



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

1200 New Jersey Avenue SE  
Washington DC 20590

# 2017 Gas State Program Evaluation

for

IDAHO 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)



# 2017 Gas State Program Evaluation -- CY 2017

Gas

**State Agency:** Idaho

**Agency Status:**

**Date of Visit:** 08/20/2018 - 08/24/2018

**Agency Representative:** Mr. Joe Leckie, Pipeline Safety Program Manager

**PHMSA Representative:** David Appelbaum, State Evaluator

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

**Name/Title:** Mr. Paul Kjellander, President

**Agency:** Idaho Public Utilities Commission

**Address:** 472 West Washington Street, P.O. Box 83720

**City/State/Zip:** Boise, ID 83720-0074

**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 2017 (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**

<b>PARTS</b>	<b>Possible Points</b>	<b>Points Scored</b>
A Progress Report and Program Documentation Review	10	10
B Program Inspection Procedures	13	13
C Program Performance	46	46
D Compliance Activities	15	14
E Incident Investigations	10	10
F Damage Prevention	8	8
G Field Inspections	12	12
H Interstate Agent State (If Applicable)	0	0
I 60106 Agreement State (If Applicable)	0	0
<b>TOTALS</b>	<b>114</b>	<b>113</b>
<b>State Rating</b> .....		<b>99.1</b>



# PART A - Progress Report and Program Documentation Review

Points(MAX) Score

- |          |   |   |   |
|----------|---|---|---|
| <b>1</b> | 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:  
Data is accurate and all units were inspected in calendar year 2017.

IPUC is investigating 11 facilities to determine if they are jurisdictional master meter systems. Investigation should be completed by 12/31/2018.

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

Evaluator Notes:  
Reviewed inspection-person day activity results to individual time sheets. Inspection days appear to be reflected appropriately.

- |          |  |   |   |
|----------|--|---|---|
| <b>3</b> | 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:  
Operators and operator inspection units are accurate in Attachment 3 of Progress Report.

- |          |  |   |   |
|----------|--|---|---|
| <b>4</b> | 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:  
Idaho had two incident reports listed. Attachment 4 was correct.

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

Evaluator Notes:  
Review shows attachment 5 is accurate.

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

Evaluator Notes:  
Files appear to be well organized. Program Manager and other staff were capable of readily accessing requested documents.

- |          |  |   |   |
|----------|--|---|---|
| <b>7</b> | 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:  
Reviewed information on each inspector and compared completion courses to TQ records. All employees participating in the pipeline safety program were listed properly.

- |          |   |   |   |
|----------|---|---|---|
| <b>8</b> | 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:  
Idaho's rules and amendments for adoption has been reported accurately.



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**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, a sufficient list of detailed information on accomplishments and future activities was provided. IPUC was encouraged to develop goals on dig-in reduction. The State's current hit/1000 one-call ticket ratio is 8.3, significantly higher than the National average.

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**10** General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

The IPUC generally complied with the requirements of Part A of this evaluation.

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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.

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes. Idaho Public Utility Commission's Program Operations Procedures (POP), Sections 3 and 7, and Attachment E contains pre-inspection, inspection and post inspection procedures.

- 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.

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes. Idaho Public Utility Commission's Program Operations Procedures (POP), Sections 3.10 and 7, and Attachment E contains pre-inspection, inspection and post inspection procedures for 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.

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes. Idaho Public Utility Commission's Program Operations Procedures (POP), Sections 3.9 and 7, and Attachment E contains pre-inspection, inspection and post inspection procedures for OQ.

- 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.

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes. Idaho Public Utility Commission's Program Operations Procedures (POP), Sections 3.12 and 7, and Attachment E contains pre-inspection, inspection and post inspection procedures for Damage Prevention.

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

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Process for On-Site Operator Training is included in Sections 3.13, 7.2, and Attachment E of POP.

- 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.

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes. Idaho Public Utility Commission's Program Operations Procedures (POP), Sections 3.11 and 7, and Attachment E contains pre-inspection, inspection and post inspection procedures for Construction.

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

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



- a. Length of time since last inspection (Within five year interval) Yes  No  Needs Improvement
- b. Operating history of operator/unit and/or location (includes leakage, incident and compliance activities) Yes  No  Needs Improvement
- c. Type of activity being undertaken by operators (i.e. construction) Yes  No  Needs Improvement
- d. Locations of operators inspection units being inspected - (HCA's, Geographic areas, Population Density, etc) Yes  No  Needs Improvement
- 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  No  Needs Improvement
- f. Are inspection units broken down appropriately? Yes  No  Needs Improvement

Evaluator Notes:

Process for Inspection priorities is included in Sections 8.0 of POP. Idaho has a risk based inspection procedure that was recently implemented into the inspection priority process. Attachment B in the POP is used to score the risk based analysis.

**8** General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

The IPUC generally complied with the requirements of Part B of this evaluation

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):  
 416.50  
 B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):  
 220 X 2.83 = 623.52  
 Ratio: A / B  
 416.50 / 623.52 = 0.67  
 If Ratio >= 0.38 Then Points = 5, If Ratio < 0.38 Then Points = 0  
 Points = 5

Evaluator Notes:

The IPUC's ratio of 0.67 far exceeded the minimum ratio of .38.

- 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:

All lead inspectors in 2017 have met the TQ requirements.

- 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:

Program Manager displayed a proficient understanding of the pipeline safety program.

- 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, Chairman Kjellander's response letter to Zach Barrett was received on September 22, 2017. PHMSA's outbound letter was dated July 26, 2017, thus the State responded within the 60-day time requirement.

- 5** Did State conduct or participate in pipeline safety training session or seminar in Past 3 Years? Chapter 8.5 1 1  
 Yes = 1 No = 0

Evaluator Notes:

Yes, there was a consolidated TQ Seminar with the States of WA, OR, and ID in May 2015.

- 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:

The State inspected all operators and inspection units at intervals less than outlined in POP. Each operator has been inspected on an annual basis.

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<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 Yes = 2 No = 0 Needs Improvement = 1	2	2
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Evaluator Notes:

The IPUC uses the federal inspection forms for its inspections. Upon a review of randomly selected 2017 inspection files all applicable portions of the forms were completed appropriately.

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<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 Yes = 1 No = 0	1	NA
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Evaluator Notes:

There was no cast iron pipe in the State of Idaho.

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<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 Yes = 1 No = 0	1	NA
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Evaluator Notes:

There was no cast iron pipe in the State of Idaho.

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<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 Yes = 1 No = 0	1	1
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Evaluator Notes:

Reviewed form "IPUC Pipeline Safety Audit Inspection Checklist" (Form 2) which includes question for operator emergency response procedures for leaks caused by excavation damage near buildings.

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<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 Yes = 1 No = 0	1	1
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Evaluator Notes:

Idaho collects data from annual reports on a "Leak Cause Spreadsheet" which list cause of leaks, excavation tickets, and excavation damage per 1000 tickets. Reviewed form "IPUC Pipeline Safety Audit Inspection Checklist" (Form 2) which included check operator records of previous accidents and failures including third party damage and leak response.

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<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? Yes = 2 No = 0 Needs Improvement = 1	2	2
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Evaluator Notes:

Yes, the IPUC inspects the responses required for failures.

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<b>13</b>	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
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Evaluator Notes:

Yes, has question on inspection form, and reviews the report in PDM of Annual Report miles vs. NPMS miles.

<b>14</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 Yes = 2 No = 0 Needs Improvement = 1	2	2
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Evaluator Notes:

Yes, IPUC did not complete any D&A inspections in CY2017, but are compliant with their three and five year cycle requirements. IPUC has not found any positive test results to date.

<b>15</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 Yes = 2 No = 0 Needs Improvement = 1	2	2
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Evaluator Notes:

The IPUC spent 30.5 inspection person-days conducting OQ inspections. Several OQ plans were reviewed and field inspections conducted.

<b>16</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). (Are the State's largest operators programs being contacted or reviewed annually? Are replies to Operator IM notifications addressed? (formerly part of Question C-13)). 49 CFR 192 Subpart O Yes = 2 No = 0 Needs Improvement = 1	2	2
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Evaluator Notes:

No IMP inspections were conducted in 2017, but the IPUC is compliant with their 5 year schedule.

<b>17</b>	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). (Are the State's largest operators programs being contacted or reviewed annually?). 49 CFR 192 Subpart P Yes = 2 No = 0 Needs Improvement = 1	2	2
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Evaluator Notes:

No IMP inspections were conducted in 2017, but the IPUC is compliant with their 5 year schedule.

<b>18</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. PAPEI Effectiveness Inspections should be conducted every four years by operators. 49 CFR 192.616 Yes = 2 No = 0 Needs Improvement = 1	2	2
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Evaluator Notes:

Intermountain Gas Co. PAP inspection performed in 2013 and 2016; Avista PAP inspection performed in 2014 and 2017; Questar PAP performed in 2014 and 2017; Northwest Gas Co. performed in 2017. Each operator is utilizing 3rd party consultants to verify effectiveness of PAP program.

<b>19</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). Yes = 1 No = 0 Needs Improvement = .5	1	1
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Evaluator Notes:

The IPUC has been working to have better transparency with enforcement cases and inspection reports being posted on website. Information on enforcement is currently limited to docket searches. IPUC indicated they would look to include their progress report on the website as a next-step in transparency. No point deduction but IPUC does acknowledge they need to enhance the mechanisms for communicating with stakeholders.

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

Evaluator Notes:  
 There were no open SRCRs for Idaho in 2017.

**21** 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? 1 1  
 Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:  
 Each operator is asked question which is included in the IPUC Form 2 (Supplemental Checklist).

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

Evaluator Notes:  
 Yes

**23** 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. 1 1  
 No = 0 Needs Improvement = .5 Yes = 1

Evaluator Notes:  
 There have been no waivers or permits for IPUC in 2017.

**24** Did the state attend the National NAPSRS Board of Directors Meeting in CY being evaluated? 1 1  
 No = 0 Needs Improvement = .5 Yes = 1

Evaluator Notes:  
 IPUC attended the National NAPSRS meeting in Columbus, OH in 2017.

**25** Discussion on State Program Performance Metrics found on Stakeholder Communication site - <http://primis.phmsa.dot.gov/comm/states.htm> 2 2  
 No = 0 Needs Improvement = 1 Yes = 2

- a. Discussion of Potential Accelerated Actions (AA's) based on any negative trends Yes  No  Needs Improvement
- b. NTSB P-11-20 Meaningful Metrics Yes  No  Needs Improvement

Evaluator Notes:  
 All of the metrics are trending in the direction of improvement. It was clear from the discussion with the Program Manager and Supervisors that the drivers of the trends are understood.

**26** Discussion with State on accuracy of inspection day information submitted into State Inspection Day Calculation Tool (SICT) Has the State updated SICT data? 1 1  
 No = 0 Yes = 1

Evaluator Notes:  
 The IPUC's inspection person days increased substantially with the new calculation tool. PHMSA discussed the importance to continually review the inspections days for all inspections and to compare with the initial estimates entered into the calculation tool.

**27** Did the State verify Operators took appropriate action regarding Pipeline Flow Reversals, Product Changes and Conversions to Service? See ADP-2014-04 1 NA  
 Needs Improvement = .5 No = 0 Yes = 1

Evaluator Notes:

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**28** General Comments:

Info Only = No Points

Info Only

Evaluator Notes:

The IPUC generally complied with the requirements of Part C of this evaluation.

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Total points scored for this section: 46  
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<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"/> |
| c. | Procedures regarding closing outstanding probable violations   | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |

Evaluator Notes:

Procedures are contained in Sections 5.5-5.7 of POP.

- |    |  |                                      |   |
|----|--|--------------------------------------|---|
| 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<br>Yes = 4 No = 0 Needs Improvement = 1-3 | 4                                    | 3   |
| a. | Were compliance actions sent to company officer or manager/board member if municipal/government system?  | Yes <input type="radio"/>            | No <input type="radio"/> Needs Improvement <input checked="" type="radio"/> |
| b. | Document probable violations   | Yes <input type="radio"/>            | No <input checked="" type="radio"/> Needs Improvement <input type="radio"/> |
| c. | Resolve probable violations  | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/>            |
| d. | Routinely review progress of probable violations   | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/>            |
| e. | Within 30 days, conduct a post-inspection briefing with the owner or operator of the gas or hazardous liquid pipeline facility inspected outlining any concerns; and   | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/>            |
| f. | Within 90 days, to the extent practicable, provide the owner or operator with written preliminary findings of the inspection.  | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/>            |

Evaluator Notes:

IPUC has, as a matter of practice, communicates findings of non-compliance and/or probable violations via email. Inspection procedures (POP 5.7.) currently has no provision for compliance actions to be communicated by email. IPUC could not guarantee that company officers receive email notices in all cases.

IPUC either needs to amend POP 5.7. to allow for email correspondence or utilize compliance letters. One point deduction.

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

Evaluator Notes:

Yes, see D.2. for additional information.

- |   |   |   |   |
|---|---|---|---|
| 4 | 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:

No instances were discovered where the operator was not given due process to argue the allegations of non-compliance.

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

Evaluator Notes:

Procedures included in 5.7 of POP. Yes, the Program Manager has shown familiarity of the state process for imposing civil penalties.

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

Through CY2017 the IPUC had not exercised its fining authority on an operator. In early 2018, Avista Utilities was issued a \$10,000 penalty which was late suspended in exchange for other conditions met.

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7 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

The IPUC has generally complied with the requirements of Part D of this evaluation.

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Total points scored for this section: 14  
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:  
 Procedures is included in Section 6.0. of POP.

- 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:  
 Procedures is included in Sections 6.2 and 6.5 of POP. The Program Manager is contacted by operator to report incidents after-hours.

- 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:  
 Procedures is included in Sections 3.15, 6.1, and 6.6 of POP. Idaho had two incidents in 2017 and performed a follow-up visit to investigate status of equipment failures.

- 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:  
 Procedures is included in Sections 6.6-6.7 of POP. Idaho had two incidents in 2017 and performed a follow-up visit to investigate status of equipment failures.

- 5 Did the state initiate compliance action for violations found during any incident/accident investigation? 1 1  
 Yes = 1 No = 0

Evaluator Notes:

- 6 Did the state assist Region Office or Accident Investigation Division (AID) 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 NA  
 Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

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



Evaluator Notes:

Yes

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**8** General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

The IPUC generally complied with the requirements of Part E of this evaluation.

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Total points scored for this section: 10

Total possible points for this section: 10



**PART F - Damage Prevention**

**Points(MAX) Score**

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- |          |  |   |   |
|----------|--|---|---|
| <b>1</b> | Has the state reviewed directional drilling/boring procedures of each pipeline operator or its contractor to determine if they include actions to protect their facilities from the dangers posed by drilling and other trench less technologies? NTSB<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

Evaluator Notes:

Procedure is included in Section 3.4 of POP. Idaho has question contained in its IPUC Form 2 (Supplemental Checklist)

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- |          |  |   |   |
|----------|--|---|---|
| <b>2</b> | Did the state inspector verify pipeline operators are following their 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:

Procedure is included in Section 3.12 of POP. Idaho has question contained in its IPUC Form 2 (Supplemental Checklist)

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- |          |  |   |   |
|----------|--|---|---|
| <b>3</b> | 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

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- |          |  |   |   |
|----------|--|---|---|
| <b>4</b> | Has the agency or another organization within the state collected data and evaluated trends on the number of pipeline damages per 1,000 locate requests? (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:

Idaho collects the data, and evaluates this data for trends on the number of pipeline damages per 1,000 locate requests.

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

Evaluator Notes:

The IPUC has generally complied with the requirements of Part F of this evaluation.

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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:  
 Intermountain Gas Company  
 Name of State Inspector(s) Observed:  
 Bruce Perkins  
 Location of Inspection:  
 Nampa, ID  
 Date of Inspection:  
 August 23, 2018  
 Name of PHMSA Representative:  
 David Appelbaum

Evaluator Notes:

**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:

Yes. The operator was notified and was present during the inspection.

**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:

Yes

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

Evaluator Notes:

Yes

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

Evaluator Notes:

Yes, inspector verified calibrations on equipment used.

**6** Did the inspector adequately review the following during the field portion of the state evaluation? (check all that apply on list) 2 2  
 Yes = 2 No = 0 Needs Improvement = 1

- a. Procedures
- b. Records
- c. Field Activities
- d. Other (please comment)

Evaluator Notes:

Yes, inspectors observed regulator testing, cathodic protection and atmospheric corrosion at a number of regulator stations.

**7** Did the inspector have adequate knowledge of the pipeline safety program and regulations? (Evaluator will document reasons if unacceptable) 2 2

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes. The inspector had adequate knowledge of the pipeline safety program and regulations during the inspection.

<b>8</b>	Did the inspector conduct an exit interview? (If inspection is not totally complete the interview should be based on areas covered during time of field evaluation) Yes = 1 No = 0	1	1
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Evaluator Notes:

Yes

<b>9</b>	During the exit interview, did the inspector identify probable violations found during the inspections? (if applicable) Yes = 1 No = 0	1	1
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Evaluator Notes:

No probable violations but the inspector did identify areas of concern (recommendations) during the exit interview.

<b>10</b>	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
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- |    |                                   |                                     |
|----|-----------------------------------|-------------------------------------|
| 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 checked="" type="checkbox"/> |
| f. | Casings                           | <input type="checkbox"/>            |
| g. | Cathodic Protection               | <input checked="" type="checkbox"/> |
| h. | Cast-iron Replacement             | <input type="checkbox"/>            |
| i. | Damage Prevention                 | <input checked="" type="checkbox"/> |
| j. | Deactivation                      | <input type="checkbox"/>            |
| k. | Emergency Procedures              | <input checked="" type="checkbox"/> |
| l. | Inspection of Right-of-Way        | <input checked="" 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 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 type="checkbox"/>            |
| w. | Plastic Pipe Installation         | <input type="checkbox"/>            |
| x. | Public Education                  | <input type="checkbox"/>            |
| y. | Purging                           | <input type="checkbox"/>            |
| z. | Prevention of Accidental Ignition | <input type="checkbox"/>            |
| A. | Repairs                           | <input type="checkbox"/>            |
| B. | Signs                             | <input checked="" type="checkbox"/> |
| C. | Tapping                           | <input type="checkbox"/>            |
| D. | Valve Maintenance                 | <input checked="" type="checkbox"/> |
| E. | Vault Maintenance                 | <input type="checkbox"/>            |



- F. Welding
- G. OQ - Operator Qualification
- H. Compliance Follow-up
- I. Atmospheric Corrosion
- J. Other

Evaluator Notes:

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Total points scored for this section: 12  
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)? 1 NA  
Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

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

Evaluator Notes:

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

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

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

Evaluator Notes:

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

Evaluator Notes:

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

Evaluator Notes:

**8** General Comments: Info Only Info Only  
Info Only = No Points

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**

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

Evaluator Notes:

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

Evaluator Notes:

**3** Were any probable violations identified by state referred to PHMSA for compliance? 1 NA  
(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

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

Evaluator Notes:

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

Evaluator Notes:

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

Evaluator Notes:

**7** General Comments: Info Only Info Only  
Info Only = No Points

Evaluator Notes:

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

