



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

NEW HAMPSHIRE 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:** New Hampshire

**Agency Status:**

**Date of Visit:** 08/14/2018 - 08/16/2018

**Agency Representative:** Randy Knepper, Director, Safety Division

**PHMSA Representative:** Jim Anderson

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

**Name/Title:** Martin P. Honigberg, Chairman

**Agency:** New Hampshire Public Utilities Commission

**Address:** 21 S. Fruit St., Suite 10

**City/State/Zip:** Concord, New Hampshire 03301-2429

**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

### PARTS

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)

### Possible Points Points Scored

10	10
13	13
47	47
15	15
6	6
8	8
11	11
0	0
0	0

### TOTALS

**110 110**

### State Rating

**100.0**

## PART A - Progress Report and Program Documentation Review

Points(MAX) Score

1	Accuracy of Jurisdictional Authority and Operator/Inspection Units Data - Progress Report Attachment 1 Yes = 1 No = 0 Needs Improvement = .5	1	1
Evaluator Notes: Reviewed data - no issues.			
2	Review of Inspection Days for accuracy - Progress Report Attachment 2 Yes = 1 No = 0 Needs Improvement = .5	1	1
Evaluator Notes: Reviewed data - no issues.			
3	Accuracy verification of Operators and Operators Inspection Units in State - Progress Report Attachment 3 Yes = 1 No = 0 Needs Improvement = .5	1	1
Evaluator Notes: Reviewed data - no issues.  Notes on Attachment 3 noting differences with Attachment 1.			
4	Were all federally reportable incident reports listed and information correct? - Progress Report Attachment 4 Yes = 1 No = 0 Needs Improvement = .5	1	1
Evaluator Notes: Accurate - NO Reportable Incidents in 2017			
5	Accuracy verification of Compliance Activities - Progress Report Attachment 5 Yes = 1 No = 0 Needs Improvement = .5	1	1
Evaluator Notes: Reviewed data - no issues. Compliance actions listed on NH PUC webpage.			
6	Were pipeline program files well-organized and accessible? - Progress Report Attachment 6 Yes = 2 No = 0 Needs Improvement = 1	2	2
Evaluator Notes: Yes, no issues. Files kept electronically and hard copy.			
7	Was employee listing and completed training accurate and complete? - Progress Report Attachment 7 Yes = 1 No = 0 Needs Improvement = .5	1	1
Evaluator Notes: Reviewed data and verified on TQ SABA - no issues.			
8	Verification of Part 192,193,198,199 Rules and Amendments - Progress Report Attachment 8 Yes = 1 No = 0 Needs Improvement = .5	1	1
Evaluator Notes: NH PUC pipeline safety rules automatically adopt all future federal safety regulations.			

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:

Reviewed data - no issues.

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10	General Comments:	Info Only	Info Only
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Info Only = No Points

Evaluator Notes:

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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. | 2 | 2 |
|---|--|---|---|

Yes = 2 No = 0 Needs Improvement = 1

### Evaluator Notes:

Standard Inspections - In written procedures in - V. TYPES of INSPECTIONS  
Listed as Routine Inspections - page 7  
Pre-Inspections Activities - page 7  
Inspection Activities - page 7  
Post Inspection Activities - page 14

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

IMP/DIMP Inspections - In written procedures in - V. TYPES of INSPECTIONS  
Listed as Integrity Management Inspections - page 9  
Pre-Inspections Activities - page 7  
Inspection Activities - page 9  
Post Inspection Activities - page 14

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

OQ Inspections - In written procedures in - V. TYPES of INSPECTIONS  
Listed as Operator Qualification Inspections - page 10  
Pre-Inspections Activities - page 7  
Inspection Activities - page 10  
Post Inspection Activities - page 14

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

Damage Prevention Inspections - In written procedures in - V. TYPES of INSPECTIONS  
Listed as Damage Prevention Inspections - page 10  
Pre-Inspections Activities - page 7  
Inspection Activities - page 10  
Post Inspection Activities - page 14

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

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

On-Site Operator Training - In written procedures in - V. TYPES of INSPECTIONS

Listed as On-Site Operator Training - page 9

Pre-Inspections Activities - page 7

Inspection Activities - page 9

Post Inspection Activities - page 14

- 
- 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:

Construction Inspections - In written procedures in - V. TYPES of INSPECTIONS

Listed as Design Testing and Construction Inspections - page 8

Pre-Inspections Activities - page 7

Inspection Activities - page 8

Post Inspection Activities - page 14

- 
- 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 ☒ 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:

Yes - Listed on page 11 of written procedures - VI. - Risk Based Inspection Process.

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- 8 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

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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):  
178.50

B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):  
220 X 2.00 = 440.00

Ratio: A / B  
178.50 / 440.00 = 0.41

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

Evaluator Notes:

No issues - Ratio of .41 exceeds 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 <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b. | Completion of Required DIMP*/IMP Training before conducting inspection as lead? *Effective Evaluation CY2013           | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c. | Root Cause Training by at least one inspector/program manager  | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d. | Note any outside training completed  | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| e. | Verify inspector has obtained minimum qualifications to lead any applicable standard inspection as the lead inspector. | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

Evaluator Notes:

D Burnell, J Vercellotti, and R Knepper have completed OQ Training.  
J Vercellotti, and R Knepper have completed DIMP and IMP Training.  
D Burnell, J Vercellotti, and R Knepper have completed Root Cause Training.  
All three have obtained minimum qualifications to lead Standard Inspection as Lead Inspector.

Verified on TQ SABA.

- 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:

R Knepper has nearly 14 years experience as Program Manager and has been past NAPSRC Chair and Chairs the NARUC Pipeline Staff Subcommittee as well as participates on various NAPSRC Subcommittees, as well as CGA committees and GTI committees.

- 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 - Letter sent dated July 28, 2016 and recieved response letter dated September 26, 2018. Addressed Database update noted on the chairman letter.

- 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:

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- |          |  |   |   |
|----------|--|---|---|
| <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:

A review of files and NH PUC written procedures confirm all inspections were scheduled in accordance to the established time intervals listed under Section IV Intervals of Inspections described on pages 2-5.

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

Evaluator Notes:

Yes, New Hampshire uses the federal forms or a version of the inspection forms to perform their inspections. With the exception of Drug and Alcohol Inspections, Inspection reports found all answers were completed with S, U, NA & NC in the appropriate block along with comments in the inspector remarks section. New Hampshire does not use S+ or Concern on their inspection reports. NH also requires inspectors to fill out comments so that rationale for the inspection result is evident. Nearly all inspections are accompanied by photo documentation.

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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<br>Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

Evaluator Notes:

This is shown on PHMSA Form 2 and NH PUC inspection Form 4 Comprehensive Corrosion (reviewed Form 4 for verification).  
Unitil (Northern Utilities) lists in Section 6.3.3 of their O&M this requirement. Each segment requires replacement or repair. Liberty lists in Section 8B Examination of a Buried Pipe When Exposed in subsection 6.2 Inspection for Graphitization describes inspection and requires replacement or repair.  
LPG Operators and Transmission Operators do not use Cast Iron.

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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<br>Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

Evaluator Notes:

Liberty is required to file all leaks, all Cast Iron breaks on a monthly basis to the Safety Division per Puc 508.05 (d) and 509.15. The Safety Division plots those leaks for trending.

In addition Puc rule 508.04 (d) requires continuous monitoring during the winter months of any system containing cast iron.

Lastly Liberty partakes in a Cast Iron Bare Steel accelerated replacement program where all replacements are ranked for priority of replacement. This program is annually docketed, requires interactive participation with the NH PUC Safety Division and reviewed formally with the Commission.

Liberty's O&M Manual Procedure 11-B "Continuing Surveillance, Subsection 6.1.5 Review and Analysis of Records states Engineering department will initiate action after reviewing Leakage Survey Records including Leak Repair Work Orders and Leak Re Evaluation Work Orders as well as Pipeline Patrol Work Orders, Subsection 6.1. Scheduled Inspection Requirements references 6.1.2 Action Criteria options such as repair, recondition, replace or retire with an accompanying schedule.

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- 10 Did the state review operator emergency response procedures for leaks caused by excavation damage near buildings and determine whether the procedures adequately address the possibility of multiple leaks and underground migration of gas into nearby buildings Refer to 4/12/01 letter from PHMSA in response to NTSB recommendation P-00-20 and P-00-21? (NTSB) Chapter 5.1 1 1  
Yes = 1 No = 0

Evaluator Notes:

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 point, No= 0 Points)

Comments:

Federal Form 2 is used by NH to accomplish this.

Liberty's O&M contains this in Section 12 C Leakage Surveys subsection 6.7 Leakage Investigation for Leakage Surveys Liberty's Emergency Response plans has numerous references to Leak Investigation (section B, F, H, and Appendices) Liberty's O&M in section 12B Leak Response, Leak Classification, Leak Repair subsection 6.1.6 Investigating an outside leak makes specific references to migration and multiple building checks (at least 5).

Unitil's O&M lists this in Section 2 N Leak Management subsections 1.0 General and 3.2 Sub-Surface Gas Detection Survey (including barhole surveys). Unitil's Emergency Response Plan section IV. EMERGENCY RESPONSE PROCESSES references in subsection C Initial Response & Reporting states "If the emergency involved an indication of a gas leak it shall be graded and investigated in accordance with Unitil's O&M Manual (Section 2-N Leak Management)".

- 11 Did the state review operator records of previous accidents and failures including reported third party damage and leak response to ensure appropriate operator response as required by 192.617? Chapter 5.1 1 1  
Yes = 1 No = 0

Evaluator Notes:

Leak Response is reported monthly by Liberty and Unitil per Commission Orders. These include 3rd party Damage and usually result in Class I Leak.

Monthly records are tracked and graphed by the Safety Division. . Times are specified to be 30 minutes, 45 minutes or 60 minutes depending upon the time of discovery. For small operators it is limited to 30 minutes.

Third Party Damages are required to be reported monthly and these are tracked by the Underground Damage Prevention Specialist. Each damage is reviewed to ensure appropriate operator response.

Previous Accidents, while few, are also required to be reviewed for Emergency Response Times.

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

Evaluator Notes:

Operator Annual Reports are reviewed, data analyzed and trending performed for Liberty and Unitil and formerly NH Gas.

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

Evaluator Notes:

Liberty Utilities only utility to have Tlines. Liberty sends email to PUC annually that they update. Reviewed NPMS webpage.

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

Evaluator Notes:

One conducted in 2017.

LNG operators on 48 month schedule for short form and 60 monthschedule for long form

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

Evaluator Notes:

Protocol 9 - every 2 years

Plan review - every 5 years

Plan review scheduled in 2018..

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

Evaluator Notes:

IMP plans are required to be submitted annually per Puc 506.02 (t) including notifications of changes. The Safety Division just switched from an 60 month review to a 60 month review. The transmission lines are piggable or made of plastic so the IMP inspections are not complex for the 19 miles of transmission pipeline. Latest pipeline run was in Nov 2015 with anomaly dig in 2016.

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

Evaluator Notes:

Yes - no issues.

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

Evaluator Notes:

PAPEI Inspections were completed for Liberty and Unitil in November 2016. Smaller LPGs have a simplified verification process.

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

Evaluator Notes:

PUC website. Safety section has incidents, damages, compliance notifications, etc.

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

Evaluator Notes:  
None 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:  
New Hampshire PUC Order 2570 in 2012 makes this an annual requirement. All Adyl A failures are reported to PPDC and the PUC.

- 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 has only been one waiver ever by the NHPUC and it was outdated. NH PUC requested the removal of the LNG waiver granted on February 11, 1993 be removed from PHMSA website. This request was submitted by R Knepper on November 7, 2014 and the wavier has been removed from PHMSA website in 2015.

- 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:  
Yes.

- 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:  
Discussed with program manager.

- 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:  
Discussed with program manager.

- 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:  
NA in New Hampshire.

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**28** General Comments:

Info Only = No Points

Info OnlyInfo Only

Evaluator Notes:

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Total points scored for this section: 47  
Total possible points for this section: 47



## 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"/> |
| c.       | Procedures regarding closing outstanding probable violations   | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |

Evaluator Notes:

- A. - Review of compliance actions noted all compliance actions were sent to prpper personnel.
- B. - In written procedures on page 16.
- C. - In written procedures on page 17.

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

- A. - Yes
- B. - Yes, also on PUC website
- C. - In written procedures on page 14.
- D. - In written procedures on page 15.
- E. - In written procedures on page 15.
- F. - In written procedures on page 15.

- |          |  |   |   |
|----------|--|---|---|
| <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:

Rule RSA.374.7a explains due process for the commission and it is included in all compliance action letters.

- |          |   |   |   |
|----------|---|---|---|
| <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.

- |          |   |   |   |
|----------|---|---|---|
| <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.

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

Evaluator Notes:

Yes, issues fines totaling \$164,600 in 2017.

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

Evaluator Notes:

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Total points scored for this section: 15  
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, Page 6 of written procedures.

- 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:

PUC notifies operator quarterly of staff member on call.

A. - On page 6 of written procedures.

B. - On page 6 of written procedures.

- 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:

PUC investigates all reportable incidents.

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

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:

None in 2017.

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

Yes = 1 No = 0

Evaluator Notes:

None in 2017.

- 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:

None in 2017.

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

Yes = 1 No = 0

Evaluator Notes:  
Yes.

8 General Comments:  
Info Only = No Points  
Evaluator Notes:

Info OnlyInfo Only

Total points scored for this section: 6  
Total possible points for this section: 6





## 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:

NH PUC Rule 805.02(e) covers trench less technology and Rule 806.01, 806.02, 806.03, 806.04, 806.05 identify marking zone tolerance, markers, identification, emergency and marking certain newly installed underground facilities. Additionally, NH PUC form Damage Prevention Module includes this item in section 192.614 (5 & Sa). A review of one operator, Liberty Utilities Procedure Damage Prevention Section 11.C 6.6.7 was reviewed and found co"ect. Unitol (Northern Utilities) states in section 2G of the O&M "Each natural gas utility shall maintain written procedures for protecting existing underground facilities during directional drilling and other trenchless technology installation techniques. Thesewritten procedures shall utilize the guidance material provided by the Gas Piping Technology Committee (GPTC) detailed in Guidance Material Appendix G-192-6, or other recognized industry standard. [ME Puc 420.3D] Refer to Appendix 2-G, GPTC Guide Material G-192-6."

- |   |  |   |   |
|---|--|---|---|
| 2 | 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:

Yes - NH PUC requires operators to report marking of underground facilities and any mismark or failed to mark. In addition to the federal inspection form, NH PUC inspectors use the damage prevention module E-26 to review notification, marking, positive response and the use of the one call system. The reporting requirement is reviewed by their Damage Prevention Specialist each month. Positive Response is required by PUC rule PUC 804.02(e) and 806.02 (a)(2).

- |   |  |   |   |
|---|--|---|---|
| 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 - This is accomplished by the local distribution companies being a member of the Hampshire Management Underground Safety Training (MUST) organization which is a recognized regional CGA partner. NH PUC has several best practices in locating underground facilities pertaining to using only company personnel in locating their gas lines and NH PUC rule 804.03 Training of Locators. This best practice was implemented thru individual NH PUC Order to each company operator. All nine elements have been adopted by the NHPUC as recognized by the 2014 PHMSA Characterization Tool Results.

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

NH PUC collects data on pipeline damages per 1,000 locate request. Operators and excavators are required to submit monthly causes of excavation damage and final- determinations are made after due process in accordance with NH PUC Rule 804.1 (a-e) (E-26). Trends are plotted and reviewed by staff. A review of data found the number of damages per 1,000. In CY2016 it was 1.27 and CY2015 it was 1.41. Past 6 years are found on the Safety Division Website under "Overall NH Damage Prevention Statistics" Reviewed information on NH PUC website.

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

Evaluator Notes:

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

## PART G - Field Inspections

Points(MAX) Score

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

Name of Operator Inspected:

Liberty Utilities

Name of State Inspector(s) Observed:

Joe Vercellotti

Location of Inspection:

Tilton

Date of Inspection:

August 15, 2018

Name of PHMSA Representative:

Jim Anderson

Evaluator Notes:

Inspected LNG peak shaving plant

- 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, operator personnel were present.

- 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, used federal IA form.

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

Evaluator Notes:

Yes, no issues.

- 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, no issues.

- 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:

Inspector checked procedures, records and field activities.

- 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, no issues.

- 
- |          |   |   |   |
|----------|---|---|---|
| <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)<br>Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

Evaluator Notes:

Yes.

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

Evaluator Notes:

None found.

- 
- |           |   |           |           |
|-----------|---|-----------|-----------|
| <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.<br>Info Only = No Points | Info Only | Info Only |
|-----------|---|-----------|-----------|

- |    |                                   |                          |
|----|-----------------------------------|--------------------------|
| a. | Abandonment                       | <input type="checkbox"/> |
| b. | Abnormal Operations               | <input type="checkbox"/> |
| c. | Break-Out Tanks                   | <input type="checkbox"/> |
| d. | Compressor or Pump Stations       | <input type="checkbox"/> |
| e. | Change in Class Location          | <input type="checkbox"/> |
| f. | Casings                           | <input type="checkbox"/> |
| g. | Cathodic Protection               | <input type="checkbox"/> |
| h. | Cast-iron Replacement             | <input type="checkbox"/> |
| i. | Damage Prevention                 | <input type="checkbox"/> |
| j. | Deactivation                      | <input type="checkbox"/> |
| k. | Emergency Procedures              | <input type="checkbox"/> |
| l. | Inspection of Right-of-Way        | <input type="checkbox"/> |
| m. | Line Markers                      | <input type="checkbox"/> |
| n. | Liaison with Public Officials     | <input type="checkbox"/> |
| o. | Leak Surveys                      | <input type="checkbox"/> |
| p. | MOP                               | <input type="checkbox"/> |
| q. | MAOP                              | <input type="checkbox"/> |
| r. | Moving Pipe                       | <input type="checkbox"/> |
| s. | New Construction                  | <input type="checkbox"/> |
| t. | Navigable Waterway Crossings      | <input type="checkbox"/> |
| u. | Odorization                       | <input type="checkbox"/> |
| v. | Overpressure Safety Devices       | <input type="checkbox"/> |
| w. | Plastic Pipe Installation         | <input type="checkbox"/> |
| x. | Public Education                  | <input type="checkbox"/> |
| y. | Purging                           | <input type="checkbox"/> |
| z. | Prevention of Accidental Ignition | <input type="checkbox"/> |
| A. | Repairs                           | <input type="checkbox"/> |
| B. | Signs                             | <input type="checkbox"/> |
| C. | Tapping                           | <input type="checkbox"/> |
| D. | Valve Maintenance                 | <input type="checkbox"/> |
| E. | Vault Maintenance                 | <input type="checkbox"/> |

- |    |                             |                                     |
|----|-----------------------------|-------------------------------------|
| F. | Welding                     | <input type="checkbox"/>            |
| G. | OQ - Operator Qualification | <input type="checkbox"/>            |
| H. | Compliance Follow-up        | <input type="checkbox"/>            |
| I. | Atmospheric Corrosion       | <input type="checkbox"/>            |
| J. | Other                       | <input checked="" type="checkbox"/> |

Evaluator Notes:

LNG peak shaving plant.

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



**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:

- |          |   |   |    |
|----------|---|---|----|
| <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:

- |          |  |   |    |
|----------|--|---|----|
| <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:

- |          |   |   |    |
|----------|---|---|----|
| <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:

- |          |   |   |    |
|----------|---|---|----|
| <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:

- |          |  |   |    |
|----------|--|---|----|
| <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:

- |          |   |   |    |
|----------|---|---|----|
| <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:

- |          |  |           |           |
|----------|--|-----------|-----------|
| <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:

- |          |  |   |    |
|----------|--|---|----|
| <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:

- |          |  |   |    |
|----------|--|---|----|
| <b>3</b> | Were any probable violations identified by state referred to PHMSA for compliance?<br>(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:

- |          |   |   |    |
|----------|---|---|----|
| <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:

- |          |  |   |    |
|----------|--|---|----|
| <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:

- |          |  |   |    |
|----------|--|---|----|
| <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:

- |          |  |           |           |
|----------|--|-----------|-----------|
| <b>7</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