



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

1200 New Jersey Avenue SE
Washington DC 20590

2010 Natural Gas State Program Evaluation

for

Connecticut Department of Public Utility Control

Document Legend

PART:

- O -- Representative Date and Title Information
- A -- General Program Qualifications
- B -- Inspections and Compliance - Procedures/Records/Performance
- C -- Interstate Agent States
- D -- Incident Investigations
- E -- Damage Prevention Initiatives
- F -- Field Inspection
- G -- PHMSA Initiatives - Strategic Plan
- H -- Miscellaneous
- I -- Program Initiatives



2010 Natural Gas State Program Evaluation -- CY 2010
Natural Gas

State Agency: Connecticut

Agency Status:

Date of Visit: 05/02/2001 - 05/04/2011

Agency Representative: Karl Baker, Supervisor of Technical Analysis

PHMSA Representative: Jim Anderson, Transportation Specialist

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

Name/Title: Kevin M. DelGobbo, Chairman

Agency: Connecticut Department of Public Utility Control

Address: 10 Franklin Square

City/State/Zip: New Britain, Connecticut 06051

Rating:

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

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 2010 (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 certification/agreement attachments provide the basis for determining the state's pipeline safety grant allocation.

Field Inspection (PART F):

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

Scoring Summary

PARTS

Possible Points Points Scored

A	General Program Qualifications	25	25
B	Inspections and Compliance - Procedures/Records/Performance	24.5	24.5
C	Interstate Agent States	4	4
D	Incident Investigations	2.5	2.5
E	Damage Prevention Initiatives	9	9
F	Field Inspection	11	11
G	PHMSA Initiatives - Strategic Plan	9	9
H	Miscellaneous	3	3
I	Program Initiatives	6	6

94 94

TOTALS

State Rating **100.0**

PART A - General Program Qualifications

Points(MAX) Score

- | | | | |
|----------|--|-------------------------------------|---|
| 1 | Did the state submit complete and accurate information on the attachments to its most current 60105(a) Certification/60106 (a) Agreement? (NOTE: PHMSA Representative to verify certification/agreement attachments by reviewing appropriate state documentation. Score a deficiency in any one area as "needs improvement". Attachment numbers appear in parenthesis) Previous Question A.1, Items a-h worth 1 point each
Yes = 8 No = 0 Needs Minor Improvement = 3-7 Needs Major Improvement = 2 | 8 | 8 |
| a. | State Jurisdiction and agent status over gas facilities (1) | <input checked="" type="checkbox"/> | |
| b. | Total state inspection activity (2) | <input checked="" type="checkbox"/> | |
| c. | Gas facilities subject to state safety jurisdiction (3) | <input checked="" type="checkbox"/> | |
| d. | Gas pipeline incidents (4) | <input checked="" type="checkbox"/> | |
| e. | State compliance actions (5) | <input checked="" type="checkbox"/> | |
| f. | State record maintenance and reporting (6) | <input checked="" type="checkbox"/> | |
| g. | State employees directly involved in the gas pipeline safety program (7) | <input checked="" type="checkbox"/> | |
| h. | State compliance with Federal requirements (8) | <input checked="" type="checkbox"/> | |

SLR Notes:

All sections of the 2011 Certification were completed accurately.

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|----------|---|---|---|
| 2 | Did the state have an adequate mechanism to receive operator reporting of incidents to ensure state compliance with 60105(a) Certification/60106(a) Agreement requirements (fatality, injury requiring hospitalization, property damage exceeding \$50,000 - Mechanism should include receiving "after hours" reports)? (Chapter 6) Previous Question A.2
Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

SLR Notes:

GPSU of the CT DPUC has 3 staff members on call 24 hours a day/7 days a week to receive incident reports from regulated operators. All operators are provided staff contact information to receive any incident reports. GPSU Administration Procedures address this in Section 18.4-Actions With Respect To Accidents.

- | | | | |
|----------|---|---|---|
| 3 | Has the state held a pipeline safety TQ seminar(s) in the last 3 years? (NOTE: Indicate date of last seminar or if state requested seminar, but T&Q could not provide, indicate date of state request for seminar. Seminars must be held at least once every 3 calendar years.) (Chapter 8.5) Previous Question A.4
Yes = 2 No = 0 | 2 | 2 |
|----------|---|---|---|

SLR Notes:

Connecticut along with other New England states participates in a region formed group called the New England Pipeline Safety Representatives (NEPSR). NEPSR host annual TQ training seminars rotated annually among the states. CT attended and participated in the Maine hosted seminar in October 2010.

- | | | | |
|----------|--|---|---|
| 4 | Were pipeline safety program files well-organized and accessible?(NOTE: This also includes electronic files) (Chapter 5) Previous Question A.5
Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

SLR Notes:

Yes. Inspection reports and GPUC correspondence with PHMSA and operators are stored electronically (backed up 3 times daily on server) and/or hard copies in centrally located file cabinets.

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|----------|---|---|---|
| 5 | Did state records and discussions with the state pipeline safety program manager indicate adequate knowledge of PHMSA program and regulations? (Chapter 4.1, Chapter 8.1) Previous Question A.6
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|---|---|---|

SLR Notes:

Yes. Karl Baker, Supervisor of Technical Analysis, is the GPSU program manager. Karl was a pipeline safety engineer for 16 years prior to being promoted to program manager in January 2010.

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|----------|---|---|---|
| 6 | Did the state respond in writing within 60 days to the requested items in the Chairman's letter following the Region's last program evaluation? (No response is necessary if no items are requested in letter and mark "Yes") (Chapter 8.1) Previous Question A.8
Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

SLR Notes:

Yes. PHMSA evaluation was conducted June 21-25, 2010, the letter to the Chair was sent August 17, 2011 and the Chair responded on October 6, 2010.

- 7 What actions, if necessary, did the State initiate as a result of issues raised in the Chairperson's letter from the previous year? Did actions correct or address deficiencies from previous year's evaluation? (No response is necessary if no items are requested in letter and mark "Yes") (Chapter 8.1) Previous Question A.8/A.9 1 NA
Yes = 1 No = 0

SLR Notes:

There were no issues raised during the 2009 evaluation.

Personnel and Qualifications

- 8 Has each inspector fulfilled the 3 year TQ training requirement? If No, has the state been granted a waiver regarding TQ courses by the Associate Administrator for Pipeline Safety? (NOTE: If the State has new inspectors who have not attended all TQ courses, but are in a program which will achieve the completion of all applicable courses within 3 years of taking first course (5 years to successfully complete), or if a waiver has been granted by the applicable Region Director for the state, please answer yes.) (Chapter 4.4) Previous Question A.10 3 3
Yes = 3 No = 0

SLR Notes:

All engineers have either completed their TQ training within the timeframe or on schedule to complete their training.

- 9 Brief Description of Non-TQ training Activities: Info Only Info Only
Info Only = No Points
For State Personnel:

For Operators:

For Non-Operator Entities/Parties, Information Dissemination, Public Meetings:

SLR Notes:

None taken in 2010.

-
- 10 Did the lead inspectors complete all required T&Q OQ courses and Computer Based Training (CBT) before conducting OQ Inspections? (Chapter 4.4.1) Previous Question A.12 1 1
Yes = 1 No = 0

SLR Notes:

Bruce Benson is the designated OQ inspection leader and has completed all required TQ OQ training courses and computer based training.

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- 11 Did the lead inspectors complete all required TQ Integrity Management (IMP) Courses/Seminars and CBT before conducting IMP Inspections? (Chapter 4.4.1) Previous Question A.13 1 1
Yes = 1 No = 0

SLR Notes:

Dan Nivison is the designated IMP inspection leader and has completed all required TQ IMP training courses and computer based training.

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- 12 Was the ratio acceptable of Total inspection Person-days to Total Person-days charged to the program by state inspectors? (Region Director may modify points for just cause) (Chapter 4.3) Previous Question B.12 5 5
Yes = 5 No = 0

A. Total Inspection Person Days (Attachment 2):
383.00

B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):
220 X 3.77 = 829.40

Ratio: A / B
383.00 / 829.40 = 0.46

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

SLR Notes:

Yes. The ratio exceeded the required total inspection person days.

13 Have there been modifications or proposed changes to inspector-staffing levels? (If yes, describe) Previous Info Only Info Only
Question B.13
Info Only = No Points

SLR Notes:

Yes. In October 2010 the GPSU hired Eugene Osei.

14 Part-A General Comments/Regional Observations Info Only Info Only
Info Only = No Points

SLR Notes:

Total points scored for this section: 25
Total possible points for this section: 25



PART B - Inspections and Compliance - Procedures/Records/ Performance

Points(MAX) Score

Inspection Procedures

- 1** Does the State have a written inspection plan to complete the following? (all types of operators including LNG) (Chapter 5.1) Previous Question B.1 + Chapter 5 Changes + Incorporate LNG 6.5 6.5
Yes = 6.5 No = 0 Needs Improvement = 50% Deduction
- | | | | | |
|---|---|--------------------------------------|--------------------------|---|
| a | Standard Inspections (Including LNG) (Max points = 2) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b | IMP Inspections (Including DIMP) (Max points = .5) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c | OQ Inspections (Max points = .5) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d | Damage Prevention (Max points = .5) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| e | On-Site Operator Training (Max points = .5) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| f | Construction Inspections (Max points = .5) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| g | Incident/Accident Investigations (Max points = 1) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| h | Compliance Follow-up (Max points = 1) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

SLR Notes:

All applicable type of inspections are included in the inspection plan. Karl Baker, program manager, plans to update inspection plan in 2011. The update will include DIMP inspections.

These are listed in the GPSU Administrative Procedures Section 5.

- 2** Did the written Procedures for selecting operators adequately address key concerns? (Chapter 5.1) Previous Question B.2, items a-d are worth .5 point each 2 2
Yes = 2 No = 0 Needs Improvement = 50% Deduction
- | | | | | |
|---|--|--------------------------------------|--------------------------|---|
| a | Length of time since last inspection | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b | History of Operator/unit and/or location (including leakage , incident and compliance history) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c | Type of activity being undertaken by operator (construction etc) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d | For large operators, rotation of locations inspected | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

SLR Notes:

These are listed in the GPSU Administrative Procedures Section 6.

Inspection Performance

- 3** Did the state inspect all types of operators and inspection units in accordance with time intervals established in its written procedures? (Chapter 5.1) Previous Question B.3 2 2
Yes = 2 No = 0

SLR Notes:

CT GPSU alternate yearly on comprehensive inspections. LDC - O&M in 2009/2011, LNG - 2010, LP - 2010.

- 4** Did the state inspection form cover all applicable code requirements addressed on the Federal Inspection forms? (Chapter 5.1 (3)) Previous Question B.4 1 1
Yes = 1 No = 0

SLR Notes:

Yes. CT GPSU uses the federal form for LNG inspections. It uses the federal form with state additional regulation and NTSB questions added.

- 5** Did state complete all applicable portions of inspection forms? (Chapter 5.1 (3)) Previous Question B.5 1 1
Yes = 1 No = 0

SLR Notes:

Yes. There were many redundant comments.

- 6** Did the state initiate appropriate follow-up actions to Safety Related Condition Reports? (Chapter 6.3) Previous Question B.6 .5 NA
Yes = .5 No = 0

SLR Notes:

N/A. None in 2010.

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- | | | | |
|----------|---|----|----|
| 7 | 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) Previous Question B.7 | .5 | .5 |
| | Yes = .5 No = 0 | | |

SLR Notes:

Yes. This question is on the inspection form.

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|----------|--|----|----|
| 8 | 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) Previous Question B.8 | .5 | .5 |
| | Yes = .5 No = 0 | | |

SLR Notes:

Yes. This question is on the inspection form.

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|----------|---|----|----|
| 9 | 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) Previous Question B.9 | .5 | .5 |
| | Yes = .5 No = 0 | | |

SLR Notes:

Yes. This question is on the inspection form.

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|-----------|--|---|---|
| 10 | 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? (NTSB) Previous Question B.10 | 1 | 1 |
| | Yes = 1 No = 0 | | |

SLR Notes:

Yes. This question is on the inspection form.

Compliance - 60105(a) States

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|-----------|---|---|---|
| 11 | Did the state adequately document sufficient information on probable violations? (Chapter 5.2) Previous Question B.14 | 1 | 1 |
| | Yes = 1 No = 0 Needs Improvement = .5 | | |

SLR Notes:

Yes. Each inspected operator received a copy of the inspection report summary with included a section on probable violations.

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|-----------|---|---|---|
| 12 | Does the state have written procedures to identify the steps to be taken from the discovery to the resolution of a probable violation as specified in the "Guidelines for State Participating in the Pipeline Safety Program"? (Chapter 5.1) Previous Question D(1).1 | 1 | 1 |
| | Yes = 1 No = 0 Needs Improvement = .5 | | |

SLR Notes:

Yes. This is in Section 10 of the GPSU Administrative Procedures.

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- | | | | |
|-----------|---|---|---|
| 13 | Does the state have written procedures to notify an operator when a noncompliance is identified as specified in the "Guidelines for States Participating in the Pipeline Safety Program"? (Chapter 5.1(4)) Previous Question D(1).2 | 1 | 1 |
| | Yes = 1 No = 0 Needs Improvement = .5 | | |

SLR Notes:

Yes. This is in Section 11 of the GPSU Administrative Procedures.

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- | | | | |
|-----------|---|---|---|
| 14 | Does the state have a written procedure for routinely reviewing the progress of compliance actions to prevent delays or breakdowns of the enforcement process, as required by the "Guidelines for States Participating in the Pipeline Safety Program"? (Chapter 5.1(5)) Previous Question D(1).3 | 1 | 1 |
| | Yes = 1 No = 0 Needs Improvement = .5 | | |

SLR Notes:

Yes. It is in the GPSU Administrative Procedures.

15	Has the State issued compliance actions for all probable violations discovered? (Note : PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation) Previous Question D(1).4 Yes = 1 No = 0	1	1
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SLR Notes:

Yes. In 2010 96 violations were found and 35 compliance actions were sent to regulated operators.

16	Did the state follow its written procedures for reviewing compliance actions and follow-up to determine that prompt corrective actions were taken by operators, within the time frames established by the procedures and compliance correspondence, as required by the "Guidelines for States Participating in the Pipeline Safety Program"? Previous Question D(1).5 Yes = 1 No = 0 Needs Improvement = .5	1	1
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SLR Notes:

Yes. This is in the Administrative Procedures but this is one of the areas the GPSU plans expand upon in its Administrative Procedures update.

17	If compliance could not be established by other means, did state pipeline safety program staff request formal action, such as a "Show Cause Hearing" to correct pipeline safety violations? (check each states enforcement procedures) Previous Question D(1).6 No = 0 Yes = 1	1	1
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SLR Notes:

Yes. In Section 10 of the GPSU Administrative Procedures.

18	Did the state adequately document the resolution of probable violations? (Chapter 5.1 (6)) Previous Question D(1).7 Yes = 1 No = 0 Needs Improvement = .5	1	1
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SLR Notes:

Yes.

19	Were compliance actions sent to a company officer? (manager or board member if municipal/government system) (Chapter 5.1(4)) Previous Question D(1).8 Yes = .5 No = 0	.5	.5
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SLR Notes:

Yes. It is stated in the GPSU Administrative Procedures, Section 10. Not only sent to but the GPSU assures a response is received by a company officer.

20	Did the compliance proceedings give reasonable due process to all parties? (check each states enforcement procedures) Previous Question D(1).9 Yes = 1 No = 0 Needs Improvement = .5	1	1
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SLR Notes:

Yes. Section 10 of the GPSU Administrative Procedures covers this.

Compliance - 60106(a) States

21	Did the state use the current federal inspection form(s)? Previous Question D(2).1 Yes = 1 No = 0 Needs Improvement = .5	1	NA
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SLR Notes:

N/A.

22	Are results adequately documented demonstrating inspection units were reviewed in accordance with state inspection plan? Previous Question D(2).2 Yes = 1 No = 0 Needs Improvement = .5	1	NA
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SLR Notes:

N/A.

23	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.) Previous Question D(2).3 Yes = 1 No = 0 Needs Improvement = .5	1	NA
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SLR Notes:

N/A.

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- | | | | |
|-----------|--|---|----|
| 24 | Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? Previous Question D(2).4
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|-----------|--|---|----|

SLR Notes:

N/A.

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- | | | | |
|-----------|---|---|----|
| 25 | Did the state give written notice to PHMSA within 60 days of all probable violations found? Previous Question D(2).5
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|-----------|---|---|----|

SLR Notes:

N/A.

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- | | | | |
|-----------|---|---|----|
| 26 | Did the state initially submit adequate documentation to support compliance action by PHMSA on probable violations? Previous Question D(2).6
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|-----------|---|---|----|

SLR Notes:

N/A.

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- | | | | |
|-----------|--|-----------|-----------|
| 27 | 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)
Info Only = No Points | Info Only | Info Only |
|-----------|--|-----------|-----------|

SLR Notes:

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- | | | | |
|-----------|---|-----------|-----------|
| 28 | Part B: General Comments/Regional Observations
Info Only = No Points | Info Only | Info Only |
|-----------|---|-----------|-----------|

SLR Notes:

Total points scored for this section: 24.5
Total possible points for this section: 24.5



PART C - Interstate Agent States

Points(MAX) Score

1	Did the state use the current federal inspection form(s)? Previous Question D(3).1 Yes = 1 No = 0 Needs Improvement = .5	1	1
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SLR Notes:

Yes.

2	Are results documented demonstrating inspection units were reviewed in accordance with "PHMSA directed inspection plan"? Previous Question D(3).2 Yes = 1 No = 0 Needs Improvement = .5	1	1
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SLR Notes:

Yes. CT followed inspection plan submitted by the Eastern Region.

3	Did the state submit documentation of the inspections within 60 days as stated in its latest Interstate Agent Agreement form? Previous Question D(3).3 Yes = 1 No = 0	1	1
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SLR Notes:

Yes. Inspection information was submitted to Eastern region within 30 days.

4	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.) Previous Question D(3).4 Yes = 1 No = 0	1	NA
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SLR Notes:

N/A. No probable violations found during the inspections in 2010.

5	Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? Previous Question D(3).5 Yes = 1 No = 0 Needs Improvement = .5	1	NA
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SLR Notes:

N/A.

6	Did the state give written notice to PHMSA within 60 days of all probable violations found? Previous Question D(3).6 Yes = 1 No = 0	1	NA
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SLR Notes:

N/A

7	Did the state initially submit documentation to support compliance action by PHMSA on probable violations? Previous Question D(3).7 Yes = 1 No = 0 Needs Improvement = .5	1	1
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SLR Notes:

N/A.

8	Part C: General Comments/Regional Observations Info Only = No Points	Info Only	Info Only
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SLR Notes:

Total points scored for this section: 4
Total possible points for this section: 4

PART D - Incident Investigations

Points(MAX) Score

- | | | | |
|---|--|---|---|
| 1 | Are state personnel following the procedures for Federal/State cooperation in case of an incident? (See Appendix in "Guidelines for States Participating in the Pipeline Safety Program") (Chapter 6.1) Previous Question E.1
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|---|--|---|---|

SLR Notes:

Yes. Guidelines were followed.

- | | | | |
|---|---|----|----|
| 2 | Are state personnel familiar with the jurisdictional authority and Memorandum of Understanding between NTSB and PHMSA? (See Appendix in "Guidelines for States Participating in the Pipeline Safety Program") (Chapter 6 ? Appendix D) Previous Question E.2
Yes = .5 No = 0 | .5 | .5 |
|---|---|----|----|

SLR Notes:

Yes.

- | | | | |
|---|--|---|----|
| 3 | Did the state keep adequate records of incident notifications received? Previous Question E.3
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|---|--|---|----|

SLR Notes:

N/A. No incidents in 2010.

- | | | | |
|---|--|---|----|
| 4 | If an onsite investigation of an incident was not made, did the state obtain sufficient information by other means to determine the facts and support the decision not to go on-site? Previous Question E.4
Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|---|--|---|----|

SLR Notes:

N/A. No incidents in 2010.

- | | | | |
|----|---|---------------------------|--|
| 5 | Were investigations thorough and conclusions and recommendations documented in an acceptable manner? Previous Question E.5, comprehensive question worth 2 points total
Yes = 2 No = 0 Needs Improvement = 1 | 2 | NA |
| a. | Observations and Document Review | Yes <input type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| b. | Contributing Factors | Yes <input type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| c. | Recommendations to prevent recurrences where appropriate | Yes <input type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |

SLR Notes:

N/A. No incidents in 2010.

- | | | | |
|---|---|---|---|
| 6 | Did the state initiate enforcement action for violations found during any incident investigation(s)? Previous Question E.6 Variation
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|---|---|---|---|

SLR Notes:

N/A. No incidents in 2010.

- | | | | |
|---|--|----|----|
| 7 | Did the state assist region office by taking appropriate follow-up actions related to the operator incident reports to ensure accuracy and final report has been received by PHMSA? (validate annual report data from operators concerning incidents/accidents and investigate discrepancies) (Chapter 6) Previous Question E.7/E.8
Yes = .5 No = 0 | .5 | NA |
|---|--|----|----|

SLR Notes:

N/A. No incidents in 2010.

- | | | | |
|---|---|-----------|-----------|
| 8 | Part D: General Comments/Regional Observations
Info Only = No Points | Info Only | Info Only |
|---|---|-----------|-----------|

SLR Notes:

Total points scored for this section: 2.5
Total possible points for this section: 2.5



PART E - Damage Prevention Initiatives

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? Previous Question B.11
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

SLR Notes:

Yes. Performed review during O&M audits. Last audits performed on 3 LDCs and Norwich in 2009 and early 2011. Also state regulations, 16-345-4(a)(5), states "If the excavator is utilizing trenchless excavation, the excavator shall, if such excavation is expected to cross or encroach within the approximate location of underground facilities either horizontally or vertically, prior to the crossing or encroaching, determine the precise location of such underground facilities expected to be so crossed or encroached."

- | | | | |
|----------|--|---|---|
| 2 | Did the state inspector check to assure the pipeline operator is following its written procedures pertaining to notification of excavation, marking, positive response and the availability and use of the one call system? New 2008
Yes = 2 No = 0 | 2 | 2 |
|----------|--|---|---|

SLR Notes:

Yes. Performed review during O&M audits. Last audits performed on 3 LDCs and Norwich in 2009 and early 2011. This is also accomplished during normal review of one-call damages that are reported to the GPSU.

- | | | | |
|----------|---|---|---|
| 3 | Did the state encourage and promote the adoption of the Common Ground Alliance Best Practices document to its regulated companies as a means of reducing damages to all underground facilities? Previous Question A.7
Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|---|---|---|

SLR Notes:

The GPSU has performed a review of the CGA Best Practices document and determined that all pertinent best practices are included in the state regulations. They are currently working on revising the underground damage prevention laws and are reviewing the CGA Best Practices to see if they can strengthen the program.

- | | | | |
|----------|---|---|---|
| 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? New 2008
Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

SLR Notes:

Yes, GPSU collects and evaluates this data. Damages per 1000 tickets -
2006 ? 4.39 total
2007 ? 4.26 total
2008 ? 4.10 total
2009 ? 3.21 total
2010 ? 3.53 total; 1.73 gas

- | | | | |
|----------|--|---|---|
| 5 | Did the state review operators' records of accidents and failures due to excavation damage to ensure causes of failure are addressed to minimize the possibility of recurrence as required by 192.617?
Yes = 2 No = 0 | 2 | 2 |
|----------|--|---|---|

SLR Notes:

Yes. Performed review during O&M audits. Last audits performed on 3 LDCs and Norwich in 2009 and early 2011. This is also accomplished during normal review of one-call damages that are reported to the GPSU.

- | | | | |
|----------|---|-----------|-----------|
| 6 | Part E: General Comments/Regional Observations
Info Only = No Points | Info Only | Info Only |
|----------|---|-----------|-----------|

SLR Notes:

Total points scored for this section: 9
Total possible points for this section: 9

PART F - Field Inspection

Points(MAX) Score

- | | | |
|----------|--|-----------------------|
| 1 | Operator, Inspector, Location, Date and PHMSA Representative
<small>Info Only = No Points</small>

Name of Operator Inspected:
Connecticut Natural Gas

Name of State Inspector(s) Observed:
Ed Fabrycki and Dan Nivison

Location of Inspection:
East Hartford, CT

Date of Inspection:
May 4, 2011

Name of PHMSA Representative:
Jim Anderson | Info Only Info Only |
|----------|--|-----------------------|

SLR Notes:

Observed Ed Fabrycki conducting new construction inspection and Dan Nivison conducting a Damage Prevention procedures inspection.

- | | | | |
|----------|--|---|---|
| 2 | Was the operator or operator's representative notified and/or given the opportunity to be present during inspection? New 2008
<small>Yes = 1 No = 0</small> | 1 | 1 |
|----------|--|---|---|

SLR Notes:

Yes. Company personnel were present at both inspections.

- | | | | |
|----------|---|---|---|
| 3 | Did the inspector use an acceptable inspection form/checklist and was the form/checklist used as a guide for the inspection? (New regulations shall be incorporated) Previous Question F.2
<small>Yes = 2 No = 0</small> | 2 | 2 |
|----------|---|---|---|

SLR Notes:

Yes. Due to inclement weather, notes were taken at construction site and later entered on a construction inspection form on the inspectors laptop. A copy of the inspection report was given to the PHMSA representative prior to the completion of the evaluation. The damage prevention inspection was conducted on the PHMSA inspection form with state damage prevention regulations attached.

- | | | | |
|----------|---|---|---|
| 4 | Did the inspector thoroughly document results of the inspection? Previous Question F.3
<small>Yes = 2 No = 0</small> | 2 | 2 |
|----------|---|---|---|

SLR Notes:

Yes. No Concerns.

- | | | | |
|----------|--|---|---|
| 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.) New 2008
<small>Yes = 1 No = 0</small> | 1 | 1 |
|----------|--|---|---|

SLR Notes:

Yes. Heating irons were tested with pyrometer.

- | | | | |
|----------|---|-----------|-----------|
| 6 | What type of inspection(s) did the state inspector conduct during the field portion of the state evaluation? (i.e. Standard, Construction, IMP, etc) New 2008
<small>Info Only = No Points</small> | Info Only | Info Only |
|----------|---|-----------|-----------|

SLR Notes:

Construction and Damage Prevention Procedures.

- | | | | |
|----------|---|-------------------------------------|---|
| 7 | Did the inspector adequately review the following during the field portion of the state evaluation? (check all that apply on list) New 2008, comprehensive question worth 2 points total
<small>Yes = 2 No = 0 Needs Improvement = 1</small> | 2 | 2 |
| a. | Procedures | <input checked="" type="checkbox"/> | |
| b. | Records | <input checked="" type="checkbox"/> | |
| c. | Field Activities/Facilities | <input checked="" type="checkbox"/> | |
| d. | Other (Please Comment) | <input type="checkbox"/> | |

SLR Notes:

Records were reviewed at operator operation center during the inspection.

- | | | | |
|----------|---|---|---|
| 8 | Did the inspector have adequate knowledge of the pipeline safety program and regulations? (Liaison will document reasons if unacceptable) Previous Question F.8
Yes = 2 No = 0 | 2 | 2 |
|----------|---|---|---|

SLR Notes:

Yes.

- | | | | |
|----------|--|---|---|
| 9 | 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) Previous Question F.10
Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

SLR Notes:

Yes.

- | | | | |
|-----------|--|---|----|
| 10 | During the exit interview, did the inspector identify probable violations found during the inspections? Previous Question F.11
Yes = 1 No = 0 | 1 | NA |
|-----------|--|---|----|

SLR Notes:

None found.

- | | | | |
|-----------|---|-----------|-----------|
| 11 | What did the inspector observe in the field? (Narrative description of field observations and how inspector performed)
Info Only = No Points | Info Only | Info Only |
|-----------|---|-----------|-----------|

SLR Notes:

DPUC inspector observed the installation of a new 2" PE main being installed to replace a high risked older cast iron main in the companies cast iron replacement program.

- | | | | |
|-----------|--|-----------|-----------|
| 12 | Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices)
Info Only = No Points | Info Only | Info Only |
|-----------|--|-----------|-----------|

SLR Notes:

- | | | | |
|-----------|--|-------------------------------------|-----------|
| 13 | Field Observation Areas Observed (check all that apply)
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 checked="" type="checkbox"/> | |
| | i. Damage Prevention | <input checked="" 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 type="checkbox"/> |

SLR Notes:

14 Part F: General Comments/Regional Observations

Info Only Info Only

Info Only = No Points

SLR Notes:

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



PART G - PHMSA Initiatives - Strategic Plan

Points(MAX) Score

Risk base Inspections - Targeting High Risk Areas

1 Does state have process to identify high risk inspection units? 1.5 1.5

Yes = 1.5 No = 0

Risk Factors (criteria) to consider may include:

Miles of HCA's, Geographic area, Population Density

Length of time since last inspection

History of Individual Operator units (leakage, incident and compliance history, etc.)

Threats - (Excavation Damage, Corrosion, Natural Forces, Other Outside Forces, Material or Welds, Equipment, Operations, Other)

SLR Notes:

Yes. Section 8 of the DPUC Administrative Procedures states "Inspections" are ordinarily conducted pursuant to one of the following criteria.

- (a) Routine scheduling
- (b) A complaint received from a member of the public
- (c) Information obtained from a previous inspection
- (d) Pipeline accident or incident
- (e) Whenever deemed appropriate by the Department

Every operator and every inspection unit will be inspected in accordance with 6c above, with priority given to inspecting systems with greater risk potential. In determining the potential risk of a facility, the following factors may be considered.

- (a) The length of time since the last inspection
- (b) The history of the inspection unit (leak history, unaccounted-for gas, prior non-compliances, accident/incident history, etc.)
- (c) Types of activities being undertaken by the inspection unit (construction, recent changes in personnel and procedures, etc.)
- (d) For multi-unit operators, rotation of inspection units to be inspected
- (e) The nature of the facility (pipeline, LNG plant, propane plant)
- (f) Pressure classification (low, elevated-low, high)
- (g) Material involved (cast iron, steel, plastic)
- (h) History of the type of facility
- (i) Population density
- (j) Threats to the facilities (Excavation damage, corrosion, natural forces, other outside forces, material or welds, equipment, operations)"

2 Are inspection units broken down appropriately? (see definitions in Guidelines) .5 0.5

Yes = .5 No = 0

SLR Notes:

Yes.

3 Consideration of operators DIMP Plan? (if available and pending rulemaking) Info Only Info Only

Info Only = No Points

SLR Notes:

N/A at this time.

4 Does state inspection process target high risk areas? .5 0.5

Yes = .5 No = 0

SLR Notes:

Yes.

Use of Data to Help Drive Program Priority and Inspections

5 Does state use data to analyze effectiveness of damage prevention efforts in the state? (DIRT or other data, etc) .5 0.5

Yes = .5 No = 0

SLR Notes:

Yes. Approximately twice per year the damage prevention data is reviewed to determine trends. These trends are reviewed to determine where emphasis needs to be placed. These trends are also reviewed with the Call Before You Dig Public Awareness Committee and where appropriate, the public awareness campaigns are modified.

6 Has state reviewed data on Operator Annual reports for accuracy? .5 0.5

Yes = .5 No = 0

SLR Notes:

Yes. Program manager has many spreadsheets showing data and trends of the operators pipelines, services, damages and other information.

7	Has state analyzed annual report data for trends and operator issues?	.5	0.5
Yes = .5 No = 0			

SLR Notes:

Yes. Program manager has many spreadsheets showing data and trends of the operators pipelines, services, damages and other information.

8	Has state reviewed data on Incident/Accident reports for accuracy?	.5	0.5
Yes = .5 No = 0			

SLR Notes:

Yes. As part of their investigation of incidents/accidents.

9	Does state do evaluation of effectiveness of program based on data? (i.e. performance measures, trends, etc.)	.5	0.5
Yes = .5 No = 0			

SLR Notes:

Yes. They evaluate their program using leak response time data, class 2 leak backlog data, third-party damage data and cast iron/bare steel replacement program data.

10	Did the State input all operator qualification inspection results into web based database provided by PHMSA in a timely manner upon completion of OQ inspections? Previous Question B.15	.5	0.5
Yes = .5 No = 0			

SLR Notes:

Yes. Viewed the state's OQ data base web page to verify database entry.

11	Did the State submit their replies into the Integrity Management Database (IMDB) in response to the Operators notifications for their integrity management program? Previous Question B.16	.5	0.5
Yes = .5 No = 0			

SLR Notes:

Yes. Viewed the state's IMP data base web page to verify database entry on participation on interstate pipeline IMP inspection.

12	Have the IMP Federal Protocol forms been uploaded to the IMDB? Previous Question B.17	.5	NA
Yes = .5 No = 0			

SLR Notes:

N/A ? No intrastate transmission lines in Connecticut.

13	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? Previous Question B.18	.5	0.5
Yes = .5 No = 0			

SLR Notes:

Yes. All data on class 1 and 2 leaks are required to be submitted to the GPSU on a monthly basis. This data is reviewed to determine trends including any plastic pipe issues. Also, during the O&M audits, this is reviewed under 192.617.

14	Has state confirmed transmission operators have submitted information into National Pipeline Mapping System (NPMS) database along with any changes made after original submission?	.5	NA
Yes = .5 No = 0			

SLR Notes:

N/A ? No intrastate transmission lines in Connecticut.

Accident/Incident Investigation Learning and Sharing Lessons Learned

15	Has state shared lessons learned from incidents/accidents? (i.e. NAPSRS meetings and communications)	.5	0.5
Yes = .5 No = 0			

SLR Notes:

Yes. Incidents/accidents lessons learned information have been presented at NAPSRS meetings and pipeline safety seminars. In addition, all incident/accident reports are sent to all applicable operators in the state for their review and response to any applicable recommendations included in the report.

16	Does the State support data gathering efforts concerning accidents? (Frequency/Consequence/etc)	.5	0.5
Yes = .5 No = 0			

SLR Notes:

Yes. The state ensures that operators correctly file appropriate PHMSA incident forms.

17	Does state have incident/accident criteria for conducting root cause analysis?	Info Only	Info Only
Info Only = No Points			

SLR Notes:

Yes. All incidents/accidents are investigated to determine the root cause. Staff has completed root cause analysis training classes.

18	Does state conduct root cause analysis on incidents/accidents in state?	Info Only	Info Only
Info Only = No Points			

SLR Notes:

The state works in conjunction with their operators to perform root cause analysis.

19	Has state participated on root cause analysis training? (can also be on wait list)	.5	0.5
Yes = .5 No = 0			

SLR Notes:

Karl, Bruce and Ed received the training in February 2010 and Dan received the training in March 2010.

Transparency - Communication with Stakeholders

20	Other than pipeline safety seminar does State communicate with stakeholders? (Communicate program data, pub awareness, etc.)	.5	0.5
Yes = .5 No = 0			

SLR Notes:

Yes. Communications occur with all operators on a regular basis. Attendance and communicate information at Call Before You Dig Board of Directors meetings and Public Awareness meetings. Attend and provide training at operator training sessions with local officials including fire departments. Staff now participating in the Northeast Gas Association CT Advisory Group meetings.

21	Does state share enforcement data with public? (Website, newsletters, docket access, etc.)	.5	0.5
Yes = .5 No = 0			

SLR Notes:

Yes. DPUC maintains website that has access to all docketed matters which include all pipeline safety and one-call enforcement proceedings. Press releases issued to local media for more notable one-call enforcement cases.

22	Part G: General Comments/Regional Observations	Info Only	Info Only
Info Only = No Points			

SLR Notes:

Total points scored for this section: 9
Total possible points for this section: 9

PART H - Miscellaneous

Points(MAX) Score

- | | | | |
|----------|---|----|-----|
| 1 | What were the major accomplishments for the year being evaluated? (Describe the accomplishments, NAPSR Activities and Participation, etc.)
Yes = .5 No = 0 | .5 | 0.5 |
|----------|---|----|-----|

SLR Notes:

Program Manager position permanently filled January 2010. Filled vacant engineer position June 2010. Added another engineer October 2010. Purchased vehicles for inspectors. Service Line Periodic Inspection Task Group Chairman, CGA Data Committee, EFV task group, Damage Prevention Task Group.

- | | | | |
|----------|--|----|-----|
| 2 | What legislative or program initiatives are taking place/planned in the state, past, present, and future? (Describe initiatives (i.e. damage prevention, jurisdiction/authority, compliance/administrative, etc.)
Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

Staff is currently in the process of updating our damage prevention statutes and regulations to make them stronger.

Program initiatives:

1. Aggressively pursuing accelerated cast iron/bare steel pipe replacement
2. Minimizing backlog of Class 2 leaks
3. Converting inspection forms and reference material to electronic format to decrease time spent on administrative overhead and to enhance the availability of information in the field through the use of laptops for all inspections
4. Damage prevention ? push to reduce numbers of damages through targeted advertising and educational sessions
5. Damage prevention ? Initiative to reduce the number of markout error damages
6. Eliminate master meters
7. Attempting to locate of jurisdictional LP Gas operators and facilities

- | | | | |
|----------|--|----|-----|
| 3 | Any Risk Reduction Accomplishments/Projects? (i.e. Cast iron replacement projects, bare steel, third-party damage reductions, etc.)
Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

Two companies were recently awarded additional revenue, in rate case proceedings, to further accelerate their cast iron/bare steel replacement programs. GPSU supported these requests. Close monitoring of leak response times, class 2 leak backlogs, third party damage and class 1 and 2 leaks. Currently working on rate case that will take CI/BS replacement program from 67 years to 20 years.

- | | | | |
|----------|--|---|---|
| 4 | Did the state participate in/respond to surveys or information requests from NAPSR or PHMSA?
Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

SLR Notes:

Yes.

- | | | | |
|----------|---|----|-----|
| 5 | Sharing Best Practices with Other States - (General Program)
Yes = .5 No = 0 | .5 | 0.5 |
|----------|---|----|-----|

SLR Notes:

Yes. Staff share their best practices through survey requests and at NAPSR Region and National meetings.

- | | | | |
|----------|---|-----------|-----------|
| 6 | Part H: General Comments/Regional Observations
Info Only = No Points | Info Only | Info Only |
|----------|---|-----------|-----------|

SLR Notes:

Total points scored for this section: 3
Total possible points for this section: 3

PART I - Program Initiatives

Points(MAX) Score

Drug and Alcohol Testing (49 CFR Part 199)

- | | | | |
|----------|--|---|---|
| 1 | Has the state verified that operators have drug and alcohol testing programs?
<small>Yes = 1 No = 0</small> | 1 | 1 |
|----------|--|---|---|

SLR Notes:

Yes. Annual field inspections performed on all intrastate operators that are required to have the program. Inspection database has dates of inspections.

- | | | | |
|----------|---|----|-----|
| 2 | Is the state verifying that operators are conducting the drug and alcohol tests required by the operators program (random, post-incident, etc.)
<small>Yes = .5 No = 0</small> | .5 | 0.5 |
|----------|---|----|-----|

SLR Notes:

Yes. Annual field inspections performed on all intrastate operators that are required to have the program and an annual review of the Drug and Alcohol Testing MIS Data Collection forms.

- | | | | |
|----------|--|----|-----|
| 3 | Is the state verifying that any positive tests are responded to in accordance with the operator's program?
<small>Yes = .5 No = 0</small> | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

Yes.

Qualification of Pipeline Personnel (49 CFR Part 192 Subpart N)

- | | | | |
|----------|--|---|---|
| 4 | Has the state verified that operators have a written qualification program?
<small>Yes = 1 No = 0</small> | 1 | 1 |
|----------|--|---|---|

SLR Notes:

Yes.

- | | | | |
|----------|---|----|-----|
| 5 | Has the state reviewed operator qualification programs for compliance with PHMSA rules and protocols?
<small>Yes = .5 No = 0</small> | .5 | 0.5 |
|----------|---|----|-----|

SLR Notes:

Yes. Both headquarters, protocols 1 through 8, and field, protocol 9, inspections have been performed on all intrastate operators.

- | | | | |
|----------|---|----|-----|
| 6 | Is the state verifying that persons who perform covered tasks for the operator are qualified in accordance with the operator's program?
<small>Yes = .5 No = 0</small> | .5 | 0.5 |
|----------|---|----|-----|

SLR Notes:

Yes. Protocol 9 field inspections are being performed. In addition, on new construction welding and joining OQ qualifications are being reviewed.

- | | | | |
|----------|---|----|-----|
| 7 | Is the state verifying that persons who perform covered task for the operator are requalified at the intervals specified in the operator's program?
<small>Yes = .5 No = 0</small> | .5 | 0.5 |
|----------|---|----|-----|

SLR Notes:

Yes. Both headquarters, protocols 1 through 8, and field, protocol 9, inspections have been performed on all intrastate operators.

Gas Transmission Pipeline Integrity Management (49 CFR Part 192 Subpart O)

- | | | | |
|----------|---|---|----|
| 8 | Has the state verified that all operators with transmission pipelines have either adopted an integrity management program (IMP), or have properly determined that one is not required?
<small>Yes = 1 No = 0</small> | 1 | NA |
|----------|---|---|----|

SLR Notes:

No intrastate transmission lines in Connecticut.

- | | | | |
|----------|---|----|----|
| 9 | Has the state verified that in determining whether a plan is required, the operator correctly calculated the potential impact radii and properly applied the definition of a high consequence area?
<small>Yes = .5 No = 0</small> | .5 | NA |
|----------|---|----|----|

SLR Notes:

No intrastate transmission lines in Connecticut.

- | | | | |
|-----------|---|----|----|
| 10 | Has the state reviewed operator IMPs for compliance with Subpart O? (In accordance with State Inspection plan)
Yes = .5 No = 0 | .5 | NA |
|-----------|---|----|----|

SLR Notes:

No intrastate transmission lines in Connecticut.

- | | | | |
|-----------|--|----|----|
| 11 | Is the state monitoring operator progress on the inspections, tests and remedial actions required by the operator's IMP, including that they are being done in the manner and schedule called for in its IMP?
Yes = .5 No = 0 | .5 | NA |
|-----------|--|----|----|

SLR Notes:

No intrastate transmission lines in Connecticut.

- | | | | |
|-----------|--|----|----|
| 12 | Is the state verifying that operators are periodically examining their transmission line routes for the appearance of new HCAs?
Yes = .5 No = 0 | .5 | NA |
|-----------|--|----|----|

SLR Notes:

No intrastate transmission lines in Connecticut.

Public Awareness (49 CFR Section 192.616)

- | | | | |
|-----------|--|----|-----|
| 13 | Has the state verified that each operator has developed a continuing public awareness program? (due date was 6/20/06 for most operators, 6/20/07 for certain very small operators, 6/13/08 for master meters)
Yes = .5 No = 0 | .5 | 0.5 |
|-----------|--|----|-----|

SLR Notes:

Yes.

- | | | | |
|-----------|--|----|-----|
| 14 | Has the state reviewed the content of these programs for compliance with 192.616 (by participating in the Clearinghouse or by other means)?
Yes = .5 No = 0 | .5 | 0.5 |
|-----------|--|----|-----|

SLR Notes:

Yes. GPSU performed the review.

- | | | | |
|-----------|--|----|-----|
| 15 | Is the state verifying that operators are conducting the public awareness activities called for in its program?
Yes = .5 No = 0 | .5 | 0.5 |
|-----------|--|----|-----|

SLR Notes:

Yes. Performed review during O&M audits. Last audits performed in 2007 and 2009.

- | | | | |
|-----------|---|-----------|-----------|
| 16 | Is the state verifying that operators have evaluated their Public Awareness programs for effectiveness as described in RP1162?
Info Only = No Points | Info Only | Info Only |
|-----------|---|-----------|-----------|

SLR Notes:

- | | | | |
|-----------|---|-----------|-----------|
| 17 | Part I: General Comments/Regional Observations
Info Only = No Points | Info Only | Info Only |
|-----------|---|-----------|-----------|

SLR Notes:

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