections, page 4, 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 1 1
Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

Yes, Public Service Commission of Wisconsin, Policy for Conducting Pipeline Safety Inspections 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, Public Service Commission of Wisconsin, Policy for Conducting Pipeline Safety Inspections items 3 & 4 on 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 |
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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 Public Service Commission of Wisconsin, Policy for Conducting Pipeline Safety Inspections, 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 |
|-----------|---|---|---|

SLR Notes:

Yes, WIPSC has the authority to issue a show cause against the operator for non-compliance.

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

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 | .5 |
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SLR Notes:

Yes, Public Service Commission of Wisconsin, Policy for Conducting Pipeline Safety Inspections items 5 on page 4, Notification & Follow-up Procedures addresses this item.

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

SLR Notes:

Yes, Wisconsin Public Service Commission rules 196.26 or 196.28 address 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 |
|-----------|---|---|----|

SLR Notes:

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
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SLR Notes:

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:

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:

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:

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:

27	Is the program manager familiar with state process for imposing civil penalties? Were civil penalties considered for repeat violations (with severity consideration) or violations resulting in incidents/accidents? (describe any actions taken) Info Only = No Points	Info Only	Info Only
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SLR Notes:

Yes, Tom Stemrich is familiar with this process and has used civil penalties on Mid West Natural Gas in 2001 for failure to properly qualify individuals on plastic fusion.

28	Part B: General Comments/Regional Observations Info Only = No Points	Info Only	Info Only
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SLR Notes:

No Comments.

Total points scored for this section: 23.5
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:

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

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

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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:

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

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

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

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

SLR Notes:

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, Public Service Commission of Wisconsin, Policy for Conducting Pipeline Safety Inspections, Incident Investigations, page 7, addresses this item.

- | | | | |
|----------|---|----|----|
| 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. However, consideration should be taken to include this memorandum of understanding between NTSB and PHMSA in the Public Service Commission of Wisconsin, Policy for Conducting Pipeline Safety Inspections document.

- | | | | |
|----------|--|---|---|
| 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.

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

No incidents occurred in 2010.

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

No incidents occurred in 2010.

- | | | | |
|----------|--|----|-----|
| 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 responded to PHMSA Central Region within ten days of an accident or information pertaining to the DOT Form F 7100.1

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

SLR Notes:

No comments.

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:

Yes, this requirement is reviewed by the engineer 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.

- | | | | |
|----------|---|---|---|
| 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, they continue to promote the adoption of the Common Ground Alliance Best Practices at the Wisconsin Digger Committee for Damage Prevention meetings. The commission's proposed rules will require all natural gas operators under their jurisdiction to report all 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. They continue to encourage operators to report damages via the DIRT program on CGA's website, but the collection and review of data on the number of pipeline damages per 1,000 locate requests is not available. The agency's proposed rule making will require this data to be filed with the WI PSC in the future. The proposed rules may be effective at the end of calendar year 2012.

- | | | | |
|----------|--|---|---|
| 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 is reviewed in the standard inspection form and all operators are required under their commission's rule to report all accidents or incidents.

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

SLR Notes:

Loss of one point pertaining to question E.4.

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 Gas Company (We Energies)

Name of State Inspector(s) Observed:

Tom Stemrich, Jeff Kluge and Jeff Murley

Location of Inspection:

Milwaukee, WI

Date of Inspection:

September 15, 2011

Name of PHMSA Representative:

Glynn Blanton, US DOT/PHMSA

SLR Notes:

This inspection was conducted in We Energies conference room located at their service center location in Milwaukee, WI.

Tim Strommen, Manger- Regulatory Compliance

Pete Schneider, Standards Analyst, Gas Regulatory Compliance

Leif Monson and Scott Olson, Engineer- Regulatory Compliance

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's official representatives were contacted by Tom Stemrich two weeks prior to the standard inspection.

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 2
Yes = 2 No = 0

SLR Notes:

Yes, the inspectors used the Microsoft software program entitled, "WGC 2011" to perform 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, the inspectors thoroughly documented each of the responses from the operator on compliance questions asked about their O & M procedures.

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 representatives had available their O & M plan or other relative information pertaining to the standard inspection being conducted.

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:

Standard inspection.

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



b. Records



- c. Field Activities/Facilities ☐
- d. Other (Please Comment) ☐

SLR Notes:

This was an office records review of the operator's O & M procedures and records.

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

SLR Notes:

Yes, each inspectors adequately demonstrated their working knowledge of the pipeline safety and WI PSC regulations.

- | | | | |
|----------|--|---|---|
| 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
Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

SLR Notes:

Yes, the inspectors conducted an exit interview with the operator providing information on areas of compliance.

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

SLR Notes:

No areas of probable violations were found or noted during this inspection.

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

SLR Notes:

This was an office records review and no outside field inspection was performed.

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

SLR Notes:

- | | | | |
|-----------|--|--------------------------|-----------|
| 13 | Field Observation Areas Observed (check all that apply)
Info Only = No Points | Info Only | Info Only |
| | 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 type="checkbox"/> | |
| | n. Liaison with Public Officials | <input type="checkbox"/> | |
| | o. Leak Surveys | <input type="checkbox"/> | |
| | p. MOP | <input type="checkbox"/> | |
| | q. MAOP | <input type="checkbox"/> | |

- | | | |
|----|-----------------------------------|--------------------------|
| r. | Moving Pipe | <input type="checkbox"/> |
| s. | New Construction | <input 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 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 type="checkbox"/> |
| J. | Other | <input type="checkbox"/> |

SLR Notes:

Due to time limitations a field inspection was not observed.

14 Part F: General Comments/Regional Observations

Info Only Info Only

Info Only = No Points

SLR Notes:

The engineers conducted a very professional inspection and discussed with the operator representative areas of change that will improve their natural gas distribution system.

Total points scored for this section: 12

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 these items on page 2, section 7.

- 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 to add the definition of "inspection unit" to the Public Service Commission of Wisconsin, Policy for Conducting Pipeline Safety Inspections.

- 3** Consideration of operators DIMP Plan? (if available and pending rulemaking) Info Only Info Only
Info Only = No Points

SLR Notes:

WIPSC staff members have contacted their natural gas operators inquiring about the status of the operator's DIMP plan by email and letter. Staff members anticipate reviewing all DIMP plans by year end 2011.

- 4** Does state inspection process target high risk areas? .5 0.5
Yes = .5 No = 0

SLR Notes:

Yes, Public Service Commission of Wisconsin, Policy for Conducting Pipeline Safety Inspections 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. The agency is encouraging all gas operators under the Wisconsin Public Service Commission jurisdiction to participate in the CGA DIRT Program but no analysis is being reviewed or performed. Therefore a loss of 0.5 point was assessed.

- 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 WIPSC 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 as the document is filed by staff members to see if the operator has an increase in leakage or removal of plastic pipelines that have been known to be of concern.

- 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.

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 assessed.

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. A loss of 0.5 points was assessed.

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. A review of the Integrity Management Data Base on September 6, 2011 indicated the forms have not been uploaded for calendar year 2010. A loss of 0.5 points was assessed.

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 pertaining to this item. WI PSC staff members reviewed the responses from the operators. Due to this action, the Wisconsin Gas agreed to replace approximately 125 miles of plastic pipe and 54 miles of fiber glass pipelines over an agreed time schedule.

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 each year.

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 continues to encourage all operators to 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:

Yes, this information is described in their Public Service Commission of Wisconsin, Policy for Conducting Pipeline Safety Inspections document. Located on page 8.



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 and described in the Public Service Commission of Wisconsin, Policy for Conducting Pipeline Safety Inspections section.

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

.5

0.5

Yes = .5 No = 0

SLR Notes:

Yes, Tom Stemrich, Jeff Murley and Dagmar Vanek completed the root cause analysis training courses in Dallas, TX and Minneapolis, MN.

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 via 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. This is accomplished via the Wisconsin Electronic Records File. This web based information is available to the public and provides information on enforcement reports and letters from operators pertaining to their compliance with the pipeline safety regulations.

22 Part G: General Comments/Regional Observations

Info Only Info Only

Info Only = No Points

SLR Notes:

A loss of points is listed below:

Question 5: No. The agency is encouraging all gas operators under the Wisconsin Public Service Commission jurisdiction to participate in the CGA DIRT Program but no analysis is being reviewed or performed. Therefore a loss of 0.5 point was assessed.

Question 10: No. This information was not submitted into the web based database provided by PHMSA. A loss of 0.5 was assessed.

Question 11: No. They have not submitted their replies into the Integrity Management Database. A loss of 0.5 points was assessed.

Question 12: No. A review of the Integrity Management Data Base on September 6, 2011 indicated the forms have not been uploaded for calendar year 2010. A loss of 0.5 points was assessed.

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 2010, a new pipeline safety engineer was hired to replace John Vogt who retired with twenty five years of experience with the Wisconsin Public Service Commission. Tom Stemrich was elected as Chairman of the NAPSR Central Region and continues to service on the Broad Based Agency's Announcements Pipeline Safety R&D.

- | | | | |
|----------|--|----|-----|
| 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 2010, a hearing was conducted by the Wisconsin PSC pertaining to the proposed rule changes to their pipeline safety regulations. The results of the hearing were positive with no objections of the rules. The rules are pending approval of the agency before going to the Secretary of State for publication and comments from the Wisconsin Legislature.

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

Wisconsin Gas has agreed to remove all fiber glass and PVC pipelines located in their system due to the potential threat this material may have to the general public

- | | | | |
|----------|--|---|---|
| 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 continues to participate and provide information to all NAPSR & PHMSA surveys and questionnaires on pipeline safety matters.

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

SLR Notes:

Yes, this item was accomplished during the "State of The States Report" at the NAPSR Central Region Meeting.

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

SLR Notes:

No comments.

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 using the PHMSA OQ form. A review of Public Service Commission of Wisconsin, Policy for Conducting Pipeline Safety Inspections indicates this description was added to the document for clarification to all staff members.

- | | | | |
|----------|--|----|-----|
| 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 using the PHMSA Field Inspection Form no. 3.1.9.MSA 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 the 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 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 the standard inspections performed by staff members.

- | | | | |
|----------|--|----|-----|
| 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 has been accomplished by the Wisconsin PSC staff members reviewing the operator's transmission pipeline system and contacting the operator requesting 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 | 0.5 |
|----------|--|----|-----|

SLR Notes:

Yes, this information is reviewed during a review of their integrity management plan.

- | | | | |
|-----------|---|----|-----|
| 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, this item is checked by staff members and is listed in the Public Service Commission of Wisconsin, Policy for Conducting Pipeline Safety Inspections document item 6, page 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 and checking the operator's schedule plans.

- | | | | |
|-----------|--|----|-----|
| 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 check this item 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 performs 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 during the 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 continue to work 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:

No comments.

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