



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

1200 New Jersey Avenue SE  
Washington DC 20590

# 2010 Natural Gas State Program Evaluation

for

IDAHO PUBLIC UTILITIES COMMISSION

## Document Legend

### PART:

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



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

**State Agency:** Idaho

**Agency Status:**

**Date of Visit:** 09/19/2011 - 09/23/2011

**Agency Representative:** Joe Leckie, Executive Administrator, and Ellis Hire, Sr. Inspector

**PHMSA Representative:** Patrick Gaume

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

**Name/Title:** Mr. Paul Kjellander, President

**Agency:** Idaho Public Utilities Commission

**Address:** 472 W Washington St, PO Box 83720

**City/State/Zip:** Boise, Idaho 83720-0074

**Rating:**

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

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**INSTRUCTIONS:**

Complete this evaluation in accordance with the Procedures for Evaluating State Pipeline Safety Program. The evaluation should generally reflect state program performance during CY 2010 (not the status of performance at the time of the evaluation). All items for which criteria have not been established should be answered based on the PHMSA representative's judgment. A deficiency in any one part of a multiple part question should be scored as needs improvement. Determine the answer to the question then select the appropriate point value. If a state receives less than the maximum points, include a brief explanation in the space provided for general comments/regional observations. If a question is not applicable to a state, select NA. Please ensure all responses are COMPLETE and ACCURATE, and OBJECTIVELY reflect state program performance. Increasing emphasis is being placed on performance. This evaluation together with selected factors reported in the state's annual certification/agreement attachments provide the basis for determining the state's pipeline safety grant allocation.

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**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	22.5	22.5
C	Interstate Agent States	0	0
D	Incident Investigations	6	6
E	Damage Prevention Initiatives	9	9
F	Field Inspection	12	12
G	PHMSA Initiatives - Strategic Plan	10	10
H	Miscellaneous	3	3
I	Program Initiatives	9	8.5

**97.5**

**97**

**TOTALS**

**State Rating .....**

**99.5**

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## PART A - General Program Qualifications

Points(MAX) Score

- |          |  |                                     |   |
|----------|--|-------------------------------------|---|
| <b>1</b> | 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<br>Yes = 8 No = 0 Needs Minor Improvement = 3-7 Needs Major Improvement = 2 | 8                                   | 8 |
| a.       | State Jurisdiction and agent status over gas facilities (1)  | <input checked="" type="checkbox"/> |   |
| b.       | Total state inspection activity (2)  | <input checked="" type="checkbox"/> |   |
| c.       | Gas facilities subject to state safety jurisdiction (3)  | <input checked="" type="checkbox"/> |   |
| d.       | Gas pipeline incidents (4)   | <input checked="" type="checkbox"/> |   |
| e.       | State compliance actions (5)   | <input checked="" type="checkbox"/> |   |
| f.       | State record maintenance and reporting (6)   | <input checked="" type="checkbox"/> |   |
| g.       | State employees directly involved in the gas pipeline safety program (7)   | <input checked="" type="checkbox"/> |   |
| h.       | State compliance with Federal requirements (8)   | <input checked="" type="checkbox"/> |   |

### SLR Notes:

A.1 Yes, 8 points, but will make comments about Attachment 1, 6, & 7. A---on Attachment 1 now that 'F' is restored as an appropriate code, use 'F' for Interstate and Interstate LNG transmission lines. Please amend the form in Fedstar. B---attachment 2, with 128 inspection days, okay. C---Attachment 3 okay. D--- attachment 4 okay. E---attachment 5 okay. F---attachment 6 okay. G---attachment 7, training & 1.04 inspection years, okay. H---okay.

- |          |   |   |   |
|----------|---|---|---|
| <b>2</b> | 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<br>Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

### SLR Notes:

A.2 Yes, see Nat Gas Pipeline Safety Program-Program Operating Procedures (POP) Sec 2.2.

- |          |   |   |   |
|----------|---|---|---|
| <b>3</b> | 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<br>Yes = 2 No = 0 | 2 | 2 |
|----------|---|---|---|

### SLR Notes:

A.3 Yes, in-state in May, 2008, & also with Oregon at Portland in June, 2009. A Training Seminar has been scheduled in November of 2012.

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

### SLR Notes:

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

- |          |   |   |   |
|----------|---|---|---|
| <b>5</b> | 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<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|---|---|---|

### SLR Notes:

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

- |          |   |   |   |
|----------|---|---|---|
| <b>6</b> | 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<br>Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

### SLR Notes:

A.6 Yes, the letter was sent on 12/28/2010 and the response was mailed 2/17/2011.

- |          |  |   |   |
|----------|--|---|---|
| <b>7</b> | 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 |
|----------|--|---|---|

**SLR Notes:**

A.7 Yes, Strengthening the 9 elements of Damage Prevention is a priority and they plan to introduce legislation in the 2012 session. They are aware that they don't have authority over master meters and they plan to introduce legislation in the 2012 session.

## Personnel and Qualifications

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

**SLR Notes:**

A.8 Yes, both inspectors are trained. They are scheduled for the 3 day HAZWOPR Training.

- 9** Brief Description of Non-TQ training Activities: Info Only Info Only
- Info Only = No Points
- For State Personnel:
- A.9 info only. State personnel- Jan, 2011 attended the Area Corrosion Control Workshop sponsored by NACE.
- For Operators:
- Operators- PUC presented an Underground Safety Seminar in 1st Qtr, 2010.
- For Non-Operator Entities/Parties, Information Dissemination, Public Meetings:
- Non-Operator- there were no activities in 2010.

**SLR Notes:**

A.9 info only. State personnel- Jan, 2011 attended the Area Corrosion Control Workshop sponsored by NACE.

Operators- PUC presented an Underground Safety Seminar in 1st Qtr, 2010.

Non-Operator- there were no activities in 2010.

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

**SLR Notes:**

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

- 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 was postponed because Idaho has no piggable pipe in HCAs. Ellis is now scheduled for PL3292.

- 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):  
128.00

B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):  
220 X 1.04 = 228.80

Ratio: A / B  
128.00 / 228.80 = 0.56

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

**SLR Notes:**

A.12- Yes. a- '10 total inspection days 128.  
b- person days '10 is 1.04\*220=228.8 days.  
c-score=A/B '10 score=128/228.8=.5594. .5594 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 Info Only Info Only  
Question B.13  
Info Only = No Points

**SLR Notes:**

A.13. ? For 2010, Staffing levels have remained the same with two trained inspectors each working about 50% on Pipeline Safety. Ron Law provided the Program Management. Effective 3/1/2011, Ron retired, Ellis was promoted to program manager, and they need to find a third inspector.

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

**SLR Notes:**

A.14 Oregon, Washington and Idaho worked together to sponsor a joint T&Q training seminar on 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 met off site with Intermountain Gas Company company officials and unit managers for an "annual exit interview." PowerPoint presentations were presented to the company illustrating any areas of concern 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 <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| b | IMP Inspections (Including DIMP) (Max points = .5)    | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| c | OQ Inspections (Max points = .5)                      | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| d | Damage Prevention (Max points = .5)                   | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| e | On-Site Operator Training (Max points = .5)           | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| f | Construction Inspections (Max points = .5)            | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| g | Incident/Accident Investigations (Max points = 1)     | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |
| h | Compliance Follow-up (Max points = 1)                 | Yes <input checked="" type="radio"/> | No <input type="radio"/> | Needs Improvement <input type="radio"/> |

#### SLR Notes:

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.

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

#### SLR Notes:

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. They will likely start addressing PAPEE in 2012.

- 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

- 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 again (2nd yr) that U, NA, and NC items need to be explained such that Supervision can defend the inspection to a third party. I also observed that the inspection reports are consistent with the NOPV letters.

- 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 or 2010.

- 
- |          |  |    |    |
|----------|--|----|----|
| <b>7</b> | 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<br>Yes = .5 No = 0 | .5 | NA |
|----------|--|----|----|

SLR Notes:

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

- 
- |          |   |    |    |
|----------|---|----|----|
| <b>8</b> | 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<br>Yes = .5 No = 0 | .5 | NA |
|----------|---|----|----|

SLR Notes:

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

- 
- |          |  |    |    |
|----------|--|----|----|
| <b>9</b> | 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<br>Yes = .5 No = 0 | .5 | .5 |
|----------|--|----|----|

SLR Notes:

B.9- Yes, with only 4 operators, (now only 3), it was easy for IPUC to ask this question of all operators in 2009 & 2010. Effective October, 2010 they created an addendum sheet and placed these questions on it. The addendum sheet is attached to Standard Inspections.

- 
- |           |  |   |   |
|-----------|--|---|---|
| <b>10</b> | 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<br>Yes = 1 No = 0 | 1 | 1 |
|-----------|--|---|---|

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

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

SLR Notes:

B.11 Yes, In 2010 there were 4 NOPV. They were all documented and the warning letters matched with the inspection records. All information is kept in the same file; the inspection, the evidence, the violation letter, the response, the final finding?

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- |           |  |   |   |
|-----------|--|---|---|
| <b>12</b> | 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<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|--|---|---|

SLR Notes:

B.12 Yes, see POP 1.6 & 5.7

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- |           |  |   |   |
|-----------|--|---|---|
| <b>13</b> | 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<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|--|---|---|

SLR Notes:

B.13 Yes, see POP 1.6 & 5.7

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- |           |  |   |   |
|-----------|--|---|---|
| <b>14</b> | 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<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | 1 |
|-----------|--|---|---|

SLR Notes:

B.14 Yes, see POP 1.6 & 5.7

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- |           |  |   |   |
|-----------|--|---|---|
| <b>15</b> | 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 | 1 |
|           | Yes = 1 No = 0   |   |   |

**SLR Notes:**

B.15 Yes, The 4 NOPV are consistent with the inspection results. Procedures are in place, see POP 1.6 & 5.7

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- |           |   |   |   |
|-----------|---|---|---|
| <b>16</b> | 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 | 1 |
|           | Yes = 1 No = 0 Needs Improvement = .5   |   |   |

**SLR Notes:**

B.16 Yes, The 4 NOPV are consistent with the inspection results. Procedures are in place, see POP 1.6 & 5.7. Follow up was made during the next inspection; all okay.

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- |           |   |   |    |
|-----------|---|---|----|
| <b>17</b> | 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 2010 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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- |           |   |   |   |
|-----------|---|---|---|
| <b>18</b> | Did the state adequately document the resolution of probable violations? (Chapter 5.1 (6)) Previous Question D(1).7 | 1 | 1 |
|           | Yes = 1 No = 0 Needs Improvement = .5   |   |   |

**SLR Notes:**

B.18 Yes, The 4 NOPV are documented and consistent with the inspection results. Procedures are in place, see POP 1.6 & 5.7. Final resolutions are documented and placed in the appropriate file.

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- |           |   |    |    |
|-----------|---|----|----|
| <b>19</b> | 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 | .5 |
|           | Yes = .5 No = 0   |    |    |

**SLR Notes:**

B.19 Yes, The 4 NOPV were sent to company VPs. Procedures are in place, see POP 1.6 & 5.7. IPUC sends notices to Corporate officers.

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- |           |  |   |   |
|-----------|--|---|---|
| <b>20</b> | Did the compliance proceedings give reasonable due process to all parties? (check each states enforcement procedures) Previous Question D(1).9 | 1 | 1 |
|           | Yes = 1 No = 0 Needs Improvement = .5  |   |   |

**SLR Notes:**

B.20 Yes, due process was afforded to all. Procedures are in place, see POP 1.6 & 5.7. Per POP, it includes notices, response times, dispute opportunity, & show cause hearings.

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## Compliance - 60106(a) States

- |           |  |   |    |
|-----------|--|---|----|
| <b>21</b> | 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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- |           |   |   |    |
|-----------|---|---|----|
| <b>22</b> | 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.

- 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.

- 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.

- 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.

- 27** Is the program manager familiar with state process for imposing civil penalties? Were civil penalties considered for repeat violations (with severity consideration) or violations resulting in incidents/accidents? (describe any actions taken) Info Only Info Only  
Info Only = No Points

SLR Notes:

B.27 Yes. The information presented by Linda Daugherty in the 2011 Nat'l NAPSRS Mtg has recently been incorporated into the revised procedures. See POP Sec 1.6.

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

SLR Notes:

B.28 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.

Total points scored for this section: 22.5  
Total possible points for this section: 22.5

## PART C - Interstate Agent States

Points(MAX) Score

- |          |   |   |    |
|----------|---|---|----|
| <b>1</b> | Did the state use the current federal inspection form(s)? Previous Question D(3).1<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|---|---|----|

SLR Notes:

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

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

SLR Notes:

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

- |          |  |   |    |
|----------|--|---|----|
| <b>3</b> | 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<br>Yes = 1 No = 0 | 1 | NA |
|----------|--|---|----|

SLR Notes:

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

- |          |   |   |    |
|----------|---|---|----|
| <b>4</b> | 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<br>Yes = 1 No = 0 | 1 | NA |
|----------|---|---|----|

SLR Notes:

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

- |          |  |   |    |
|----------|--|---|----|
| <b>5</b> | 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<br>Yes = 1 No = 0 Needs Improvement = .5 | 1 | NA |
|----------|--|---|----|

SLR Notes:

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

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

SLR Notes:

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

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

SLR Notes:

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

- |          |   |           |           |
|----------|---|-----------|-----------|
| <b>8</b> | Part C: General Comments/Regional Observations<br>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

- |          |  |   |   |
|----------|--|---|---|
| <b>1</b> | 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<br>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.

- |          |   |    |    |
|----------|---|----|----|
| <b>2</b> | 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<br>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.

- |          |  |   |   |
|----------|--|---|---|
| <b>3</b> | Did the state keep adequate records of incident notifications received? Previous Question E.3<br>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, one incident in 2010, Significant at \$28K because it was newsworthy.)

- |          |  |   |   |
|----------|--|---|---|
| <b>4</b> | 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<br>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.

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

### SLR Notes:

D.5 Yes, Yes, Yes, The Federal incident has been documented and the report is in the file. Final reports were filed in March, 2011. Recommendations to prevent recurrences are identified and are included in the final report.

- |          |   |   |    |
|----------|---|---|----|
| <b>6</b> | Did the state initiate enforcement action for violations found during any incident investigation(s)? Previous Question E.6 Variation<br>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.

- |          |  |    |     |
|----------|--|----|-----|
| <b>7</b> | 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<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

### SLR Notes:

D.7 Yes, the incident was monitored and the Operator was reminded to submit final reports to the federal database. The incident is closed.

- |          |   |           |           |
|----------|---|-----------|-----------|
| <b>8</b> | Part D: General Comments/Regional Observations<br>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

- |          |  |   |   |
|----------|--|---|---|
| <b>1</b> | 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<br>Yes = 2 No = 0 Needs Improvement = 1 | 2 | 2 |
|----------|--|---|---|

### SLR Notes:

E.1 Yes, IPUC does this per POP 7.7. Effective October, 2010 they created an addendum sheet and placed this question on it. The addendum sheet is attached to Standard Inspections.

- |          |  |   |   |
|----------|--|---|---|
| <b>2</b> | 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<br>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. Effective October, 2010 they created an addendum sheet and placed this question on it. The addendum sheet is attached to Standard Inspections.

- |          |   |   |   |
|----------|---|---|---|
| <b>3</b> | 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<br>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 MANDATORY. 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.

- |          |   |   |   |
|----------|---|---|---|
| <b>4</b> | 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<br>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.

- |          |  |   |   |
|----------|--|---|---|
| <b>5</b> | 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?<br>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.

- |          |   |           |           |
|----------|---|-----------|-----------|
| <b>6</b> | Part E: General Comments/Regional Observations<br>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. They are working with the Idaho Utility Coordinating Council, the utilities, and other stakeholder groups in this endeavor.

They have met with different groups and made presentations on their draft proposed damage prevention program, and have requested their input, help, support and most importantly, their buy-in. They 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.

They are working closely with the Idaho Utility Coordinating Council and others as they develop their State Damage Prevention Program utilizing the Nine Elements as a guide. They have conducted various surveys to identify all of the stakeholders. In addition, they 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.

They 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 they 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.

The PUC has received a \$100K grant to further their efforts towards a continuing state damage prevention program and to help them facilitate the establishment of UCCs throughout the state and to enhance their 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 Info Only  
Info Only = No Points

Name of Operator Inspected:  
Intermountain Gas Company, opid 8160

Name of State Inspector(s) Observed:  
Bud Barthlome and Ellis Hire

Location of Inspection:  
Pocatello, ID

Date of Inspection:  
September 21, 2011

Name of PHMSA Representative:  
Patrick Gaume

### SLR Notes:

F.1 Intermountain Gas Company, opid 8160, Bud Barthlome and Ellis Hire  
Pocatello, ID, September 21, 2011, Patrick Gaume, Intermountain contacts;  
Doug Hansone, Operations Mngr; JJ Murphy Corrosion Tech; Jess Ottero, Meter Inspector; Theresa Browne, Compliance Officer.

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

### 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 2 2  
Yes = 2 No = 0

### 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 2 2  
Yes = 2 No = 0

### SLR Notes:

F.4 Yes, one day of field inspection was observed, the field notes were thorough, but filling out the Form was not the targeted objective on the day I observed. This was a follow up field inspection of a full standard inspection that was done earlier in 2011. 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 1 1  
Yes = 1 No = 0

### SLR Notes:

F.5 Yes, multi-meter, Half cell, pressure gauges, gauge tree, bypass hoses, paint, 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 Info Only  
Info Only = No Points

### SLR Notes:

F.6 Standard Inspection of a Distribution Unit, specifically a field inspection of 4 regulator stations, rectifier station, cp points, casing cp, valve actuations, pressure relief valve tests, road, river, 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 2 2  
Yes = 2 No = 0 Needs Improvement = 1

a.	Procedures	<input type="checkbox"/>
b.	Records	<input type="checkbox"/>
c.	Field Activities/Facilities	<input checked="" type="checkbox"/>

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 & Bud showed good & 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 exit review of the entire week.

---

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, facilities are in good shape, one regulator valve failed to lock up and was taken off line & will be repaired within 48 hrs, the back-up was fine and was adjusted for primary service. A homeowner had piled sharp rocks around an inlet riser, the rocks were removed and the riser checked.

---

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 4 regulator stations, rectifier station, cp points, casing cp, valve actuations, pressure relief valve tests, road, river, and bridge crossings, atmospheric corrosion, exposed pipe, ROW, signs, markers, site security, locked valves, atmospheric corrosion, weed control, MOP, emergency numbers, equipment vents, pipe to soil interface, 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 that clear pressure marking for all parts of the regulator stations appears to be SOP for all of Intermountain Gas; 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	<input type="checkbox"/>
b.	Abnormal Operations	<input checked="" 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 type="checkbox"/>
o.	Leak Surveys	<input type="checkbox"/>
p.	MOP	<input checked="" type="checkbox"/>

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

**SLR Notes:**

F.13 Yes, field inspection of 4 regulator stations, rectifier station, cp points, casing cp, valve actuations, pressure relief valve tests, road, river, and bridge crossings, atmospheric corrosion, exposed pipe, ROW, signs, markers, site security, locked valves, atmospheric corrosion, weed control, MOP, emergency numbers, equipment vents, pipe to soil interface, and weather protection.

Checked items; b, f, g, i, l, m, p, s, v, B, I.

**14** Part F: General Comments/Regional Observations

Info Only Info Only

Info Only = No Points

**SLR Notes:**

F.14 On September 21, 2011, Bud Barthlome and Ellis Hire performed a Field portion of a Standard Inspection of a gas distribution Unit Operated by Intermountain Gas Company at Pocatello, ID. The Evaluation was to observe Mr. Barthlome while he performed a day of Field Inspection of the gas distribution Unit. The Operator was very cooperative and Mr. Barthlome conducted himself in a courteous, competent, and professional manner.

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





## PART G - PHMSA Initiatives - Strategic Plan

Points(MAX) Score

### Risk base Inspections - Targeting High Risk Areas

- |          |   |     |     |
|----------|---|-----|-----|
| <b>1</b> | Does state have process to identify high risk inspection units?<br>Yes = 1.5 No = 0 | 1.5 | 1.5 |
|----------|---|-----|-----|

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 3 operators and 10 units, that are seen every year, risk ranking is meaningless.

- |          |  |    |     |
|----------|--|----|-----|
| <b>2</b> | Are inspection units broken down appropriately? (see definitions in Guidelines)<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

#### SLR Notes:

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

- |          |  |           |           |
|----------|--|-----------|-----------|
| <b>3</b> | Consideration of operators DIMP Plan? (if available and pending rulemaking)<br>Info Only = No Points | Info Only | Info Only |
|----------|--|-----------|-----------|

#### SLR Notes:

G.3 Yes, IPUC is aware of the DIMP Rule and will implement the DIMP inspections per the federal guidelines. Both inspectors have completed the DIMP Class in August, 2011.

- |          |  |    |     |
|----------|--|----|-----|
| <b>4</b> | Does state inspection process target high risk areas?<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

#### 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 3 operators and 10 units, that are seen every year, risk ranking is meaningless.

### Use of Data to Help Drive Program Priority and Inspections

- |          |  |    |     |
|----------|--|----|-----|
| <b>5</b> | Does state use data to analyze effectiveness of damage prevention efforts in the state? (DIRT or other data, etc)<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

#### 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.

- |          |   |    |     |
|----------|---|----|-----|
| <b>6</b> | Has state reviewed data on Operator Annual reports for accuracy?<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|---|----|-----|

#### SLR Notes:

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

- |          |  |    |     |
|----------|--|----|-----|
| <b>7</b> | Has state analyzed annual report data for trends and operator issues?<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

#### 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.

- |          |   |    |     |
|----------|---|----|-----|
| <b>8</b> | Has state reviewed data on Incident/Accident reports for accuracy?<br>Yes = .5 No = 0 | .5 | 0.5 |
|----------|---|----|-----|

#### SLR Notes:

G.8. Yes, for both incidents in 2009 & the one in 2010. Incident reports are reviewed for completeness, probable cause, final report, timeliness, & necessary procedural changes.

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

**SLR Notes:**

G.9 Yes, they have a Qtrly report that is complied by Bud and Ellis. This results in a consensus evaluation of the effectiveness of their program, and is the major tool for planning the next year's work.

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

**SLR Notes:**

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

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

**SLR Notes:**

G.11 Yes, a follow up IM inspection with replies were uploaded in 2009. No updates were required in 2010.

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

**SLR Notes:**

G.12 Yes, the follow up IM inspection was uploaded in 2009. No updates were required in 2010.

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

**SLR Notes:**

G.13 Yes, this is addressed during the annual Headquarters audits. Effective October, 2010 they created an addendum sheet and placed this question on it. The addendum sheet is attached to Standard Inspections.

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

**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. Effective October, 2010 they created an addendum sheet and placed this question on it. The addendum sheet is attached to Standard Inspections.

## Accident/Incident Investigation Learning and Sharing Lessons Learned

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

**SLR Notes:**

G.15 Yes per their state reports presented at the NAPSIR WR Meetings in 2008, 2009 and 2010.

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

**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 & POP 6.6 specifically.

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

**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).

---

## 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, In 2010 Ron & Ellis met 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. With Ron's retirement, Ellis will continue this practice.

---

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.

---

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 they can use in Idaho rather than try and reinvent the wheel. They were very interested in the state database program that Minnesota has developed; however, they haven't been able to get it to work on their system. They 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.) .5 0.5  
Yes = .5 No = 0

### SLR Notes:

H.1 Yes, In 2010 Ron Law served on the National NAPSR Board and was on the NARUC legislative committee. In addition IPUC participated in all surveys or information requests from NAPSR or PHMSA.

IPUC was successful in applying for and receiving a \$100,000 'State Damage Prevention Program' grant through PHMSA for improving element 3, Public Education, and element 5, Stakeholder Involvement and Education. Specifically 60% of the grant will be used to establish Stakeholder chapters in each county where the stakeholders will meet to discuss work projects that may impact underground facilities. Most of the rest will be used to present CGA safety notices through local and state wide media outlets.

In 2010, IPUC Pipeline Safety Division increased their construction inspection activity. Immediate benefits included intervention to stop excavation at an improperly marked site, identification of problems with mis-locates, and stopping the excavations of non-certified excavators.

- 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.) .5 0.5  
Yes = .5 No = 0

### 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.) .5 0.5  
Yes = .5 No = 0

### SLR Notes:

H.3 Yes, IPUC was successful in applying for and receiving a \$100,000 'State Damage Prevention Program' grant through PHMSA for improving element 3, Public Education, and element 5, Stakeholder Involvement and Education.

In 2010, IPUC Pipeline Safety Division increased their construction inspection activity. Immediate benefits included intervention to stop excavation at an improperly marked site, identification of problems with mis-locates, and stopping the excavations of non-certified excavators.

In 2010 the OQ Field inspections were focused on ensuring proper Line Locate techniques. IPUC sees a continuing need to continue focus in this area.

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

### 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) .5 0.5  
Yes = .5 No = 0

### SLR Notes:

H.5 The Avista snow shield for meter sets was shared at the 2011 WR NAPSR meeting. The focus on proper Line Locating during OQ Field Inspections will be reported in the 2012 WR NAPSR meeting.

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

### SLR Notes:

H.6 Yes, In 2010 Ron Law served on the National NAPSR Board and was on the NARUC legislative committee. In addition IPUC participated in all surveys or information requests from NAPSR or PHMSA.

IPUC was successful in applying for and receiving a \$100,000 'State Damage Prevention Program' grant through PHMSA for improving element 3, Public Education, and element 5, Stakeholder Involvement and Education. Specifically 60% of the grant will be used to establish Stakeholder chapters in each county where the stakeholders will meet to discuss work projects that may impact underground facilities. Most of the rest will be used to present CGA safety notices through local and state wide media outlets.

In 2010, IPUC Pipeline Safety Division increased their construction inspection activity. Immediate benefits included intervention to stop excavation at an improperly marked site, identification of problems with mis-locates, and stopping the excavations of non-certified excavators.

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)

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

#### SLR Notes:

I.1 Yes, IPUC has a D&A program that addresses all 3 operators every two years; usually 2 per year.

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

#### 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 was used in 2010, and is planned to be used thereafter. "It is a much better form!"

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

#### SLR Notes:

I.3 Yes, there was one positive test in 2008 and none in 2009 or 2010. Operator procedures were followed. This question was asked verbally when using the short form. It is on the long form.

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

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

#### SLR Notes:

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

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

#### 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.

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

#### SLR Notes:

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

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

#### 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)

- |          |   |   |   |
|----------|---|---|---|
| <b>8</b> | 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?<br><small>Yes = 1 No = 0</small> | 1 | 1 |
|----------|---|---|---|

#### SLR Notes:

I.8 Yes. two operators are required to have GIMP, and one operator is certified to have no transmission lines in Idaho. (Questar's 7 miles in ID are presently included in Utah's IMP program. WARNING: ID can't delegate an inspection of their pipe to UT. IPUC must conduct the Questar IMP inspection of the pipe in Idaho.

- |          |   |    |     |
|----------|---|----|-----|
| <b>9</b> | 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?<br><small>Yes = .5 No = 0</small> | .5 | 0.5 |
|----------|---|----|-----|

SLR Notes:

I.9 Yes. The impact radii calculations and the HCA determinations have been documented during Standard Inspections. (Questar's 7 miles in ID are included in Utah's IMP program). WARNING: IPUC must conduct the Questar IMP inspection of the pipe in Idaho.

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

SLR Notes:

I.10 No, 0 of 0.5 point, Initial GIMP have been done and compliance with subpart O has been checked for two operators during Standard Inspections; However, IPUC personnel were NOT PRESENT during the Questar IMP inspection. GIMP re-inspections are scheduled to start in 2011. (Questar's 7 miles in ID are included in Utah's IMP program. WARNING: IPUC must conduct the Questar IMP inspection of the pipe in Idaho.

- |           |  |    |     |
|-----------|--|----|-----|
| <b>11</b> | 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?<br>Yes = .5 No = 0 | .5 | 0.5 |
|-----------|--|----|-----|

SLR Notes:

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

- |           |  |    |     |
|-----------|--|----|-----|
| <b>12</b> | Is the state verifying that operators are periodically examining their transmission line routes for the appearance of new HCAs?<br>Yes = .5 No = 0 | .5 | 0.5 |
|-----------|--|----|-----|

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)

- |           |  |    |     |
|-----------|--|----|-----|
| <b>13</b> | 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)<br>Yes = .5 No = 0 | .5 | 0.5 |
|-----------|--|----|-----|

SLR Notes:

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

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

SLR Notes:

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

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

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. The new PAPEE Inspection, Form 21, will be used in 2012.

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

SLR Notes:

I.16 Yes. All three of the Operator's programs were reviewed in 2010 to API RP 1162 using a self generated form. No inspections were required in 2011. The new PAPEE Inspection, Form 21, will be used in 2012.

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

SLR Notes:

I.17 Operator Public Awareness Programs are being closely monitored by the Idaho Public Utilities Commission. Initial surveys that were sent out by operators in 2006 to public officials, emergency responders and the general public were reviewed and compared to the 2009 survey results for trends, improvement, effectiveness and knowledge of the pipeline safety message to stakeholders. The programs of all three operators were reviewed for effectiveness in 2010.

The IPUC has begun performing comprehensive inspections using the DOT 3.1.11 long form for Operator Drug and Alcohol Misuse Program inspections for covered pipeline personnel. Idaho Operators are D & A inspected frequently, (almost annually), 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.

The OQ Program re-inspections for ID operators were started in 2011. All three re-inspections are scheduled to be completed by 12/2011.

The questions concerning the IMP of Questar's 7 miles of transmission pipe in ID will be researched. The tentative indication is that Questar will need to be GIMP inspected by Idaho personnel.

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Total points scored for this section: 8.5

Total possible points for this section: 9

