



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

CALIFORNIA PUBLIC UTILITIES COMMISSION

Document Legend

PART:

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



2017 Gas State Program Evaluation -- CY 2017

Gas

State Agency: California

Agency Status:

Date of Visit: 10/22/2018 - 10/26/2018

Agency Representative: Ken Bruno, Program Manager

Rating:

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

PHMSA Representative: Michael Thompson, David Lykken

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

Name/Title: Michael Picker, President

Agency: California Public Utility Commission

Address: 505 Van Ness Avenue

City/State/Zip: San Francisco, CA 94102

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	8.5
13	12.5
47	47
15	15
11	11
8	8
12	12
0	0
0	0

TOTALS

116 114

State Rating

98.3

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:

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

- | | | | |
|----------|----------------------------------------------------------------------------------------------------------------|---|-----|
| 2 | Review of Inspection Days for accuracy - Progress Report Attachment 2
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 0.5 |
|----------|----------------------------------------------------------------------------------------------------------------|---|-----|

Evaluator Notes:

Half-Point deduction for Needed Improvement. Significant errors found with respect to the categorization of inspection days. No impacts to inspection person-day/total person-day ratio. Errors will be corrected in a supplemental submission.

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

Evaluator Notes:

No issues were found

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

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

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

Evaluator Notes:

Yes, compliance activities for 2017 were reviewed and no issues were found.

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

Evaluator Notes:

One-Point deduction as Needing Improvement. Some difficulty experienced searching for inspection records located on the agency's "Southern Region" server. In some cases inspection documentation was located on inspector computers local drives. Records for the Northern Region were easily obtained and verified.

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

Yes, the training for the CaPUC inspectors showed a lot of courses being attended during 2017.

- | | | | |
|----------|-----------------------------------------------------------------------------------------------------------------------------------|---|---|
| 8 | Verification of Part 192,193,198,199 Rules and Amendments - Progress Report Attachment 8
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|----------|-----------------------------------------------------------------------------------------------------------------------------------|---|---|

Evaluator Notes:

No issues at this time. All applicable rules and amendments have been adopted.

- 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:

The CaPUC did a good job describing their plans and accomplishments.

10 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

A-2, Half-Point deduction for Needed Improvement. Significant errors found with respect to the categorization of inspection days. No impacts to inspection person-day/total person-day ratio. Errors will be corrected in a supplemental submission.

A-6, One-Point deduction as Needing Improvement. Some difficulty experienced searching for inspection records located on the agency's "Southern Region" server. In some cases inspection documentation was located on inspector computers local drives. Records for the Northern Region were easily obtained and verified.

Total points scored for this section: 8.5
Total possible points for this section: 10



PART B - Program Inspection Procedures

Points(MAX) Score

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

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

GSRB GO112-F Inspection Procedures Manual.

Sections II(D-F), III(A-G, I, Q, R), Field Inspections 1 thru 6, IV (A-G)

Pre-Inspection, Inspection, and Post Inspection activities addressed.

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

GSRB GO112-F Inspection Procedures Manual.

TIMP - Section III(L) DIMP - Section III(M)

Pre-Inspection, Inspection, and Post Inspection activities addressed. For CY2017 comprehensive plan reviews not to exceed every 3 years. Annual "check-in" with operators for program and plan updates. For field verifications inspection staff request schedules of their assigned operators field activities.

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

GSRB GO112-F Inspection Procedures Manual.

Sections III(I). Pre-Inspection, Inspection, and Post Inspection activities addressed in throughout Sections II, III and IV.

- | | | | |
|----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|-----|
| 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 | 0.5 |
|----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|-----|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

GSRB GO112-F Inspection Procedures Manual. Sections III(J). Pre-Inspection, Inspection, and Post Inspection activities addressed in Sections II, III and IV.

Scored as needing improvement (Half point deduction). Pre-inspection, Inspection, and enforcement activities and processes should describe in detail specific actions required to conduct comprehensive damage prevention inspections.

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

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

GSRB GO112-F Inspection Procedures Manual.

Section VII - Training

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

GSRB GO112-F Inspection Procedures Manual.

Section III (H). also SED Field Safety Practices - Appendix H

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	6	6
a.	Length of time since last inspection (Within five year interval)	Yes <input checked="" type="radio"/>	No <input type="radio"/> Needs Improvement <input type="radio"/>
b.	Operating history of operator/unit and/or location (includes leakage, incident and compliance activities)	Yes <input checked="" type="radio"/>	No <input type="radio"/> Needs Improvement <input type="radio"/>
c.	Type of activity being undertaken by operators (i.e. construction)	Yes <input checked="" type="radio"/>	No <input type="radio"/> Needs Improvement <input type="radio"/>
d.	Locations of operators inspection units being inspected - (HCA's, Geographic areas, Population Density, etc)	Yes <input checked="" type="radio"/>	No <input type="radio"/> Needs Improvement <input type="radio"/>
e.	Process to identify high-risk inspection units that includes all threats - (Excavation Damage, Corrosion, Natural Forces, Outside Forces, Material and Welds, Equipment, Operators and any Other Factors)	Yes <input checked="" type="radio"/>	No <input type="radio"/> Needs Improvement <input type="radio"/>
f.	Are inspection units broken down appropriately?	Yes <input checked="" type="radio"/>	No <input type="radio"/> Needs Improvement <input type="radio"/>

Evaluator Notes:

a. Section VII(c)

b. Section VII(B) also GSRB Inspection Matrix

c. Section II(B)(7)

d, e, f. Section II. Also addressed in inspection plan documents ...GSRB Inspection Units, Annual Report Analysis & Trending

8 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

B-4 Scored as needing improvement (Half point deduction). Pre-inspection, Inspection, and enforcement activities and processes should describe in detail specific actions required to conduct comprehensive damage prevention inspections.

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



PART C - Program Performance

Points(MAX) Score

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

A. Total Inspection Person Days (Attachment 2):
2532.75

B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):
220 X 23.90 = 5257.26

Ratio: A / B
2532.75 / 5257.26 = 0.48

If Ratio \geq 0.38 Then Points = 5, If Ratio $<$ 0.38 Then Points = 0
Points = 5

Evaluator Notes:

220 X 23.90 = 5258 ? 2532.75/5258 = (.482)

240 Construction Inspections = .094 % of total

27 Days Operator Training

- 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:

Training requirements have been met. Inspectors have taken required training in specific discipline(s) prior to leading specialized inspections or standard inspections.

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

Evaluator Notes:

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

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

Evaluator Notes:

Yes, the Chairman's letter was sent to CPUC on 10/3/2017, and their response was sent to PHMSA on 11/6/2017.

- 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, the last seminar was held on 9/27-29/2016. They are planning another in 2019.

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

Evaluator Notes:

After review of the CaPUC process for scheduling inspections and looking over a large percentage of the inspections conducted in 2017 they inspecting all types of operators and inspection units in accordance with time intervals established in their written procedures,

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

Evaluator Notes:

The CaPUC Gas safety section has all the most current inspection forms stored electronically for inspectors to use.

-
- | | | | |
|----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 8 | Did the state review operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization and if necessary remedial action was taken? (NTSB) Chapter 5.1
Yes = 1 No = 0 | 1 | 1 |
|----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

Evaluator Notes:

Yes. Information contained on CPUC Safety & Enforcement Division (SED) Form OM "Operations & Maintenance of a Gas Dist and Trans Pipeline", Page 26 has the question asked even though, * All known cast iron systems have been replaced in California.

-
- | | | | |
|----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 9 | Did the state review operator procedures for surveillance of cast iron pipelines, including appropriate action resulting from tracking circumferential cracking failures, study of leakage history, or other unusual operating maintenance condition? (Note: See GPTC Appendix G-18 for guidance) (NTSB) Chapter 5.1
Yes = 1 No = 0 | 1 | 1 |
|----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

Evaluator Notes:

Yes. Information contained on page 28 of the CPUC Safety & Enforcement Division (SED) Form OM "Operations & Maintenance of a Gas Dist and Trans Pipeline".
* All known cast iron systems have been replaced in California.

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

Evaluator Notes:

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

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

Evaluator Notes:

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

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

Evaluator Notes:

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

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

Evaluator Notes:

Yes, there is personnel assigned to this task.

- | | | | |
|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 14 | Is the state verifying operators are conducting drug and alcohol tests as required by regulations? This should include verifying positive tests are responded to in accordance with program. 49 CFR 199
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
-

Evaluator Notes:

The CaPUC has a question for this on their inspection form #3. It is listed under (49 USC 60132, ADB - 08-07)

- | | | | |
|-----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 15 | 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 |
|-----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
-

Evaluator Notes:

Yes, they are completing D&A inspections as part of their inspection schedule.

- | | | | |
|-----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 16 | 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 |
|-----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
-

Evaluator Notes:

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

- | | | | |
|-----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 17 | 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 |
|-----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
-

Evaluator Notes:

Yes, the CaPUC is working this as part of their inspection schedule.

- | | | | |
|-----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 18 | 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 |
|-----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
-

Evaluator Notes:

Yes, they have started to formally revisit their operators.

- | | | | |
|-----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 19 | Does the state have a mechanism for communicating with stakeholders - other than state pipeline safety seminar? (This should include making enforcement cases available to public).
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
-

Evaluator Notes:

Yes, the CaPUC provides information on inspections, enforcement and has guidance materials and information for small operators on their web site. They also provide presentations at public hearings and commission meetings.

- 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:

19 SRC's reported in CY2017. One remains open (original report date 10/18/2017). SRC 20170151, the tap remains shut in and isolated. The operator is still developing a plan to return this tap to service but tentatively intends to return the tap to service by the end of 2018.

WR providing the SRC report number but not a copy of the report itself. Suggested that they contact WR to ensure a copy is provided in each case. The CAPUC has assigned TIMP and DIMP Process Owners (SME'S) who are responsible for reviewing every SRC report.

- 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:

- 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, the CaPUC keeps records of all responses to PHMSA or NAPSRS surveys or questions. The list was reviewed during the evaluation.

- 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:

Yes, they have assigned an inspector to work this process. They have verified all waivers and have made recommendations to close all those they can with PHMSA. The PHMSA needs to close out the waivers that are no longer needed or active.

- 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, Supervisor Dennis Lee attended for the Program Manager.

- 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:

Damages per 100 locate tickets have dropped to their lowest level, (3.0) since starting to collect data in 2010. With the extra focus and effort on Call Before you dig by the CPUC they have steadily declined over the past couple years from over 4.2 to 3.0.

Inspection days per 1000 miles of pipeline has increased over the 6.3 days in 2015 to a 10.3 days in 2017. This is an all-time high since 2010.

Inspection days per MMO/LPG has stayed the same as 2016 with one day per MMO/LPG operator which is slightly down from 1.5 days in 2015.

Pipeline inspector qualification continues to stay at a high level in 2017 with the largest jump coming in 2016. The percentage of 5-year retention is at an all-time high.

Gas distribution system leaks show that the number of leaks repaired per 1000 miles is down slightly from 2016, but still comparatively high to earlier years. The hazardous leaks repaired has stayed the same as 2016 and the outstanding leaks/100 miles is slightly increased from 2016.

The enforcement program evaluation score has risen to 100 percent of the possible score for the first time since 2011.

Incident investigation score has stayed at 100 percent for the second year in a row. The last tie this happened was in 2010 and 2011.

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

Evaluator Notes:
SICT = 2575
2017 PR= 2532.75
Old Formula = 988
2016 Progress Report = 2022

The CPUC was very close to their estimated days.

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

Evaluator Notes:

-
- | | | | |
|-----------|--------------------------------------------|-----------|-----------|
| 28 | General Comments:
Info Only = No Points | Info Only | Info Only |
|-----------|--------------------------------------------|-----------|-----------|

Evaluator Notes:

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



PART D - Compliance Activities

Points(MAX) Score

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

Evaluator Notes:

Yes. List of companies and official's names and procedures to review progress of compliance actions are noted on page 33 in Section 5 Enforcement and Compliance of the GSRB inspection manual.

- | | | | |
|----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------|-----------------------------------------|
| 2 | Did the state follow compliance procedures (from discovery to resolution) and adequately document all probable violations, including what resolution or further course of action is needed to gain compliance? Chapter 5.1
Yes = 4 No = 0 Needs Improvement = 1-3 | 4 | 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:

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

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

Evaluator Notes:

Yes, this was verified by reviewing the inspection/enforcement records for 2017.

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

Evaluator Notes:

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

- | | | | |
|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 5 | Is the program manager familiar with state process for imposing civil penalties? Were civil penalties considered for repeat violations (with severity consideration) or violations resulting in incidents/accidents? (describe any actions taken)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

Evaluator Notes:

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

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

Evaluator Notes:

Yes, the CaPUC assessed \$200,000.00 in civil penalties in 2017. This is down from the \$44,376,000.00 in civil penalties in 2016.

- 7 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

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. Reviewed the CPUC-GSRB incident and investigations procedures manual. It has a revision date of October 2017, and a previous revision date of August 2017

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

Yes = 2 No = 0 Needs Improvement = 1

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

Evaluator Notes:

Yes. The program has a mechanism for receiving and responding to operator reports of incidents including 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:

Yes, the language for this can be found on pages 5-7 in the incident and investigation procedures manual.

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

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

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

Evaluator Notes:

Yes. Reviewed a percentage of the incident investigations and found them to be thoroughly documented.

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

Yes = 1 No = 0

Evaluator Notes:

Yes, compliance actions were initiated and civil penalties were filed against one operator for PV's found in investigation.

- 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 1

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Yes. The program works closely with the PHMSA - Accident Investigation Division.

- 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, the Program Manager shared this information at the 2017 NAPS Western Region meeting.

8 General Comments:

Info Only = No Points

Info OnlyInfo Only

Evaluator Notes:

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



PART F - Damage Prevention

Points(MAX) Score

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

Evaluator Notes:

Yes. No change from last year. SED Form 14 titled Damage Prevention Inspection Report of a Gas Dist. & Trans. Pipeline.

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

Evaluator Notes:

Yes. Typically covered during inspections and incident investigations.

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

Evaluator Notes:

Yes. They ensure operators comply with State Statute 4216 and CGA Best Practices including the 9 Elements.

- | | | | |
|---|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 4 | Has the agency or another organization within the state collected data and evaluated trends on the number of pipeline damages per 1,000 locate requests? (This can include DIRT and other data shared and reviewed by the pipeline safety program)
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|---|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

Evaluator Notes:

Yes. State now collects data through DIRT and they received quarterly reports on damages.

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

Evaluator Notes:

In 2016 the State Legislature created the California Underground Facilities Safe Excavation Board under, and assisted by the staff of the Office of the State Fire Marshal. The board is responsible for coordinating education and outreach activities, developing standards, and enforcement. Authorizes the board to prescribe rules and regulations as may be necessary or proper to carry out the purposes of law provisions. The board is composed of 9 members who will serve 4-year terms, and 2 nonvoting ex officio members who may be invited by the appointed members of the board. The board will transmit the investigation results and any recommended penalty to the state or local agency with jurisdiction over the activity or business undertaken in the commission of the violation.

In 2017 the board is working to set up the processes and resources needed to begin the enforcement of the Dig Law. Sunil Shori from the CPUC is working closely with them to ensure the process moves smoothly. They are trying to stick close to the requirements of the 9 Elements. Enforcement actions are not scheduled to start until 2020.

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 OnlyInfo Only
Info Only = No Points

Name of Operator Inspected:

1. San Diego Gas & Electric 2. Southwest Gas 3. Long Beach Gas & Oil

Name of State Inspector(s) Observed:

1. Michelle Wei, Sann Naing 2. Alula Gebremedhin,Paul Penny, Victor Muller, (Ken Bruno) 3. Mahmoud 'Steve' Intably, Anh-Tran Do

Location of Inspection:

1. San Diego/Borrego Springs 2. Carson City NV, Truckee Ca, North Lake Tahoe CA, 3. Long Beach, CA

Date of Inspection:

1. 4/24-26/2018 2. 6/18-22/2018 3. 7/17-19/2018

Name of PHMSA Representative:

1. David Lykken 2. Michael Thompson 3. David Lykken

Evaluator Notes:

1. Observed a Standard Inspection of SDG&E's Borrego LNG Plant and downstream distribution system serving the Roadrunner Club residential community.
2. Observed a full Standard inspection of Southwest Gas records and field operations for their North and South Tahoe and Truckee California systems.
3. Observed a standard inspection of the City of Long Beach gas distribution system including a review of O&M procedures, operating records and gas facilities. This municipal inspected under a 60106 agreement with PHMSA.

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

Evaluator Notes:

1. Yes, the operator was notified and represented.
2. Yes, the operator was notified well in advance and several discussions took place to establish the dates, locations and scope of the inspection.
3. Yes. the operator was notified in advance. Being the first inspection by the CPUC of a municipal gas system, a pre-inspection meeting was conducted with the municipality to go over expectations/agenda, obtain copy of O&M procedures, and request certain operating records in advance of 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:

1. Yes, the IA application was used for this inspection.
2. Yes, the IA application was used for this inspection Prior to the inspection Alula meet with the inspectors and reviewed specific sections of the inspection that each would be responsible for completing.
3. Yes, the IA application was used for this inspection utilizing the protocols for baseline procedures, baseline records, and OQ Field form 15.

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

Evaluator Notes:

1. Yes. Inspection results were thoroughly documented.
2. Yes, each inspector kept notes in IA and on inspection forms. They also collected evidence for any issues or PV they found from the operator.
3. Yes. Substantive comments provided on inspection checklists to support the inspector's determination of operator compliance.

- 5 Did the inspector check to see if the operator had necessary equipment during inspection to conduct tasks viewed? (Maps,pyrometer,soap spray,CGI,etc.) 1 1

Yes = 1 No = 0

Evaluator Notes:

1. Yes. Inspectors verified instrument calibration dates for equipment used during ESD checks, CP checks, and odorant level checks.
2. Yes, Alula checked the calibration dates of the gauges used by the service techs doing the regulator station maintenance, and Victor checked the calibration dates of the instruments used by the tech doing CP reads and rectifier checks.
3. Yes, where applicable. Checked pressure gauge calibration, CP equipment, Odorization testing equipment, CGI/Leak detection equipment, and pipeline locating devices.

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

Evaluator Notes:

1. Yes. Inspectors reviewed procedures for field activities being observed. Records were reviewed at operators facility.
2. Yes. The procedures and records were reviewed in the office and in the field while inspectors were observing maintenance and other field activities.
3. Yes. Written procedures reviewed on office and copies on hand during field facility checks. Operator personnel ask to explain process/steps while conducting regulator station maintenance tasks, Cathodic Protection facility testing/reads, Odorization level checks, valve operation, operation of testing equipment.

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

Evaluator Notes:

1. Yes, the lead inspectors appeared to have a good working knowledge of the pipeline safety program and relevant regulations.
2. Yes, all three inspectors observed had adequate knowledge of the pipeline safety program and the regulations.
3. Yes. Lead inspector demonstrated adequate knowledge.

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

Evaluator Notes:

1. Yes, a exit interview was conducted. Communications to the operator were articulate and thorough.
2. Yes, Alula the lead inspector conducted a brief meeting with all inspectors at the end of each days work and then reported out the findings to the operator.
3. Inspection was not completed at the time of the field evaluation. The operator was provided a daily briefing on items covered.

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

Evaluator Notes:

1. Yes. One item of concern noted regarding inconsistent records/mapping of placement of CP anode locations.
2. No probable violations were identified during this inspection, however a few areas of concern were discussed with the operator.
3. Yes. PV's identified issues related to Corrosion Protection procedures, surveys, and records; Meter protection; Pipeline Markers; Emergency Response plans; and Odorization. Several Areas of Concerns noted also. Inspection findings forwarded to PHMSA Western Region for possible enforcement.

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

Info Only = No Points

a.	Abandonment	<input type="checkbox"/>
b.	Abnormal Operations	<input type="checkbox"/>
c.	Break-Out Tanks	<input type="checkbox"/>
d.	Compressor or Pump Stations	<input type="checkbox"/>
e.	Change in Class Location	<input type="checkbox"/>
f.	Casings	<input checked="" 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 checked="" type="checkbox"/>
o.	Leak Surveys	<input checked="" 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 checked="" type="checkbox"/>
v.	Overpressure Safety Devices	<input checked="" type="checkbox"/>
w.	Plastic Pipe Installation	<input type="checkbox"/>
x.	Public Education	<input checked="" type="checkbox"/>
y.	Purging	<input type="checkbox"/>
z.	Prevention of Accidental Ignition	<input type="checkbox"/>
A.	Repairs	<input checked="" type="checkbox"/>
B.	Signs	<input checked="" type="checkbox"/>
C.	Tapping	<input type="checkbox"/>
D.	Valve Maintenance	<input checked="" type="checkbox"/>
E.	Vault Maintenance	<input type="checkbox"/>
F.	Welding	<input type="checkbox"/>
G.	OQ - Operator Qualification	<input checked="" type="checkbox"/>
H.	Compliance Follow-up	<input type="checkbox"/>
I.	Atmospheric Corrosion	<input checked="" type="checkbox"/>
J.	Other	<input type="checkbox"/>

Evaluator Notes:

1. The inspection covered items related to the operation and maintenance of a small scale LNG facility and downstream distribution system. Ms. Wei and Mr. Maing were knowledgeable and competent and conducted the inspections in a courteous and professional manner. No issues noted.
2. The field inspection covered the annual maintenance for regulator stations, CP read verification, leak repair follow up and the response to a reported leak found during a leak survey currently being conducted.
3. Observed a standard inspection of the City of Long Beach gas distribution system including a review of O&M procedures, operating records and gas facilities. This municipal inspected under a 60106 agreement with PHMSA. Inspectors did good job of noting observations during site visits and observed a number of issues related to the operator's Cathodic Protection program.

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

Evaluator Notes:

N/A. Does not have an interstate agent agreement.

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

Evaluator Notes:

N/A. Does not have an interstate agent agreement.

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

Evaluator Notes:

N/A. Does not have an interstate agent agreement.

- | | | | |
|----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|----|
| 4 | Were probable violations identified by state referred to PHMSA for compliance? (NOTE: PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation.)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|----|

Evaluator Notes:

N/A. Does not have an interstate agent agreement.

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

Evaluator Notes:

N/A. Does not have an interstate agent agreement.

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

Evaluator Notes:

N/A. Does not have an interstate agent agreement.

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

Evaluator Notes:

N/A. Does not have an interstate agent agreement.

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

Evaluator Notes:

N/A.

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

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

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

Evaluator Notes:

N/A for CY2017. State does have a 60106 agreement for CY2018.

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

Evaluator Notes:

N/A for CY2017. State does have a 60106 agreement for CY2018.

- | | | | |
|----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|----|
| 3 | Were any probable violations identified by state referred to PHMSA for compliance? (NOTE: PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation.)
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|----|

Evaluator Notes:

N/A for CY2017. State does have a 60106 agreement for CY2018.

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

Evaluator Notes:

N/A for CY2017. State does have a 60106 agreement for CY2018.

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

Evaluator Notes:

N/A for CY2017. State does have a 60106 agreement for CY2018.

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

Evaluator Notes:

N/A for CY2017. State does have a 60106 agreement for CY2018.

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

Evaluator Notes:

N/A for CY2017. State does have a 60106 agreement for CY2018.

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