



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

1200 New Jersey Avenue SE  
Washington DC 20590

## 2015 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)



# 2015 Gas State Program Evaluation -- CY 2015

Gas

**State Agency:** California

**Agency Status:**

**Date of Visit:** 08/22/2016 - 08/26/2016

**Agency Representative:** Ken Bruno

**PHMSA Representative:** Michael Thompson, David Lykken

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

**Name/Title:** Mr. Michael Picker, President

**Agency:** California Public Utilities Commission

**Address:** 505 Van Ness Avenue

**City/State/Zip:** San Francisco, California 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 2015 (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	10
13	13
50	48
15	13
11	11
8	8
12	12
0	0
0	0

### TOTALS

**119 115**

**State Rating** .....

**96.6**

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

Evaluator Notes:

CaPUC still has only partial jurisdiction over master meter operators and gas gathering lines. No issues with accuracy.

- |   |  |   |   |
|---|--|---|---|
| 2 | Review of Inspection Days for accuracy - Progress Report Attachment 2<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|---|--|---|---|

Evaluator Notes:

More improvement needed in this area. Staff has provided monthly summary of person-days but better explanation as to time applied to particular inspection category is needed. New time entry system should help alleviate this issue by proving a corresponding inspection number with the time entry provided by the inspector. Inspectors should also provide sufficient detail in the description box of the time entry system.

- |   |  |   |   |
|---|--|---|---|
| 3 | Accuracy verification of Operators and Operators Inspection Units in State - Progress Report Attachment 3<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|---|--|---|---|

Evaluator Notes:

No Issues. They have gained one more LNG facility. PG&E LNG mobile units are now one inspection unit.inspection unit.

- |   |  |   |   |
|---|--|---|---|
| 4 | Were all federally reportable incident reports listed and information correct? - Progress Report Attachment 4<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|---|--|---|---|

Evaluator Notes:

Incident/Accident information listed in Attachment 4 of Progress Report complete and accurate. Reconciles with information located in Data Mart. No issues noted.

- |   |  |   |   |
|---|--|---|---|
| 5 | Accuracy verification of Compliance Activities - Progress Report Attachment 5<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|---|--|---|---|

Evaluator Notes:

Yes, compliance activities for 2015 were reviewed and no issues found.

- |   |   |   |   |
|---|---|---|---|
| 6 | Were pipeline program files well-organized and accessible? - Progress Report Attachment 6<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|---|---|---|

Evaluator Notes:

The program files are in better condition with almost all being electronic.

- |   |  |   |   |
|---|--|---|---|
| 7 | Was employee listing and completed training accurate and complete? - Progress Report Attachment 7<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|---|--|---|---|

Evaluator Notes:

Yes, the CaPUC has committed a lot of effort to getting their inspectors thru the required training.

- |   |   |   |   |
|---|---|---|---|
| 8 | Verification of Part 192,193,198,199 Rules and Amendments - Progress Report Attachment 8<br>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:

Yes, the CaPUC completed this portion of the progress report.

---

10 General Comments:

Info Only = No Points

Info OnlyInfo Only

Evaluator Notes:

---

Total points scored for this section: 10  
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:

The CaPUC procedures manual GO 112 F last updated August 2016. Standard inspections are covered in Section 2.

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

The CaPUC procedures manual GO 112 F last updated August 2016. IMP and DIMP are generally covered in section 2, and also in detail that the actions for both DIMP and IMP will be covered on an annual basis.

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

The CaPUC procedures manual GO 112 F last updated August 2016. OQ inspections are covered in Section 2 along with the procedure to upload the results of those inspections to the PHMSA data base. The field portions of the OQ inspections are conducted with standard inspections..

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

The procedures for Damage Prevention inspections are covered in Section 2 of the CaPUC GO 112 F.

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

Yes = 1 No = 0 Needs Improvement = .5

### Evaluator Notes:

The CaPUC has a program for providing training to master meter operators during their scheduled inspections.

- |   |  |   |   |
|---|--|---|---|
| 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 | 1 |
|---|--|---|---|

Yes = 1 No = 0 Needs Improvement = .5

### Evaluator Notes:

Constructions inspection procedures have been improved this year and great effort has been made to improve this type of inspection with new forms and training of inspectors.

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

Review of the 2015 and other records showed no issues for the elements.

## 8 General Comments:

Info Only = No Points

Info Only Info Only

Evaluator Notes:

Total points scored for this section: 13  
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):  
1893.00
- B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):  
220 X 22.30 = 4906.36
- Ratio: A / B  
1893.00 / 4906.36 = 0.39
- If Ratio  $\geq$  0.38 Then Points = 5, If Ratio  $<$  0.38 Then Points = 0  
Points = 5

### Evaluator Notes:

Yes, the CaPUC had a .39 ratio. We advised them that this was very close this year and that they needed to stay aware of the number of inspection days so they would not slip below the required .38 ratio. They also had 199 construction inspection days in 2015 which was 10% of their total.

- 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 ☒ No ☐ Needs Improvement ☐
- b. Completion of Required DIMP\*/IMP Training before conducting inspection as lead? \*Effective Evaluation CY2013 Yes ☒ No ☐ Needs Improvement ☐
- c. Root Cause Training by at least one inspector/program manager Yes ☒ No ☐ Needs Improvement ☐
- d. Note any outside training completed Yes ☒ No ☐ Needs Improvement ☐
- e. Verify inspector has obtained minimum qualifications to lead any applicable standard inspection as the lead inspector. Yes ☒ No ☐ Needs Improvement ☐

### Evaluator Notes:

Training requirements have been met. Inspectors have taken required training in specific discipline(s) prior to leading specialized inspections. With the exception of newly hired persons, all current inspection staff have taken the PH3600 Root Cause course. Outside training completed: Cognitive Interviewing Techniques/December 2015.

Due to the number of jurisdictional LPG operators (650) suggested that the CPUC identify staff who perform LPG inspections be registered and attend the new T&Q PL-5342 LPG course. To date one inspector (P. Penny) has attended.

- 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 Bruno, Program Manager has a good understanding of the PHMSA states program and continues to increase his knowledge of the regulations.

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

### Evaluator Notes:

Yes, the letter was sent on 11/18/15 and the CaPUC responded on 12/8/2015.

There are still some outstanding issues from the 2014 evaluation letter that are being addressed, but will take some time to resolve completely.

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

Evaluator Notes:

Last one held on 10/10/2014. They will need to hold one in 2017.

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

Evaluator Notes:

Yes, after review of the CaPUC process for scheduling inspections and looking over a good percentage of the inspections conducted in 2015 they have all types of operators and inspection units in accordance with time intervals established in their written procedures.

- 
- |          |  |   |   |
|----------|--|---|---|
| <b>7</b> | 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<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

Evaluator Notes:

Inspection forms used by CPUC staff appear to address all applicable code requirements although revision dates for CPUC checklists Control Room Management (Rev 3-2012) and DIMP (Rev 9-2011) are older than the current PHMSA "IA Equivalent" forms posted on the PHMSA web site (CRM Rev 5-2015 and DIMP Rev 3-2015).

A review of completed inspection forms for CY2015 show staff do a good job at documenting their observations when a probable violation, area of concern, or other issue has been identified but provide little or no information when a finding of satisfactory has been found.

Recommendation(s):

1. To ensure inspection forms are kept current, suggest that the CPUC task an individual with the responsibility of maintaining the content of all inspections forms.
2. Establish some basic Version Control Guidelines such as the inclusion of "document dates" and "version numbers" to ensure that staff are using the most up to date inspection forms.
3. To properly conduct an inspection of an operator's facilities, inspection forms should be documented well enough that the agency could defend the inspection to a 3rd party. Inspection staff should include substantive comments on inspection checklists of observations made in the field to support the inspector's rationale for determining the operator's compliance, both satisfactory and unsatisfactory.

- 
- |          |   |   |   |
|----------|---|---|---|
| <b>8</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) Chapter 5.1<br>Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

Evaluator Notes:

Yes. Information contained on CPUC Safety & Enforcement Division (SED) Form OM "Operations & Maintenance of a Gas Dist and Trans Pipeline", Page 26.

- 
- |          |  |   |   |
|----------|--|---|---|
| <b>9</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) Chapter 5.1<br>Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

Evaluator Notes:

Yes. Information contained on page 28 of the CPUC Safety & Enforcement Division (SED) Form OM "Operations & Maintenance of a Gas Dist and Trans Pipeline".

- 
- |           |   |   |   |
|-----------|---|---|---|
| <b>10</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) Chapter 5.1<br>Yes = 1 No = 0 | 1 | 1 |
|-----------|---|---|---|



Evaluator Notes:

Yes. Information contained on CPUC Safety & Enforcement Division (SED) Page 3, Form 4, "EP - Emergency Plan Inspection Report of a Gas Dist and Trans Pipeline".

- |           |  |   |   |
|-----------|--|---|---|
| <b>11</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? Chapter 5.1<br>Yes = 1 No = 0 | 1 | 1 |
|-----------|--|---|---|

Evaluator Notes:

Yes. Information contained on CPUC Safety & Enforcement Division (SED) Page 3, Form 4, "EP - Emergency Plan Inspection Report of a Gas Dist and Trans Pipeline".

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

Evaluator Notes:

Yes, they have personnel assigned to the task and the information is reviewed by supervisors and the program manager.

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

Evaluator Notes:

Improvement needed. Good job uploading Operator Qualification program review and field verification form into the OQDB. Only two TIMP inspections noted in the IMDB. Only one form uploaded (SDG&E). Although some IM field verification work had been completed in CY2015, no PHMSA Form 16's had been uploaded into the IMDB. No DIMP forms uploaded.

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

Evaluator Notes:

Yes. No issues noted.

- |           |   |   |   |
|-----------|---|---|---|
| <b>15</b> | 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<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|---|---|---|

Evaluator Notes:

Yes, they are doing D&A inspections on a three year cycle.

- |           |   |   |   |
|-----------|---|---|---|
| <b>16</b> | 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<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|---|---|---|

Evaluator Notes:

Yes, they are verifying this each year while doing their O&M inspections. They also do PHMSA form 9 during standard inspections.

- |           |  |   |   |
|-----------|--|---|---|
| <b>17</b> | 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<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 1 |
|-----------|--|---|---|

Evaluator Notes:

Further attention is needed by inspectors to go out and field verify operators are performing tests, repairs, and other remedial

actions identified as part of their IM assessments. Field inspections documented need to be uploaded onto the IMDB as noted under question C13.

- 
- |           |  |   |   |
|-----------|--|---|---|
| <b>18</b> | Is state verifying operator's gas distribution integrity management Programs (DIMP)?<br>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 have been complete by December 2014<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|--|---|---|

Evaluator Notes:

Yes, they have been working with their operators. But it is time to formally start to revisit all operators to verify their activities and plans.

- 
- |           |   |   |   |
|-----------|---|---|---|
| <b>19</b> | 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 be conducted every four years per RP1162<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|---|---|---|

Evaluator Notes:

Yes. Four PA inspections conducted in CY2015. Sempra, SWG, Lodi Gas Storage, and Wild Goose Storage. Currently doing effectiveness inspections as part of CY2016 inspection plan.

- 
- |           |  |   |   |
|-----------|--|---|---|
| <b>20</b> | 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).<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|--|---|---|

Evaluator Notes:

Yes, the CaPUC provides information on inspections, enforcement and has guidance materials and information for small operators on their web site.

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

Evaluator Notes:

Yes, they have a good process in place.

- 
- |           |   |   |   |
|-----------|---|---|---|
| <b>22</b> | 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?<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|---|---|---|

Evaluator Notes:

The operators in California work with and provide information to the PPDC. The CaPUC needs to add a question to their distribution system inspection form in order to expand their information on this issue.

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

Evaluator Notes:

Yes, they have responded to NAPSRS surveys and with the PHMSA on requests for information.

- 
- |           |  |   |   |
|-----------|--|---|---|
| <b>24</b> | 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.<br>No = 0 Needs Improvement = .5 Yes = 1 | 1 | 1 |
|-----------|--|---|---|

Evaluator Notes:

They have created a list of all waivers granted by the PHMSA and the state and are working to clear the ones they can.

- 
- |           |   |   |   |
|-----------|---|---|---|
| <b>25</b> | Did the state attend the National NAPS Board of Directors Meeting in CY being evaluated?<br>No = 0 Needs Improvement = .5 Yes = 1 | 1 | 1 |
|-----------|---|---|---|

Evaluator Notes:

Yes, the program manager and one supervising engineer attended the national NAPS meeting in 2015.

---

- |           |   |                                      |  |
|-----------|---|--------------------------------------|--|
| <b>26</b> | Discussion on State Program Performance Metrics found on Stakeholder Communication site - <a href="http://primis.phmsa.dot.gov/comm/states.htm">http://primis.phmsa.dot.gov/comm/states.htm</a><br>No = 0 Needs Improvement = 1 Yes = 2 | 2                                    | 2  |
| a.        | Discussion of Potential Accelerated Actions (AA's) based on any negative trends   | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| b.        | NTSB P-11-20 Meaningful Metrics   | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |

Evaluator Notes:

The State Program Performance Metrics were reviewed with the program manager and the following trends discussed.

Damages per 100 locate tickets have increased from 2014 to 2015 back to level of 2012 and 2013.

Inspection days per 1000 miles of pipeline have stayed about steady with 2014, but have decreased from 2013.

Inspection days per MMO/LPG have increased over 2014 and are on level with 2013.

Pipeline inspector qualification has improved dramatically over previous years.

Gas distribution system leaks show that the number of leaks repaired per 1000 miles has gone up, hazardous leaks repaired has stayed the same and leaks outstanding have gone up a little.

Enforcement program evaluation score has stayed the same for 2014 and 2015.

Incident investigation score has gone up significantly.

---

- |           |                       |           |           |
|-----------|-----------------------|-----------|-----------|
| <b>27</b> | General Comments:     | Info Only | Info Only |
|           | Info Only = No Points |           |           |

Evaluator Notes:

Points

C-17 Loss of 1 point. Further attention is needed by inspectors to go out and field verify operators are performing tests, repairs, and other remedial actions identified as part of their IM assessments. Field inspections documented need to be uploaded onto the IMDB as noted under question C13.

Recommendations:

Question C2 - Due to the number of jurisdictional LPG operators (650) suggested that the CPUC identify staff who perform LPG inspections be registered and attend the new T&Q PL-5342 LPG course.

Question C7:

1. To ensure inspection forms are kept current, suggest that the CPUC task an individual with the responsibility of maintaining the content of all inspections forms.
2. Establish some basic Version Control Guidelines such as the inclusion of "document dates" and "version numbers" to ensure that staff are using the most up to date inspection forms.
3. To properly conduct an inspection of an operator's facilities, inspection forms should be documented well enough that the agency could defend the inspection to a 3rd party. Inspection staff should include substantive comments on inspection checklists of observations made in the field to support the inspector's rationale for determining the operator's compliance, both satisfactory and unsatisfactory.

C-18 Yes, they have been working with their operators on DIMP. But it is time to formally start to revisit all operators to verify their activities and DIMP plans.

C-13, C-17. Recommend utilizing the IA program to improve on program elements (e.g., inspection form updates; track IMP,

OQ, PA inspection results/data collection, etc.).

---

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



## PART D - Compliance Activities

Points(MAX) Score

- |          |  |   |   |
|----------|--|---|---|
| <b>1</b> | Does the state have written procedures to identify steps to be taken from the discovery to resolution of a probable violation? Chapter 5.1<br>Yes = 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:**

Yes. List of companies and official's names in Appendix "A" of the CPUC GO112-F Gas Safety and Reliability Branch (GSRB) Inspection Manual. Procedures to review progress of compliance actions noted on page 24 of GSRB inspection manual.

- |          |  |   |  |
|----------|--|---|--|
| <b>2</b> | 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<br>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.       | Document probable violations   | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/>            |
| c.       | Resolve probable violations  | Yes <input type="radio"/> No <input type="radio"/>            | Needs Improvement <input checked="" type="radio"/> |
| d.       | Routinely review progress of probable violations   | Yes <input type="radio"/> No <input type="radio"/>            | Needs Improvement <input checked="" type="radio"/> |
| e.       | Were applicable civil penalties outlined in correspondence with operator(s)  | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/>            |

**Evaluator Notes:**

Yes, compliance correspondence sent to appropriate company officials. Good use of notes and photographs when documenting probable violations and other area's of concern. Improvement needed in timeliness of issuing inspection findings to operators after exit interview. Length of time to issue letter to operator averaging 4 months or longer. Operator compliance with agency enforcement actions typically followed up on during next inspection cycle. Not very timely since it may be up to three years before inspection staff can confirm compliance. No process in place to formally document close out operators actions taken to comply with enforcement actions.

Recommend using the IA program to better monitor inspection activity.

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

**Evaluator Notes:**

Yes, this was verified by reviewing the inspection/enforcement records for 2015.

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

**Evaluator Notes:**

Yes, the information can be found in the SED - Citations procedure that was effective on 3/25/2015 and for formal proceedings in Resolution ALJ 274.

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

**Evaluator Notes:**

Yes, the program manager is familiar with the states process for imposing civil penalties, and has used them over the past several years.

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

Evaluator Notes:

Yes, the CaPUC collected \$301,000,000.00 in civil penalties in 2015.

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

Evaluator Notes:

Points;

D-2 Loss of 2 points, Compliance correspondence sent to appropriate company officials. Good use of notes and photographs when documenting probable violations and other area's of concern. Improvement needed in timeliness of issuing inspection findings to operators after exit interview. Length of time to issue letter to operator averaging 4 months or longer. Operator compliance with agency enforcement actions typically followed up on during next inspection cycle. Not very timely since it may be up to three years before inspection staff can confirm compliance. No process in place to formally document close out operators actions taken to comply with enforcement actions.

Recommended utilizing the IA program for monitoring staff inspection activity/status

Total points scored for this section: 13  
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:

Yes. GSRB Gas Incident Investigation Procedures Manual. Revision Aug 2016 includes procedures for investigating incidents and incident investigation report requirements. Appendices include processes and procedures for On-Call duties, Incident Investigation process Flow Chart, Decision Tree, Pre-set Data Request for identified large LDC's, Incident Report Template, and other supplemental guidance.

- 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:

Yes, the state has an adequate mechanism to receive and respond to operator reports of incidents, including after-hours reports, and as kept adequate records of Incident/Accident notifications received.

- 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:

Yes, if the state decides to not go on site their procedure requires them to send a request to the operator for a data set to supply the information needed to support their decision to not go on site.

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

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:

Yes, incident investigations were thoroughly documented and they are adding a step to the process to include conclusions and recommendations.

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

Yes = 1 No = 0

Evaluator Notes:

Yes, they initiated compliance actions for the violations found in the records that were reviewed during the evaluation.

- 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:

Yes, the state works very closely with Peter Katchmar the PHMSA Accident Coordinator for the Western Region.

- 7 Does state share lessons learned from incidents/accidents? (sharing information, such as: 1 1  
at NAPSRS Region meetings, state seminars, etc)  
Yes = 1 No = 0

Evaluator Notes:

Yes, the state shared lessons learned at the 2015 NAPSRS Western Region meeting during their State of the State report.

---

8 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

Recommendations;

The state should continue to train inspectors to take a broader view when approaching each incident/incident site for investigation.

---

Total points scored for this section: 11  
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<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--|---|---|

Evaluator Notes:

Yes. Page three of the Safety and Enforcement Division (SED) Form 14 "DP - Damage Prevention Inspection Report of a Gas Dist. & Trans. Pipeline".

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

Evaluator Notes:

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

- |   |  |   |   |
|---|--|---|---|
| 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.)<br>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. He is also tracking the efforts in the state legislature to get a more effective enforcement process going.

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

Evaluator Notes:

Yes, the CaPUC requires operators to submit quarterly reports in order to evaluate trends for the number of damages to pipeline facilities and the percentage for damages per 1000 locate requests. they are currently at 4.35 damages.

- |   |  |  |                    |
|---|--|--|--------------------|
| 5 | General Comments:<br>Info Only = No Points |  | Info OnlyInfo 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:

1. Southern California Gas 2. Pacific Gas and Electric (PG&E)

Name of State Inspector(s) Observed:

1. Mahmoud Intably, James Zhang, Desmond Lew, KanWai Tong, Ken Bruno 2. Sikandar Khatri (Lead), Nathan Sarina, Durga Shrestha, Alula Grebremedhin

Location of Inspection:

1. Glendale, CA and surrounding area 2. Oakland, Richmond and surrounding areas

Date of Inspection:

1. June 6-9, 2016 2. Aug 30, 31, Sep 1, 2016

Name of PHMSA Representative:

1. Michael Thompson and David Appelbaum 2. David Lykken

Evaluator Notes:

1. CPUC conducted myriad evaluations of meter, regulator and valve maintenance activities.
2. CPUC records and field audit of PG&E's East Bay Division's Gas Pressure Regulator stations and Emergency Valves facilities.

- 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:

1. Yes, operator was notified in advance and had all requisite records and personnel available. Operator also had someone from their compliance group in attendance.
2. Yes. Operator was notified in advance and a schedule of the first week's daily activities arranged ahead of time. Several PG&E personnel were in attendance including staff from regulatory compliance, engineering, field operations. Most records were available.

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

Evaluator Notes:

1. Yes, inspectors had current inspection forms available.
2. Yes. SED "Form 2B - Standard Inspection Report of a Gas Distribution Pipeline" utilized.

Recommendation: consider deploying a process to utilize inspection guidance when conducting field evaluations. This will ensure consistency and uniformity with all inspectors.

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

Evaluator Notes:

1. Inspectors appeared to take very good notes of all observations.
2. Yes. CPUC inspectors took detailed notes of observations noted during both the records review and field check of gas facilities visited.

- 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:

1. Yes

Recommendation: Deploy process to verify equipment calibrations are conducted as a first step. This will ensure these verifications are not missed.

2. Yes. Inspectors verified instrument calibration checks where necessary as well as checking the general condition of equipment used by the operator such as pressure gauges and CGI's.

---

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:

1. Inspectors reviewed procedures for field activities being observed. Records were reviewed at operators' facility.

2. Inspectors had copies of operator's written procedure for conducting pressure regulator station and emergency valve operations and maintenance. Maps of Regulator Station Diagrams/Schematics, Regulator Maintenance Sheets, Division Regulator Data Sheets, and Gas Valve Maintenance Records for each facility visited were also in hand during field checks.

---

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	2
---	---	---	---

Evaluator Notes:

1. Yes, the lead inspectors appeared to have a good working knowledge of the pipeline safety program and relevant regulations. The operator had challenged interpretations regarding maintenance requirements on valves, and the inspector (Intably) did a good job in rebutting this challenge.

2. Yes. Inspectors demonstrated adequate knowledge. Inspectors identified an issue during the records review regarding inconsistencies between regulator station diagrams and operator maps in the naming convention for emergency and other critical valves. Different ID#s for valves were used on Operating Diagrams vs. Valve Data Sheets. The operator has settled on a standard system for naming their valves and is in the middle of changing their maps and records to reflect the change. Questions asked regarding relief valve calculations. During one regulator station visit while performing lock-up test the operator provided a confusing reason as to why the regulator would not lock up. The inspector questioned the operators rational. In the end it was identified that there was a defective diaphragm inside the pressure regulator which required replacement.

---

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:

1. Yes, we observed a brief (field) exit interview by Inspector Intably. His communications to the operator were articulate and thorough.

2. Final exit interview not observed. Status briefings conducted each night with operator. A tracking log created by the operator is discussed at the end of each inspection day and updated to reflect the status of any open data requests, outstanding questions or issues expressed by CPUC inspectors.

---

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:

1. Yes

2. No probable violations identified at time of program field evaluation.

**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

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 checked="" 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 checked="" type="checkbox"/>
w.	Plastic Pipe Installation	<input type="checkbox"/>
x.	Public Education	<input type="checkbox"/>
y.	Purging	<input type="checkbox"/>
z.	Prevention of Accidental Ignition	<input type="checkbox"/>
A.	Repairs	<input type="checkbox"/>
B.	Signs	<input type="checkbox"/>
C.	Tapping	<input type="checkbox"/>
D.	Valve Maintenance	<input checked="" 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:**

1. Inspectors observed several valve and vault maintenance activities and did an adequate job evaluating.  
(Observation): The quality of questions asked and ancillary probing by the inspectors was proportionate to their respective training and experience. Recommend deploying processes where guidance material can be used in the field to allow newer inspectors an opportunity to expedite inspection competencies.

2. Selection of site visits by the lead inspector were both methodical (based on review of regulator station and emergency valve maintenance history) and at times random. Number of site visits was limited during this review due to time spent by the operator tearing down and rebuilding of pressure station regulators which failed to lock-up during testing, and the accessing emergency valve locations in high traffic areas. Not an issue during this inspection but problematic over future years since these types of facilities only get visited every three years per the CPUC's inspection policy.

Observation: Inspection of a operator's gas facilities need not be performed only during formal gas safety program audits. Suggest that CPUC inspectors perform regular gas facility site visits over the course of the year and document accordingly to

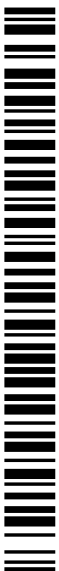
achieve demonstrate that a satisfactory representation of gas facilities have been visited.

CPUC North Recommendations:

Recommendation: consider deploying a process to utilize inspection guidance when conducting field evaluations. This will ensure consistency and uniformity with all inspectors.

---

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



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

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

Evaluator Notes:

CPUC is not an Interstate Agent

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

Evaluator Notes:

CPUC is not an Interstate Agent

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

Evaluator Notes:

CPUC is not an Interstate Agent

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

Evaluator Notes:

CPUC is not an Interstate Agent

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

Evaluator Notes:

CPUC is not an Interstate Agent

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

Evaluator Notes:

CPUC is not an Interstate Agent

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

Evaluator Notes:

CPUC is not an Interstate Agent

- |          |  |           |           |
|----------|--|-----------|-----------|
| <b>8</b> | General Comments:<br>Info Only = No Points | Info Only | Info Only |
|----------|--|-----------|-----------|

Evaluator Notes:

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

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

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

Evaluator Notes:

CPUC does not have a 60106 agreement

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

Evaluator Notes:

CPUC does not have a 60106 agreement

- |          |   |   |    |
|----------|---|---|----|
| <b>3</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.)<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

Evaluator Notes:

CPUC does not have a 60106 agreement

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

Evaluator Notes:

CPUC does not have a 60106 agreement

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

Evaluator Notes:

CPUC does not have a 60106 agreement

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

Evaluator Notes:

CPUC does not have a 60106 agreement

- |          |  |           |           |
|----------|--|-----------|-----------|
| <b>7</b> | General Comments:<br>Info Only = No Points | Info Only | Info Only |
|----------|--|-----------|-----------|

Evaluator Notes:

CPUC does not have a 60106 agreement

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