



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

KENTUCKY PUBLIC SERVICE 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



## Natural Gas

**City/State/Zip:** Frankfort, Kentucky 40602-0615

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.

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.

<b>State Rating</b>	<b>99.5</b>
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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:

The 2011 Certification document appeared to have accurate information based upon a review of the KPSC's records for 2010.

- |          |                                                                                                                                                                                                                                                                                                                                                                             |   |   |
|----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| <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:

Operators are required to notify the KPSC directly when reporting an incident that meets federal reporting requirements. The KPSC maintains a log of telephonic reports. The information is maintained the KPSC's report database which is used to track the status of incident reports.

- |          |                                                                                                                                                                                                                                                                                                                                       |   |   |
|----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| <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:

The KPSC held its last seminar in May, 2010. It intends to hold these seminars once every two years.

- |          |                                                                                                                                                                  |   |   |
|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| <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:

The KPSC maintains both electronic and hard copies of their inspections reports. The KPSC utilizes a database system to complete reports electronically and stored in the database. Hard copy inspection reports are kept in filing cabinets that are organized by operator and the date of the inspection. Other electronic files are kept to keep track of telephonic reports of incidents, summary information of inspections and track follow up on non-compliance issues found. All of the files are well organized and easy to access.

- |          |                                                                                                                                                                                                                                         |   |   |
|----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| <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:

Jason Brangers has been the program manager for the KPSC for six years. Mr. Brangers exhibited knowledge of pipeline safety regulations and the requirements for a state pipeline safety program outlined in the Guidelines For A State Pipeline Safety Program.

- |          |                                                                                                                                                                                                                                                                                     |   |   |
|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| <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:

The KPSC replied in 38 days.

- |   |                                                                                                                                                                                                                                                                                                                                        |   |   |
|---|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 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:**

The KPSC cleared all outstanding incident reports, decreased the backlog of OQ and IMP inspection protocol forms that had not been uploaded to PHMSA's databases. The KPSC has also followed up on the outstanding non-compliance issues with Irvington Gas.

## Personnel and Qualifications

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

**SLR Notes:**

All required courses have now been completed by all inspectors. The KPSC will need to complete the recently added Hazwoper course but is within the 3 and 5 year timeframe.

- |   |                                                                                                                                                                                         |           |           |
|---|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|-----------|
| 9 | Brief Description of Non-TQ training Activities:                                                                                                                                        | Info Only | Info Only |
|   | Info Only = No Points                                                                                                                                                                   |           |           |
|   | For State Personnel:                                                                                                                                                                    |           |           |
|   | As in 2009, the KPSC has participated in various training opportunities with the Kentucky Gas Association.                                                                              |           |           |
|   | For Operators:                                                                                                                                                                          |           |           |
|   | None in 2010.                                                                                                                                                                           |           |           |
|   | For Non-Operator Entities/Parties, Information Dissemination, Public Meetings:                                                                                                          |           |           |
|   | The KPSC developed a brochure about pipeline safety responsibilities for the Kentucky League of Cities. The target audience is the mayors of cities that operate municipal gas systems. |           |           |

**SLR Notes:**

See above.

- |    |                                                                                                                                                                         |   |   |
|----|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 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:**

No issues with these training requirements and OQ inspections.

- |    |                                                                                                                                                                                |   |   |
|----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 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:**

The KPSC complied with this requirement.

- |    |                                                                                                                                                                                                                   |   |   |
|----|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| 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):                                                                                                                                                                   |   |   |
|    | 404.00                                                                                                                                                                                                            |   |   |
|    | B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7):                                                                                                            |   |   |
|    | 220 X 2.98 = 655.60                                                                                                                                                                                               |   |   |
|    | Ratio: A / B                                                                                                                                                                                                      |   |   |
|    | 404.00 / 655.60 = 0.62                                                                                                                                                                                            |   |   |
|    | If Ratio >= 0.38 Then Points = 5, If Ratio < 0.38 Then Points = 0                                                                                                                                                 |   |   |
|    | Points = 5                                                                                                                                                                                                        |   |   |

**SLR Notes:**

The KPSC experienced 404 inspection person days during 2010. The resulting ratio was 0.62 which exceeds the minimum of 0.38.

- 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:

None in 2010; however the KPSC is considering adding an inspection position responsible for identifying gas gathering systems which may now be under the KPSC's pipeline safety authority.

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

SLR Notes:

The KPSC has generally complied with the requirements of Part A.

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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:

The KPSC creates a spreadsheet at the beginning of the year that shows scheduled inspections during the year. The schedule is developed in consideration of procedures outlined in its office procedures. The KPSC developed a risk ranking process during 2009 that it will implemented for 2010 inspections. The risk ranking process will be incorporated into its written office procedures.

- 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:

The KPSC's written office procedures for 2010 inspections requires operators to be inspected at least once each three years. The length of time since the last inspection is the key driver for scheduling inspections during 2010. The KPSC transitioned to a risk based scheduling process for its 2010 inspections.

### 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:

The KPSC's procedure state that each unit is inspected at least once each three years. The KPSC inspected over 50% of the units in 2010 which is on a pace more frequent than procedures require.

- 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:

The KPSC uses the federal inspection forms to conduct its inspections.

- 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:

Upon a review of randomly selected inspection reports, all portions of the forms were completed appropriately.

- 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:

There were no safety related condition reports filed by operators during 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 | .5              | .5 |
|          |                                                                                                                                                                                                         | Yes = .5 No = 0 |    |

#### SLR Notes:

The KPSC reviews this issue when conducting an operator headquarter's inspection which covers operation and maintenance of the operator.

- |          |                                                                                                                                                                                                                                                                                                                                |                 |    |
|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|----|
| <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 | .5              | .5 |
|          |                                                                                                                                                                                                                                                                                                                                | Yes = .5 No = 0 |    |

#### SLR Notes:

Approximately 100 miles of cast iron main is in service in Kentucky. The KPSC encourages operators to have cast iron replacement programs. The KPSC reviews this issue when conducting an review of operator's operation and maintenance procedures.

- |          |                                                                                                                                                                                                                                                                                                                                                                                           |                 |    |
|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|----|
| <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 | .5              | .5 |
|          |                                                                                                                                                                                                                                                                                                                                                                                           | Yes = .5 No = 0 |    |

#### SLR Notes:

The KPSC verifies that operators have procedures to identify the extent of migration of underground leaks when reviewing operator's emergency procedures and leak response procedures. The KPSC reviews leak survey and leak repair records during its 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 | 1              | 1 |
|           |                                                                                                                                                                                                                                | Yes = 1 No = 0 |   |

#### SLR Notes:

The KPSC's standard inspection covers Part 192.617 requirements on the federal inspection form. The KPSC reviews leak repair records during its inspections.

### Compliance - 60105(a) States

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

#### SLR Notes:

Upon a review of randomly selected inspection reports completed in 2010, probable violations (term "deficiency" is used by the KPSC) were documented with descriptions of the operator's actions or lack of actions that resulted in a probable violation. It is recommended that the KPSC also cite the pipeline safety regulation for which the operator did not comply.

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

#### SLR Notes:

The KPSC's procedures provide the operators with 30 days to respond to alleged probable violations. A form for the operator to complete (if a deficiency is found) is included with the letter to the operator detailing the results of each inspection. The operator must complete the three questions on the form for the KPSC to consider closing the file on the inspection. The operator has the opportunity to argue their case if they feel like a probable violation did not occur.

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

#### SLR Notes:

Probable violations are documented in written notification to the operator. An attachment to the letter, Deficiency Transaction Report (DTR), describes what actions or lack of actions on the part of the operator that caused a probable violation of pipeline safety regulations.

- |           |                                                                                                                                                                                                                                                                                                   |   |   |
|-----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| <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 | 1 | 1 |
|-----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

**SLR Notes:**

The KPSC includes a Deficiency Transaction Report (DTR) for each probable violation is communicated to operators. The DTR provides three questions to be answered by the operators to document their corrective actions. The DTR also shows the required response date also contained in the written notification. The procedures state that follow up inspections are scheduled after written notification of non compliance has been sent to an operator. Each inspection report describes the status of deficiencies found in previous inspections. Deficiency information is entered into the inspection database which can be used to report the status of probable violations.

- |                |                                                                                                                                                                                                                                                                                            |   |   |
|----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| <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:**

Upon a review of randomly selected inspection reports, all inspections that discovered probable violations were followed up with written notifications of non compliance. The KPSC issued 48 compliance actions during 2010.

- |                                       |                                                                                                                                                                                                                                                                                                                                                                       |   |   |
|---------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| <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:**

Upon a review of randomly selected inspection report files, follow up inspection documentation was present to indicate that corrective actions had taken place or another follow up inspection was scheduled for a later date when corrective actions were not completed.

- |                |                                                                                                                                                                                                                                                                 |   |   |
|----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| <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 | 1 |
| No = 0 Yes = 1 |                                                                                                                                                                                                                                                                 |   |   |

**SLR Notes:**

A "Show Cause" proceeding went to hearing during 2010. The Order was issued in 2010.

- |                                       |                                                                                                                     |   |   |
|---------------------------------------|---------------------------------------------------------------------------------------------------------------------|---|---|
| <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:**

The KPSC had completed DTR's from operators in its files. The KPSC also documents the date that operators corrective actions were accepted by the KPSC. This date is entered into the inspection database.

- |                 |                                                                                                                                                       |    |    |
|-----------------|-------------------------------------------------------------------------------------------------------------------------------------------------------|----|----|
| <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:**

Upon a review of randomly selected inspection files, non compliance letters were addressed to company officers of private companies and highest public official of publicly owned operators.

- |                                       |                                                                                                                                                |   |   |
|---------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| <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:**

Operators are given an opportunity to provide information that argues a probable violation did not occur. If not satisfied with pipeline safety's decision an operator can petition the Commissioners for a "show cause" hearing.

## 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>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>23</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(2).3 | 1 | NA |
|-----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|----|
- Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

- |           |                                                                                                                                                             |   |    |
|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|---|----|
| <b>24</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(2).4 | 1 | NA |
|-----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|---|----|
- Yes = 1 No = 0 Needs Improvement = .5

SLR Notes:

- |           |                                                                                                                      |   |    |
|-----------|----------------------------------------------------------------------------------------------------------------------|---|----|
| <b>25</b> | 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>26</b> | 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>27</b> | 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 | NA |
|-----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|----|
- Info Only = No Points

SLR Notes:

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

SLR Notes:

The KPSC has generally complied with the requirements of Part B of this evaluation.

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



## 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:

The KPSC is 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:

The KPSC is 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:

The KPSC is 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:

The KPSC is 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:

The KPSC is 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:

The KPSC is 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:

The KPSC is not an interstate agent.

- |          |                                                                         |           |           |
|----------|-------------------------------------------------------------------------|-----------|-----------|
| <b>8</b> | Part C: General Comments/Regional Observations<br>Info Only = No Points | Info Only | Info Only |
|----------|-------------------------------------------------------------------------|-----------|-----------|

SLR Notes:

The KPSC is 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:

The KPSC followed the procedures to cooperate with PHMSA in the investigation of reportable incidents during the two incidents that occurred in 2010. The KPSC kept the Southern Region Office informed of the facts surrounding the incident and the status of its investigation.

- |          |                                                                                                                                                                                                                                                                                 |    |    |
|----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|----|
| <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:

The NTSB did not investigate any incidents in Kentucky during 2010. The KPSC exhibited knowledge of the MOU between PHMSA and the NTSB. The KPSC understands the agreement of cooperation within the MOU.

- |          |                                                                                                                                        |   |   |
|----------|----------------------------------------------------------------------------------------------------------------------------------------|---|---|
| <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:

The three incidents that occurred during 2010 were recorded in the KPSC's electronic incident log. The log is used to ensure that operators file written reports of the incident within the required timeframe. It is also used to track the KPSC's investigation findings and follow up on any non-compliance issues found.

- |          |                                                                                                                                                                                                                                                      |   |   |
|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| <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:

Two of the three incidents that occurred in 2010 were caused by the burning of a structure prior to the release of gas from the pipeline facilities (commonly called "fire first"). An onsite investigation was not made on these two incidents but appropriate information was gathered from the operator's investigation and first responders.

- |          |                                                                                                                                                                                                                 |                                      |                                                                  |
|----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|------------------------------------------------------------------|
| <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:

The incident that was investigated onsite was documented in an acceptable manner. The final report covered the areas listed above. Corrective actions and deficiencies were communicated to the operator.

- |          |                                                                                                                                                                               |   |   |
|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| <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 | 1 |
|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

### SLR Notes:

The incident in Martin, KY occurring on May 25, 2010 was investigated onsite. The resulting investigation report found that the operator had two probable violations that contributed to the incident and injury to three individuals. The KPSC issued a deficiency tracking report to the operator citing the two noncompliance issues.

- |          |                                                                                                                                                                                                                                                                                                                                                        |    |     |
|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|-----|
| <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:

The KPSC did follow up with the operator and PHMSA's Southern Region Office to assist PHMSA in closing written incident reports.

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

SLR Notes:

The KPSC has generally complied with the requirements of Part D.

---

Total points scored for this section: 7

Total possible points for this section: 7



## 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:

The KPSC initiated these reviews prior to 2007 and has continued this practice during its review of operators' operation and maintenance procedures.

- |          |                                                                                                                                                                                                                                                        |   |   |
|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| <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:

The KPSC reviews operators' damage prevention programs and verifies from operator records that the damage prevention programs are being followed. The KPSC covers these requirements on the portion of the inspection form covering Part 192.614.

- |          |                                                                                                                                                                                                                                                               |   |   |
|----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| <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:

Jason Brangers represents NAPS on the CGA Best Practices Committee. The KPSC has added an item on the federal standard inspection form to promote best practices to operators.

- |          |                                                                                                                                                                                     |   |   |
|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| <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:

The KPSC participates on the Kentucky 811 Board of Directors. Kentucky 811 receives "damage tickets" when a damage occurs and the operator requests a relocate. Trends and statistics concerning damages are discussed during KY811 board meetings.

- |          |                                                                                                                                                                                                                          |   |   |
|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|
| <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:

The KPSC reviews operator's records on leaks and failures upon completing 192.617 requirements portion of the federal inspection form.

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

### SLR Notes:

The KPSC has generally complied with the requirements of Part E.

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:

Louisville Gas and Electric and Atmos Energy

Name of State Inspector(s) Observed:

Steven Samples, Joel Grugin and Melissa Holbrook

Location of Inspection:

Oldham, Trimble, Henry counties, Stations G13139, G18730 and G13131 and Campbellsvilles service area

Date of Inspection:

6/6-10/2011

Name of PHMSA Representative:

Dale Bennett

### SLR Notes:

Steven Samples & Joel Grugin - Beford and Crestwood City City Gate Station, Beford, Campbellsburg, Eminence, Hwy 22 & Ballard Weeks Regulator Stations.

Melissa Holbrook - Campbellvill Servic Area, warehouse, town border station, purchase station and Lebanon station.

- 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:

Yes. The operators were notified on 04/03/2010, prior to the inspection. Operator's representatives were present during 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:

Yes. The KPSC inspectors used the federal inspection form for gas distribution operators.

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

### SLR Notes:

Yes. The inspectors marked the "check off" columns for each item on the federal form. If unsatisfactory was checked, an explanation of the non compliance issue was provided in the comments sections.

- 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:

Yes. The inspectors checked that the operator representatives had testing equipment for odorant checks, voltmeters, half cells for cathodic protection readings and leak detection equipment for finding leaks. The inspector checked records to verify that testing equipment met manufacturer's recommendations for calibration of the instruments.

- 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:

The KPSC conducted a standard inspection of Louisville Gas & Electric and Atmos Energy.

- 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 ☒
- b. Records ☐

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

**SLR Notes:**

The KPSC reviewed the operator's procedures, operation and maintenance records and observed test readings taken in the field. The KPSC covered records and readings in the field.

- 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:**

Yes. All three inspectors have several years experience in gas pipeline operations experience and have taken a number of classes at PHMSA's Training and Qualification training facility.

- 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:**

Yes. The KPSC inspectors provided the operator's representatives with a briefing of his findings for each day of the inspection.

- 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:**

Yes. The KPSC inspectors described the probable violations that were found during the inspections. The KPSC inspectors also provided an explanation of the written notification that would be sent and the follow up process until the corrections actions are verified.

- 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:**

The observation of test readings taken in the field on odorant levels. cathodic test point readings and overpressure protection pressure set point readings.

- 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:**

There were no inspection activities observed that were identified as best practices to be shared with other states.

- 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	<input type="checkbox"/>
r.	Moving Pipe	<input type="checkbox"/>
s.	New Construction	<input type="checkbox"/>
t.	Navigable Waterway Crossings	<input type="checkbox"/>
u.	Odorization	<input checked="" 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 checked="" 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:**

Either records were reviewed or test readings were observed for the items checked above.

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

Info Only Info Only

Info Only = No Points

**SLR Notes:**

The KPSC inspectors generally met the requirements for this portion of the evaluation. The inspectors conducted themselves in a professional manner and treated the operator's personnel with respect.

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

- 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:

The KPSC developed a spreadsheet which provides a relative risk ranking of pipeline operators' systems based upon certain criteria. The relative risk ranking results are being used to prioritize the KPSC's inspection schedule.

- 2 Are inspection units broken down appropriately? (see definitions in Guidelines) .5 0.5  
Yes = .5 No = 0

#### SLR Notes:

The inspection units have been established consistent with the description in the "Guidelines For State Pipeline Programs" (Guideline).

- 3 Consideration of operators DIMP Plan? (if available and pending rulemaking) Info Only Info Only  
Info Only = No Points

#### SLR Notes:

DIMP Plans will not be available until August, 2011.

- 4 Does state inspection process target high risk areas? .5 0.5  
Yes = .5 No = 0

#### SLR Notes:

The KPSC has developed a process to identify high risk areas on a relative basis. The process is used to schedule inspections and provide focus areas during inspections.

### 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:

The continues the use of data for damage prevention effectiveness as described below in the 2009 evaluation:  
Kentucky 811 receives "damage tickets" when a damage occurs and the operator requests a relocate. Trends and statistics concerning damages are discussed during KY811 board meetings, in which the PSC participates. KY 811 enters this information into the DIRT reporting system and has had virtual private DIRT for KY since October 2007. Operators are encouraged to input damage information into DIRT. Information collected by Kentucky 811 shows an increase in membership and a decrease in damages. The PSC annually reviews the "DIRT Report" as produced and distributed by the Common Ground Alliance (CGA). The PSC receives and responds to calls concerning third party damage involving jurisdictional pipelines and works through the One-call Grant to promote effective damage prevention efforts. In addition, Kentucky 811 receives damage statistics and information from one of the largest phone companies in Kentucky and identifies "hot spots" for damage to underground facilities. This information is used as a correlation between all utilities and helps in identifying areas where targeted damage prevention efforts are needed.

- 6 Has state reviewed data on Operator Annual reports for accuracy? .5 0.5  
Yes = .5 No = 0

#### SLR Notes:

The KPSC reviews operators' annual reports each year as they are submitted. The KPSC communicates any discrepancies to the operators.

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

#### SLR Notes:

The KPSC monitors the mileage of cast iron and bare steel mains remaining in each operator's system and the total mileage within the state. The KPSC reviews trends on leak repair and lost and unaccounted for gas data. The KPSC is incorporating this data into its relative risk ranking model.

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

**SLR Notes:**

The KPSC rules require operators to send written incident reports directly to the KPSC. All written reports are reviewed for completeness. The KPSC follows up with the operator until the status is reported as final.

<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:**

The KPSC has viewed cast iron main as a key risk factor in the gas distribution pipeline portion of its regulatory oversight. The KPSC tracks the mileage of cast iron mains remaining in Kentucky each year from data provided by operators on their Annual Reports. There is approximately 100 miles of cast iron remaining in the state.

<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:**

The KPSC has made progress but inspection results for only 20 out of 113 operators have been uploaded.

<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:**

There were no notifications without responses from the KPSC found in the database.

<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:**

The KPSC has uploaded the protocol forms for the IMP inspections that have been completed.

<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:**

Operators have been requested to monitor plastic pipe and component failures. The KPSC reviews this information when verifying that operators have complied with 192.617. The KPSC is monitoring the status of PE pipe manufactured by PolyPipe that has had wall thickness anomalies reported in the past.

<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:**

The KPSC's GIS department routinely uses the NPMS and reviews data submitted by operators within Kentucky. The GIS department confirmed that transmission operators submitted information into NPMS during the original submission of data.

## Accident/Incident Investigation Learning and Sharing Lessons Learned

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

**SLR Notes:**

The KPSC presented an update of its program at the 2010 NAPSRS Southern Region Meeting. The KPSC included a topic on the incidents that occurred in Kentucky since the previous NAPSRS Southern Region meeting.

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

**SLR Notes:**

There were no requests for information on accidents received by the KPSC. Jason Brangers served on the joint NAPSRS/PHMSA Data Team thereby supporting this effort.

**17** Does state have incident/accident criteria for conducting root cause analysis?

Info Only Info Only

Info Only = No Points

SLR Notes:

Not at this time.

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

Info Only Info Only

Info Only = No Points

SLR Notes:

The KPSC has not used this investigation technique at this point in time.

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

.5

0.5

Yes = .5 No = 0

SLR Notes:

Four individuals have completed the training.

## 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:

The KPSC participates in Kentucky Gas Association meetings and conferences, Common Ground Alliance committee meetings and Kentucky 811 Board Meetings. Press releases are sent to stakeholders.

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

.5

0.5

Yes = .5 No = 0

SLR Notes:

The KPSC maintains a case docket system that is accessible by the public. Case information can be viewed in the web based system.

**22** Part G: General Comments/Regional Observations

Info Only Info Only

Info Only = No Points

SLR Notes:

Question G.10 - The KPSC has made progress but inspection results for only 20 out of 113 operators have been uploaded. 0.5 points could not be given for this requirement.

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

### SLR Notes:

From Attachment 10 of the KPSC's 2011 Certification:

The KPSC has modified the criteria used to prioritize the periodic inspections it will conduct during the year in order to focus available resources in the direction. This criterion was used to develop the inspection schedule for the current calendar year. Furthermore, more on-site follow-up inspections are being conducted to assist operators and ensure that compliance and safety is being achieved and maintained. In addition to the periodic and follow-up inspections, construction inspections are still being conducted and scheduled in order to witness and inspect operators and their process and procedures as they are being conducted in the field. KPSC focused on performing Operator Qualification inspections (Protocol 9) to witness operators/contractors perform covered tasks in the field. The KPSC has also been conducting the five part Drug and Alcohol inspection as part of our periodic compliance inspections. Pipeline safety staff continue to attend numerous trainings, including PHMSA's T&Q courses, KGA training modules (operator qualification), and various industry and operator events. KPSC staff has completed integrity management training courses and have focused on conducting IM inspections, this focus will continue through 2011 as well. KPSC remains active with the KGA through participation in the Education Committee, training seminars, expos, and conferences.

KPSC routinely conducts presentations at KGA functions conducted throughout the state. KPSC staff has worked closely with Kentucky 811, holds a non-voting position on the Board of Directors, and participates in numerous meetings and workshops pertaining to the prevention of damage to underground facilities. KPSC inspectors regularly distribute information pertaining to 811 and calling before digging to stakeholders across the state and attend several public awareness meetings each year. Kentucky 811 is introducing legislation in 2011 in an effort to clarify the regulations, including definitions and the operations of the call center. The states damage prevention program is continually discussed and regulations reviewed to determine what changes should be made to bring them more in line with the nine element of an effective damage prevention program as identified in the 2006 PIPES Act. Membership to the call center has increased over the last couple of years, due in part to smaller gas operators joining after being advised by KPSC staff of the requirements and benefits. KPSC staff has been more involved in NAPSR through participation in the CGA Best Practice committee, Data Team, and the Liaison Committee. Also, KPSC is the vice-chair of the southern region, as well as a NAPSR board member. In addition, completion of NAPSR surveys and communication with other states has increased.

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

### SLR Notes:

Changes to the damage prevention regulations (aka "dig laws") are being considered as well in order to more closely follow the nine elements of an effective damage prevention program (enforcement, membership, etc.). This was attempted in recent legislative session but only minor changes were enacted. Attempts are planned for the future.  
The KPSC was successful in legislative enactment to give the KPSC more authority to step in and determine a system is abandoned.

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

### SLR Notes:

The KPSC has identified cast iron mains as a key risk factor for pipeline safety in Kentucky. The KPSC continues to encourage the replacement of cast iron mains. The KPSC's data shows that cast iron main mileage is trending downward. There are approximately 100 miles of cast iron main remaining in Kentucky.

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

### SLR Notes:

Mr. Brangers is on the NAPSR Liaison Committee which conducts the surveys on behalf of NAPSR and PHMSA, assists in developing the survey questions, and reviews the survey before sending to all program managers. The KPSC is dedicated to responding to all survey requests.

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

### SLR Notes:

The KPSC has shared its practices with other states in annual NAPSR Southern Region meetings.

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

### SLR Notes:

The KPSC has generally complied with the requirements of Part H of this evaluation.

---

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>Yes = 1 No = 0 | 1 | 1 |
|----------|-------------------------------------------------------------------------------------------------|---|---|

#### SLR Notes:

The KPSC has completed the review of all operators' drug and alcohol testing programs in past years. The KPSC conducted 52 drug and alcohol program inspections during 2009. There were no drug and alcohol inspections during 2010.

- |          |                                                                                                                                                                    |    |     |
|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|-----|
| <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>Yes = .5 No = 0 | .5 | 0.5 |
|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|-----|

#### SLR Notes:

Operators records are reviewed during standard inspections to verify random drug testing rates exceed 25 percent. The KPSC checks records of tests for cause or post incident tests of employees who may have been involved in an incident. These inspections are not recorded as drug and alcohol inspections when completing Attachment 2 of the Certification.

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

#### SLR Notes:

During standard inspections, if positive results are shown in an operator's records, the KPSC questions operators of the actions taken as a result of the positive test(s). The KPSC compares the action taken with the process described in the operator's plan.

### 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>Yes = 1 No = 0 | 1 | 1 |
|----------|-----------------------------------------------------------------------------------------------|---|---|

#### SLR Notes:

The KPSC has completed the review of all operators' Operator Qualification Plans but has not used the protocol forms for all. The KPSC should complete the protocol inspection forms and upload to the OQ database.

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

#### SLR Notes:

The KPSC has not used the federal protocol forms to inspect all of the operators' OQ Plans. Inspections of 20 operators are uploaded into the database. There are 113 operators. 0.5 points could not be given for this requirement.

- |          |                                                                                                                                                            |    |     |
|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------|----|-----|
| <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>Yes = .5 No = 0 | .5 | 0.5 |
|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------|----|-----|

#### SLR Notes:

The KPSC reviews OQ Qualification records as a part of its standard inspections. The KPSC verifies that the records show an individual designated to perform a covered task has completed qualification requirements.

- |          |                                                                                                                                                                        |    |     |
|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|-----|
| <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>Yes = .5 No = 0 | .5 | 0.5 |
|----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|-----|

#### SLR Notes:

The KPSC reviews OQ Qualification records as a part of its standard inspections. The verifies that requalifications are performed within the timeframes established in the operator's OQ Plan.

### 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>Yes = 1 No = 0 | 1 | 1 |
|----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---|

#### SLR Notes:

The KYPSC has completed Integrity Management Plan (IMP) inspections for all gas transmission operators except for two that were recently added to the KPSC's program.

- |          |                                                                                                                                                                                                     |    |     |
|----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|-----|
| <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? | .5 | 0.5 |
|----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|-----|

Yes = .5 No = 0

**SLR Notes:**

For the Gas IMP inspections that the KPSC has completed, the KPSC used and completed all information in the protocol forms while conducting its inspections of Integrity Management Plans. The protocol form covers this requirement.

- |           |                                                                                                                |    |     |
|-----------|----------------------------------------------------------------------------------------------------------------|----|-----|
| <b>10</b> | 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:**

The KPSC uses the Integrity Management Plan (IMP) inspection protocols while conducting its IMP inspections. The protocol forms covers the requirements in Subpart O.

- |           |                                                                                                                                                                                                               |    |     |
|-----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|-----|
| <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? | .5 | 0.5 |
|-----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|-----|

Yes = .5 No = 0

**SLR Notes:**

The KPSC uses the Integrity Management Plan inspection protocols while conducting its IMP inspections. The protocol forms covers the requirements for tests and remedial actions.

- |           |                                                                                                                                 |    |     |
|-----------|---------------------------------------------------------------------------------------------------------------------------------|----|-----|
| <b>12</b> | 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:**

The KPSC uses the Integrity Management Plan (IMP) inspection protocols while conducting its IMP inspections. The protocol forms covers the requirements for operators to examine for new HCA's.

## 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) | .5 | 0.5 |
|-----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|-----|

Yes = .5 No = 0

**SLR Notes:**

The KPSC has completed a review of operators' Public Awareness Plans through participation in the Public Awareness Clearinghouse. The KPSC verified that all operators submitted their Public Awareness Plans within the timeframe prescribed by the regulations.

- |           |                                                                                                                                             |    |     |
|-----------|---------------------------------------------------------------------------------------------------------------------------------------------|----|-----|
| <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)? | .5 | 0.5 |
|-----------|---------------------------------------------------------------------------------------------------------------------------------------------|----|-----|

Yes = .5 No = 0

**SLR Notes:**

The KPSC participated in the Public Awareness Clearinghouse review. The KPSC sent notifications of deficiencies to operators if the review found deficiencies. The KPSC has followed up with operators on any deficiencies identified by the review of the Public Awareness Clearinghouse.

- |           |                                                                                                                 |    |     |
|-----------|-----------------------------------------------------------------------------------------------------------------|----|-----|
| <b>15</b> | 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:**

The KPSC reviews public awareness records during standard inspections.

- |           |                                                                                                                                |           |           |
|-----------|--------------------------------------------------------------------------------------------------------------------------------|-----------|-----------|
| <b>16</b> | 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:**

The KPSC plans to conduct these reviews after receiving the Tnq training and the new federal inspection form.

- |           |                                                |           |           |
|-----------|------------------------------------------------|-----------|-----------|
| <b>17</b> | Part I: General Comments/Regional Observations | Info Only | Info Only |
|-----------|------------------------------------------------|-----------|-----------|

Info Only = No Points

**SLR Notes:**

Question I.5 - The KPSC has not used the federal protocol forms to inspect all of the operators' OQ Plans. Inspections of 20 operators are uploaded into the database. There are 113 operators. 0.5 points could not be given for this requirement.

Total points scored for this section: 8.5

Total possible points for this section: 9