



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

CALIFORNIA PUBLIC UTILITIES COMMISSION

Document Legend

PART:

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



2018 Gas State Program Evaluation -- CY 2018

Gas

State Agency: California

Agency Status:

Date of Visit: 09/23/2019 - 09/26/2019

Agency Representative: Dennis Lee, Acting Program Manager

PHMSA Representative: David Lykken, Michael Thompson

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

Name/Title: Marybel Batjer, President

Agency: California Public Utilities Commission

Address: 505 Van Ness Avenue

City/State/Zip: San Francisco, CA 94102

Rating:

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

INSTRUCTIONS:

Complete this evaluation in accordance with the Procedures for Evaluating State Pipeline Safety Program. The evaluation should generally reflect state program performance during CY 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

Possible Points Points Scored

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)

10	10
13	13
44	41
13	12
11	9.5
8	8
12	12
0	0
5	5

TOTALS

116 110.5

State Rating

95.3

PART A - Progress Report and Program Documentation Review

Points(MAX) Score

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

Evaluator Notes:

No issues noted. CPUC entered into 60106 agreement with PHMSA in CY2018. Operator counts and Inspection Unit totals by operator type on Attachment 3 are consistent with totals on Attachment 1.

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

Evaluator Notes:

Minimum number of inspection days required for CY2018 was 2575. Actual was 2835. No D&A inspections conducted. The number of inspection days entered for each operator type and inspection type essentially match the records kept by the program.

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

Reviewed PDM data including operator annual reports. No issues noted.

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|---|--|---|---|
| 4 | Were all federally reportable incident reports listed and information correct? - Progress Report Attachment 4
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
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Evaluator Notes:

The 20 incidents listed are consistent with the incident report information contained in PDM.

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

No issues noted. Numbers match the program's inspection database information and inspection/correspondence records reviewed.

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

Evaluator Notes:

Yes. No issues. All inspections maintained electronically via pipeline database and spreadsheets. Information readily available.

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

Training information verified with the information locate in Blackboard. No issues.

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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:

Automatic adoption by reference. California Statute GO 112-F, Subpart A (General). Information listed in Attachment 8 is up to date.

9	List of Planned Performance - Did state describe accomplishments on Progress Report in detail - Progress Report Attachment 10 Yes = 1 No = 0 Needs Improvement = .5	1	1
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Evaluator Notes:

In 2018, the program began attending meetings of the California Underground Facilities Safe Excavation Board tasked with overall enforcement of California's one-call law. Also, the CPUC established an MOU with the Board which clarifies respective agency roles with the goal of avoiding duplicative activities allowing for effective enforcement of the state's one-call law.

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

No point deductions under Part A.

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



PART B - Program Inspection Procedures

Points(MAX) Score

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

Yes = 2 No = 0 Needs Improvement = 1

Evaluator Notes:

GSRB GO112-F and CFR Inspection Procedures Manual. Section II(D-F), Section III(A-G, I, Q, R), Field Inspections 1 thru 6, IV (A-G) Pre-Inspection, Inspection, and Post Inspection activities addressed. Additional procedures manual developed for inspecting Mobile Home Parks and Propane Programs.

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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:

GSRB GO112-F and CFR Inspection Procedures Manual. TIMP - Section III(L) DIMP - Section III(M) Pre-Inspection, Inspection, and Post Inspection activities addressed. For CY2018 comprehensive plan reviews not to exceed every 4 years. Will perform Annual "check-in" with large operators to review IMP program and plan updates. For field verifications inspection staff request schedules of their assigned operators field activities.

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|---|--|---|---|
| 3 | OQ Inspection procedures should give guidance to state inspectors that insure consistency in all inspections conducted by the state? The following elements should be addressed at a minimum - pre-inspection activities, inspection activities, post-inspection activities. | 1 | 1 |
|---|--|---|---|

Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

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

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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:

GSRB GO112-F and CFR Inspection Procedures Manual. Pre-Inspection, Inspection, and Post Inspection activities addressed in Section II, III(J), and IV. Improvements made from prior year now detailing specific actions for conducting these inspections?

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| 5 | Any operator training conducted should be outlined and appropriately documented as needed. | 1 | 1 |
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Yes = 1 No = 0 Needs Improvement = .5

Evaluator Notes:

GSRB GO112-F Inspection Procedures Manual. Section VII(2) - Operator Training

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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:

GSRB GO112-F and CFR Inspection Procedures Manual. Section III (H). also Appendices D & E of GSRB Pipeline Safety Enhancement Program Field Audit Guide.

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

Evaluator Notes:

- Section II(C)
- Section II(B) also GSRB Inspection Matrix
- Section II(B)(7)
- e, f. Section II.

Also addressed in inspection plan documents ...GSRB Inspection Units, Annual Report Analysis & Trending

8 General Comments:

Info Only Info Only

Info Only = No Points

Evaluator Notes:

No point deductions under Part B.

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):
2835.00

B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):
220 X 24.78 = 5451.96

Ratio: A / B
2835.00 / 5451.96 = 0.52

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

Evaluator Notes:

Yes. Total inspection days/ratio met. No issues.

- 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

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|----|--|--------------------------------------|-------------------------------------|---|
| 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 type="radio"/> | No <input checked="" 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. a) OQ training necessary for conducting OQ inspections completed. b) Inspection staff who have conducted IM inspections as lead have completed all necessary T&Q training. c) 22 Supervisors/inspectors have completed the T&Q Root Cause training. d) No outside training in CY2018 e) Inspectors who conducted standard inspections as the lead have attend all necessary T&Q courses.

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

Evaluator Notes:

PM position is currently vacant. Scored as N/A. Position has been posted and due to close on 9/27/19.

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

Evaluator Notes:

Yes, the State Program's letter to President Picker went out 3/8/2019. The President Picker's response letter was received on 4/17/2019 addressing the deficiencies noted.

- 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. Seminar a was held on 9/27-29/2016. A 2019 seminar was hosted on April 16-17 at CPUC Hdqtrs, San Francisco.

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| 6 | Did state inspect all types of operators and inspection units in accordance with time intervals established in written procedures? Chapter 5.1
Yes = 5 No = 0 Needs Improvement = 1-4 | 5 | 2 |
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Evaluator Notes:

No. As of CY2018 the CPUC has 643 LPG Operators/Units (O/U). A total of 470 LPG O/U's were inspected between CY's 2014-2018. Master Meter O/U's inspected 1784 of 2504. Interval not met in part due to high profile incidents resulting in a shift to inspection scheduling. A total of 1357 field inspection days for incident investigations reported in PR's for CY's 2015-2018. A three-point deduction for not meeting the established maximum time intervals.

The program is currently conducting a pilot program to eliminate MM's. As of 9/24/2019 the number of MM's has been reduced to 2153.

The CPUC has approved for inclusion in the program an additional 1827 mobile home parks for conversion. The CPUC GSRB Mobile Home Park & Propane Program Inspection Procedure Manual puts the inspection interval at not to exceed seven years. They will be revising their procedures to reflect the 5 year maximum interval requirement.

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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:

The CPUC utilizes the IA for conducting and recording inspection results. The program uses CPUC Safety & Enforcement Division forms for conducting LPG, MM's, and New Construction inspections.

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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 | NA |
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Evaluator Notes:

N/A. All known cast iron systems have been replaced in California.

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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 | NA |
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Evaluator Notes:

N/A. All known cast iron systems have been replaced in California.

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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. Reviewed IA Procedure inspection reports for SDG&E-South, PG&E-Hdqtrs, SEMPRA (So Cal Gas & SDG&E), City of Glendale, City of Susanville, City of Coalinga, City of Palo Alto, City of Long Beach, and City of Victorville.

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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. Reviewed IA R & O Standard Inspection reports for SDG&E (Borrego Springs, SE-Desert, South; So Cal Gas (SE-Desert, Inland South, North Valley); SW Gas (Needles, North); PG&E (North Bay, Peninsula, Central Coast, Mission, East Bay Division).

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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. Staff are assigned to review and document reports. Data is used in part to prioritize inspections/inspection activities. Pipeline mileage and material type tracked in the "CY2018 Jurisdictional Operators Annual Report Analysis & Trends" spreadsheet.

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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:

Annual check-in meetings conducted. Reviewed meeting agendas/minutes. One operator cited in CY2019 as not submitting NPMS update.

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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:

None conducted in CY2018. Five D&A's conducted in CY2017. A total of 52 D&A inspections conducted between CY's 2010-2018. Reminded Acting PM to use PHMSA Form 3.1.11 (excluding protocols O & P) to conduct comprehensive D&A inspections not to exceed the programs stipulated interval (4yrs) between inspections.

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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. Reviewed IA R & O Standard Inspection reports for OQ Field Verification. SDG&E (Borrego Springs, SE-Desert, South; So Cal Gas (SE-Desert, Inland South, North Valley); SW Gas (Needles, North); PG&E (North Bay, Peninsula, Central Coast, Mission, East Bay Division). OQ plan reviews performed (SD&G-South, PG&E, SEMPRA, City of Glendale, Gill Ranch Storage)

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

Yes. Reviewed IA TIMP inspection reports for SEMPRA (So Cal Gas & SDG&E) and PG&E.

Follow-up reviews of the comprehensive Integrity Management programs conduct at intervals not exceeding 3 calendar years. The program may extend this to four years. IMP Annual check-ins with the largest operators on off years to focus on different elements of the TIMP program. Inspectors are assigned to conduct TIM field inspections of the work being performed on pipeline facilities.

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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:

No DIMP reviews in CY2018. The CPUC receives weekly reports of construction and maintenance activities including work related to DIM.

CPUC conducts DIMP Annual check-in with the large operators on the off years for program and plan updates. They conduct full DIMP inspections not exceeding 3 calendar years. The interval may be extended up to four years.

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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:

Yes. Reviewed PA and PAPEI inspections for SW Gas and SEMPRA (So Cal Gas & SDG&E).

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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:

Yes, as noted in last evaluation the CPUC provides information on inspections, enforcement. Has guidance materials and information for small operators on their web site. Presentations conducted at public hearings and commission meetings. Incident investigations made available on web site via public records request.

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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:

17 SRC's reported in CY2018. None remain open. The CPUC assigns TIMP and DIMP Process Owners (SME'S) responsibility for reviewing every SRC report. SRC processing/assignments and updates now provided via the PHMSA WMS.

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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:

Part of annual check-in's conducted. Program considering sending annual letter to operators requesting updates.

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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. Reviewed three survey responses.

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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 | 1 |
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Evaluator Notes:

There are presently no open waivers/special permits. The CPUC worked with the PHMSA Standards and Rulemaking group to get those posted on the PHMSA web site removed.

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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 CPUC was represented at the meeting held in Sante Fe, NM.

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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:

Damages per 1000 locate tickets have dropped to their lowest level, (2.90) since starting to collect data in 2010. Inspection days per 1000 miles of pipeline has increased for the fourth year in a row to 13 inspection days for every 1000 miles of gas pipeline. Inspection days per MMO/LPG have increase three fold over 2017 to .19 day per MMO/LPG operator in 2018. Pipeline inspector qualification has improved dramatically over previous years. Gas distribution system leaks show that the number of leaks repaired per 1000 miles is up some from 2017 and the leaks scheduled for repaired has stayed the same. Enforcement program evaluation score has stayed the same for 2016 and 2017. Incident investigation score has stayed the same for 2015 - 2017.

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

Discussed. Tool was updated in CY2018. No significant changes to inspections day calculation and have not identified any additional staffing needs.

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

N/A no flow reversal, product changes, and/or conversion to service. Has sent out past PHMSA Advisory Bulletins to operators. Have received operator responses concerning changes. Program considering sending annual letter to operators requesting updates.

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| 28 | General Comments:
Info Only = No Points | Info Only | Info Only |
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Evaluator Notes:

C-6. Three-point deduction for not meeting the established maximum time intervals for completing all MM and LPG operator/units inspections. N/A's for questions 3,8, 9, and 27.

Total points scored for this section: 41
Total possible points for this section: 44

PART D - Compliance Activities**Points(MAX) Score**

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

Evaluator Notes:

Yes. Sections IV (Post Inspection Documentation), V (Compliance Enforcement), and VI (Re-Inspections) of the GSRB Inspection Procedures Manual. Also the GSRB Internal Citation Procedure. Program to update procedures to better clarify process/milestones for moving AOC's to PV status.

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

Evaluator Notes:

One-point deduction for exceeding the 90 written notice for the following inspections.
Sempra (O&M) Insp dates 1/8-12/2018. Exceeded by 43 days.
So Cal Gas (South Desert Trans) Insp dates 1/25-2/09/2018. Exceeded by 5 days
PG&E (East Bay) Insp Dates 2/5-16/2018 . Exceeded by 8 days.

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

Evaluator Notes:

Yes, this was verified by reviewing the inspection/enforcement records for 2018.

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

Evaluator Notes:

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

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

Evaluator Notes:

The state representative at the CY2018 evaluation is in an acting capacity at this time.

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

Evaluator Notes:

Yes, the CaPUC assessed \$5,350,000.00 in civil penalties in 2018. Dollars collected were \$5,150,000.00

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

Evaluator Notes:

D-2 One-point deduction for not meeting 90 day written notice requirement.

D-5 Scored as N/A. Acting PM in position currently.

Total points scored for this section: 12
Total possible points for this section: 13



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

Evaluator Notes:

Yes. Reviewed the CPUC-GSRB incident and investigations procedures manual.

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

- | | | | | |
|----|--|--------------------------------------|--------------------------|---|
| a. | Acknowledgement of MOU between NTSB and PHMSA (Appendix D) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b. | Acknowledgement of Federal/State Cooperation in case of incident/accident (Appendix E) | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

Evaluator Notes:

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

- | | | | |
|---|--|---|---|
| 3 | If onsite investigation was not made, did state obtain sufficient information from the operator and/or by other means to determine the facts to support the decision to not go on-site? Chapter 6
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|---|--|---|---|

Evaluator Notes:

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

- | | | | | |
|----|---|---------------------------|--------------------------|--|
| 4 | Were all incidents investigated, thoroughly documented, and with conclusions and recommendations?
Yes = 3 No = 0 Needs Improvement = 1-2 | 3 | 2 | |
| a. | Observations and document review | Yes <input type="radio"/> | No <input type="radio"/> | Needs Improvement <input checked="" type="radio"/> |
| b. | Contributing Factors | Yes <input type="radio"/> | No <input type="radio"/> | Needs Improvement <input checked="" type="radio"/> |
| c. | Recommendations to prevent recurrences when appropriate | Yes <input type="radio"/> | No <input type="radio"/> | Needs Improvement <input checked="" type="radio"/> |

Evaluator Notes:

Although progress had been made over a few years, all incidents investigated and documented for 2018 were reviewed and there is too large of a time lapse between occurrence and reports being written or recommendations sent to company to respond to. The process was not being monitored or conducted as outlined in their procedures.

- | | | | |
|---|---|---|-----|
| 5 | Did the state initiate compliance action for violations found during any incident/accident investigation?
Yes = 1 No = 0 | 1 | 0.5 |
|---|---|---|-----|

Evaluator Notes:

PV found on incident NRC#1206479 for PG&E on 3/10/2018 was not sent to the operator until 9/6/2019. (18 months - over 540 days) This is too large of a time lapse between occurrence and compliance action being taken.

- | | | | |
|---|--|---|---|
| 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
Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|---|--|---|---|

Evaluator Notes:

Yes, the state has worked with AID.

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

Yes = 1 No = 0

Evaluator Notes:

Yes, the state shares lessons learned with other Western Region states at the annual NAPSRR WR meeting.

8 General Comments:

Info OnlyInfo Only

Info Only = No Points

Evaluator Notes:

E-4Although progress had been made over a few years, all incidents investigated and documented for 2018 were reviewed and there is too large of a time lapse between occurrence and reports being written or recommendations sent to company to respond to. The process was not being monitored or conducted as outlined in their procedures. Loss of 1 point

E-5 PV found on incident NRC#1206479 for PG&E on 3/10/2018 was not sent to the operator until 9/6/2019. (18 months - over 540 days) This is too large of a time lapse between occurrence and compliance action being taken. Loss on .5 points

Total points scored for this section: 9.5
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. Question incorporated into CPUC Damage Prevention inspection checklist. Observed this inspection as part of field evaluation.

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

Asked as part of Damage Prevention inspection. Question incorporated into CPUC checklist.

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

Evaluator Notes:

Yes. As noted previously the CPUC ensure operators comply with State Statute 4216 and CGA Best Practices including the 9 Elements. CPUC web site provides link to the California811 page.

- | | | | |
|---|--|---|---|
| 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. Damage data collected via DIRT and through quarterly damage reports received.

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

Evaluator Notes:

No point deductions under Part F.

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

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

Name of Operator Inspected:

1. West Coast Gas 2. Southern California Edison 3. Pacific Gas & Electric 4. So Cal Gas

Name of State Inspector(s) Observed:

1. Sunil Shori, Desmond Lew, Alula Gebremedhin 2. Durga Shrestha, Desmond Lew, Mahmoud (Steve) Intably 3. Jason McMillan, Paul Penny, Alula Gebremedhin, Damir Lysak, Terrence Eng

Location of Inspection:

1. Sacramento, CA 2. Avalon, CA (Catalina Island) 3. Fresno, CA 4. Compton, CA

Date of Inspection:

1. 3/13-14/2019 2. 3/18-22/2019 3. 3/4-8/2019 4. 5/6-10/2019

Name of PHMSA Representative:

1 & 2 ? David Lykken 3&4 - Michael Thompson

Evaluator Notes:

- Observed a comprehensive review of West Coast Gas's damage prevention program.
- Observed a standard inspection of Southern California Edison's LPG distribution system including a review of O&M procedures, operating records and LPG facilities. This inspection also covered a review of the operators small LPG DIMP program.
- Observed a portion of a standard inspection on both the records and field maintenance of the PG&E Transmission Line facilities around Fresno, CA.
- Observed a portion of a standard inspection, both field and records for So Cal Gas distribution in Compton, CA.

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

Evaluator Notes:

- 1&2. Yes, the operators were notified by the CAPUC via correspondence back in December 2018 and were represented at the time of the inspections.
3&4. Yes, the operator was informed of this inspection after the CPUC schedule was developed in December 2018, and was also communicated with by E-mail prior to the inspection date.

- 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 IA application was used for this inspection. It is the CAPUC's policy to conduct all inspections utilizing the IA application. It was noted during this inspection that the IA GD question set only includes one procedural and one records question whereas the IA GT question set has a total of nine damage prevention questions. Five procedural, one record, and one observation question of the nine total also apply to gas distribution systems. The CAPUC used a modified form in addition to the IA to create a more comprehensive inspection form. For continuity it is suggest that the CAPUC assign a form number to this modified form and make it a part of their form library. This completed form can then be uploaded into any relevant IA inspection.
- Yes. The IA MM/Small LPG Gas Distribution form, CAPUC LP-Gas Distribution form and the IA OQ Form 15 (Field Validation) were utilized.
- Yes, the team used IA to conduct this inspection. Jason McMillan, (Lead) developed the inspection of 106 questions and split up the work between three teams of two during the inspection. Some questions were covered by the group as a whole.
- Yes, the inspection was done using IA. The lead inspector developed the questions in coordination with the team and then split up the areas of focus between the members.

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

Evaluator Notes:

1. Inspectors appeared to take very good notes of all observations.
2. Yes. CPUC inspectors took detailed notes of observations noted during both the records review and field check of gas facilities visited.
3. Yes, each team of inspectors is able to input their findings into IA and then at the end of the inspection the team as a whole reviews and agrees on the final finding for the inspection report.
4. Yes, each team of inspectors is able to input their findings into IA and then at the end of the inspection the team as a whole reviews and agrees on the final finding for the inspection report.

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

Evaluator Notes:

1. Yes. Inspector verified procedure used by operator and calibration method and test records for pipe locating equipment.
2. Yes. Inspectors verified instrument calibration checks where necessary as well as checking the general condition of equipment used by the operator such as pipeline locating equipment and CGI's.
3. Yes, the inspectors did check the calibration dates for required equipment used by the operator and check OQ qualifications for those employees conducting covered tasks. They also reviewed procedures and regulator station drawings for accuracy.
4. Yes, the inspectors did check the calibration dates for required equipment used by the operator and check OQ qualifications for those employees conducting covered tasks. They also reviewed procedures and regulator station drawings for accuracy.

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:

1. Inspectors reviewed procedures for field activities being observed. Records were reviewed at operators' facility.
2. Inspectors conducted a procedure and records review at the operator's facility. Field site visits selected based on the records review and a random selection of facilities.
3. Yes, records were reviewed at the operator's facility, and procedures were reviewed during field site visits. The location of field sites were selected based on the records reviewed and some random selections of facilities.
4. Yes, records were reviewed at the operator's facility, and procedures were reviewed during field site visits. The location of field sites were selected based on the records reviewed and some random selections of facilities.

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

Evaluator Notes:

- 1 & 2. Yes. Inspection teams demonstrated good knowledge of regulations and program specifics.

3. Yes, the inspection team was made up of experienced and newer inspectors. The more experienced inspectors showed good knowledge of the pipeline safety program and regulations and shared that with the newer inspectors.
4. Yes, Gordon Kuo was newer inspector with three years experience, but the rest of the team had between 5 and 15 years experience.

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
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Evaluator Notes:

- 1 & 2. Yes. Findings and areas of concern were discussed at that time.
3. Yes, Findings and requests for additional records/information were discussed during the interview.
4. Yes, the team held a meeting at the end of each day in the field to discuss issues and concerns. They also provided me with the findings covered with the operator on the last day of the inspection.

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

1. Yes. One PV identified related to the safe operation and maintenance of distribution valves. Several Areas of Concern identified related to accuracy of distribution maps, calibration records of leak detection equipment, operator O&M procedures, and Public Awareness plan.
2. Yes. Several concerns were identified and communicated to the operator regarding necessary amendments to operator's damage prevention procedures.
3. Yes, possible PVs and concerns were raised during the interview. There were regulator station drawings of stations that were found to be out of date, valves found in station that were not rated to the MAOP in effect at the time of the inspection and one regulator failed to lock up due to sulfur build up on the regulator boot and cage/strainer. There were some pipeline soil/air points of five different spans on their transmission line that were in need of maintenance.(Ongoing discussion of timing right now).
4. Yes, the CPUC listed several PV's and issues in the final exit interview.

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
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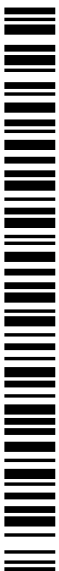
- | | | |
|----|-------------------------------|-------------------------------------|
| a. | Abandonment | <input type="checkbox"/> |
| b. | Abnormal Operations | <input type="checkbox"/> |
| c. | Break-Out Tanks | <input type="checkbox"/> |
| d. | Compressor or Pump Stations | <input type="checkbox"/> |
| e. | Change in Class Location | <input type="checkbox"/> |
| f. | Casings | <input checked="" type="checkbox"/> |
| g. | Cathodic Protection | <input checked="" type="checkbox"/> |
| h. | Cast-iron Replacement | <input type="checkbox"/> |
| i. | Damage Prevention | <input checked="" type="checkbox"/> |
| j. | Deactivation | <input type="checkbox"/> |
| k. | Emergency Procedures | <input type="checkbox"/> |
| l. | Inspection of Right-of-Way | <input checked="" type="checkbox"/> |
| m. | Line Markers | <input checked="" type="checkbox"/> |
| n. | Liaison with Public Officials | <input checked="" type="checkbox"/> |

o.	Leak Surveys	<input checked="" type="checkbox"/>
p.	MOP	<input type="checkbox"/>
q.	MAOP	<input checked="" type="checkbox"/>
r.	Moving Pipe	<input type="checkbox"/>
s.	New Construction	<input type="checkbox"/>
t.	Navigable Waterway Crossings	<input type="checkbox"/>
u.	Odorization	<input checked="" type="checkbox"/>
v.	Overpressure Safety Devices	<input checked="" type="checkbox"/>
w.	Plastic Pipe Installation	<input type="checkbox"/>
x.	Public Education	<input checked="" type="checkbox"/>
y.	Purging	<input type="checkbox"/>
z.	Prevention of Accidental Ignition	<input type="checkbox"/>
A.	Repairs	<input type="checkbox"/>
B.	Signs	<input checked="" type="checkbox"/>
C.	Tapping	<input type="checkbox"/>
D.	Valve Maintenance	<input checked="" type="checkbox"/>
E.	Vault Maintenance	<input type="checkbox"/>
F.	Welding	<input type="checkbox"/>
G.	OQ - Operator Qualification	<input checked="" type="checkbox"/>
H.	Compliance Follow-up	<input type="checkbox"/>
I.	Atmospheric Corrosion	<input checked="" type="checkbox"/>
J.	Other	<input type="checkbox"/>

Evaluator Notes:

Question F3. It was noted during this inspection that the IA GD question set only includes one procedural and one records question whereas the IA GT question set has a total of nine damage prevention questions. Five procedural, one record, and one observation question of the nine total also apply to gas distribution systems. I will be recommending to the IA Task team that the GD Question set also incorporate the five relevant DP question found in the GT question set.

Total points scored for this section: 12
Total possible points for this section: 12



PART H - Interstate Agent State (If Applicable)**Points(MAX) Score**

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

Evaluator Notes:

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

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

Evaluator Notes:

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

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

Evaluator Notes:

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

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

Evaluator Notes:

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

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

Evaluator Notes:

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

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

Evaluator Notes:

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

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

Evaluator Notes:

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

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

Evaluator Notes:

Part H is N/A.

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

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

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

Evaluator Notes:

Yes. The program utilizes the IA to document inspection results. Inspection planning/question selection approved by WR.

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

Evaluator Notes:

Yes. No issues. Inspections identified in the CPUC work plan were reviewed in the IA and inspection results noted. Work plan for next CY is submitted to WR for review.

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

Evaluator Notes:

Yes. A number of UnSats and AOC results were identified. The IA was utilized to perform inspections and record inspection results. PHMSA WR personnel are listed as Supervisory and Director team members to approve and finalize inspections.

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

Evaluator Notes:

N/A. No hazardous conditions identified.

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

Evaluator Notes:

Yes. Inspections results submitted to WR via the IA as an assigned task for review by PHMSA Supervisor.

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

Evaluator Notes:

Yes. No issues identified. PHMSA personnel are listed as Supervisory and Director team members to approve and finalize all 60106 inspections.

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

Evaluator Notes:

No point deductions. Question I-4 marked as N/A.

Total points scored for this section: 5
Total possible points for this section: 5