



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

1200 New Jersey Avenue SE
Washington DC 20590

2018 Gas State Program Evaluation

for

MICHIGAN PUBLIC SERVICE 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)



2018 Gas State Program Evaluation -- CY 2018

Gas

State Agency: Michigan

Agency Status:

Date of Visit: 06/25/2019 - 06/27/2019

Agency Representative: July 1, 2019

David Chislea

Manager, Gas Operations

Rating:

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

PHMSA Representative: Clint Stephens

Transportation Specialist

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

Name/Title: Ms. Sally A. Talberg, Chairman

Agency: Michigan Public Service Commission

Address: 7109 West Saginaw Highway

City/State/Zip: Lansing, Michigan 48917

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 2018 (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.

Scoring Summary

PARTS

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

Possible Points Points Scored

10	10
13	13
48	47
15	13
11	11
8	8
11	11
7	7
0	0

TOTALS

123 120

State Rating **97.6**

PART A - Progress Report and Program Documentation Review

Points(MAX) Score

- | | | | |
|---|---|---|---|
| 1 | Accuracy of Jurisdictional Authority and Operator/Inspection Units Data - Progress Report Attachment 1
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|---|---|---|---|

Evaluator Notes:

Reviewed Attachment 1 of Progress Report, and data seems accurate. Report indicates there are six operators (farm taps) that have not been inspected due to legal issues pertaining to jurisdiction. Effective January 3, 2019, the Michigan PSC, prohibiting such connections being made without appropriate safety measures in place going forward, which also includes annual reporting requirements on the status of safety measures in place for existing connections. These operators were last inspected in 2013, 2014, and 2015.

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

Evaluator Notes:

Reviewed Attachment 2 of Progress Report, and data seems accurate.

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

Evaluator Notes:

Reviewed Attachment 3 of Progress Report, and data seems accurate.

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

Reviewed Attachment 4 of Progress Report and verified information with PDM, and data seems accurate.

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

Evaluator Notes:

Reviewed Attachment 5 of Progress Report, and data seems accurate.

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

Evaluator Notes:

Yes, pipeline program files were well organized and accessible through Windows 7 on S Drive, but inspectors with new computers on Windows 10 do not have access to Pipeline Safety database. There is still four staff members that have access to Pipeline Safety database.

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

Evaluator Notes:

Reviewed Attachment 7 of Progress Report and compared training records with T&Q blackboard, and training records seem accurate.

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



Reviewed Attachment 8 of Progress Report, and all rules and amendments have been adopted and up to date.

- 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 Michigan PSC outlined planned and long term goals in detail for the pipeline safety program.

- 10** General Comments: Info OnlyInfo Only
Info Only = No Points

Evaluator Notes:

There were no issues on Part A of the evaluation.

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



PART B - Program Inspection Procedures

Points(MAX) Score

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

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Procedures are contained in sections 2.10, 2.11 Part #1, 2.16, and 2.17.

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

Procedures are contained in sections 2.10, 2.11 Part #4, 2.16, and 2.17.

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

Procedures are contained in sections 2.10, 2.11 Part #5, 2.16, and 2.17.

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|---|---|---|---|
| 4 | Damage Prevention Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities. | 1 | 1 |
|---|---|---|---|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Procedures are contained in sections 2.10, 2.11 Part #7, 2.16, and 2.17.

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

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

Procedures are contained in sections 2.10, 2.11 Part #3, 2.16, and 2.17.

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

Procedures are contained in sections 2.10, 2.11 Part #2, 2.16, and 2.17. Under Rule 460.20502 requires operators to report construction projects. (Updated with effective date January 3, 2019)

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|---|---|---|---|
| 7 | Does inspection plan address inspection priorities of each operator, and if necessary each unit, based on the following elements? | 6 | 6 |
|---|---|---|---|

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

- a. Length of time since last inspection (Within five year interval)

Yes ☒ No ☐ Needs Improvement ☐

- | | | | |
|--|--------------------------------------|--------------------------|---|
| b. Operating history of operator/unit and/or location (includes leakage, incident and compliance activities) | Yes <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:

Procedures are contained in section 3.1 of the Michigan Operation Procedures.

8 General Comments:

Info Only = No Points

Info OnlyInfo Only

Evaluator Notes:

There were no issues in Part B of the evaluation.

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



PART C - Program Performance

Points(MAX) Score

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

A. Total Inspection Person Days (Attachment 2):
959.00

B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):
 $220 \times 10.71 = 2355.47$

Ratio: A / B
 $959.00 / 2355.47 = 0.41$

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

Evaluator Notes:

Ratio: A/B = $959/220 \times 10.71 = 959/2356.2 = .41 > .39$

- 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:

Yes. The majority of inspectors have completed OQ Training, Tim Wolf is only inspector qualified to perform IMP inspections, majority have completed root cause course, and four new hires in 2018.

- 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:

Yes. The state pipeline safety program manager indicated adequate knowledge of PHMSA program and 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. Chair letter sent Sept. 7, 2018, response received on Nov. 2, 2018. No issue.

- 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. Previous seminar was held in September 26-28, 2016; the next seminar is scheduled for October 2019.

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

Evaluator Notes:

Reviewed DTE TIMP inspection, DART Oil & Gas Corp. standard inspection, Michigan Gas Utilities (MGU) standard

inspection, and Crystal Mountain Program OQ inspection was performed in 2018, but no record of any OQ Program inspections prior to 2018.

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|----------|---|---|---|
| 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 |
|----------|---|---|---|
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Evaluator Notes:

Inspection forms covered all applicable code requirements as outlined by the MPSC inspection checklist for Cycle 'C' and 'D' (1st Half) in CY2018.

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|----------|--|---|---|
| 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 |
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Evaluator Notes:

Yes. Verified in Cycle "A" of 2013, and during 4 -year interval for Cycle "A" in 2017.

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| 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 |
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Evaluator Notes:

Yes. Verified in Cycle "A" of 2013, and during 4 -year interval for Cycle "A" in 2017.

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

Yes. Verified in cycle "H" of last half of 2016, and previously 4-year interval for Cycle "H" in 2012.

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| 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 |
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Evaluator Notes:

Yes. Verified during Cycle 'A,' in First Half 2013, and being inspected in First Half 2018 Cycle 'C'. Reviewed inspection reports from the first half of 2018. No issues.

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| 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 |
|-----------|--|---|---|
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Evaluator Notes:

Yes. The MPSC is reviewing operator annual reports for accuracy and data is analyzed. Incident/Accident reports are reviewed monthly in the PDM, and a spreadsheet is established to track the reports. The spreadsheet is emailed to AID (Accident Investigation Division) monthly.

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| 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 |
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Evaluator Notes:

Yes. Verified during Cycle 'D' inspected in 2018 (2nd Half).

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|-----------|---|---|---|
| 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 |
|-----------|---|---|---|
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Evaluator Notes:

Yes. Verified in Cycle "H" second half of 2016, which was previously performed in 4-year interval in second half of 2012. Did use abbreviated D&A inspection form in 2016. The comprehensive D&A inspection is required as of 2019.

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| 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 |
|-----------|---|---|---|
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Evaluator Notes:

Yes. OQ inspections were verified starting late in 2015 through 2016. (Cycles 'E' and 'F').

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| 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 |
|-----------|---|---|---|
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Evaluator Notes:

In 2018 IMP inspections were performed on the four largest operators in the State of Michigan; Consumers Energy, DTE Energy, SEMCO, and MGU. These operators are met with on an annual basis, for communication which includes IM to discuss assessment, pigging schedules, and remediation schedules for that year. There were no issues.

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|-----------|--|---|---|
| 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 |
|-----------|--|---|---|
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Evaluator Notes:

DIMP for the four big operators was performed in 2016, and scheduled for the next inspection in 2020. The smaller operators' inspection was performed in 2017, and scheduled for the next inspection in 2021. They are on four-year inspection interval. The Michigan PSC meets with the four larger operators on annual basis to discuss mainly their main replacement program which is part of their DIMP Plan. There were no issues.

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|-----------|---|---|---|
| 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 |
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Evaluator Notes:

Public Awareness program inspections were performed in 2016, and scheduled for 2020. These inspections were performed in the Inspection Assistant (IA) database. There were no issues.

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| 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 |
|-----------|--|---|---|
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Evaluator Notes:

The Michigan PSC utilizes its website to post slide presentation which is presented to the four large operators on an annual basis. The power point presentation gives insight on non-compliance issues found during inspections and information from

incident/accident investigations during that past year. The smaller operators and the public have access to this power point presentation on the Michigan PSC website. There were no issues.

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

Yes. The Michigan PSC has taken appropriate follow-up action on two open SRC reports from DTE and Consumers Energy in 2019. There were numerous SRCs reported in 2018, and the Michigan PSC tracked those SRCs by spreadsheet with some being recommended for closure. Those recommended for closure was sent to PHMSA Central Region and the AID. There were no issues.

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|-----------|---|---|---|
| 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?
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|---|---|---|
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Evaluator Notes:

Yes. Verified in Cycle "A" first half 2013, and the 4-year interval of first of 2017. This is also communicated to SEMCO as part of their main replacement program.

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

Yes. The Michigan PSC responded to surveys or information requests from NAPSRS and PHMSA.

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- | | | | |
|-----------|--|---|----|
| 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.
No = 0 Needs Improvement = .5 Yes = 1 | 1 | NA |
|-----------|--|---|----|
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Evaluator Notes:

There were no waivers/special permits issued or open in CY2018.

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- | | | | |
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| 24 | Did the state attend the NAPSRS National Meeting in CY being evaluated?
No = 0 Needs Improvement = .5 Yes = 1 | 1 | 1 |
|-----------|--|---|---|
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Evaluator Notes:

Yes. The Michigan PSC attended the NAPSRS National Meeting in Santa Fe, NM in CY2018.

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- | | | | |
|-----------|---|--------------------------------------|--|
| 25 | Discussion on State Program Performance Metrics found on Stakeholder Communication site - http://primis.phmsa.dot.gov/comm/states.htm
No = 0 Needs Improvement = 1 Yes = 2 | 2 | 2 |
| a. | Discussion of Potential Accelerated Actions (AA's) based on any negative trends | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
| b. | NTSB P-11-20 Meaningful Metrics | Yes <input checked="" type="radio"/> | No <input type="radio"/> Needs Improvement <input type="radio"/> |
-

Evaluator Notes:

? Excavation damages per 1,000 locates decreased from 2017 to 2018;
? Inspection activity increased from 2017 to 2018. (Distribution and Transmission);
? Inspection days decreased substantially from 2017 to 2018. (Master meters and LPG) ? spent more time with Amerigas (full NFPA inspection);
? Inspector qualification has trended downward in %core training and % 5-year retention from 2017 to 2018 ? lost two inspectors in 2018 and gained 4 new inspectors since 2018; and
? Gas distribution total leaks eliminated/repairs has continuously decreased from 2015 to 2018. Leaks scheduled for repair at end of year has increased from 2017 to 2018. This number may be skewed based on 2 year leak repair projections due to main replacement programs.

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

Evaluator Notes:

SIC tool calculated at 872 person days for CY2018, and Attachment 2 - Progress Report indicated 959 person days were completed for CY2018. Michigan PSC is included 103 interstate inspection person days for CY2018 which decreased person days to 856. However, using the CY2017 progress report excluding interstate inspections for CY2018, the inspection person days was 753.

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

Evaluator Notes:

This item is being inspected in inspection cycle 'D.' Currently 2018 2nd Half.

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

Evaluator Notes:

The following issues were identified in Part C:

? Crystal Mountain Program OQ inspection was performed in 2018, but no record of any OQ Program inspections prior to 2018.

? SIC tool calculated at 872 person days for CY2018, and Attachment 2 - Progress Report indicated 959 person days were completed for CY2018. Michigan PSC is included 103 interstate inspection person days for CY2018 which decreased person days to 856. However, using the CY2017 progress report excluding interstate inspections for CY2018, the inspection person days was 753.

Total points scored for this section: 47
Total possible points for this section: 48



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:

The procedures are found in the following:

- ? Section 5.3 Written Non-Compliance Letter of the PG. Also, Sections 2.16 (Exit Interview 30-day briefing) and 2.17 (Post-Inspection 90-day Notification);
- ? Section 5.9 Follow-up;
- ? Section 5.5 Resolution of Non-Compliance; and
- ? Section 5.10 Verification.

- | | | | |
|----------|--|---|--|
| 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? (Incident Investigations do not need to meet 30/90 day requirement) Chapter 5.1
Yes = 4 No = 0 Needs Improvement = 1-3 | 4 | 2 |
| a. | Were compliance actions sent to company officer or manager/board member if municipal/government system? | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b. | Document probable violations | Yes <input checked="" type="radio"/> No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c. | Resolve probable violations | Yes <input type="radio"/> No <input type="radio"/> | Needs Improvement <input checked="" type="radio"/> |
| d. | Routinely review progress of probable violations | Yes <input type="radio"/> No <input type="radio"/> | Needs Improvement <input checked="" type="radio"/> |
| e. | 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:

- ? SEMCO control room management inspection was performed in 2/6/2018, but no compliance letter has been sent to the operator as of the date of the evaluation.
- ? Michigan PSC does not resolve probable violations in an adequate amount time. There are probable violations that are still open from 2012 to 2018.
- ? Michigan PSC has not done an adequate job of reviewing the progress of probable violations. There were open probable violations that could have been closed if inspector had tracked or monitored the progress by communicating with operator or following-up with the response letter from the operators.

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

Evaluator Notes:

Yes. Reviewed numerous inspection reports and found that the Michigan PSC issued compliance actions for all probable violations discovered.

- | | | | |
|----------|---|---|---|
| 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 Michigan PSC gives reasonable due process to all parties, but there were no "show cause" hearings in CY2018.

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

Evaluator Notes:

Yes. The program manager is familiar with state process for imposing civil penalties.

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

Evaluator Notes:

Yes. The Michigan PSC assessed a total of \$301,500 in civil penalties in CY2018, and collected \$275,500 in civil penalties in CY2018.

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

Evaluator Notes:

The following issues were found in Part D of evaluation:

- ? SEMCO control room management inspection was performed in 2/6/2018, but no compliance letter has been sent to the operator as of the date of the evaluation.
- ? Michigan PSC does not resolve probable violations in an adequate amount time. There are probable violations that are still open from 2012 to 2018.
- ? Michigan PSC has not done an adequate job of reviewing the progress of probable violations. There were open probable violations that could have been closed if inspector had tracked or monitored the progress by communicating with operator or following-up with the response letter from the operators.

Total points scored for this section: 13
Total possible points for this section: 15



PART E - Incident Investigations

Points(MAX) Score

- 1 Does the state have written procedures to address state actions in the event of an incident/accident? 2 2

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes. Procedures are included on Chapter 6 and 7 in the MPSC Gas Safety 2018 Procedures.

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

Yes = 2 No = 0 Needs Improvement = 1

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

Evaluator Notes:

Yes. Each Engineer in that location of the incident is notified and receives after hour calls. If they cannot be notified, the operator will go down the list of pipeline safety staff. Records of notifications are kept in the pipeline database.

- 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:

The procedure is located in 7.4 of the MPSC Gas Safety 2018 Procedures. When the Michigan PSC did not go on site for the incident investigation, sufficient information from the operator was gathered to support the decision.

- 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:

Reviewed incident investigations for Consumers Energy and DTE, which indicated they were thoroughly documented, with conclusions and recommendations.

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

Yes = 1 No = 0

Evaluator Notes:

Reviewed incident investigations for Consumers Energy and the Michigan PSC initiated compliance actions for violations found during the incident investigation. There were fifteen reportable incidents in CY2018 with seven having compliance actions. Three reports have not been issued at the time of the evaluation.

- 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:

The Michigan PSC submits a monthly report to AID with status of incident reports. Also, AID has requested the Michigan PSC assistance with following up on the status of some interstate pipeline incidents.

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

Evaluator Notes:

Yes. The Michigan PSC shared lessons learned during the NAPS Region meeting; monthly meetings with the four large operators in the State, and on Michigan PSC website.

8 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

There were no issues in Part E of evaluation.

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. Verified during Cycle "H" second half of 2016. Reviewed 2016 inspection records for Breitborn and Citizens Gas.

- | | | | |
|---|--|---|---|
| 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. Verified during Cycle "H" second half of 2016, and included in the Michigan One Call Law ? ACT 174. Cycle "H" includes Part 192.614 Damage Prevention of the Code. Along with a recommendation for training when enforcing the One Call Law.

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

In 2014 Michigan passed an updated damage prevention Act (Act 174).

? JMQ's role. KML field enforcement, additional DP Engineer being added shortly. Potential future changes in this part of our group.

? Notifications (Damage bulletins from operators, DTE, Consumers). Go to JMQ and KML.

? MDPB attendance. (JMQ/KML/DJC)

? Communications Meeting (2019) ? \\hcs084vsnbpf003\dleg4\PSC\Shared\PSC Data\PSC\psc_owmd\Gas Operations\Presentations\2019 Communication Meeting.pptx

? 2015 DJC presentation at the Renter's Association Meeting.

? 2018 Presentations at MDPB and MISS DIG annual Meeting: o \\hcs084vsnbpf003\dleg4\PSC\Shared\PSC Data \PSC\psc_owmd\Gas Operations\Presentations\2018 MDPB Annual Meeting.ppt

? Staff annually attends paradigm meetings.

? Damage Prevention procedures, Section 9 of the PG: S:\PSC\psc_owmd\Gas Operations\Gas Safety\Gas Safety Program Guidelines

? (For 2019), Damage Prevention Summit.

- | | | | |
|---|--|---|---|
| 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. The Michigan PSC has collected data from the annual reports and evaluated those trends on the number of pipeline damages per 1,000 locate requests. Excavation damages per 1,000 locates decreased from 2017 to 2018.

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

Evaluator Notes:

There were no issues in Part F of the evaluation.

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

PART G - Field Inspections

Points(MAX) Score

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

Name of Operator Inspected:

(1) Michigan Gas Utilities (2) Consumers Energy Co.

Name of State Inspector(s) Observed:

(1) Rob Gregg (lead), Heather David, Derrick Schimming, and Kristin Lawless (2)
Heather David and Eleanor Mundorf

Location of Inspection:

(1) 70 Sauk River Drive, Coldwater, MI (2) 10155 Genesee Rd., Mt. Morris, MI and
12201 Pleasant Lake Rd., Manchester, MI 48158

Date of Inspection:

June 18 thru June 19, 2019

Name of PHMSA Representative:

Clint Stephens

Evaluator Notes:

During the field inspection observed state inspectors perform an O&M inspection on Michigan Gas Utilities, and two separate construction inspections on Consumers Energy Co.

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

Evaluator Notes:

Yes. The operators' representative was notified and present during the inspection.

- 3 Did the inspector use an appropriate inspection form/checklist and was the form/checklist used as a guide for the inspection? (New regulations shall be incorporated) 2 2
Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

Yes. The inspectors used the Michigan PSC inspection form-checklist as a guide during the O&M and construction inspections.

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

Evaluator Notes:

Yes. The inspectors used the Michigan PSC inspection form/checklist as a guide during the O&M and construction inspections.

- 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:

The inspectors reviewed as-built maps and welding rods during the construction inspections.

- 6 Did the inspector adequately review the following during the field portion of the state evaluation? (check all that apply on list) 2 2
Yes = 2 No = 0 Needs Improvement = 1
- | | |
|---------------------------|-------------------------------------|
| a. Procedures | <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:

The inspectors reviewed O&M procedures, construction specifications, welding procedures, OQ records, welder qualifications, and observed compressor station piping.

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

Yes. The inspectors had adequate knowledge of the pipeline safety program and regulations.

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

The inspectors did not conduct exit interviews; however, the operator was informed of those areas of concern following each day of the construction inspections. The O&M inspection was not completed during the evaluation, so no exit interview was performed at that time.

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

Evaluator Notes:

There no probable violations found during the construction inspections.

- | | | | |
|----|---|-----------|-----------|
| 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 | 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 checked="" type="checkbox"/> |
| e. | Change in Class Location | <input type="checkbox"/> |
| f. | Casings | <input type="checkbox"/> |
| g. | Cathodic Protection | <input type="checkbox"/> |
| h. | Cast-iron Replacement | <input type="checkbox"/> |
| i. | Damage Prevention | <input type="checkbox"/> |
| j. | Deactivation | <input type="checkbox"/> |
| k. | Emergency Procedures | <input type="checkbox"/> |
| l. | Inspection of Right-of-Way | <input type="checkbox"/> |
| m. | Line Markers | <input type="checkbox"/> |
| n. | Liaison with Public Officials | <input type="checkbox"/> |
| o. | Leak Surveys | <input type="checkbox"/> |
| p. | MOP | <input type="checkbox"/> |
| q. | MAOP | <input type="checkbox"/> |
| r. | Moving Pipe | <input type="checkbox"/> |
| s. | New Construction | <input checked="" 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 checked="" type="checkbox"/> |
| G. | OQ - Operator Qualification | <input checked="" type="checkbox"/> |
| H. | Compliance Follow-up | <input type="checkbox"/> |
| I. | Atmospheric Corrosion | <input type="checkbox"/> |
| J. | Other | <input type="checkbox"/> |

Evaluator Notes:

There were no issues in Part G of the evaluation.

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



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

Evaluator Notes:

Yes. MI PSC utilizes the IA Program and all the forms within that program.

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

Evaluator Notes:

Yes. Results were documented demonstrating inspection units were reviewed in accordance with "PHMSA directed inspection plan".

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

Evaluator Notes:

Yes. MI PSC submits their notification of all issues within 30 days. This is done in accordance with the CR Interstate Agent document.

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

Evaluator Notes:

Yes. NOPV's and NOAs were issued to Blue Water Gas Storage.

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

Evaluator Notes:

Yes. Any issues that MI PSC considers an imminent safety hazard gets reported to PHMSA immediately.

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

Evaluator Notes:

Yes. Done when MI PSC gives PHMSA their 30 day preliminary findings report.

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

Evaluator Notes:

Yes. MI PSC will collect and upload all appropriate documentation to back up any proposed NOPV. This was done during the Blue Water NOPVs and NOAs.

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

Evaluator Notes:

MI PSC is also participating in PHMSA led inspections as a team member(s). To date, PHMSA has not heard of any issues or concerns about their participation in those inspections.

Total points scored for this section: 7

Total possible points for this section: 7



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:

MI PSC has no 60106 agreement.

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

MI PSC has no 60106 agreement.

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

MI PSC has no 60106 agreement.

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

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

MI PSC has no 60106 agreement.

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

MI PSC has no 60106 agreement.

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

Evaluator Notes:

MI PSC has no 60106 agreement.

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