



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

OREGON PUC

## 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
- G -- PHMSA Initiatives - Strategic Plan
- H -- Miscellaneous
- I -- Program Initiatives



2010 Natural Gas State Program Evaluation -- CY 2010  
Natural Gas

**State Agency:** Oregon

**Agency Status:**

**Date of Visit:** 07/19/2011 - 07/21/2011

**Agency Representative:** Michael Thompson, Chief, Pipeline Safety

**PHMSA Representative:** Jim Anderson

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

**Name/Title:** Commissioner Susan Ackerman and Commissioner John Savage, Commissioner

**Agency:** Oregon Public Utility Commission

**Address:** P O Box 2148

**City/State/Zip:** Salem, Oregon 97308-2148

**Rating:**

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

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**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.

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**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.

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**Scoring Summary**

**PARTS**

**Possible Points    Points Scored**

A	General Program Qualifications	26	26
B	Inspections and Compliance - Procedures/Records/Performance	22.5	22
C	Interstate Agent States	0	0
D	Incident Investigations	7	7
E	Damage Prevention Initiatives	9	9
F	Field Inspection	11	11
G	PHMSA Initiatives - Strategic Plan	10	10
H	Miscellaneous	3	3
I	Program Initiatives	9	9

**97.5                      97**

**TOTALS**

**State Rating ..... 99.5**

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## PART A - General Program Qualifications

Points(MAX) Score

- |          |  |                                     |   |
|----------|--|-------------------------------------|---|
| <b>1</b> | 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<br>Yes = 8 No = 0 Needs Minor Improvement = 3-7 Needs Major Improvement = 2 | 8                                   | 8 |
|          | a. State Jurisdiction and agent status over gas facilities (1)   | <input checked="" type="checkbox"/> |   |
|          | b. Total state inspection activity (2)   | <input checked="" type="checkbox"/> |   |
|          | c. Gas facilities subject to state safety jurisdiction (3)   | <input checked="" type="checkbox"/> |   |
|          | d. Gas pipeline incidents (4)  | <input checked="" type="checkbox"/> |   |
|          | e. State compliance actions (5)  | <input checked="" type="checkbox"/> |   |
|          | f. State record maintenance and reporting (6)  | <input checked="" type="checkbox"/> |   |
|          | g. State employees directly involved in the gas pipeline safety program (7)  | <input checked="" type="checkbox"/> |   |
|          | h. State compliance with Federal requirements (8)  | <input checked="" type="checkbox"/> |   |

### SLR Notes:

The program manager completed all sections of the Certification with accurate information.

- |          |   |   |   |
|----------|---|---|---|
| <b>2</b> | 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<br>Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

### SLR Notes:

Yes. OR PUC sent a letter with inspection 24/7 contact information in February 2010. Received a copy of letter for evaluation file.

- |          |   |   |   |
|----------|---|---|---|
| <b>3</b> | 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<br>Yes = 2 No = 0 | 2 | 2 |
|----------|---|---|---|

### SLR Notes:

Yes. June 2009 (information documented in TQ SABA)

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

### SLR Notes:

Yes. Electronic files are kept on state server (P drive) and hard copies kept in pipeline safety staff office.

- |          |   |   |   |
|----------|---|---|---|
| <b>5</b> | 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<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|---|---|---|

### SLR Notes:

Yes. Michael Thompson is the current NAPS Past Chair and has indept knowledge of PHMSA and pipeline safety regulations.

- |          |   |   |   |
|----------|---|---|---|
| <b>6</b> | 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<br>Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

### SLR Notes:

Yes. Letter to Chair was dated October 7, 2010 and response letter was dated November 23, 1010.

- |          |  |   |   |
|----------|--|---|---|
| <b>7</b> | 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<br>Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

SLR Notes:

Yes. Inspectors completed all required training in 2010, new language was placed into Commission rules to expedite implementing new safety rules, will review possibility of changing civil penalty rules and paper work for credential and badges has been started.

## Personnel and Qualifications

- |          |  |   |   |
|----------|--|---|---|
| <b>8</b> | 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<br>Yes = 3 No = 0 | 3 | 3 |
|----------|--|---|---|

SLR Notes:

Yes. Reviewed TQ SABA data base and all inspectors have met TQ training requirements for their assigned duties.

- |          |   |           |           |
|----------|---|-----------|-----------|
| <b>9</b> | Brief Description of Non-TQ training Activities:<br>Info Only = No Points<br><br>For State Personnel:<br><br><br>For Operators:<br><br><br>For Non-Operator Entities/Parties, Information Dissemination, Public Meetings: | Info Only | Info Only |
|----------|---|-----------|-----------|

SLR Notes:

- |           |   |   |   |
|-----------|---|---|---|
| <b>10</b> | 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<br>Yes = 1 No = 0 | 1 | 1 |
|-----------|---|---|---|

SLR Notes:

Yes. John Ivey is the lead inspector and has completed all required courses.

- |           |  |   |   |
|-----------|--|---|---|
| <b>11</b> | 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<br>Yes = 1 No = 0 | 1 | 1 |
|-----------|--|---|---|

SLR Notes:

Yes. Alan Lau is the lead inspector and has completed all required courses.

- |           |  |   |   |
|-----------|--|---|---|
| <b>12</b> | 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<br>Yes = 5 No = 0<br><br>A. Total Inspection Person Days (Attachment 2):<br>355.00<br><br>B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):<br>220 X 3.35 = 737.00<br><br>Ratio: A / B<br>355.00 / 737.00 = 0.48<br><br>If Ratio >= 0.38 Then Points = 5, If Ratio < 0.38 Then Points = 0<br>Points = 5 | 5 | 5 |
|-----------|--|---|---|

SLR Notes:

Yes. Formula ratio is .48 which is greater than the required .38 ratio.

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

SLR Notes:

No modifications.

**14** Part-A General Comments/Regional Observations

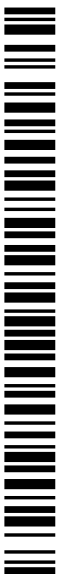
Info Only Info Only

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 6.5  
(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:

Yes. Section VI of the Guideline Procedures addresses thype of inspection. Last updated 1/21/2011 and received an electronic copy for Oregon evaluation file.

- 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 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 type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c | Type of activity being undertaken by operator (construction etc)                               | Yes <input type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d | For large operators, rotation of locations inspected   | Yes <input type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

#### SLR Notes:

Yes. Section VI of the Guideline Procedures addresses thype of inspection.

### 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. Program manager has a inspection spreadsheet to monitor inspections.

- 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:

OP PUC uses the federal inspection form - Form 2.

- 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. Reviewed 2 LDC inspection forms, 1 LNG inspection form, 1 master meter inspection form and 1 intrastate transmission line inspection form.

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

#### SLR Notes:

<b>7</b>	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:**

No cast iron in state.

<b>8</b>	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:**

No cast iron in state.

<b>9</b>	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	0
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**SLR Notes:**

Did not document in 2010.

<b>10</b>	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. As part of the standard inspection.

**Compliance - 60105(a) States**

<b>11</b>	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. Reviewed 2 LDC inspection forms, 1 LNG inspection form, 1 master meter inspection form and 1 intrastate transmission line inspection form and reviewed all correspondence to operator.

<b>12</b>	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. In Section VIII of the Guideline Procedures.

<b>13</b>	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. In Section VIII of the Guideline Procedures.

<b>14</b>	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. In Section VIII (H) of the Guideline Procedures.

<b>15</b>	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 on all report reviewed with noncompliances.

<b>16</b>	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.

<b>17</b>	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	NA
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SLR Notes:

<b>18</b>	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. All responses and follow up correspondences were kept with inspection folder.

<b>19</b>	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- as stated in the Guideline Procedures.

<b>20</b>	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.

## Compliance - 60106(a) States

<b>21</b>	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:

<b>22</b>	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:

<b>23</b>	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:

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<b>24</b>	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:

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<b>25</b>	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:

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<b>26</b>	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:

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<b>27</b>	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	NA
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SLR Notes:

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

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Total points scored for this section: 22  
Total possible points for this section: 22.5



## PART C - Interstate Agent States

Points(MAX) Score

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

SLR Notes:

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

SLR Notes:

- |          |  |   |    |
|----------|--|---|----|
| <b>3</b> | 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<br>Yes = 1 No = 0 | 1 | NA |
|----------|--|---|----|

SLR Notes:

- |          |   |   |    |
|----------|---|---|----|
| <b>4</b> | 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<br>Yes = 1 No = 0 | 1 | NA |
|----------|---|---|----|

SLR Notes:

- |          |  |   |    |
|----------|--|---|----|
| <b>5</b> | 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<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

SLR Notes:

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

SLR Notes:

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

SLR Notes:

- |          |   |           |           |
|----------|---|-----------|-----------|
| <b>8</b> | Part C: General Comments/Regional Observations<br>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

- |          |  |   |   |
|----------|--|---|---|
| <b>1</b> | 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<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

SLR Notes:

Yes.

- |          |   |    |    |
|----------|---|----|----|
| <b>2</b> | 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<br>Yes = .5 No = 0 | .5 | .5 |
|----------|---|----|----|

SLR Notes:

Yes. Memorandum of Understanding is referenced in the state Guideline Procedures - Section IX. REPORTS, A. Incident Investigations: 1. General:.

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

SLR Notes:

Yes. All reportable incidents are kept in the Incident Report Book.

- |          |  |   |   |
|----------|--|---|---|
| <b>4</b> | 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<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|--|---|---|

SLR Notes:

Yes.

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

SLR Notes:

Yes.

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

SLR Notes:

No violations found during incident investigation.

- |          |  |    |     |
|----------|--|----|-----|
| <b>7</b> | 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<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

Yes.

- |          |   |           |           |
|----------|---|-----------|-----------|
| <b>8</b> | Part D: General Comments/Regional Observations<br>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

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

SLR Notes:

The OPUC has a very active damage prevention program and works closely with all operators to ensure they have processes and procedures in place to prevent damaging other facilities and to their own. By state law they must all be members of the state One Call.

- |          |  |   |   |
|----------|--|---|---|
| <b>2</b> | 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<br>Yes = 2 No = 0 | 2 | 2 |
|----------|--|---|---|

SLR Notes:

Yes, OPUC reviews and discusses with each operator during standard inspections their procedures for compliance with the state One Call law as in reference to Part 192.614.

- |          |   |   |   |
|----------|---|---|---|
| <b>3</b> | 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<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|---|---|---|

SLR Notes:

Yes, the OPUC holds the authority to enforce the state One Call law and works very closely with its operators to ensure they are doing everything they can to reduce the risk on excavator damage. Gas operators are required to join OR One-Call and the One-Call Senter adopted the CGA's Best practices.

- |          |   |   |   |
|----------|---|---|---|
| <b>4</b> | 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<br>Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

SLR Notes:

Yes, the OPUC tracks and evaluates data from gas operators on at least an annual basis.

- |          |  |   |   |
|----------|--|---|---|
| <b>5</b> | 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?<br>Yes = 2 No = 0 | 2 | 2 |
|----------|--|---|---|

SLR Notes:

Yes, during each Standard inspection this data is reviewed and discussed with the operator.

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

SLR Notes:

Total points scored for this section: 9

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:

Northwest Natural

Name of State Inspector(s) Observed:

Kevin Hennessy and Alan Lau

Location of Inspection:

Coos Bay

Date of Inspection:

July 20, 2001

Name of PHMSA Representative:

Jim Anderson

SLR Notes:

- 
- 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. Operator was present and actively participated during the 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. Uses federal forms during inspection.

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

SLR Notes:

Yes.

- 
- 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. Operator had all needed equipment for inspection.

- 
- 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:

Transmission valve inspection - also checked bridge crossings.

- 
- 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:

Yes. Records and procedures were checked the previous day.

- |          |   |                               |   |
|----------|---|-------------------------------|---|
| <b>8</b> | 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 |
|          |   | <small>Yes = 2 No = 0</small> |   |

**SLR Notes:**

Yes. Both inspections, according to TQ SABA data base, were qualified to conduct a standard inspection.

- |          |  |                               |   |
|----------|--|-------------------------------|---|
| <b>9</b> | 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 |
|          |  | <small>Yes = 1 No = 0</small> |   |

**SLR Notes:**

Yes - for the part observed. The transmission line inspection was not fully completed during the time of PHMSA evaluation.

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

**SLR Notes:**

No violations found.

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

**SLR Notes:**

Transmission line valves and above ground piping (pipeline hanging on bridge).

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

**SLR Notes:**

- |           |   |                                      |           |
|-----------|---|--------------------------------------|-----------|
| <b>13</b> | Field Observation Areas Observed (check all that apply) | Info Only                            | Info Only |
|           |   | <small>Info Only = No Points</small> |           |
|           | 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 checked="" type="checkbox"/> |
| C. | Tapping                           | <input type="checkbox"/>            |
| D. | Valve Maintenance                 | <input checked="" 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 type="checkbox"/>            |

SLR Notes:

---

**14** Part F: General Comments/Regional Observations

Info Only Info Only

Info Only = No Points

SLR Notes:

Both inspectors conducted them very professionally and did a good job during the inspection.

---

Total points scored for this section: 11  
Total possible points for this section: 11





## 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:

The OPUC selects operator inspection units for standardized inspections based on; the type of operator, leak history, records, miles of HCA's, number and severity of Probable Violations found in previous inspections, the time interval since the last inspection, and the logistics, road conditions, etc.

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

Yes = .5 No = 0

#### SLR Notes:

The OPUC has broken its inspection units in an appropriate manner that follows the guidelines.

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

Info Only = No Points

#### SLR Notes:

The OPUC is working with both the state of Washington and Idaho to host a DIMP workshop for all gas operators on August 17, 2011.

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

Yes = .5 No = 0

#### SLR Notes:

Yes. Program manager maintains a spreadsheet of all inspections of inspection units and notes which ones have issues and there is a inspection scheduled for the following year.

### 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 0.5

Yes = .5 No = 0

#### SLR Notes:

Yes, the OPUC gas safety staff uses data collect from the operators on an annual basis.

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

Yes = .5 No = 0

#### SLR Notes:

Yes, the OPUC has created EXCEL spread sheets to tract this type of data.

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

Yes = .5 No = 0

#### SLR Notes:

Yes, the OPUC has created EXCEL spread sheets to tract this type of data.

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

Yes = .5 No = 0

#### SLR Notes:

Yes, each reported incident is reviewed for accuracy.

**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.

**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 0.5  
Yes = .5 No = 0

SLR Notes:

Yes. Data was submitted. Printed the OR state page on the OQ database web page and reviewed it with the program manager.

**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 0.5  
Yes = .5 No = 0

SLR Notes:

Yes. Data was submitted. Printed the OR state page on the IMDB database web page and reviewed it with the program manager.

**12** Have the IMP Federal Protocol forms been uploaded to the IMDB? Previous Question B.17 .5 0.5  
Yes = .5 No = 0

SLR Notes:

Yes.

**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. Looked at during 2010 standard inspection. None found in 2010.

**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. All operators submitted information to the NPMS.

## 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. The OPUC shares this information at the NAPSIR Regional meetings in the state of the State report.

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

SLR Notes:

Yes.

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

SLR Notes:

Not at this time, but they are working to develop some.

**18** Does state conduct root cause analysis on incidents/accidents in state? Info Only Info Only  
Info Only = No Points

SLR Notes:

Yes, when appropriate.

---

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, two of the 3.25 inspectors have attended the PHMSA T&Q course.

---

## 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. The OPUC is active in a variety of agencies and committees that are associated with the pipeline safety mission - The Oregon Utility Safety Committee, Oregon Utility Notification Center and Oregon Utility Coordinating Councils.

---

21	Does state share enforcement data with public? (Website, newsletters, docket access, etc.)	.5	0.5
	Yes = .5 No = 0		

SLR Notes:

At this time only Damage Prevention enforcement actions are shared on the web.

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22	Part G: General Comments/Regional Observations	Info Only	Info Only
	Info Only = No Points		

SLR Notes:

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



## PART H - Miscellaneous

Points(MAX) Score

- |          |   |    |     |
|----------|---|----|-----|
| <b>1</b> | What were the major accomplishments for the year being evaluated? (Describe the accomplishments, NAPSRR Activities and Participation, etc.)<br><small>Yes = .5 No = 0</small> | .5 | 0.5 |
|----------|---|----|-----|

SLR Notes:

The Chief, Pipeline Safety served as NAPSRR Chair during 2009-2010. The total amount of The overall number of damages to gas facilities per 1000 locate requests was reduced again for the fourth straight year.

- |          |   |    |     |
|----------|---|----|-----|
| <b>2</b> | 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.)<br><small>Yes = .5 No = 0</small> | .5 | 0.5 |
|----------|---|----|-----|

SLR Notes:

None passed in 2010.

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

SLR Notes:

Cast Iron replacement programs ended in 2000 and the bare steel programs have reduced the amount of miles of main to fewer than 39 in 2010.

- |          |  |   |   |
|----------|--|---|---|
| <b>4</b> | Did the state participate in/respond to surveys or information requests from NAPSRR or PHMSA?<br><small>Yes = 1 No = 0</small> | 1 | 1 |
|----------|--|---|---|

SLR Notes:

Yes. Many of them.

- |          |  |    |     |
|----------|--|----|-----|
| <b>5</b> | Sharing Best Practices with Other States - (General Program)<br><small>Yes = .5 No = 0</small> | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

The OPUC is very willing to share information with other states whenever requested or possible.

- |          |  |           |           |
|----------|--|-----------|-----------|
| <b>6</b> | Part H: General Comments/Regional Observations<br><small>Info Only = No Points</small> | 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)

- |          |  |   |   |
|----------|--|---|---|
| <b>1</b> | Has the state verified that operators have drug and alcohol testing programs?<br><small>Yes = 1 No = 0</small> | 1 | 1 |
|----------|--|---|---|

SLR Notes:

Yes. Every year.

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

SLR Notes:

Yes. Every year.

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

SLR Notes:

Yes. Every year the operators are asked if there were any and what they have done. This does not include names.

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

- |          |  |   |   |
|----------|--|---|---|
| <b>4</b> | Has the state verified that operators have a written qualification program?<br><small>Yes = 1 No = 0</small> | 1 | 1 |
|----------|--|---|---|

SLR Notes:

Yes.

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

SLR Notes:

Yes.

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

SLR Notes:

Yes. This is done as part of the field inspection process. (Protocol 9)

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

SLR Notes:

Yes.

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

- |          |   |   |   |
|----------|---|---|---|
| <b>8</b> | 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?<br><small>Yes = 1 No = 0</small> | 1 | 1 |
|----------|---|---|---|

SLR Notes:

Yes.

- |          |   |    |     |
|----------|---|----|-----|
| <b>9</b> | 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?<br><small>Yes = .5 No = 0</small> | .5 | 0.5 |
|----------|---|----|-----|

SLR Notes:

Yes. As part of initial inspections and verified in the field.

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<b>10</b>	Has the state reviewed operator IMPs for compliance with Subpart O? (In accordance with State Inspection plan) Yes = .5 No = 0	.5	0.5
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SLR Notes:

Yes.

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<b>11</b>	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. This is ongoing with a rolling look ahead at schedules provided by operators.

---

<b>12</b>	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. This is part of the standardized inspection process.

---

## Public Awareness (49 CFR Section 192.616)

<b>13</b>	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.

---

<b>14</b>	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. Oregon participated in the clearinghouse, and submitted questions from that process to operators and received responses back.

---

<b>15</b>	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.

---

<b>16</b>	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
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SLR Notes:

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<b>17</b>	Part I: General Comments/Regional Observations Info Only = No Points	Info Only	Info Only
-----------	---	-----------	-----------

SLR Notes:

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