



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

1200 New Jersey Avenue SE
Washington DC 20590

2014 Gas State Program Evaluation

for

CALIFORNIA PUBLIC UTILITIES COMMISSION

Document Legend

PART:

- O -- Representative Date and Title Information
- A -- Progress Report and Program Documentation Review
- B -- Program Inspection Procedures
- C -- Program Performance
- D -- Compliance Activities
- E -- Incident Investigations
- F -- Damage Prevention
- G -- Field Inspections
- H -- Interstate Agent State (If Applicable)
- I -- 60106 Agreement State (If Applicable)



2014 Gas State Program Evaluation -- CY 2014

Gas

State Agency: California

Agency Status:

Date of Visit: 08/11/2015 - 10/29/2015

Agency Representative: Ken Bruno, Program Manager; Dennis Lee- Supervisor

PHMSA Representative: Rex Evans, Michael Thompson, David Lykken

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

Name/Title: Michael Picker, President

Agency: California Public Utilities Commission

Address: 505 Van Ness Avenue

City/State/Zip: San Francisco, CA 94102

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 2014 (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 progress report attachments provide the basis for determining the state's pipeline safety grant allocation.

Field Inspection (PART G):

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 G, the PHMSA representative should include a written summary which thoroughly documents the inspection.

Scoring Summary

PARTS

Possible Points Points Scored

A	Progress Report and Program Documentation Review
B	Program Inspection Procedures
C	Program Performance
D	Compliance Activities
E	Incident Investigations
F	Damage Prevention
G	Field Inspections
H	Interstate Agent State (If Applicable)
I	60106 Agreement State (If Applicable)

10	9.5
13	12.5
46	43
15	12
11	9.5
8	8
12	10
0	0
0	0

TOTALS

115 104.5

State Rating

90.9

PART A - Progress Report and Program Documentation Review

Points(MAX) Score

1	Accuracy of Jurisdictional Authority and Operator/Inspection Units Data - Progress Report Attachment 1 Yes = 1 No = 0 Needs Improvement = .5	1	1
Evaluator Notes: No issues			
2	Review of Inspection Days for accuracy - Progress Report Attachment 2 Yes = 1 No = 0 Needs Improvement = .5	1	0.5
Evaluator Notes: Found limited amount of inspection person-days that were spent at conferences, industry meetings etc. Also had trouble with person-day overall reconciliation. Improvement needed in this area. Staff has provided monthly summary of person-days but little explanation as to time applied to particular inspection category.			
3	Accuracy verification of Operators and Operators Inspection Units in State - Progress Report Attachment 3 Yes = 1 No = 0 Needs Improvement = .5	1	1
Evaluator Notes: No issues			
4	Were all federally reportable incident reports listed and information correct? - Progress Report Attachment 4 Yes = 1 No = 0 Needs Improvement = .5	1	1
Evaluator Notes: Information listed appears correct. MT			
5	Accuracy verification of Compliance Activities - Progress Report Attachment 5 Yes = 1 No = 0 Needs Improvement = .5	1	1
Evaluator Notes: No issues. Again separate all other items on progress report.			
6	Were pipeline program files well-organized and accessible? - Progress Report Attachment 6 Yes = 2 No = 0 Needs Improvement = 1	2	2
Evaluator Notes: Progress appears to have been made as far as getting information located in central electronic files. Continued work needed but all information we looked for was accessible and able to be found by staff.			
7	Was employee listing and completed training accurate and complete? - Progress Report Attachment 7 Yes = 1 No = 0 Needs Improvement = .5	1	1
Evaluator Notes: No issues. MT			
8	Verification of Part 192,193,198,199 Rules and Amendments - Progress Report Attachment 8 Yes = 1 No = 0 Needs Improvement = .5	1	1
Evaluator Notes: No issues			

9 List of Planned Performance - Did state describe accomplishments on Progress Report in detail - Progress Report Attachment 10 1 1
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

No issues

10 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

Total points scored for this section: 9.5
Total possible points for this section: 10



PART B - Program Inspection Procedures

Points(MAX) Score

- | | | | |
|---|--|---|---|
| 1 | Standard Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities. | 2 | 2 |
|---|--|---|---|

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

CPUC Procedures Manual GO-112E, last updated January 2015. Standard Inspections are covered starting in Section II and throughout. Also, have field inspection procedures in separate manual.

- | | | | |
|---|--|---|---|
| 2 | IMP and DIMP Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities. | 1 | 1 |
|---|--|---|---|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

This is generally covered under Section II. Recommend further enhancement which should include what activities will take place on an annual basis for both IMP and DIMP.

- | | | | |
|---|--|---|---|
| 3 | OQ Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities. | 1 | 1 |
|---|--|---|---|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Same notes as above, covered generally in Section II. Recommend enhancement to include plan reviews along with process to upload results into database and specifically when field OQ inspections should be done.

- | | | | |
|---|---|---|---|
| 4 | Damage Prevention Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities. | 1 | 1 |
|---|---|---|---|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

General coverage in Section II. Recommend enhancement and more specific detailed review of damage prevention programs for operators.

- | | | | |
|---|--|---|---|
| 5 | Any operator training conducted should be outlined and appropriately documented as needed. | 1 | 1 |
|---|--|---|---|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

No issues, but should note in procedures on as-needed basis.

- | | | | |
|---|--|---|-----|
| 6 | Construction Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities. | 1 | 0.5 |
|---|--|---|-----|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

There have been new efforts in this area, with inspection forms and field audit guide and as built procedure. Some improvement still needed in making sure ample amount of distribution inspection is being done and adequately addressing all issues along with making sure the OQ element of the inspections are documented.

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|---|---|---|---|
| 7 | Does inspection plan address inspection priorities of each operator, and if necessary each unit, based on the following elements? | 6 | 6 |
|---|---|---|---|

Yes = 6 No = 0 Needs Improvement = 1-5

- | | | | | |
|----|---|--------------------------------------|--------------------------|---|
| a. | Length of time since last inspection (Within five year interval) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b. | Operating history of operator/unit and/or location (includes leakage, incident and compliance activities) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c. | Type of activity being undertaken by operators (i.e. construction) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d. | Locations of operators inspection units being inspected - (HCA's, Geographic areas, Population Density, etc) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| e. | Process to identify high-risk inspection units that includes all threats - (Excavation Damage, Corrosion, Natural Forces, Outside Forces, Material and Welds, Equipment, Operators and any Other Factors) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| f. | Are inspection units broken down appropriately? | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

Evaluator Notes:

Information is generally there, recommend enhancement in this area to describe any process that is used in determining priorities including SME process. Inspection units have been generally broken down over past couple of years, now need to give time to have it settle out to see if field application is acceptable.

8 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

Overall general enhancement and review of issues noted above to provide more specificity. Have provided Appendix S for guidance.

Total points scored for this section: 12.5
Total possible points for this section: 13



PART C - Program Performance

Points(MAX) Score

- 1 Was ratio of Total Inspection person-days to total person days acceptable? (Director of State Programs may modify with just cause) Chapter 4.3 5 5
Yes = 5 No = 0

A. Total Inspection Person Days (Attachment 2):
1845.00

B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):
220 X 21.51 = 4732.20

Ratio: A / B
1845.00 / 4732.20 = 0.39

If Ratio >= 0.38 Then Points = 5, If Ratio < 0.38 Then Points = 0
Points = 5

Evaluator Notes:

1845 Inspection days, 21.51 Inspectors. 1828 days needed, 1845 days achieved. Full Points.

- 2 Has each inspector and program manager fulfilled the T Q Training Requirements? (See Guidelines Appendix C for requirements) Chapter 4.4 5 5
Yes = 5 No = 0 Needs Improvement = 1-4

- | | | | | |
|----|--|--------------------------------------|--------------------------|---|
| a. | Completion of Required OQ Training before conducting inspection as lead? | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b. | Completion of Required DIMP*/IMP Training before conducting inspection as lead? *Effective Evaluation CY2013 | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c. | Root Cause Training by at least one inspector/program manager | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d. | Note any outside training completed | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| e. | Verify inspector has obtained minimum qualifications to lead any applicable standard inspection as the lead inspector. | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

Evaluator Notes:

Appropriate training appears to have been achieved. No issues. MT

- 3 Did state records and discussions with state pipeline safety program manager indicate adequate knowledge of PHMSA program and regulations? Chapter 4.1,8.1 2 2
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Ken has a good hold on program requirements. A great deal of effort being made along with taking TQ courses, etc.

- 4 Did state respond to Chairman's letter on previous evaluation within 60 days and correct or address any noted deficiencies? (If necessary) Chapter 8.1 2 1
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Chair letter was sent December 3, 2014. Response received January 28, 2015. There are still outstanding issues needing correction, but progress is being made.

- 5 Did State hold PHMSA TQ Seminar in Past 3 Years? Chapter 8.5 2 2
Yes = 2 No = 0

Evaluator Notes:

October 2014

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

Evaluator Notes:

According to review it appears all have been inspected although some units have been broken down into various segments in past few years. Master Meter/LPG had limited reviewed, but their risk inspection process appears acceptable.

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- | | | | |
|---|--|---|---|
| 7 | Did inspection form(s) cover all applicable code requirements addressed on Federal Inspection form(s)? Did State complete all applicable portions of inspection forms? Chapter 5.1
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|
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Evaluator Notes:

In general all forms reviewed appear to be complete and address necessary code requirements. Starting in CY2015 they will be splitting up inspections to cover distributed parts of form. Otherwise no issue.

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|---|---|---|---|
| 8 | 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) Chapter 5.1
Yes = 1 No = 0 | 1 | 1 |
|---|---|---|---|
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Evaluator Notes:

This is covered on SED Checklist 3 (O & M Review) in Corrosion Control Review section. No issues.

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|---|--|---|---|
| 9 | 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) Chapter 5.1
Yes = 1 No = 0 | 1 | 1 |
|---|--|---|---|
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Evaluator Notes:

This is covered on SED Checklist 3 (O & M Review) in Corrosion Control Review section. No issues.

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|----|---|---|---|
| 10 | 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) Chapter 5.1
Yes = 1 No = 0 | 1 | 1 |
|----|---|---|---|
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Evaluator Notes:

This information is reviewed, but needs to be specifically listed on checklist to ensure compliance.

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- | | | | |
|----|--|---|---|
| 11 | 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? Chapter 5.1
Yes = 1 No = 0 | 1 | 1 |
|----|--|---|---|
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Evaluator Notes:

192.617 on checklist. Also recommend specificity to this question on a checklist.

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- | | | | |
|----|--|---|---|
| 12 | Has the state reviewed Operator Annual reports, along with Incident/Accident reports, for accuracy and analyzed data for trends and operator issues?
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----|--|---|---|
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Evaluator Notes:

Trends reviewed and no issues. Recommend gathering information from Pipeline Data Mart along with keeping up operating unit statistic sheet they use at beginning of inspection.

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- | | | | |
|----|---|---|---|
| 13 | Did state input all applicable OQ, IMP inspection results into federal database in a timely manner? This includes replies to Operator notifications into IMDB database. Chapter 5.1
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 1 |
|----|---|---|---|
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Evaluator Notes:

Improvement still needed in getting all of this information uploaded into database. Seems to be a gap in timely documentation of this and other issues.

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- | | | | |
|-----------|---|---|---|
| 14 | Has state confirmed intrastate transmission operators have submitted information into NPMS database along with changes made after original submission?
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|---|---|---|
-

Evaluator Notes:

This question is adequately addressed on transmission checklist

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|-----------|---|---|---|
| 15 | Is the state verifying operators are conducting drug and alcohol tests as required by regulations? This should include verifying positive tests are responded to in accordance with program. 49 CFR 199
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|---|---|---|
-

Evaluator Notes:

Records indicate these have been completed.

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|-----------|---|---|---|
| 16 | Is state verifying operators OQ programs are up to date? This should include verification of any plan updates and that persons performing covered tasks (including contractors) are properly qualified and requalified at intervals determined in the operators plan. 49 CFR 192 Part N
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|---|---|---|
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Evaluator Notes:

Plan inspections appear to have been done - not necessarily uploaded to OQDB which needs to happen.

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|-----------|--|---|---|
| 17 | Is state verifying operator's gas transmission integrity management programs (IMP) are up to date? This should include a previous review of IMP plan, along with monitoring progress on operator tests and remedial actions. In addition, the review should take in to account program review and updates of operators plan(s). 49 CFR 192 Subpart 0
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 1 |
|-----------|--|---|---|
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Evaluator Notes:

Although state has the Pipeline Safety Enhancement Program (PSEP) with operators in place, there is improvement needed to ensure IMP plan progress monitoring is documented appropriately and those inspections uploaded onto the IMP database. A great deal of improvement is needed in documentation.

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|-----------|--|---|---|
| 18 | Is state verifying operator's gas distribution integrity management Programs (DIMP)? This should include a review of DIMP plans, along with monitoring progress. In addition, the review should take in to account program review and updates of operators plan(s). 49 CFR 192 Subpart P DIMP ? First round of program inspections should be complete by December 2014
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|--|---|---|
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Evaluator Notes:

First round of DIMP plans appear to have been appropriately inspected. Recommend making sure future plans are clear and procedures in place in order to make sure monitoring actions and remedial actions are reviewed appropriately.

- | | | | |
|-----------|--|---|---|
| 19 | Is state verifying operators Public Awareness programs are up to date and being followed. State should also verify operators have evaluated Public Awareness programs for effectiveness as described in RP1162. 49 CFR 192.616 (I13-16) PAPEI
Effectiveness Inspections should have been completed by December 2013
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|--|---|---|
-

Evaluator Notes:

Inspections have been done - recommend making sure future effectiveness evaluations are conducted at intervals prescribed by RP1162.

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|-----------|--|---|---|
| 20 | Does the state have a mechanism for communicating with stakeholders - other than state pipeline safety seminar? (This should include making enforcement cases available to public).
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|--|---|---|
-

Evaluator Notes:

They make a great deal of information available on website, letters to operators after inspections.

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- | | | | |
|----|---|---|---|
| 21 | Did state execute appropriate follow-up actions to Safety Related Condition (SRC) Reports? Chapter 6.3
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----|---|---|---|

Evaluator Notes:

No issues

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|----|---|---|---|
| 22 | 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?
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----|---|---|---|

Evaluator Notes:

No issues - operators work with PPDC

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|----|--|---|---|
| 23 | Did the state participate in/respond to surveys or information requests from NAPSRS or PHMSA?
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----|--|---|---|

Evaluator Notes:

No issues

- | | | | |
|----|--|---|---|
| 24 | If the State has issued any waivers/special permits for any operator, has the state verified conditions of those waivers/special permits are being met? This should include having the operator amend procedures where appropriate.(New Question for CY2013, no points until CY2015 evaluation conducted in CY2016)
Info Only = No Points | 0 | 0 |
|----|--|---|---|

Evaluator Notes:

No issues.

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|----|---|---|---|
| 25 | Did the state attend the National NAPSRS Board of Directors Meeting in CY being evaluated? (New Question for CY2014, no points first year)
Info Only = No Points | 0 | 0 |
|----|---|---|---|

Evaluator Notes:

Staff attended National Meeting in CY2014

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|----|---|---|---|
| 26 | Discussion on State Program Performance Metrics found on Stakeholder Communication site. (question will be rolled up and included as part of Question C12 on future evaluations) http://primis.phmsa.dot.gov/comm/states.htm
Info Only = No Points | 0 | 0 |
|----|---|---|---|

Evaluator Notes:

- | | | | |
|----|--|-----------|-----------|
| 27 | General Comments:
Info Only = No Points | Info Only | Info Only |
|----|--|-----------|-----------|

Evaluator Notes:

Overall work on documentation

Total points scored for this section: 43
Total possible points for this section: 46

PART D - Compliance Activities

Points(MAX) Score

- | | | | |
|----------|--|--------------------------------------|--|
| 1 | Does the state have written procedures to identify steps to be taken from the discovery to resolution of a probable violation? Chapter 5.1
Yes = 4 No = 0 Needs Improvement = 1-3 | 4 | 4 |
| a. | Procedures to notify an operator (company officer) when a noncompliance is identified | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| b. | Procedures to routinely review progress of compliance actions to prevent delays or breakdowns | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |

Evaluator Notes:

Compliance process is outlined in procedures manual

- | | | | |
|----------|--|--------------------------------------|---|
| 2 | Did the state follow compliance procedures (from discovery to resolution) and adequately document all probable violations, including what resolution or further course of action is needed to gain compliance? Chapter 5.1
Yes = 4 No = 0 Needs Improvement = 1-3 | 4 | 2 |
| a. | Were compliance actions sent to company officer or manager/board member if municipal/government system? | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| b. | Were probable violations documented? | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| c. | Were probable violations resolved? | Yes <input type="radio"/> | No <input type="radio"/> Needs Improvement <input checked="" type="radio"/> |
| d. | Was the progress of probable violations routinely reviewed? | Yes <input type="radio"/> | No <input type="radio"/> Needs Improvement <input checked="" type="radio"/> |

Evaluator Notes:

Continuing issue, again progress has been made but it's still taking several months to get letters out and far too long for resolution. All issues appear to be addressed - but again it takes far too long and further improvement is needed.

- | | | | |
|----------|--|---|---|
| 3 | Did the state issue compliance actions for all probable violations discovered?
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 1 |
|----------|--|---|---|

Evaluator Notes:

Again, it appears compliance actions are being taken, but also due to timing delays there is still more improvement needed and a one point deduction.

- | | | | |
|----------|---|---|---|
| 4 | Did compliance actions give reasonable due process to all parties? Including "show cause" hearing if necessary.
Yes = 2 No = 0 | 2 | 2 |
|----------|---|---|---|

Evaluator Notes:

no issues.

- | | | | |
|----------|---|---|---|
| 5 | 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)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|---|---|---|

Evaluator Notes:

no issues

- | | | | |
|----------|---|---|---|
| 6 | Can the State demonstrate it is using their enforcement fining authority for pipeline safety violations?
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|---|---|---|

Evaluator Notes:

definitely yes

- | | | | |
|----------|--|-----------|-----------|
| 7 | General Comments:
Info Only = No Points | Info Only | Info Only |
|----------|--|-----------|-----------|

Evaluator Notes:

All issues noted above - need to get caught up and get compliance issues to operators more quickly in order to make sure they are doing necessary corrections to prevent recurrence especially on violations as a result of incidents.

Total points scored for this section: 12
Total possible points for this section: 15



PART E - Incident Investigations

Points(MAX) Score

- 1 Does the state have written procedures to address state actions in the event of an incident/accident? 2 2

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Written procedures are in place.

- 2 Does state have adequate mechanism to receive and respond to operator reports of incidents, including after-hours reports? And did state keep adequate records of Incident/Accident notifications received? Chapter 6 2 2

Yes = 2 No = 0 Needs Improvement = 1

- a. Acknowledgement of MOU between NTSB and PHMSA (Appendix D) Yes ☒ No ☐ Needs Improvement ☐
- b. Acknowledgement of Federal/State Cooperation in case of incident/accident (Appendix E) Yes ☒ No ☐ Needs Improvement ☐

Evaluator Notes:

All incidents have been address and records are in file.

- 3 If onsite investigation was not made, did state obtain sufficient information from the operator and/or by other means to determine the facts to support the decision to not go on-site? Chapter 6 1 1

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

No issues - reports should be clear about whether did on-site visit or not.

- 4 Were all incidents investigated, thoroughly documented, and with conclusions and recommendations? 3 2

Yes = 3 No = 0 Needs Improvement = 1-2

- a. Observations and document review Yes ☐ No ☐ Needs Improvement ☒
- b. Contributing Factors Yes ☐ No ☐ Needs Improvement ☒
- c. Recommendations to prevent recurrences when appropriate Yes ☐ No ☐ Needs Improvement ☒

Evaluator Notes:

Although progress has been made, all incidents investigated and documented there is too large of a time lapse between occurrence and reports being written or recommendations sent to company to respond to.

- 5 Did the state initiate compliance action for violations found during any incident/accident investigation? 1 0.5

Yes = 1 No = 0

Evaluator Notes:

Yes, but again improvement needed in this area due to timeliness of violations being sent to operators. The compliance actions for these incidents are being grouped together with all other non-DOT reportable violations on a quarterly basis. Recommend pulling these out individually and sending as soon as possible after incident report is complete.

- 6 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 report data from operators concerning incidents/accidents and investigate discrepancies) Chapter 6 1 1

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

No issues

- 7 Does state share lessons learned from incidents/accidents? (sharing information, such as: at NAPSR Region meetings, state seminars, etc) 1 1

Yes = 1 No = 0

Evaluator Notes:

Yes, they shared at NAPSIR region

8 General Comments:

Info Only = No Points

Evaluator Notes:

Info OnlyInfo Only

Total points scored for this section: 9.5
Total possible points for this section: 11



PART F - Damage Prevention

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? NTSB
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

Yes, the CPUC has added this question on the inspection form.

- | | | | |
|---|---|---|---|
| 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?
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|---|---|---|

Evaluator Notes:

Yes, this is part of the inspection form used by the CPUC.

- | | | | |
|---|--|---|---|
| 3 | Did the state encourage and promote practices for reducing damages to all underground facilities to its regulated companies? (i.e. such as promoting/adopting the CGA Best Practices encouraging adoption of the 9 Elements, etc.)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

Yes, Inspector Sunil Shori is the CPUC lead for their damage prevention efforts. He is an active member of the Common Ground Alliance (CGA) Regional Committee and works with both the USA North, (Northern California) and Dig Alert (Southern California) one call systems as part of the California One Call.

- | | | | |
|---|--|---|---|
| 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? (This can include DIRT and other data shared and reviewed by the pipeline safety program)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

Yes, the CPUC uses data from the operators annual reports along with information provided by operators in the DIRT system to evaluate trends for pipeline damages caused by excavation.

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

Evaluator Notes:

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

PART G - Field Inspections

Points(MAX) Score

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

Name of Operator Inspected:

(A)(B)Pacific Gas and Electric, (C)Southern California Gas

Name of State Inspector(s) Observed:

(A) Quang Pham (B) Quang Pham-Aimee Cauguiran- M. Mohammad Ali(c) Alula Gebemedhin, Steve (Mahmoud) Intably

Location of Inspection:

(A) 111 Alvarado Road, Berkeley, CA, (B) 1220 Anderson Rd., San Rafael, Ca.(C) So.Cal area - Chino, Fontana, Corona, CA

Date of Inspection:

(A) 8/11/2015 (B) 10/26-29/2015 (c) 10/26-29/2015

Name of PHMSA Representative:

Michael Thompson

Evaluator Notes:

(A) PG&E was replacing an inserted 1/2 inch Aldyla service line with a 3/4 inch poly pipe.

(B) Portion of Standard Inspection/Form 2A covering Corrosion Control Records, O&M Records, Pipeline Field Inspection

(C) SoCal Gas Field Inspection, Chino, Fontana, Corona California. Standard inspection covering corrosion control records and field inspection.

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

Evaluator Notes:

(A) Yes, they were notified. There was someone from compliance and a operations supervisor.

(B) Yes, the operator was notified well in advance and had the necessary records and personnel available.

(c) Yes

- 3 Did the inspector use an appropriate inspection form/checklist and was the form/checklist used as a guide for the inspection? (New regulations shall be incorporated) 2 1
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

(A) The inspector had the checklist on site and was writing his notes and comments on the back side of the form and did not seem use the form as a guide for the inspection.

Improvement is needed in this area by improving the procedures for inspectors and giving the inspectors more time in the field with a help from a more experienced inspector.

One point is being deducted.

(B) Yes, the inspectors used Form 2A covering Corrosion Control Records, O&M Records and Pipeline Field Inspection to guide the inspection.

(C) Yes, same as (b)

- 4 Did the inspector thoroughly document results of the inspection? 2 2
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

(A)Yes, Quang kept very good notes on what was observed and what information he received from the operator.

(B) Yes, the inspectors used their laptops while in the office reviewing records to document their findings and information.

(C) appropriate documentation appeared to be taken, have asked for final inspection report to be forwarded after complete

- 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.) 1 1

Yes = 1 No = 0

Evaluator Notes:

(A) Yes, Quang checked out all of the equipment used by the operators crew.

(B) Yes, the inspector checked the equipment being used in the field.

(C) Yes, no issues

6	Did the inspector adequately review the following during the field portion of the state evaluation? (check all that apply on list) Yes = 2 No = 0 Needs Improvement = 1	2	2
a.	Procedures	<input checked="" type="checkbox"/>	
b.	Records	<input checked="" type="checkbox"/>	
c.	Field Activities	<input checked="" type="checkbox"/>	
d.	Other (please comment)	<input type="checkbox"/>	

Evaluator Notes:

(A) Quang reviewed the procedures provided by the operator on site for the field activities being observed.

(B) The inspectors reviewed records while in the operators facility and procedures and activities in the field.

(C) Yes, no issues

7	Did the inspector have adequate knowledge of the pipeline safety program and regulations? (Evaluator will document reasons if unacceptable) Yes = 2 No = 0 Needs Improvement = 1	2	1
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Evaluator Notes:

(A) The questions asked and comments made by the inspector showed he had a adequate understanding of the pipeline safety program and the regulations, but you could tell that he had not been on very many service line construction jobs by the issues he missed identifying during the inspection.

The inspector missed identifying that the crew failed to use a calibrated pressure gauge to conduct the pressure test while on site. He also missed the use of a wrench by one crew member to tighten the cap on a mechanical taping tee.

Improvement is needed by spending more time in the field doing distribution construction inspections. One point will be deducted.

(B) All three inspectors were observed in the field and showed adequate knowledge of the pipeline safety program and regulations.

(C) Inspectors appear to have appropriate knowledge, but suggest further investigation into application of regulations on corrosion and casing isolation regulations

8	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) Yes = 1 No = 0	1	1
---	---	---	---

Evaluator Notes:

(A) Yes, a short exit interview was done at the end of the days job.

(B) The official exit interview was scheduled for Friday morning of this inspection and the inspectors discussed concerns and issues with the operator at the end of each field day.

(C) we were not present for final review with operator, but we did review of issues found and look forward to final inspection report for confirmation of issues

9	During the exit interview, did the inspector identify probable violations found during the inspections? (if applicable) Yes = 1 No = 0	1	1
---	---	---	---

Evaluator Notes:

(A) No violations were noted in the exit interview, but some recommendations and concerns were covered.

(B) Violations will be reviewed in final report once forwarded to state program.

(C) Violations were to be written and will review final report for confirmation once written.

10 General Comments: 1) What did the inspector observe in the field? (Narrative description of field observations and how inspector performed) 2) Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices) 3) Other.

Info Only = No Points

- | | Info Only | Info Only |
|--------------------------------------|-------------------------------------|-----------|
| a. Abandonment | <input checked="" 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 checked="" type="checkbox"/> | |
| g. Cathodic Protection | <input checked="" type="checkbox"/> | |
| h. Cast-iron Replacement | <input type="checkbox"/> | |
| i. Damage Prevention | <input type="checkbox"/> | |
| j. Deactivation | <input type="checkbox"/> | |
| k. Emergency Procedures | <input type="checkbox"/> | |
| l. Inspection of Right-of-Way | <input type="checkbox"/> | |
| m. Line Markers | <input checked="" type="checkbox"/> | |
| n. Liaison with Public Officials | <input type="checkbox"/> | |
| o. Leak Surveys | <input type="checkbox"/> | |
| p. MOP | <input type="checkbox"/> | |
| q. MAOP | <input type="checkbox"/> | |
| r. Moving Pipe | <input type="checkbox"/> | |
| s. New Construction | <input checked="" type="checkbox"/> | |
| t. Navigable Waterway Crossings | <input type="checkbox"/> | |
| u. Odorization | <input type="checkbox"/> | |
| v. Overpressure Safety Devices | <input type="checkbox"/> | |
| w. Plastic Pipe Installation | <input type="checkbox"/> | |
| x. Public Education | <input type="checkbox"/> | |
| y. Purging | <input type="checkbox"/> | |
| z. Prevention of Accidental Ignition | <input type="checkbox"/> | |
| A. Repairs | <input type="checkbox"/> | |
| B. Signs | <input type="checkbox"/> | |
| C. Tapping | <input checked="" type="checkbox"/> | |
| D. Valve Maintenance | <input type="checkbox"/> | |
| E. Vault Maintenance | <input type="checkbox"/> | |
| F. Welding | <input type="checkbox"/> | |
| G. OQ - Operator Qualification | <input checked="" type="checkbox"/> | |
| H. Compliance Follow-up | <input type="checkbox"/> | |
| I. Atmospheric Corrosion | <input checked="" type="checkbox"/> | |
| J. Other | <input type="checkbox"/> | |

Evaluator Notes:

(A) G-3, The inspector had the checklist on site and was writing his notes and comments on the back side of the form and did not seem use the form as a guide for the inspection.

Improvement is needed in this area by improving the procedures for inspectors and giving the inspectors more time in the field with a help from a more experienced inspector.
One point is being deducted.

G-7, The questions asked and comments made by the inspector showed he had a adequate understanding of the pipeline

safety program and the regulations, but you could tell that he had not been on very many service line construction jobs by the issues he missed identifying during the inspection.

The inspector missed identifying that the crew failed to use a calibrated pressure gauge to conduct the pressure test while on site. He also missed the use of a wrench by one crew member to tighten the cap on a mechanical tapping tee.

Improvement is needed by spending more time in the field doing distribution construction inspections. One point will be deducted.

(B) (C) General records and field observation of corrosion activity.

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



PART H - Interstate Agent State (If Applicable)**Points(MAX) Score**

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

Evaluator Notes:

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

Evaluator Notes:

- | | | | |
|----------|--|---|----|
| 3 | Did the state submit documentation of the inspections within 60 days as stated in its latest Interstate Agent Agreement form?
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

- | | | | |
|----------|---|---|----|
| 4 | Were 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.)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:

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

Evaluator Notes:

- | | | | |
|----------|--|---|----|
| 6 | Did the state give written notice to PHMSA within 60 days of all probable violations found?
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

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

Evaluator Notes:

- | | | | |
|----------|--|-----------|-----------|
| 8 | General Comments:
Info Only = No Points | Info Only | Info Only |
|----------|--|-----------|-----------|

Evaluator Notes:

Section Not Applicable

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

PART I - 60106 Agreement State (If Applicable)**Points(MAX) Score**

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

Evaluator Notes:

- | | | | |
|----------|--|---|----|
| 2 | Are results documented demonstrating inspection units were reviewed in accordance with state inspection plan?
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

- | | | | |
|----------|--|---|----|
| 3 | 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.)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

- | | | | |
|----------|---|---|----|
| 4 | Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment?
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:

- | | | | |
|----------|--|---|----|
| 5 | Did the state give written notice to PHMSA within 60 days of all probable violations found?
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

- | | | | |
|----------|--|---|----|
| 6 | Did the state initially submit adequate documentation to support compliance action by PHMSA on probable violations?
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

Evaluator Notes:

- | | | | |
|----------|--|-----------|-----------|
| 7 | General Comments:
Info Only = No Points | Info Only | Info Only |
|----------|--|-----------|-----------|

Evaluator Notes:

Section Not Applicable

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