



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

MAINE PUBLIC UTILITIES COMMISSION

Document Legend

PART:

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



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

State Agency: Maine

Agency Status:

Date of Visit: 06/13/2011 - 06/17/2011

Agency Representative: Gary A. Kenny

PHMSA Representative: Dino N. Rathod, P.E.

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

Name/Title: Thomas Welch, Chairman

Agency: Maine Public Utilities Commission

Address: 101 Second Street

City/State/Zip: Hallowell, ME 04334

Rating:

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

INSTRUCTIONS:

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

Field Inspection (PART F):

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

Scoring Summary

PARTS

Possible Points Points Scored

A	General Program Qualifications	26	24
B	Inspections and Compliance - Procedures/Records/Performance	24.5	24
C	Interstate Agent States	0	0
D	Incident Investigations	3.5	3.5
E	Damage Prevention Initiatives	9	9
F	Field Inspection	12	12
G	PHMSA Initiatives - Strategic Plan	9	9
H	Miscellaneous	3	3
I	Program Initiatives	9	7

96 91.5

TOTALS

State Rating 95.3

PART A - General Program Qualifications

Points(MAX) Score

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

Discussed with PUC need to review and revise Attachments 1, 5 and 8. PUC agreed to contact PHMSA State Programs (Zach Barrett) for implementing corrections in FedStar.

1) Attachment 1- Intrastate transmission- No. of inspection unit and units should be filled in as "2";

2) Attachment 5 Recheck No. of Probable Violations found, number corrected and to be corrected as well as No. of Compliance Actions (CA0 Taken. (Follow instruction on Page 6 of Certification);

3) Attachment 8- Item 7h- Part 198. Cite State Law/ Regs and Effective date; Actual Civil Penalty Limits- PUC to describe limits, if different than federal limits. Provide this information in Notes for Attachment 8.

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

SLR Notes:

PUC 65-407-Chapter 130 Safety & Accident Reporting Requirements; PUC Contact List also covers after-hrs coverage information.

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

SLR Notes:

PUC hosted Joint T&Q seminar as part of New England Pipeline Safety Rep (NEPSR) in Ogonquit, ME. Oct 2010

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

SLR Notes:

Pipeline Safety files- Hard copies and electronic maintained in a secure bldg, accessible.

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

SLR Notes:

Gary Kenny brings wealth of Pipeline Safety experience. He continues to take required T&Q training. He works closely with NEPSR, NAPSRS and PHMSA

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

SLR Notes:

PUC responded Nov 4, 2010

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 Yes = 1 No = 0	1	1
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SLR Notes:

1 PUC hired an inspector Jim Atkins. 2. PUC also allowed inspectors to take out of town travel for T&Q courses and be able to respond to emergencies on designated mandated furlough days.

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 Yes = 3 No = 0	3	3
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SLR Notes:

Gary and Jim Atkins continue their T&Q training courses.

9	Brief Description of Non-TQ training Activities: Info Only = No Points For State Personnel: For Operators: For Non-Operator Entities/Parties, Information Dissemination, Public Meetings:	Info Only	Info Only
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SLR Notes:

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 Yes = 1 No = 0	1	1
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SLR Notes:

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 Yes = 1 No = 0	1	1
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SLR Notes:

At this point, Gary Kenny has only completed WBT for IMP and he is waitlisted for IMP training in Jan 2012.

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 Yes = 5 No = 0 A. Total Inspection Person Days (Attachment 2): 109.00 B. Total Inspection Person Days Charged to the Program (220 X Inspection Person Years) (Attachment 7): 220 X 0.97 = 212.67 Ratio: A / B 109.00 / 212.67 = 0.51 If Ratio >= 0.38 Then Points = 5, If Ratio < 0.38 Then Points = 0 Points = 5	5	5
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SLR Notes:

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:

Jim Atkins joined PUC in Jul 2010.

14

Part-A General Comments/Regional Observations

Info Only

Info Only

Info Only = No Points

SLR Notes:

Total points scored for this section: 24

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
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 type="radio"/> | No <input type="radio"/> | Needs Improvement <input checked="" type="radio"/> |
| c | OQ Inspections (Max points = .5) | Yes <input type="radio"/> | No <input type="radio"/> | Needs Improvement <input checked="" 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:

Discussed with PUC need for Inspection Plan to include OQ , Drug & Alcohol and IMP Plan reviews and field verifications, as necessary.

- 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:

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:

Discussed with PUC need for performing OQ, IMP, D&A and Public Awareness (PA) inspections PUC agreed to work-in these activities moving forward (CY 2011).

- 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:

- 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:

- 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:

7	Did the state review operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization and if necessary remedial action was taken? (NTSB) Previous Question B.7	.5	.5
	Yes = .5 No = 0		

SLR Notes:

8	Did the state review operator procedures for surveillance of cast iron pipelines, including appropriate action resulting from tracking circumferential cracking failures, study of leakage history, or other unusual operating maintenance condition? (Note: See GPTC Appendix G-18 for guidance) (NTSB) Previous Question B.8	.5	.5
	Yes = .5 No = 0		

SLR Notes:

9	Did the state review operator emergency response procedures for leaks caused by excavation damage near buildings and determine whether the procedures adequately address the possibility of multiple leaks and underground migration of gas into nearby buildings Refer to 4/12/01 letter from PHMSA in response to NTSB recommendation P-00-20 and P-00-21? (NTSB) Previous Question B.9	.5	.5
	Yes = .5 No = 0		

SLR Notes:

10	Did the state review operator records of previous accidents and failures including reported third party damage and leak response to ensure appropriate operator response as required by 192.617? (NTSB) Previous Question B.10	1	1
	Yes = 1 No = 0		

SLR Notes:

Compliance - 60105(a) States

11	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:

Discussed with PUC example of PHMSA's Compliance and Enforcement and definitions of NOPV and Compliance Actions (Certification and Guideline Manual). It is essential to receive a response in "Writing" from the Operator for PUC's letters (NOPV, WL, NA, CA etc).

12	Does the state have written procedures to identify the steps to be taken from the discovery to the resolution of a probable violation as specified in the "Guidelines for State Participating in the Pipeline Safety Program"? (Chapter 5.1) Previous Question D(1).1	1	1
	Yes = 1 No = 0 Needs Improvement = .5		

SLR Notes:

13	Does the state have written procedures to notify an operator when a noncompliance is identified as specified in the "Guidelines for States Participating in the Pipeline Safety Program"? (Chapter 5.1(4)) Previous Question D(1).2	1	1
	Yes = 1 No = 0 Needs Improvement = .5		

SLR Notes:

14	Does the state have a written procedure for routinely reviewing the progress of compliance actions to prevent delays or breakdowns of the enforcement process, as required by the "Guidelines for States Participating in the Pipeline Safety Program"? (Chapter 5.1(5)) Previous Question D(1).3	1	1
	Yes = 1 No = 0 Needs Improvement = .5		

SLR Notes:

Discussed with PUC need for a process to keep track of pending actions and closure upon completion of necessary remedial actions. PUC agreed to consider it and implement ASAP.

15	Has the State issued compliance actions for all probable violations discovered? (Note : PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation) Previous Question D(1).4 Yes = 1 No = 0	1	1
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SLR Notes:

16	Did the state follow its written procedures for reviewing compliance actions and follow-up to determine that prompt corrective actions were taken by operators, within the time frames established by the procedures and compliance correspondence, as required by the "Guidelines for States Participating in the Pipeline Safety Program"? Previous Question D(1).5 Yes = 1 No = 0 Needs Improvement = .5	1	1
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SLR Notes:

17	If compliance could not be established by other means, did state pipeline safety program staff request formal action, such as a "Show Cause Hearing" to correct pipeline safety violations? (check each states enforcement procedures) Previous Question D(1).6 No = 0 Yes = 1	1	1
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SLR Notes:

18	Did the state adequately document the resolution of probable violations? (Chapter 5.1 (6)) Previous Question D(1).7 Yes = 1 No = 0 Needs Improvement = .5	1	1
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SLR Notes:

19	Were compliance actions sent to a company officer? (manager or board member if municipal/government system) (Chapter 5.1(4)) Previous Question D(1).8 Yes = .5 No = 0	.5	.5
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SLR Notes:

20	Did the compliance proceedings give reasonable due process to all parties? (check each states enforcement procedures) Previous Question D(1).9 Yes = 1 No = 0 Needs Improvement = .5	1	1
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SLR Notes:

Compliance - 60106(a) States

21	Did the state use the current federal inspection form(s)? Previous Question D(2).1 Yes = 1 No = 0 Needs Improvement = .5	1	NA
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SLR Notes:

22	Are results adequately documented demonstrating inspection units were reviewed in accordance with state inspection plan? Previous Question D(2).2 Yes = 1 No = 0 Needs Improvement = .5	1	NA
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SLR Notes:

23	Were any probable violations identified by state referred to PHMSA for compliance? (NOTE: PHMSA representative has discretion to delete question or adjust points, as appropriate, based on number of probable violations; any change requires written explanation.) Previous Question D(2).3 Yes = 1 No = 0 Needs Improvement = .5	1	NA
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SLR Notes:

24	Did the state immediately report to PHMSA conditions which may pose an imminent safety hazard to the public or to the environment? Previous Question D(2).4 Yes = 1 No = 0 Needs Improvement = .5	1	NA
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SLR Notes:

25	Did the state give written notice to PHMSA within 60 days of all probable violations found? Previous Question D(2).5 Yes = 1 No = 0 Needs Improvement = .5	1	NA
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SLR Notes:

26	Did the state initially submit adequate documentation to support compliance action by PHMSA on probable violations? Previous Question D(2).6 Yes = 1 No = 0 Needs Improvement = .5	1	NA
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SLR Notes:

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

28	Part B: General Comments/Regional Observations Info Only = No Points	Info Only	NA
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SLR Notes:

Total points scored for this section: 24
Total possible points for this section: 24.5



PART C - Interstate Agent States

Points(MAX) Score

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

SLR Notes:

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

SLR Notes:

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

SLR Notes:

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

SLR Notes:

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

SLR Notes:

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

SLR Notes:

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

SLR Notes:

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

SLR Notes:

ME is only intrastate gas 60105(a).

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

PART D - Incident Investigations

Points(MAX) Score

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

SLR Notes:

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

SLR Notes:

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

SLR Notes:

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

SLR Notes:

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

SLR Notes:

No reportable incidents in CY 2010

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

SLR Notes:

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

SLR Notes:

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

SLR Notes:

No Reportable incidents in CY 2010

Total points scored for this section: 3.5
Total possible points for this section: 3.5



PART E - Damage Prevention Initiatives

Points(MAX) Score

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

SLR Notes:

PUC reviewed Directional Drilling Procedures:

Unitil ? O&M Procedures, Appendix 2?

G Maine Natural Gas ? Construction Standards

Bangor Gas ? O&M Procedures, ?II.H.1.j (for use of trenchless technology by the operator)

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

SLR Notes:

Dig SafePUC inspector reviews ticket number (indicating notification) at all construction inspections for work by the operator and their contractors.

Random, unannounced construction site visits, by the Damage Prevention Investigators, verify marking and positive response.

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

SLR Notes:

The PUC encourages and promotes the CGA Best Practices through annual training by Maine's Managing Underground Safety Training (MUST)

Committee, in which the MPUC actively participates. The CGA Best Practices are also referenced in MPUC Rule Chapter 420, Safety Standards For Natural Gas and LNG Facility Operators, regarding the qualification of pipeline locating personnel.

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

SLR Notes:

Damage Prevention Investigators at PUC maintain a spreadsheet of all underground facility incidents; including those resulting in no damage. The spreadsheet details the damages per 1,000 locate requests.

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

SLR Notes:

All incidents (resulting in damage or not) are investigated by the ME PUC's Damage Prevention Investigators. Since Unitil experienced the greatest rate of damages, they are scrutinized very closely. Steps to minimize the possibility of recurrence are often incorporated in consent agreements associated with Notices of Probable Violations. Also, in 2010 the Pipeline Safety Staff investigated an incident of self inflicted damage incurred on a Bangor Gas facility. Through that investigation it was learned that Bangor Gas conducts root cause investigations of all incidents.

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

SLR Notes:

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:

Unitil (NUI)

Name of State Inspector(s) Observed:

Gary Kenny, P.E.

Location of Inspection:

Portland

Date of Inspection:

06/13/2011 and 06/14/2011

Name of PHMSA Representative:

Dino N. Rathod, P.E.

SLR Notes:

PUC reviewed Status update of DIMP implementation and recent major pipeline incidents and discussed with Unitil for possible pro-active measures to enhance pipeline safety.

- 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:

Unitil Company Rep was notified and present at jobsite

- 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:

Gary used Check List and PHMSA OQ Protocol for field verification.

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

SLR Notes:

PUC inspector Gary Kenny documented his observations.

- 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:

Gary checked heaing iron for pipe fusion and contact pyrometer.

- 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:

1 Review of DIMP implementation progress status ; 2) Observe construction of new 8-inch plastic pipe to replace exist cast iron; Perform field verification of pipe fusion activity. 4) Recent major pipeline incidents- SanBruno, CA and Allentown, PA and pro-active measures LDC can consider.

- 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:

1 Review of DIMP implementation progress status ; 2) Observe construction of new 8-inch plastic pipe to replace exist cast iron; Perform field verification of pipe fusion activity. 4) Recent major pipeline incidents- SanBruno, CA and Allentown, PA and pro-active measures LDC can consider

8	Did the inspector have adequate knowledge of the pipeline safety program and regulations? (Liaison will document reasons if unacceptable) Previous Question F.8 Yes = 2 No = 0	2	2
----------	---	---	---

SLR Notes:

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 Yes = 1 No = 0	1	1
----------	--	---	---

SLR Notes:

10	During the exit interview, did the inspector identify probable violations found during the inspections? Previous Question F.11 Yes = 1 No = 0	1	1
-----------	--	---	---

SLR Notes:

Gary expressed concern for two minor items- Fusion temp range, need forTip Card by fusor and calibration of Contact Pyromter for checking heating iron. PUC to follow-up for resolution.

11	What did the inspector observe in the field? (Narrative description of field observations and how inspector performed) Info Only = No Points	Info Only	Info Only
-----------	---	-----------	-----------

SLR Notes:

1 Construction: Innstallation of new 8-inch HDPE plastic pipe. Checked fusor qualifications, Dig Safe ticket validity, pipe storage and handling. Quality of sand padding and excavation at site. Verified heating iron temp and pipe fusion temp,
2 Unutil's DIMP implementation status- progress review.

12	Best Practices to Share with Other States - (Field - could be from operator visited or state inspector practices) Info Only = No Points	Info Only	Info Only
-----------	--	-----------	-----------

SLR Notes:

13	Field Observation Areas Observed (check all that apply) Info Only = No Points	Info Only	Info Only
-----------	--	-----------	-----------

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

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

SLR Notes:

1 Review of DIMP implementation progress status ; 2) Observe construction of new 8-inch plastic pipe to replace exist cast iron; Perform field verification of pipe fusion activity. 4) Recent major pipeline incidents- SanBruno, CA and Allentown, PA and pro-active measures LDC can consider.

14 Part F: General Comments/Regional Observations

Info Only Info Only

Info Only = No Points

SLR Notes:

1 Review of DIMP implementation progress status ; 2) Observe construction of new 8-inch plastic pipe to replace exist cast iron; Perform field verification of pipe fusion activity. 4) Recent major pipeline incidents- SanBruno, CA and Allentown, PA and pro-active measures LDC can consider

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:

PUC has Gas Safety Program Procedures which are revised annually. The most recent revision was reviewed June 3, 2011

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

SLR Notes:

The inspection units for the natural gas LDCs, Intrastate transmission, and LNG are straightforward.

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

SLR Notes:

PUC has monitored progress of DIMP implementation. PUC verification that operators have DIMP Plans in place will begin in early August. Since the December 2009 notice in the Federal Register, information has been forwarded to the natural gas and LPG operators. On March 23, 2011 the Gas Safety Manager attended a presentation of the DIMP Plan by the state's largest gas utility, Unitil. It appears their plan is very thorough

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

SLR Notes:

July 22, 2010 incident of self damage to a main by Bangor Gas (BG). Although the incident was minor, the initial report indicated a cause that didn't seem plausible. PUC's ensuing investigation indicated the report was false. Subsequently, all matters pertaining to operator qualification and records are being very closely scrutinized with BG. PUC's previous Gas Safety Program Procedures included a schedule of inspecting LPG facilities every three years. With two new intrastate transmission lines proposed (one by a proposed LDC), Unitil's cast iron replacement program, and the general growth of natural gas due to favorable pricing, that schedule has been revised to once every five years.

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:

PUC's Damage Prevention Investigators maintain a spreadsheet titled "Incident Activity" that tracks all incidents, including those where there was no damage. Also, the 2010 Damage Prevention Grant from PHMSA was utilized to develop a new damage prevention database and procure handheld data collection units. The new database is currently in the implementation phase.

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

SLR Notes:

Yes. Unitil purchased Northern Utilities in 2008. Review of subsequent annual reports by PUC indicated some discrepancies regarding miles of main by type, services by type, and the total of services. These discrepancies have been attributable to Unitil's diligence to verify records through field verification.

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

SLR Notes:

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

Yes = .5 No = 0

SLR Notes:

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

SLR Notes:

1. PUC evaluates constueciton activites and replacement considerations and took action thru Commission stipulation of cast iron and bare steel pipes in Portland area. PUC has effective Dig Safe Program and strong enforcement. PUC collects and reviews operator data and damage data and follow trends.

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

SLR Notes:

PUC conducted OQ field verificationinspection and entered in OQBD.

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

SLR Notes:

.

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

SLR Notes:

NO IMP inspections were conducted in CY 2010. Gary has recently completed IMP WBT training and wait-listed for IMP training course for JAN 2012. PUC plans to conduct IMP reviews upon successful completion of IMP trainingby GARu Kenny

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

SLR Notes:

Yes

- | | | | |
|--------------------------------|--|----|-----|
| 14 | 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 |
| <small>Yes = .5 No = 0</small> | | | |

SLR Notes:

NPMS Public Viewer has been utilized to verify that both transmission operators, Bangor Gas and Maine Natural Gas, have their lines on the system. Neither line has been modified since its installation

Accident/Incident Investigation Learning and Sharing Lessons Learned

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

SLR Notes:

PUC regularly disseminates incident/accident information which it receives from NAPSR and PHMSA to natural gas and LPG operators.

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

SLR Notes:

Yes; PUC Rule Chapter 420 requires participation in the Plastic Pipe Data Collection and Sharing Initiative

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

Info Only Info Only

Info Only = No Points

SLR Notes:

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

Info Only Info Only

Info Only = No Points

SLR Notes:

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

.5

0.5

Yes = .5 No = 0

SLR Notes:

Gas Safety Manager Gary Kenny attended PHMSA's Root Cause/Incident Course (PHMSA?PL3600) in September 2010

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 documents pertaining to all docketed cases are available online through the MPUC's Virtual Case File which may be found at the following link:

http://mpuc.informe.org/easyfile/easyweb.php?func=easyweb_splashpage

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

.5

0.5

Yes = .5 No = 0

SLR Notes:

PUC documents pertaining to all docketed cases are available online through the MPUC's Virtual Case File which may be found at the following link:

http://mpuc.informe.org/easyfile/easyweb.php?func=easyweb_splashpage

22 Part G: General Comments/Regional Observations

Info Only Info Only

Info Only = No Points

SLR Notes:

Total points scored for this section: 9
Total possible points for this section: 9

PART H - Miscellaneous

Points(MAX) Score

- | | | | |
|----------|---|----|-----|
| 1 | What were the major accomplishments for the year being evaluated? (Describe the accomplishments, NAPS Activities and Participation, etc.) | .5 | 0.5 |
| | Yes = .5 No = 0 | | |

SLR Notes:

1. PUC hired James Atkins as a Pipeline safety inspector in July 2010.
2. Program Manager Gary Kenny attended NAPS and the regional and national meetings and found to be very informative and productive.
3. Gary Kenny also hosted his first NEPSR joint seminar in October 2011 in Ogonquit, ME. NEPSR is a group of New England states (CT, MA, ME, NH, RI & VT). Seminar was well attended with over 120 participants.

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

SLR Notes:

1. PUC inspection staff was able to respond to emergency and allowed to attend T&Q training during furlough days.

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

SLR Notes:

The Commission Order stipulated that all Cast Iron and bare steel replacement by UNITIL (NUI) by Oct 2024.

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

SLR Notes:

Maine has also been the recipient of information requested from NAPS members and responded.

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

SLR Notes:

In addition to replying to NAPS inquiries, the MPUC has had correspondence with other New England states regarding the rules for jurisdictional LPG systems

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

SLR Notes:

Total points scored for this section: 3
Total possible points for this section: 3

PART I - Program Initiatives

Points(MAX) Score

Drug and Alcohol Testing (49 CFR Part 199)

- | | | | |
|----------|---|---|---|
| 1 | Has the state verified that operators have drug and alcohol testing programs?
Yes = 1 No = 0 | 1 | 0 |
|----------|---|---|---|

SLR Notes:

During CY 2010 PUC did not conduct D&A plan review.

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

SLR Notes:

During CY 2010 PUC did not conduct D&A plan review

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

SLR Notes:

During CY 2010 PUC did not conduct D&A plan review

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

- | | | | |
|----------|---|---|---|
| 4 | Has the state verified that operators have a written qualification program?
Yes = 1 No = 0 | 1 | 1 |
|----------|---|---|---|

SLR Notes:

During CY 2010 PUC conducted two OQ inspections Maine Natural GAs (MNG) has adopted NGA OQ Plan and Bangor Gas has adopted Energy West (plan of their parent company).

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

SLR Notes:

CY 2010 PUC reviewed MNG and Bangor Gas OQ plans

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

SLR Notes:

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

SLR Notes:

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

- | | | | |
|----------|--|---|---|
| 8 | Has the state verified that all operators with transmission pipelines have either adopted an integrity management program (IMP), or have properly determined that one is not required?
Yes = 1 No = 0 | 1 | 1 |
|----------|--|---|---|

SLR Notes:

Maine Natural Gas (MNG) evaluated HCA determination for gas transmission pipeline and indicated that No HCA exist for this pipeline. Another operator Bangor Gas has adopted NGA IMP plan. PUC found inadequate documentation and request additional documentation from Bangor Gas.

- | | | | |
|----------|--|----|-----|
| 9 | Has the state verified that in determining whether a plan is required, the operator correctly calculated the potential impact radii and properly applied the definition of a high consequence area?
Yes = .5 No = 0 | .5 | 0.5 |
|----------|--|----|-----|

SLR Notes:

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

Bagor Gas IMP plan was found to be andequate, PUC has followed up and requested additional documentation. Possible Compliance Action from PUC may be forthcoming.

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

SLR Notes:

PUC did not provide any supporting documentation

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

SLR Notes:

Maine Natural Gas (MNG) map documented class location study and HCA determination.

Public Awareness (49 CFR Section 192.616)

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

SLR Notes:

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

SLR Notes:

NGA program was reviewed by Clearing house initially.

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

SLR Notes:

In CY 2010- Maine Natural Gas (MNG) Public Awareness activities for new service territory being expanded.

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

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

Total points scored for this section: 7
Total possible points for this section: 9