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

1200 New Jersey Avenue SE
Washington DC 20590

2009 Natural Gas State Program Evaluation

for

IDAHO PUBLIC UTILITIES COMMISSION

Document Legend
PART:

- O -- Representative Date and Title Information
- A -- General Program Qualifications
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2009 Natural Gas State Program Evaluation -- CY 2009

Natural Gas

State Agency: Idaho
Rating:
Agency Status:
60105(a): Yes **60106(a):** No **Interstate Agent:** No
Date of Visit: 10/17/2010 - 10/22/2010
Agency Representative: Ellis Hire, Inspector & Ron Law, Executive Administrator, Idaho Public Utilities Commission
PHMSA Representative: Patrick Gaume
Commission Chairman to whom follow up letter is to be sent:

Name/Title: Mr. Jim Kemptom, Chairman
Agency: Idaho Public Utilities Commission
Address: (472 W Washington St, 83702) PO Box 83720
City/State/Zip: Boise, Idaho 83720-0074

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 2009 (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 then the maximum points, include a brief explanation in the space provided for general comments/regional observations. If a question is not applicable to a state, select NA. Please ensure all responses are COMPLETE and ACCURATE, and OBJECTIVELY reflect state program performance. Increasing emphasis is being placed on performance. This evaluation together with selected factors reported in the state's annual certification/agreement attachments provide the basis for determining the state's pipeline safety grant allocation.

Field Inspection (PART F):

The field inspection form used will allow different areas of emphasis to be considered for each question. Question 13 is provided for scoring field observation areas. In completing PART F, the PHMSA representative should include a written summary which thoroughly documents the inspection.

Scoring Summary

PARTS		Possible Points	Points Scored
A	General Program Qualifications	26	26
B	Inspections and Compliance - Procedures/Records/Performance	17	17
C	Interstate Agent States	0	0
D	Incident Investigations	6	6
E	Damage Prevention Initiatives	9	9
F	Field Inspection	10	10
G	PHMSA Initiatives - Strategic Plan	10	10
H	Miscellaneous	3	3
I	Program Initiatives	9	9
TOTALS		**90**	**90**
State Rating			**100.0**

PART A - General Program Qualifications

		Points(MAX)	Score
1	Did the state submit complete and accurate information on the attachments to its most current 60105(a) Certification/60106 (a) Agreement? (NOTE: PHMSA Representative to verify certification/agreement attachments by reviewing appropriate state documentation. Score a deficiency in any one area as "needs improvement". Attachment numbers appear in parenthesis) Previous Question A.1, Items a-h worth 1 point each Yes = 8 No = 0 Needs Minor Improvement = 3-7 Needs Major Improvement = 2	8	8

a.	State Jurisdiction and agent status over gas facilities (1)	☒
b.	Total state inspection activity (2)	☒
c.	Gas facilities subject to state safety jurisdiction (3)	☒
d.	Gas pipeline incidents (4)	☒
e.	State compliance actions (5)	☒
f.	State record maintenance and reporting (6)	☒
g.	State employees directly involved in the gas pipeline safety program (7)	☒
h.	State compliance with Federal requirements (8)	☒

SLR Notes:

A.1 Yes, 8 points, but will make comments about Attachment 1, 6, & 7. A---on Attachment 1 make it clear that you are a 60105 Agent Status; code 'F' under Transmission Interstate should likely be changed to code 'B'. B---attachment 2, with 135 inspection days, okay. C---Attachment 3 okay. D--- attachment 4 okay. E---attachment 5 okay, it is of interest to note that there were NO probable violations in 2009. (there are 4 so far in 2010). F---attachment 6 okay, Please be more descriptive of records maintained. G---attachment 7, training & 1.03 inspection years. Two completion dates are juxtaposed and Completed Course PL3OQ 7/08 completion is not shown for Ellis Hire. Completed courses PL3OQ, PL3296, PL1297, & PL31C are not shown for Lysle Bartolome. H---okay

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

SLR Notes:

A.2 Yes, see Nat Gas Pipeline Safety Program-Program Operating Procedures (POP)

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

SLR Notes:

A.3 Yes, in-state in May, 2008, & also with Oregon at Portland in June, 2009

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

SLR Notes:

A.4 Yes, the files are in a file cabinet next to Ron Law's office

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

SLR Notes:

A.5 Yes, Ellis and Ron have a professional knowledge of the 49 CFR 190-194 regulations

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

SLR Notes:

A.6 Yes, no response was required. Ron Law did respond to the State Liaison letter

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

Yes = 1 No = 0

SLR Notes:

A.7 Yes, no response was required. Ron Law's letter addressed that Inspectors are verifying that Operators are evaluating the effectiveness of their Public Awareness Programs

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Personnel and Qualifications

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

Yes = 3 No = 0

SLR Notes:

A.8 Yes, both inspectors are trained. They are on track for the new HAZWOPR Training

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9 Brief Description of Non-TQ training Activities: — Info Only — Info Only

Info Only = No Points

For State Personnel:

State personnel- One inspector has taken Root Cause Analysis.

For Operators:

Operators- PUC is finding ways to have yearly Pipeline Safety Seminars, either in-state or joint with other State partners with the locations rotating.

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

Non-Operator- there were no activities in 2009

SLR Notes:

A.9 info only. State personnel- One inspector has taken Root Cause Analysis.
Operators- PUC is finding ways to have yearly Pipeline Safety Seminars, either in-state or joint with other State partners with the locations rotating.
Non-Operator- there were no activities in 2009

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10 Did the lead inspectors complete all required T&Q OQ courses and Computer Based Training (CBT) before conducting OQ Inspections? (Chapter 4.4.1) Previous Question A.12 — 1 — 1

Yes = 1 No = 0

SLR Notes:

A.10 Yes, Ellis Hire was trained in July 2008 & Bud Barthlome was trained in Dec 2003. Course PL3OQ, (formerly 299)

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11 Did the lead inspectors complete all required TQ Integrity Management (IMP) Courses/Seminars and CBT before conducting IMP Inspections? (Chapter 4.4.1) Previous Question A.13 — 1 — 1

Yes = 1 No = 0

SLR Notes:

A.11 Yes, Ellis Hire was trained in PL1297 10/07, PL3293 4/08, & PL3254 4/08; PL3292 is NA because Idaho has no piggable pipe in HCAs. Bud Barthlome was trained in PL1297 4/05, PL3293 7/02, & PL3254 3/02; PL3292 is NA because Idaho has no piggable pipe in HCAs

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12 Was the ratio acceptable of Total inspection Person-days to Total Person-days charged to the program by state inspectors? (Region Director may modify points for just cause) (Chapter 4.3) Previous Question B.12 — 5 — 5

Yes = 5 No = 0

A. Total Inspection Person Days (Attachment 2):

135.00

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

220 X 1.03 = 226.60

Ratio: A / B

135.00 / 226.60 = 0.60

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

Points = 5

SLR Notes:

A.12- Yes. a- '09 total inspection days 135.

b- person days '09 is 1.03*220=226.6 days.
c-score=A/B '09 score=135/226.6=.596. .596 is greater than .38. Okay

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13 Have there been modifications or proposed changes to inspector-staffing levels? (If yes, describe) Previous Question B.13 — Info Only — Info Only

Info Only = No Points

SLR Notes:

A.13. ? Staffing levels have remained the same with two trained inspectors each working about 50% on Pipeline Safety. Ron Law provides the Program Management

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14 Part-A General Comments/Regional Observations — Info Only — Info Only

Info Only = No Points

SLR Notes:

A.14 Last year, Oregon, Washington and Idaho worked together to sponsor a joint T&Q training seminar. The training was held June 17 ? 18, 2009, in Portland, Oregon. We plan to continue this joint effort, rotating the training year-to-year between the three states.

In 2009, the IPUC program manager and inspectors met off site with Intermountain Gas Company senior company officials and satellite unit managers for an "annual exit interview." PowerPoint presentations were presented to the company illustrating any areas of concern that we had and recommendations. The presentations also covered follow-up procedures, new regulations, and the requirements followed by our inspectors in conducting inspections. As a result of the meeting, the company put new procedures in place to address our concerns and recommendations. It was a very productive meeting, and we plan to continue to hold these meetings

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Total points scored for this section: 26
Total possible points for this section: 26

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

Points(MAX) **Score**

Inspection Procedures

1 Does the State have a written inspection plan to complete the following? (all types of operators including LNG) (Chapter 5.1) Previous Question B.1 + Chapter 5 Changes + Incorporate LNG — 6.5 — 6.5

Yes = 6.5 No = 0 Needs Improvement = 50% Deduction

a	Standard Inspections (Including LNG) (Max points = 2)	Yes ◉	No ○	Needs Improvement ○
b	IMP Inspections (Including DIMP) (Max points = .5)	Yes ◉	No ○	Needs Improvement ○
c	OQ Inspections (Max points = .5)	Yes ◉	No ○	Needs Improvement ○
d	Damage Prevention (Max points = .5)	Yes ◉	No ○	Needs Improvement ○
e	On-Site Operator Training (Max points = .5)	Yes ◉	No ○	Needs Improvement ○
f	Construction Inspections (Max points = .5)	Yes ◉	No ○	Needs Improvement ○
g	Incident/Accident Investigations (Max points = 1)	Yes ◉	No ○	Needs Improvement ○
h	Compliance Follow-up (Max points = 1)	Yes ◉	No ○	Needs Improvement ○

SLR Notes:

B.1. Yes a- POP 1.5, 3.1 b- POP 1.5, 3.10 c- POP 1.5, 3.9 d- POP 1.5, 3.12 part of the Std Insp e- POP 1.5, 3.13 is opportunistically observed during Std Insp as available. Also the annual Pipeline Safety Seminars f- POP 1.5, 3.11 g- POP 1.5, 3.15, 3.20 h- POP 1.5, 3.7, 3.20, 5.3, 6.5

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2 Did the written Procedures for selecting operators adequately address key concerns? (Chapter 5.1) Previous Question B.2, items a-d are worth .5 point each — 2 — 2

Yes = 2 No = 0 Needs Improvement = 50% Deduction

a	Length of time since last inspection	Yes ◉	No ○	Needs Improvement ○
b	History of Operator/unit and/or location (including leakage , incident and compliance history)	Yes ◉	No ○	Needs Improvement ○
c	Type of activity being undertaken by operator (construction etc)	Yes ◉	No ○	Needs Improvement ○
d	For large operators, rotation of locations inspected	Yes ◉	No ○	Needs Improvement ○

SLR Notes:

B.2 Yes see POP 3.19 and attachment B

Inspection Performance

3 Did the state inspect all types of operators and inspection units in accordance with time intervals established in its written procedures? (Chapter 5.1) Previous Question B.3 — 2 — 2

Yes = 2 No = 0

SLR Notes:

B.3 Yes, most Units are inspected yearly. OQ & IMP will start being due in 2011. Damage Prevention is part of Std Insp

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4 Did the state inspection form cover all applicable code requirements addressed on the Federal Inspection forms? (Chapter 5.1 (3)) Previous Question B.4 — 1 — 1

Yes = 1 No = 0

SLR Notes:

B.4- Yes, Idaho uses the federal forms

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5 Did state complete all applicable portions of inspection forms? (Chapter 5.1 (3)) Previous Question B.5 — 1 — 1

Yes = 1 No = 0

SLR Notes:

B.5- Yes. A spot check of OQ and Standard inspections showed the reports to be complete. U, NA, and NC items were generally explained, I advised that U, NA, and NC items need to be explained such that Supervision can defend the inspection to a third party. We observed that there were no violations in 2009, and discussed that inspection reports need to be consistent with the NOPV letters

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6 Did the state initiate appropriate follow-up actions to Safety Related Condition Reports? (Chapter 6.3) Previous Question B.6 — .5 — NA

Yes = .5 No = 0

SLR Notes:

B.6- NA no SRCR in 2009

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7 Did the state review operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization and if necessary remedial action was taken? (NTSB) Previous Question B.7 — .5 — NA

Yes = .5 No = 0

SLR Notes:

B.7- NA no cast iron in Idaho and they never had any

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8 Did the state review operator procedures for surveillance of cast iron pipelines, including appropriate action resulting from tracking circumferential cracking failures, study of leakage history, or other unusual operating maintenance condition? (Note: See GPTC Appendix G-18 for guidance) (NTSB) Previous Question B.8 — .5 — NA

Yes = .5 No = 0

SLR Notes:

B.8- NA no cast iron in Idaho and they never had any

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9 Did the state review operator emergency response procedures for leaks caused by excavation damage near buildings and determine whether the procedures adequately address the possibility of multiple leaks and underground migration of gas into nearby buildings Refer to 4/12/01 letter from PHMSA in response to NTSB recommendation P-00-20 and P-00-21? (NTSB) Previous Question B.9 — .5 — .5

Yes = .5 No = 0

SLR Notes:

B.9- Yes, with only 4 operators it was easy for IPUC to ask this question of all operators in 2009. They have agreed to create an addendum sheet and place these questions on it. The addendum sheet will be attached to Standard Inspections

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10 Did the state review operator records of previous accidents and failures including reported third party damage and leak response to ensure appropriate operator response as required by 192.617? (NTSB) Previous Question B.10 — 1 — 1

Yes = 1 No = 0

SLR Notes:

B.10 ? Yes, by reviewing the operator's annual reports and then asking the operators to explain during the headquarters audit for each Operator each year

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Compliance - 60105(a) States

11 Did the state adequately document sufficient information on probable violations? (Chapter 5.2) Previous Question B.14 — 1 — NA

Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

B.11 NA for 2009 as there were no probable violations. Practice is to have written and photo documentation even on the follow up of the corrections. All information is kept in the same file; the inspection, the evidence, the violation letter, the response, the final finding?

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12 Does the state have written procedures to identify the steps to be taken from the discovery to the resolution of a probable violation as specified in the "Guidelines for State Participating in the Pipeline Safety Program"? (Chapter 5.1) Previous Question D(1).1 — 1 — 1

Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

B.12 Yes, see POP 1.6 & 5.7

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13 Does the state have written procedures to notify an operator when a noncompliance is identified as specified in the "Guidelines for States Participating in the Pipeline Safety Program"? (Chapter 5.1(4)) Previous Question D (1).2 — 1 — 1

Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

B.13 Yes, see POP 1.6 & 5.7

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14 Does the state have a written procedure for routinely reviewing the progress of compliance actions to prevent delays or breakdowns of the enforcement process, as required by the "Guidelines for States Participating in the Pipeline Safety Program"? (Chapter 5.1(5)) Previous Question D(1).3 — 1 — 1

Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

B.14 Yes, see POP 1.6 & 5.7

15 Has the State issued compliance actions for all probable violations discovered? (Note : PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation) Previous Question D(1).4 — 1 — NA

Yes = 1 No = 0

SLR Notes:

B.15 NA for 2009 as there were no probable violations. Procedures are in place, see POP 1.6 & 5.7

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16 Did the state follow its written procedures for reviewing compliance actions and follow-up to determine that prompt corrective actions were taken by operators, within the time frames established by the procedures and compliance correspondence, as required by the "Guidelines for States Participating in the Pipeline Safety Program"? Previous Question D(1).5 — 1 — NA

Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

B.16 NA for 2009 as there were no probable violations. Procedures are in place, see POP 1.6 & 5.7

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17 If compliance could not be established by other means, did state pipeline safety program staff request formal action, such as a "Show Cause Hearing" to correct pipeline safety violations? (check each states enforcement procedures) Previous Question D(1).6 — 1 — NA

No = 0 Yes = 1

SLR Notes:

B.17 NA for 2009 as there were no formal actions. It is an available process, but is rarely needed (Show Cause Hearing). Most Operators are cooperative. Even fines are seldom necessary. See POP 1.6 & 5.7.

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18 Did the state adequately document the resolution of probable violations? (Chapter 5.1 (6)) Previous Question D(1).7 — 1 — NA

Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

B.18 NA for 2009 as there were no probable violations. Procedures are in place, see POP 1.6 & 5.7. Final resolutions are documented and placed in the appropriate file

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19 Were compliance actions sent to a company officer? (manager or board member if municipal/government system) (Chapter 5.1(4)) Previous Question D(1).8 — .5 — NA

Yes = .5 No = 0

SLR Notes:

B.19 NA for 2009 as there were no probable violations. Procedures are in place, see POP 1.6 & 5.7. IPUC sends notices to Corporate officers

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20 Did the compliance proceedings give reasonable due process to all parties? (check each states enforcement procedures) Previous Question D(1).9 — 1 — NA

Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

B.20 NA for 2009 as there were no probable violations. Procedures are in place, see POP 1.6 & 5.7. It is a formalized process that is followed and explained to the Operator in the notice letter. Per POP, it includes notices, response times, dispute opportunity, & show cause hearings

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Compliance - 60106(a) States

21 Did the state use the current federal inspection form(s)? Previous Question D(2).1 — 1 — NA

Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

B.21 ? B.26 NA. Idaho is a 60105(a) program

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22 Are results adequately documented demonstrating inspection units were reviewed in accordance with state inspection plan? Previous Question D(2).2 — 1 — NA

Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

B.21 ? B.26 NA. Idaho is a 60105(a) program

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23 Were any probable violations identified by state referred to PHMSA for compliance? (NOTE: PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation.) Previous Question D(2).3 — 1 — NA

Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

B.21 ? B.26 NA. Idaho is a 60105(a) program

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24 Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? Previous Question D(2).4 — 1 — NA

Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

B.21 ? B.26 NA. Idaho is a 60105(a) program

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25 Did the state give written notice to PHMSA within 60 days of all probable violations found? Previous Question D(2).5 — 1 — NA

Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

B.21 ? B.26 NA. Idaho is a 60105(a) program

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26 Did the state initially submit adequate documentation to support compliance action by PHMSA on probable violations? Previous Question D(2).6 — 1 — NA

Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

B.21 ? B.26 NA. Idaho is a 60105(a) program

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27 Part B: General Comments/Regional Observations — Info Only — Info Only

Info Only = No Points

SLR Notes:

B.27 It is IPUC practice to inspect every Unit every year, and with few exceptions that practice is achieved. There is a high level of cooperation and shared goals between IPUC and operators to achieve and maintain safety in Idaho's pipeline systems

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Total points scored for this section: 17

Total possible points for this section: 17

PART C - Interstate Agent States

		Points(MAX)	Score
1	Did the state use the current federal inspection form(s)? Previous Question D(3).1 Yes = 1 No = 0 Needs Improvement = .5	1	NA

SLR Notes:

C.1 ? C.8. NA. Not an Interstate Agent

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

SLR Notes:

C.1 ? C.8. NA. Not an Interstate Agent

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

SLR Notes:

C.1 ? C.8. NA. Not an Interstate Agent

4	Were any probable violations identified by state referred to PHMSA for compliance? (NOTE: PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation.) Previous Question D(3).4 Yes = 1 No = 0	1	NA

SLR Notes:

C.1 ? C.8. NA. Not an Interstate Agent

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

SLR Notes:

C.1 ? C.8. NA. Not an Interstate Agent

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

SLR Notes:

C.1 ? C.8. NA. Not an Interstate Agent

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

SLR Notes:

C.1 ? C.8. NA. Not an Interstate Agent

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

SLR Notes:

C.1 ? C.8. NA. Not an Interstate Agent

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

PART D - Incident Investigations

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

SLR Notes:

D.1 Yes, 'Appendix E ? Federal/State Cooperation in Case of an Incident/Accident' is being followed. Also the new proposed Federal Incident form is being studied. Also see POP 6.0

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

SLR Notes:

D.2 Yes, the State has a good understanding of the MOU between NTSB and DOT (PHMSA). Also see POP 6.2

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

SLR Notes:

D.3 YES, All incidents are investigated and a report is made. (two incidents in '09.)

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

SLR Notes:

D.4 Yes, see POP 6.1 & 6.6. telephonic contact, and data (including emails and State Fire Marshall reports). Most incidents are responded to by the State Fire Marshall or local fire dept

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5	Were investigations thorough and conclusions and recommendations documented in an acceptable manner? Previous Question E.5, comprehensive question worth 2 points total Yes = 2 No = 0 Needs Improvement = 1	2	2

a.	Observations and Document Review	Yes ◉	No ○	Needs Improvement ○
b.	Contributing Factors	Yes ◉	No ○	Needs Improvement ○
c.	Recommendations to prevent recurrences where appropriate	Yes ◉	No ○	Needs Improvement ○

SLR Notes:

D.5 Yes, Yes, Yes, Both Federal incidents have been documented and the reports are in the file. Final reports are still pending. Recommendations to prevent recurrences are identified and will be included in the final report

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

SLR Notes:

D.6 NA, no violations were found. Procedures are in place, see POP 1.6 & 5.7

7	Did the state assist region office by taking appropriate follow-up actions related to the operator incident reports to ensure accuracy and final report has been received by PHMSA? (validate annual report data from operators concerning incidents/accidents and investigate discrepancies) (Chapter 6) Previous Question E.7/E.8 Yes = .5 No = 0	.5	0.5

SLR Notes:

D.7 Yes, the incidents were monitored and the Operators were reminded to submit final reports to the federal database. Both incidents are closed

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

SLR Notes:

D.8 IPUC enjoys a great relationship with Western Region PHMSA on incident data sharing and investigation. That relationship is proving beneficial to both parties

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

PART E - Damage Prevention Initiatives

		Points(MAX)	Score
1	Has the state reviewed directional drilling/boring procedures of each pipeline operator or its contractor to determine if they include actions to protect their facilities from the dangers posed by drilling and other trench less technologies? Previous Question B.11 Yes = 2 No = 0 Needs Improvement = 1	2	2

SLR Notes:

E.1 Yes, IPUC does this per POP 7.7 and they have agreed to create an addendum sheet and place this question on it. The addendum sheet will be attached to Standard Inspections.

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

SLR Notes:

E.2 Yes, it is in the Std Insp Form, under Damage Prevention. IPUC also checks the operator's 'Excavator Damage Report' for Avista, Intermountain Gas Co (IGC), and Questar.

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

SLR Notes:

E.3 Yes, the 3 main operators, many other underground utilities, both One-Call centers, IPUC, and some excavators are members of CGA, however MEMBERSHIP IS NOT MANDITORY. Two of the 4 operators have adopted DIRT, and a third operator is moving to adopt DIRT. The fourth operator has a miniscule amount of jurisdictional pipe in remote land. The IPUC is active in the CGA. The Idaho One-Call Law requires mandatory one-call membership for companies with underground facilities. The Idaho One-Call Law addresses many of the 9 elements within Damage Prevention of the 2006 PIPES Act, but enforcement has not been effectively addressed and mandatory excavator membership in One-Call is not required.

4	Has the agency or another organization within the state collected data and evaluated trends on the number of pipeline damages per 1,000 locate requests? New 2008 Yes = 1 No = 0	1	1

SLR Notes:

E.4 Yes, per Digline Inc., Notifications and locates are by county, hits are reported by both county and operator. Hits per thousand is a calculated number.

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

SLR Notes:

E.5 Yes, generally during the annual headquarters audit. Annual reports, and work and repair tickets are used to ensure failure analysis is done

---

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

SLR Notes:

E.6 The Commission has been aggressively working to establish a statewide damage prevention program for Idaho. We are working with the Idaho Utility Coordinating Council, the utilities, and other stakeholder groups in this endeavor.

We have met with different groups and made presentations on our draft proposed damage prevention program, and have requested their input, help, support and most importantly, their buy-in. We recently hosted a special damage prevention meeting at the Commission and invited senior management officials of the major utilities in the state. The meeting was very well attended and everyone there committed their support to the effort.

We are working closely with the Idaho Utility Coordinating Council and others as we develop our State Damage Prevention Program utilizing the Nine Elements as a guide. We have conducted various surveys to identify all of the stakeholders. In addition, we have gathered input from stakeholders regarding the effectiveness of the state Underground Facilities Damage Prevention Act (dig law), their willingness to share damage stats and help facilitate a statewide damage prevention program.

We have created task groups to work on various aspects of a good damage prevention program. These task groups are made up of representatives from different stakeholders. One task group is currently looking at the enforcement efforts in several other states to determine the model we may want to try to implement in Idaho.

Another task group is working on a plan for establishing more local Utility Coordinating Councils (UCC) around the state, while other groups are working on the best ways to educate the public on calling before you dig and promoting the use of 811.

We have applied for a state damage prevention program grant to help us facilitate the establishment of UCCs throughout the state and to enhance our advertising and education program in regard to "calling 811 before you dig."

Total points scored for this section: 9

Total possible points for this section: 9

PART F - Field Inspection

		Points(MAX)	Score
1	Operator, Inspector, Location, Date and PHMSA Representative Info Only = No Points Name of Operator Inspected: Intermountain Gas Company, opid 8160 Name of State Inspector(s) Observed: Ellis Hire and Ron Law Location of Inspection: Nampa, ID Date of Inspection: October 21, 2010 Name of PHMSA Representative: Patrick Gaume	Info Only	Info Only

SLR Notes:

F.1 Intermountain Gas Company, opid 8160
Ellis Hire and Ron Law
Nampa, ID
October 21, 2010
Patrick Gaume
Intermountain contacts; Tim Wold, Operations Mngr; Dave Call, Meter Inspector; Scott Hubbard, Corrosion Tech.

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

SLR Notes:

F.2 Yes, the Operator was notified in advance and they had up to 4 personnel participating in the inspection

---

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

SLR Notes:

F.3 Yes, Form 2, Standard Inspection Report of Gas Distribution Operator, Rev 03/28/10

4	Did the inspector thoroughly document results of the inspection? Previous Question F.3 Yes = 2 No = 0	2	NA

SLR Notes:

F.4 NA, Two days of field inspection was observed, the field notes were thorough, but filling out the Form was not the targeted objective on the days I observed. I have full confidence the Form will be filled out based on the field notes

---

5	Did the inspector check to see if the operator had necessary equipment during inspection to conduct tasks viewed? (Maps, pyrometer, soap spray, CGI, etc.) New 2008 Yes = 1 No = 0	1	1

SLR Notes:

F.5 Yes, multi-meter, Half cell, valve operating tools, test gauge equipment to prove pressures and test pressure reliefs, compressed gas, hoses and hand tools

---

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

SLR Notes:

F.6 Standard Inspection of a Distribution Unit, specifically a field inspection of 6 regulator stations, rectifier stations, cp points, casing cp, valve actuations, pressure relief tests, road and bridge crossings, atmospheric corrosion, exposed pipe, etc

---

7	Did the inspector adequately review the following during the field portion of the state evaluation? (check all that apply on list) New 2008, comprehensive question worth 2 points total Yes = 2 No = 0 Needs Improvement = 1	2	2
	a. Procedures	☐	

b.	Records	☐	
c.	Field Activities/Facilities	☒	
d.	Other (Please Comment)	☐	

SLR Notes:

F.7 Yes, (field activities) This was a Field portion of a full standard inspection and was focused on field activities

---

8 Did the inspector have adequate knowledge of the pipeline safety program and regulations? (Liaison will document reasons if unacceptable) Previous Question F.8 — 2 — 2

Yes = 2 No = 0

SLR Notes:

F.8. Yes, Ellis & Ron showed adequate knowledge of the pipeline safety program goals and regulations

---

9 Did the inspector conduct an exit interview? (If inspection is not totally complete the interview should be based on areas covered during time of field evaluation) Previous Question F.10 — 1 — 1

Yes = 1 No = 0

SLR Notes:

F.9. Yes, it was an 'end-of-day' review

---

10 During the exit interview, did the inspector identify probable violations found during the inspections? Previous Question F.11 — 1 — 1

Yes = 1 No = 0

SLR Notes:

F.10. Yes, low cp reading, sticky rain flap, debris in some valve casings, short bolts, loose pipe wrap, some vegetation. All items were isolated and minor, and were generally corrected on site or were immediately scheduled for correction

---

11 What did the inspector observe in the field? (Narrative description of field observations and how inspector performed) — Info Only — Info Only

Info Only = No Points

SLR Notes:

F.11 field inspection of 6 regulator stations, rectifier stations, cp points, casing cp, valve actuations, pressure relief tests, road and bridge crossings, atmospheric corrosion, exposed pipe, emergency numbers, signs and markers, condition of ROW, vegetation, cp isolation districts, locks, chains, fences, verified operating pressures, equipment vents and weather protection

---

12 Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices) — Info Only — Info Only

Info Only = No Points

SLR Notes:

F.12 Noted the clear pressure marking for all parts of the regulator stations; was done for emergency responders, and it was discovered to be valuable for all

---

13 Field Observation Areas Observed (check all that apply) — Info Only — Info Only

Info Only = No Points

a.	Abandonment	☐
b.	Abnormal Operations	☐
c.	Break-Out Tanks	☐
d.	Compressor or Pump Stations	☐
e.	Change in Class Location	☐
f.	Casings	☒
g.	Cathodic Protection	☒
h.	Cast-iron Replacement	☐
i.	Damage Prevention	☒
j.	Deactivation	☐
k.	Emergency Procedures	☐
l.	Inspection of Right-of-Way	☒
m.	Line Markers	☒
n.	Liaison with Public Officials	☐
o.	Leak Surveys	☐

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

SLR Notes:

F.13 Yes, regulator stations, rectifier stations, cp points, casing cp, valve actuations, pressure relief tests, road and bridge crossings, atmospheric corrosion, exposed pipe, emergency numbers, signs and markers, condition of ROW, vegetation, cp isolation districts, locks, chains, fences, verified operating pressures, equipment vents and weather protection.
Checked items; f, g, i, l, m, q, u, v, B, D, I

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14 Part F: General Comments/Regional Observations — Info Only Info Only

Info Only = No Points

SLR Notes:

F.14 On October 20 & 21, 2010, Mr. Ellis Hire and Ron Law performed a Field portion of a Standard Inspection of a gas distribution Unit Operated by Intermountain Gas Company at Nampa, ID. The Evaluation was to observe Mr. Hire while he performed two days of Field Inspection of the gas distribution Unit. The Operator was very cooperative and Mr. Hire conducted himself in a courteous, competent, and professional manner

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

PART G - PHMSA Initiatives - Strategic Plan

		Points(MAX)	Score

Risk base Inspections - Targeting High Risk Areas

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

Yes = 1.5 No = 0

Risk Factors (criteria) to consider may include:

Miles of HCA's, Geographic area, Population Density

Length of time since last inspection

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

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

SLR Notes:

G.1 Yes, see POP 3.19. POP 3.19 is really a contingency plan; with only 4 operators and 10 units, that are seen every year, risk ranking is meaningless

---

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

Yes = .5 No = 0

SLR Notes:

G.2 Yes, see POP table 1.2.1, Table of Inspection Units

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

Info Only = No Points

SLR Notes:

G.3 Yes, IPUC is aware of the pending DIMP Rule and will implement the DIMP inspections per the federal guidelines. At least one inspector is on the wait list for a 2011 DIMP Class

---

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

Yes = .5 No = 0

SLR Notes:

G.4 Yes, see POP 3.19, table 1.2.1, and attachment B. POP 3.19 and attachment B are really contingency plans; with only 4 operators and 10 units, that are seen every year, risk ranking is meaningless

---

Use of Data to Help Drive Program Priority and Inspections

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

Yes = .5 No = 0

SLR Notes:

G.5 Yes, per use of 'Survey Monkey', a survey of stakeholders concerning damage prevention. Also have # calls and # damages in ID that can be disaggregated into more specific areas. DIRT started being used in 2009, and is addressed during every Headquarters audit

---

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

Yes = .5 No = 0

SLR Notes:

G.6 Yes, the reviews are done every year in March or April during Headquarters audits

---

7 Has state analyzed annual report data for trends and operator issues? — .5 — 0.5

Yes = .5 No = 0

SLR Notes:

G.7. Yes, for increase in corrosion, damages, leaks, etc. Such review of Avista caused them to create a riser replacement program that was started in 4th Qtr 2009. Avista replaced 40 risers in 2009

---

8 Has state reviewed data on Incident/Accident reports for accuracy? — .5 — 0.5

Yes = .5 No = 0

SLR Notes:

G.8. Yes, for both incidents in 2009. Incident reports are reviewed for completeness, probable cause, final report, timeliness, & necessary procedural changes

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

SLR Notes:

G.9 Yes, they have a Qtrly report that is complied by Bud and Ellis. Ron evaluates the report with Bud & Ellis, and this results in an evaluation of the effectiveness of their own program

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

SLR Notes:

G.10 Yes, uploading of OQ data is part of every Std Inspection, and the upload is documented in the file

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

SLR Notes:

G.11 Yes, a follow up IM inspection with replies were uploaded in 2009

12	Have the IMP Federal Protocol forms been uploaded to the IMDB? Previous Question B.17 Yes = .5 No = 0	.5	0.5

SLR Notes:

G.12 Yes, the follow up IM inspection was uploaded in 2009

13	Did the State ask Operators to identify any plastic pipe and components that has shown a record of defects/leaks and what those operators are doing to mitigate the safety concerns? Previous Question B.18 Yes = .5 No = 0	.5	0.5

SLR Notes:

G.13 Yes, this is addressed during the annual Headquarters audits

14	Has state confirmed transmission operators have submitted information into National Pipeline Mapping System (NPMS) database along with any changes made after original submission? Yes = .5 No = 0	.5	0.5

SLR Notes:

G.14 Yes, this is addressed during the annual Headquarters audits of the two Operators with transmission lines. There are no recent or planned changes to transmission lines in ID

Accident/Incident Investigation Learning and Sharing Lessons Learned

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

SLR Notes:

G.15 Yes per their state reports presented at the NAPSR WR Meetings in 2008 and 2009

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

SLR Notes:

G.16. Yes, reports are received, follow up is made, paperwork is checked, lessons learned are derived, Incident causes and regulatory compliance are determined, and site visit reports are reviewed. Operators are encouraged to share lessons learned. Inspector duties are outlined in POP

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

SLR Notes:

G.17 Not yet. IPUC does not have a criteria for a formal Root Cause Analysis at this time. One inspector took a Root Cause class in 2005. They do search for probable cause and compliance with the regulations. Also the use of the DIRT Form started in 2009

18 Does state conduct root cause analysis on incidents/accidents in state? Info Only Info Only

Info Only = No Points

SLR Notes:

G.18 Not yet. IPUC does not have a criteria for a formal Root Cause Analysis at this time. One inspector took a Root Cause class in 2005. They do search for probable cause and compliance with the regulations. Also the use of the DIRT Form started in 2009

---

19 Has state participated on root cause analysis training? (can also be on wait list) .5 0.5

Yes = .5 No = 0

SLR Notes:

G.19 Yes, Ellis had root cause analysis training from DOT by the Battelle Corporation in 2005 in Las Vegas sponsored by Federal Railroad Administration (FRA). Bud should be on the wait list

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Transparency - Communication with Stakeholders

20 Other than pipeline safety seminar does State communicate with stakeholders? (Communicate program data, pub awareness, etc.) .5 0.5

Yes = .5 No = 0

SLR Notes:

G.20 Yes, Ron meets regularly with the Idaho Utility Coordinating Council. They communicate with operators, excavators, other underground utilities, and the public at the meetings. In addition the IPUC has hosted it own meetings with participation of the various stakeholders

---

21 Does state share enforcement data with public? (Website, newsletters, docket access, etc.) .5 0.5

Yes = .5 No = 0

SLR Notes:

G.21 Yes, IPUC shares enforcement data with the public on their PUC website. In addition all finalized records can be requested through FOIA

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22 Part G: General Comments/Regional Observations Info Only Info Only

Info Only = No Points

SLR Notes:

G.22 The Commission is looking for a good state database program that already exists that we can use in Idaho rather than try and reinvent the wheel. We were very interested in the state database program that Minnesota has developed; however, we haven't been able to get it to work on our system. We will continue to try and utilize their program and at the same time look into other database programs

---

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

PART H - Miscellaneous

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

SLR Notes:

H.1 Yes, Dirt started being used in 2009. The CGA is well established. The Idaho Underground Coordinating Council is well established. The Idaho One Call Law addresses many of the 9 elements of Damage Prevention, even though a path to implement effective civil penalties has not yet been found. Ron is on the NAPSR Board of Directors

---

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

SLR Notes:

H.2 Yes, the legislative process has mostly been addressed through the Idaho One Call Law. Program Initiatives include expanded membership in One-Call, expanded membership in CGA, program leadership through IUCC, the creation of local UCC, and IPUC hosting meetings with stakeholders. Many of the 9 element objectives have been accomplished except for effective civil penalties and mandatory excavator memberships. Different enforcement models are being reviewed and it may include an additional legislative effort. The additional legislative effort will also address parts of the 9 elements that have been identified for improvement

---

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

SLR Notes:

H.3 Yes, have performed damage prevention surveys of stakeholders in order to create a consensus proposal to go to the legislature to get more detailed jurisdiction and authority in the damage prevention arena and to create effective civil penalties for one-call violations

---

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

SLR Notes:

H.4 Yes, IPUC works with NAPSR, NARUC, T&Q, NTSB, & PHMSA, and responds to all surveys

---

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

SLR Notes:

H.5 The Avista snow shield for meter sets was shared at the 2010 WR NAPSR meeting

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

SLR Notes:

H.6 Dirt started being used in 2009. The CGA is well established. The Idaho Underground Coordinating Council is well established. The Idaho One Call Law addresses many of the 9 elements of Damage Prevention, even though a path to implement effective civil penalties has not yet been found. Ron is on the NAPSR Board of Directors

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Total points scored for this section: 3

Total possible points for this section: 3

PART I - Program Initiatives

		Points(MAX)	Score

Drug and Alcohol Testing (49 CFR Part 199)

1 Has the state verified that operators have drug and alcohol testing programs? — 1 — 1

Yes = 1 No = 0

SLR Notes:

I.1 Yes, IPUC has a D&A program that addresses all 4 operators every two years; usually 2 per year

---

2 Is the state verifying that operators are conducting the drug and alcohol tests required by the operators program (random, post-incident, etc.) — .5 — 0.5

Yes = .5 No = 0

SLR Notes:

I.2 Yes, IPUC verifies to CFR 199 and to the operator's program. In 2009 the D&A short form was used. The Long form has been used in 2010, and is planned to be used thereafter. "It is a much better form!"

---

3 Is the state verifying that any positive tests are responded to in accordance with the operator's program? — .5 — 0.5

Yes = .5 No = 0

SLR Notes:

I.3 Yes, there was one positive test in 2008 and none in 2009. Operator procedures were followed. This question was asked verbally when using the short form. It is on the long form

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

4 Has the state verified that operators have a written qualification program? — 1 — 1

Yes = 1 No = 0

SLR Notes:

I.4 Yes, Bud did this ca. 2005. IPUC is targeting full OQ re-inspections for 2011

---

5 Has the state reviewed operator qualification programs for compliance with PHMSA rules and protocols? — .5 — 0.5

Yes = .5 No = 0

SLR Notes:

I.5 Yes, All OQ inspections were done using Federal Forms and according to Federal guidelines. All Operators came into compliance. Field OQ inspections are done every year

---

6 Is the state verifying that persons who perform covered tasks for the operator are qualified in accordance with the operator's program? — .5 — 0.5

Yes = .5 No = 0

SLR Notes:

I.6 Yes, it is covered in the OQ inspections. Also Protocol 9 reviews are done every year

---

7 Is the state verifying that persons who perform covered task for the operator are requalified at the intervals specified in the operator's program? — .5 — 0.5

Yes = .5 No = 0

SLR Notes:

I.7 Yes, OQ records are checked during annual headquarter audits, also the original OQ inspection and during Protocol 9 inspections

---

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

8 Has the state verified that all operators with transmission pipelines have either adopted an integrity management program (IMP), or have properly determined that one is not required? — 1 — 1

Yes = 1 No = 0

SLR Notes:

I.8 Yes, three operators have GIMP, and one operator is certified to have no transmission lines in Idaho

---

9 Has the state verified that in determining whether a plan is required, the operator correctly calculated the potential impact radii and properly applied the definition of a high consequence area? — .5 — 0.5

Yes = .5 No = 0

SLR Notes:

I.9 Yes, the impact radii calculations and the HCA determinations have been verified during every GIMP review

---

10 Has the state reviewed operator IMPs for compliance with Subpart O? (In accordance with State Inspection plan) .5 0.5
Yes = .5 No = 0

SLR Notes:

I.10 Yes, Initial GIMP have been done and compliance with subpart O has been checked for two operators. The third Operator is a new GIMP program and was determined to need GIMP in 2009. Its initial GIMP is scheduled for 2011. GIMP re-inspections are scheduled to start in 2011

---

11 Is the state monitoring operator progress on the inspections, tests and remedial actions required by the operator's IMP, including that they are being done in the manner and schedule called for in its IMP? .5 0.5
Yes = .5 No = 0

SLR Notes:

I.11 Yes, these items are addressed during the annual Headquarters audits

---

12 Is the state verifying that operators are periodically examining their transmission line routes for the appearance of new HCAs? .5 0.5
Yes = .5 No = 0

SLR Notes:

I.12 Yes, this is addressed during the annual Headquarters audits. This is a minor concern as there has been no transmission construction, nor population encroachment

---

Public Awareness (49 CFR Section 192.616)

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

SLR Notes:

I.13 Yes, the programs have been developed and verified. They are re-checked annually during Headquarters audits

---

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

SLR Notes:

I.14 Yes per the Clearing House annual review and follow up of any deficiencies

---

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

SLR Notes:

I.15 Yes, per operator surveys and results, also per the PHMSA inspection form. A fully API RP 1162 compliant inspection is waiting on a new Federal Form

---

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

SLR Notes:

I.16 Not yet. Was not done in 2009. Three of the four Operator's programs have been reviewed in 2010. The fourth operator is new and developed its program in 2009. Effectiveness review for it is scheduled for 2013

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

SLR Notes:

I.17 Operator Public Awareness Program is being closely monitored by the Idaho Public Utilities Commission. Initial surveys sent out by operators in 2006 to public officials, emergency responders and the general public are reviewed and compared to 2009 survey results for trends, improvement, effectiveness and knowledge of the pipeline safety message to these stakeholders.

The Commission has begun performing comprehensive Operator Drug and Alcohol Misuse Program inspections for covered pipeline personnel. Idaho Operators are rotated annually for scheduled standard inspections to ensure compliance with the Department of Transportation drug-free workplace policies. Results of these inspections are documented on the Department of Transportation's Substance Abuse Program forms and coordinated with the Office of Substance Abuse, Investigations and Compliance

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Total points scored for this section: 9

Total possible points for this section: 9