COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

CLOSURE OF PIPELINE SAFETY INVESTIGATION – LOUISVILLE GAS AND ELECTRIC COMPANY	)))	CASE NO. 2020-00094

O R D E R

The Commission, on its own motion, initiates this proceeding to close the investigation of the gas distribution system operated by Louisville Gas and Electric Company (LG&E) for alleged violations of minimum federal pipeline safety standards. Staff from the Commission's Division of Inspections (Staff) conducted a periodic inspection of LG&E's gas distribution system on April 1-5 and 18, 2019, and cited the company for two violations of federal pipeline safety standards. Staff prepared an inspection report dated May 14, 2019 (Report), setting forth its findings of violations.

Based upon the findings of violations, Staff issued LG&E a Demand for Remedial Measures and Penalty Assessment (Letter), a copy of which is attached to this Order as an Appendix, as a means to resolve all compliance and enforcement matters pertaining to the alleged pipeline safety violations. Staff noted in the Letter that LG&E is taking appropriate remedial measures to address the violations of federal pipeline safety standards identified in the Report. LG&E subsequently paid the proposed penalty.

The Commission finds that LG&E has addressed to the Commission's satisfaction the probable violations cited by Staff in the Report. The Commission further finds that the Commission's investigation of the incident should be closed.

IT IS THEREFORE ORDERED that:

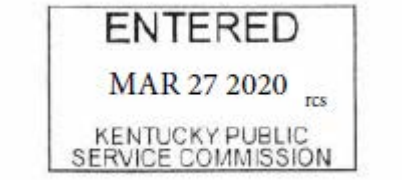
1. LG&E's payment of Staff's proposed penalty and completion of remedial measures is accepted and resolves any and all alleged violations of KRS 278.495, KAR Title 807, or 49 CFR Parts 191, 192 or 199, as well as all claims for any penalty that could be assessed under KRS 278.992(1), arising out of the pipeline safety violations cited in the Report.

2. LG&E's payment of Staff's proposed penalty is not an admission by LG&E that it willfully violated any provision of KRS 278.495, KAR Title 807, or 49 CFR Parts 191, 192 or 199.

3. The Commission's investigation of LG&E's gas distribution system is closed.

4. This case is closed and removed from the Commission's docket.

By the Commission



ATTEST:

Executive Director

APPENDIX

APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE COMMISSION IN CASE NO. 2020-00094 DATED MAR 27 2020

SEVENTY PAGES TO FOLLOW

Andy Beshear
Governor

Rebecca W. Goodman
Secretary
Energy and Environment Cabinet

Commonwealth of Kentucky
Public Service Commission
211 Sower Blvd.
P.O. Box 615
Frankfort, Kentucky 40602-0615
Telephone: (502) 564-3940
Fax: (502) 564-3460
psc.ky.gov

Michael J. Schmitt
Chairman

Robert Cicero
Vice Chairman

Talina R. Mathews
Commissioner

January 17, 2020

Robert Conroy, VP State Regulation & Rates
Louisville Gas and Electric Company
220 W. Main Street
P.O. Box 32010
Louisville, KY 40232-2010

Re: Standard Inspection

DEMAND FOR REMEDIAL MEASURES AND PENALTY ASSESSMENT

Dear Mr. Conroy:

Commission Staff (Staff) performed a standard periodic inspection of the gas distribution system of Louisville Gas & Electric Company (LG&E) on April 1-5 and 18, 2019. Based on its review of LG&E's operations and management practices, Staff prepared the attached Inspection Report dated May 14, 2019 (Report).

As detailed in the Report, Staff identified the following violations of federal pipeline safety standards during its inspection of LG&E's gas distribution system:

1. **49 CFR § 192.614** – Damage prevention program.

(a) Except as provided in paragraphs (d) and (e) of this section, each operator of a buried pipeline must carry out, in accordance with this section, a written program to prevent damage to that pipeline from excavation activities. For the purposes of this section, the term "excavation activities" includes excavation, blasting, boring, tunneling, backfilling, the removal of aboveground structures by either explosive or mechanical means, and other earthmoving operations.

. . .

(c) The damage prevention program required by paragraph (a) of this section must, at a minimum:

. . .

(5) Provide for temporary marking of buried pipelines in the area of excavation activity before, as far as practical, the activity begins.

Finding: LG&E failed to provide temporary marking of buried pipelines within 48 hours for approximately 131,698 facility locate requests received during the review period of 2016-2018. This constitutes a failure by LG&E to carry out a damage prevention program that provides for timely marking of buried pipelines as required by 49 CFR § 192.614(c)(5).

2. **49 CFR § 192.327** – Cover.

(b) Except as provided in paragraphs (c) and (d) of this section, each buried main must be installed with at least 24 inches (610 millimeters) of cover.

Finding: Investigation of excavation damage to a 4-inch low pressure main that occurred on September 11, 2018, at 630 S. 4th Street in Louisville, Kentucky, established that the main was installed with approximately 7 inches of cover.

LG&E provided a response to the Report and its findings by letter dated June 20, 2019 (Response):

1. **49 CFR § 192.614** – LG&E asserts that many of its late locates fell under a statutory exemption to the 48-hour deadline to provide temporary marking of underground pipelines. LG&E acknowledges, however, late locate requests that did not fall within any exemption as well as a persistent backlog of locate requests during the review period.

   LG&E indicated that the problem was due to poor performance by its contractors that have provided line locate services. LG&E states that, as of December 14, 2018, it has hired two new companies to perform line locating services. LG&E stresses that it has taken appropriate measures to improve compliance with line locate requirements.

2. **49 CFR § 192.327** – LG&E notes that, although 49 CFR § 192.327 requires each buried main to be installed with at least 24 inches of cover, less cover may be used where an underground structure prevents installation with the minimum cover if provided with additional protection to withstand anticipated external loads. LG&E states that it was not possible to install the 4-inch low pressure main at 630 S. 4th Street with 24 inches of cover because of the location of other utility facilities in the area, so LG&E planned to install the pipe with a steel plate to withstand external loads. LG&E asserts that, although the construction contractor represented that it had installed the steel plate, LG&E's investigation of the excavation damage revealed that the steel plate was not present.

LG&E states that, since the time of this installation, it has enhanced its training and certification program for pipeline inspectors. Additionally, if it is not possible to install with 24 inches of cover and an additional protective measure must be taken, LG&E states that it now requires its personnel to verify that the planned measure is, in fact, taken and that the verification is then noted on the main construction report.

While the information provided in LG&E's Response does not alter Staff's determination that LG&E violated 49 CFR § 192.614(c)(5) and § 192.327, the remedial measures that LG&E outlines in its Response have been appropriately considered in the calculation of a civil penalty.

REMEDIAL MEASURES

Staff finds that LG&E is taking appropriate remedial measures to address the violations identified in the Report. The Commission will continue to monitor the effectiveness of LG&E's damage prevention program for compliance with minimum federal pipeline safety standards.

In its Response to the Report, LG&E states that it has started an initiative to review other locations in downtown Louisville where mains were installed with less than minimum cover in order to confirm that additional protection was provided to withstand anticipated external loads. Within 15 days of the date of this letter, LG&E is directed to submit a report on the status of this initiative. The status report shall include the number of locations reviewed, identify any locations where LG&E determined that the planned additional protection was not provided, and outline LG&E's plan for bringing the locations where additional protection is needed into compliance, including the anticipated date when such work will be completed.

CIVIL PENALTY

KRS 278.992(1) provides that any person who violates any minimum pipeline safety standard adopted by the United States Department of Transportation or any regulation adopted by the Commission governing the safety of pipeline facilities shall be subject to a civil penalty not to exceed the maximum civil penalty contained in 49 CFR § 190.223, as amended. Currently, the maximum civil penalty is $218,647 for each violation for each day the violation continues, with a maximum administrative civil penalty not to exceed $2,186,465 for any related series of violations.[1]

[1] Prior to July 14, 2018, the maximum civil penalty is $100,000 for each violation for each day the violation continues, with a maximum administrative civil penalty not to exceed $1,000,000 for any related series of violations. At the time of the September 11, 2018 excavation damage incident, the maximum civil penalty was $209,002 for each

In determining the amount of the proposed penalty, Staff considers the assessment factors set forth in KRS 278.992(1): "the size of the business of the person charged, the gravity of the violation, and the good faith of the person charged in attempting to achieve compliance, after notification of the violation." Additionally, Staff considers the assessment factors applied under federal law by the Associate Administrator for Pipeline Safety for PHMSA to determine the amount of the civil penalty for violation of a federal pipeline safety standard.[2]

Staff recognizes the steps LG&E has taken to address the deficiencies in its damage prevention program and to improve its compliance with line locate requirements. Staff also acknowledges LG&E's improvement in performing line locates in a timely manner. Staff recognizes the substantial investment LG&E has made to address the deficiencies in its damage prevention program. Finally, Staff recognizes the enhanced training LG&E now provides its pipeline inspectors and its initiative to review other locations in downtown Louisville where mains were installed with less than minimum cover to confirm that additional protection was provided to withstand anticipated external loads. Staff has taken these good faith efforts to achieve compliance into account in calculating the penalty to be assessed.

Based on its investigation of this matter and consideration of the penalty assessment factors discussed above, Staff concludes that LG&E should be assessed a civil penalty in the amount of $150,000. Staff considers both of LG&E's violations to be serious because they were causal factors in pipeline safety incidents. The gravity of LG&E's failure to provide 24 inches of cover or additional protection to withstand external loads is heightened because it involved the defective installation of infrastructure. LG&E's failure to carry out an effective damage prevention program in accordance with federal pipeline safety standards was a long-standing violation that persisted throughout the review period and is subject to assessment of a civil penalty for each day the violation continued, up to the cap for a related series of violations.

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violation for each day the violation continues, with a maximum administrative civil penalty not to exceed $2,090,022 for any related series of violations.

[2] Federal law provides that PHMSA shall consider: (1) the nature, circumstances and gravity of the violation, including adverse impact on the environment; (2) the degree of the respondent's culpability; (3) the respondent's history of prior offenses; (4) any good faith by the respondent in attempting to achieve compliance; and (5) the effect on the respondent's ability to continue in business. The Associate Administrator also may consider: (1) the economic benefit gained from the violation, if readily ascertainable, without any reduction because of subsequent damages; and (2) such other matters as justice may require. *See* 49 CFR § 190.225.

If LG&E does not wish to contest the proposed civil penalty, it should mail or deliver a cashier's check or money order, made payable to the **"Kentucky State Treasurer"** in the amount of $150,000 within 30 days of the date of this letter, to:

Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40602

Payment of the proposed civil penalty and completion of all remedial measures will satisfy and resolve any and all claims against LG&E for violation of KRS 278.495, KAR Title 807, or 49 CFR Parts 191, 192 or 199, as well as for any penalty that could be assessed under KRS 278.992(1), arising out of the pipeline safety violations cited herein. LG&E's payment of the proposed civil penalty will not be considered an admission by LG&E that it willfully violated any provision of KRS 278.495, KAR Title 807, or 49 CFR Parts 191, 192 or 199. Upon payment of the proposed penalty, the Commission will confirm the resolution of this matter by entry of an order. Payment of the penalty constitutes a waiver by LG&E of any right to a hearing in any proceeding initiated to close the investigation.

If LG&E does not pay the proposed civil penalty within 30 days of the date of this letter, the Commission will institute an administrative proceeding against LG&E and hold a formal hearing during which LG&E will have an opportunity to present evidence and show cause why it should not be subject to penalties under KRS 278.992(1) for the pipeline safety violations cited herein.

This demand letter addresses only those matters specifically referred to in this document. This demand letter does not waive or otherwise affect any obligations or liabilities that may result from other activities by LG&E. If you have any questions, please contact John Park at 502-782-2589.

Sincerely,

Gwen R. Pinson

Gwen R. Pinson
Executive Director

Attachment

INSPECTION REPORT

INSPECTION INFORMATION

KY PSC Inspector(s):	Michael Nantz	Report Number:	5142019
Inspection Date(s):	4/1,2,3,4,5,18/2019	Report Date:	5/14/2019
Inspection Type:	☒ Standard ☐ Integrity Management ☐ Operator Qualification ☐ Compliance Follow-up ☐ Construction		

OPERATOR INFORMATION

Name of Operator:	Louisville Gas and Electric	OP ID No.: (If no OP ID No., explain if an application has been submitted.)	11824
Type of Facility:	Private Distribution	Location of Facility:	Louisville, Kentucky
Area of Operation:	Louisville and surrounding areas in Jefferson, Trimble, Oldham, Henry, Shelby, Bullitt, Nelson, Meade, and Hardin counties.		

Official Operator Contact and Address: (Contact for Inspection Letter)	Unit Name and Address
John Malloy, Vice President P.O. Box 32010 220 West Main Street Louisville, Kentucky 40232	

Phone # and Email:	John.Malloy@lge-ku.com
Records Location:	East Operations Center, Louisville, KY

Persons Interviewed	Title	Phone No.	Email
Dara Griggs	Gas Environmental & Compliance Coordinator	502-627-2543	Dara.Griggs@lge-ku.com
Tom Reith	Director Gas Operations, Construction & Engineering	502-627-3386	Tom.Reith@lge-ku.com
Joe Ryan	Manager, Gas Distribution Integrity and Compliance	502-367-5944	Joe.Ryan@lge-ku.com
Peter Clyde	Manager, Gas Transmission Integrity and Compliance	502-364-8715	Peter.Clyde@lge-ku.com
Barry Walker	Director, Gas Control & Storage	502-627-3038	Barry.Walker@lge-ku.com

Has the Operator provided an updated Emergency Contact List?	x☐	Yes	☐	No

Number of Customers:	Approximately 326,000	
Number of Gas Employees:	Approximately 290	
Gas Supplier:	Tennessee Gas, Texas Gas and LGE Transmission	
Unaccounted for Gas:	1.43% (2018 Annual Report)	
Services:	Residential: 300,410 (All 1" to over 8")	Commercial / Industrial / Other
Operating Pressure(s):	MAOP (within last year)	Actual Operating Pressure (at time of inspection)

Feeder:	Low Pressure .05 psig; Elevated Pressure Distribution 3.0 psig; Medium Pressure Distribution 15 psig to 60 psig; High Pressure Distribution 99 psig to 350 psig	
Town:		
Other:		

Does the Operator have any transmission pipeline (above 20% SMYS):	No

Additional Operator Information:

Date of Last Inspection:	8/22/2016		
Number of Deficiencies:	1	Deficiencies not Cleared:	0

Summary of Areas Inspected

PHMSA Question Set

☒	Emergency Plan (PHMSA Form 2)	☒	Operations and Maintenance Plan (PHMSA Form 2)	☒	Critical Valves Maintenance Inspections
☒	Cathodic Protection (PHMSA Form 2)	☐	Accidents - (PHMSA Form 11)	☒	Leak Surveys
☒	Odorization - (PHMSA Form 2)	☒	Operator Qualification (PHMSA Form 15 – Protocol 9)	☒	Damage Prevention (PHMSA Form 2)
☒	Pipeline ROW Markers (PHMSA Form 2)	☐	Regulator Stations	☒	DIMP – (PHMSA Form 24)
☒	Field Inspection (PHMSA Form 15)	☒	NTSB Supplemental Questions	☒	PAPE – (PHMSA Form 2)
☒	Public Awareness (PHMSA Form 2)	☐	Other		

Other:

State Question Set

☒	Cybersecurity	☐	Other

Other:

Summary

This standard inspection involved the review of Louisville Gas & Electric Company's operations and the company's compliance with 49 CFR Parts 191 and 192. The inspection covered the company's Operating and Maintenance, Emergency, Damage Prevention, Operator Qualifications, Distribution Integrity Management, Cathodic Protection, Odorization, and Leak Survey records. Records were reviewed at the company's East Operations Center in Louisville. Field inspections consisted of company's city gate station, district regulator stations and large customer metering locations in the area. A Protocol 9 was conducted regarding odorant checks and cathodic protection measurements.

Records reviewed were in good order and except for the deficiencies noted below regarding the company's Damage Prevention program and a Depth of Cover issue regarding a Low Pressure Main, the company's operations review were found to be compliant. Field inspections and the Protocol 9 performed on field personnel resulted in no compliance issues. Two positive areas to note were the company's Operation Qualification (OQ) Plan and the Distribution Integrity Management Plan (DIMP) which both provided evidence of the company's commitment to these important operational programs.

An exit interview was conducted in which the company was made aware of the Damage Prevention plan deficiency described in detail below. The second deficiency regarding the Depth of Cover was discussed with LG&E, but at the time of the interview it had not been determined if it would be investigated as a part of this report or as a separate investigation. The company was made aware of the inclusion of this deficiency in this inspection report at a later date. There were no other deficiencies noted during this inspection.

The inspection checklist contains in the "Notes" section provides cites to the company's Operation and Maintenance or Procedure Manuals or other company documents where applicable.

All previous deficiencies from the 2016 Inspection Report had been corrected.

Pipeline Safety staff appreciates the efforts and professionalism of the company's staff during the inspection process.

Probable Violations

1. *CFR 192.614(c)(5) Provide for temporary marking of buried pipelines in the area of excavation activity before, as far as practical, the activity begins.*

Records obtained from Louisville Gas & Electric Company during the Commission's Damage Prevention Enforcement investigations of KRS 367.4901-4917 (Dig Law) incidents of reported excavation damages from the company provided evidence of non-compliance with the cited regulation. During the performance years covered in this inspection, 2016, 2017, and 2018, the following data was provided to the Commission's Damage Prevention Enforcement and Pipeline Safety staff regarding the timeliness of the company's locating responsibility to locate request submitted through KY 811. As noted below in the company's data provided, the company failed to provide timely facility locates for approximately 131,698 requests received from KY 811 during the period covered by this inspection.

Louisville Gas & Electric (Gas)

	2016	2017	2018
Total Tickets	156,413	161,906	143,221
<48 hours	123,157	120,092	84,843
>48 hours	33,256	41,814	56,628
%>48 hours	21.26%	25.83%	39.54%

2. *192.327(b) Except as provided in paragraphs(c) and(d) of this section, each buried main must be installed with at least 24 inches (610 millimeters) of cover.*

At the time of this inspection, an investigation by the Commission's Damage Prevention Enforcement staff of a reported damage at 630 S. 4th Street Louisville, KY discovered that a 4 inch Low Pressure main was damaged. The incident occurred on 9/11/2018. Photographs and correspondence with LG&E staff confirmed the main to have approximately 7 inches of cover at the time of the damage. Damage Prevention Enforcement Staff informed the Pipeline Safety Staff of the incident for review under CFR 192. Documentation of the incident is contained in the company's Gas Excavation Damage Report Number 21036 and Enforcement Staff report number 3724.f

Areas of Concern

There were no Areas of Concern noted.

Submitted By:

Inspector 5/14/2019
Utility Regulatory and Safety Investigator

Procedures - Reporting *

*** 1. Immediate Reporting: Incidents (detail)** *Is there a process to immediately report incidents to the National Response Center?* (RPT.RR.IMMEDREPORT.P) (detail)

191.5(b) (191.7)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: GEOP Section 5

*** 2. Incident Reports (detail)** *Does the process require preparation and filing of an incident report as soon as practicable but no later than 30 days after discovery of a reportable incident?* (RPT.RR.INCIDENTREPORT.P) (detail)

191.15(a)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: GEOP Section 5

3. Supplemental Incident Reports (detail) *Does the process require preparation and filing of supplemental incident reports?* (RPT.RR.INCIDENTREPORTSUPP.P) (detail)

191.15(c)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: GEOP & I-GN-SR-001

*** 4. National Registry of Pipeline and LNG Operators (OPID) (detail)** *Does the process require the obtaining, and appropriate control, of Operator Identification Numbers (OPIDs)?* (RPT.RR.OPID.P) (detail)

191.22	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: GEOP & I-GN-SR-001

5. Safety Related Condition Reports (detail) *Do the procedures require reporting of safety-related conditions?* (RPT.RR.SRCR.P) (detail)

192.605(a) (191.23(a); 191.25(a); 191.25(b))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: GEOP & I-GN-SR-001

6. Offshore Pipeline Condition Reports (detail) *Does the process require reports to be submitted within 60 days after completing inspection of underwater pipelines in GOM and its inlets?* (RPT.RR.OPCR.P) (detail)

191.27(a) (191.27(b); 192.612(a))	Sat+	Sat	Concern	Unsat	NA	NC
					X	

Notes

7. Safety Related Conditions (detail) *Does the process include instructions enabling personnel who perform operation and maintenance activities to recognize conditions that may potentially be safety-related conditions?* (MO.GO.SRC.P) (detail)

192.605(d)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: OQ Plan Section B pages 13-15

Procedures - Customer and EFV Installation Notification

1. Customer Notification (detail) *Is a customer notification process in place that satisfies the requirements of 192.16?* (MO.GO.CUSTNOTIFY.P) (detail)

192.13(c) (192.16(a); 192.16(b); 192.16(c); 192.16(d))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: OMI GOM & I-PO-VM 002
Also, website offer customers option to install, email notifications referring customers to website for additional information, included in new customer packets.

2. EFV Installation (detail) *Is there an adequate excess flow valve (EFV) installation and performance program in place?* (MO.GO.EFVINSTALL.P) (detail)

192.383(b) (192.381(a); 192.381(b); 192.381(c); 192.381(d); 192.381(e); 192.383(a); 192.383(c))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Yes

Procedures - Normal Operating And Maintenance

1. Normal Maintenance and Operations (detail) *Does the process include a requirement to review the manual at intervals not exceeding 15 months, but at least once each calendar year?* (MO.GO.OMANNUALREVIEW.P) (detail)

192.605(a)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Annual reviews GOMI GN-004

2. Normal Operations and Maintenance Procedures - History (detail) *Does the process include requirements for making construction records, maps and operating history available to appropriate operating personnel?* (MO.GO.OMHISTORY.P) (detail)

192.605(a) (192.605(b)(3))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOMI-FM-003

3. Normal Operations and Maintenance Procedures (detail) *Does the process include procedures for starting up and shutting down any part of the pipeline in a manner to assure operation with the MAOP limits, plus the build-up allowed for operation of pressure-limiting and control devices?* (MO.GOMAOP.MAOPLIMIT.P) (detail)

192.605(a) (192.605(b)(5))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOM & I-SO-MA-001; GOM & I-PO-RS-001

4. Normal Operations and Maintenance Procedures - Review (detail) *Does the process include requirements for periodically reviewing the work done by operator personnel to determine the effectiveness, and adequacy of the procedures used in normal operations and maintenance and modifying the procedures when deficiencies are found?* (MO.GO.OMEFFECTREVIEW.P) (detail)

192.605(a) (192.605(b)(8))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOM & I-PO-EP-001

5. Safety While Making Repairs (detail) *Does the process ensure that repairs are made in a safe manner and are made so as to prevent damage to persons and property?* (AR.RMP.SAFETY.P) (detail)

192.605(b)(9) (192.713(b))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: GOM&I-PO-EP-001

6. Holders (detail) *Does the process include systematic and routine testing and inspection of pipe-type or bottle-type holders?* (MO.GM.HOLDER.P) (detail)

192.605(a) (192.605(b)(10))	Sat+	Sat	Concern	Unsat	NA	NC
					X	

Notes

7. Gas Odor Response (detail) *Does the process require prompt response to the report of a gas odor inside or near a building?* (MO.GO.ODDOR.P) (detail)

192.605(a) (192.605(b)(11))	Sat+	Sat	Concern	Unsat	NA	NC

Notes: GEOP Section 4

Procedures - Change In Class Location

1. Change in Class Location Required Study (detail) *Does the process include a requirement that the operator conduct a study whenever an increase in population density indicates a change in the class location of a pipeline segment operating at a hoop stress that is more than 40% SMYS?* (MO.GOCLASS.CLASSLOCATESTUDY.P) (detail)

192.605(b)(1) (192.609(a); 192.609(b); 192.609(c); 192.609(d); 192.609(e); 192.609(f))	Sat+	Sat	Concern	Unsat	NA	NC
						X

Notes: To be reviewed in Transmission Inspection

*** 2. Change in Class Location Confirmation or Revision of MAOP (detail)** *Does the process include a requirement that the MAOP of a pipeline segment be confirmed or revised within 24 months whenever the hoop stress corresponding to the established MAOP is determined not to be commensurate with the existing class location?* (MO.GOCLASS.CLASSLOCATEREV.P) (detail)

192.605(b)(1) (192.611(a); 192.611(b); 192.611(c); 192.611(d))	Sat+	Sat	Concern	Unsat	NA	NC
						X

Notes: To be reviewed in Transmission Inspection

Procedures - Continuing Surveillance

1. Continuing Surveillance (detail) *Does the process include procedures for performing continuing surveillance of pipeline facilities, and also for reconditioning, phasing out, or reducing the MAOP in a pipeline segment that is determined to be in unsatisfactory condition but on which no immediate hazard exists?* (MO.GO.CONTSURVEILLANCE.P) (detail)

192.605(e) (192.613(a); 192.613(b); 192.703(b); 192.703(c))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: GOM&I PO-CS-001 used as procedure

Procedures - Damage Prevention Program

1. Damage Prevention Program (detail) *Is a damage prevention program approved and in place?* (PD.OC.PDPROGRAM.P) (detail)

192.614(a)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: New Public Awareness Coordinators on staff to increase focus on excavator relations. New software in place to improve tracking/reporting and distribution of locate requests.

Procedures - Emergency

1. Receiving Notices (detail) *Does the emergency plan include procedures for receiving, identifying, and classifying notices of events which need immediate response?* (EP.ERG.NOTICES.P) (detail)

192.615(a)(1)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Emergency Plan Section 3

2. Emergency Response Communication (detail) *Does the emergency plan include procedures for establishing and maintaining adequate means of communication with appropriate fire, police, and other public officials?* (EP.ERG.COMMSYS.P) (detail)

192.615(a) (192.615(a)(2))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: NIMs standard includes a scalable response team

*** 3. Emergency Response (detail)** *Does the emergency plan include procedures for making a prompt and effective response to a notice of each type of emergency, including gas detected inside or near a building, a fire or explosion near or directly involving a pipeline facility, or a natural disaster?* (EP.ERG.RESPONSE.P) (detail)

192.615(a) (192.615(a)(3); 192.615(a)(11); 192.615(b)(1))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Emergency Plan Section 4

4. Emergency Response (detail) *Does the process include procedures for ensuring the availability of personnel, equipment, tools, and materials as needed at the scene of an emergency?* (EP.ERG.READINESS.P) (detail)

192.615(a) (192.615(a)(4))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes:

5. Emergency Response - Actions (detail) *Does the emergency plan include procedures for taking actions directed toward protecting people first and then property?* (EP.ERG.PUBLICPRIORITY.P) (detail)

192.615(a) (192.615(a)(5))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Emergency Plan Section 3.5 & 4.0

6. Emergency Response (detail) *Does the emergency plan include procedures for the emergency shutdown or pressure reduction in any section of pipeline system necessary to minimize hazards to life or property?* (EP.ERG.PRESSREDUCESD.P) (detail)

192.615(a) (192.615(a)(6))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: Emergency Plan Section 7.0

7. Emergency Response - Hazards (detail) *Does the emergency plan include procedures for making safe any actual or potential hazard to life or property?* (EP.ERG.PUBLICHAZ.P) (detail)

192.605(a) (192.615(a)(7))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: Emergency Plan Section 4

8. Public Official Notification (detail) *Does the emergency plan include procedures for notifying appropriate public officials of gas pipeline emergencies and coordinating with them both planned responses and actual responses during an emergency?* (EP.ERG.AUTHORITIES.P) (detail)

192.615(a) (192.615(a)(8))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: Emergency Plan Section 10 (Liaison) Section 5 (Notification Procedures)

9. Service Outage Restoration (detail) *Does the emergency plan include procedures for safely restoring any service outage?* (EP.ERG.OUTAGERESTORE.P) (detail)

192.615(a) (192.615(a)(9))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: Emergency Plan Section 8

10. Incident Investigation Actions (detail) *Does the process include procedures for beginning action under §192.617, if applicable, as soon after the end of the emergency as possible?* (EP.ERG.INCIDENTACTIONS.P) (detail)

192.615(a) (192.615(a)(10))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: GOM&I-PO-IF-001 Section 6.1

11. Emergency Response Training (detail) *Does the process include training of the appropriate operating personnel to assure they are knowledgeable of the emergency procedures and verifying that the training is effective?* (EP.ERG.TRAINING.P) (detail)

192.615(b)(2)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: GEOP Section 9

12. Emergency Response Performance (detail) *Does the process include detailed steps for reviewing employee activities to determine whether the procedures were effectively followed in each emergency?* (EP.ERG.POSTEVNTREVIEW.P) (detail)

192.615(b)(3)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: Emergency Plan Section 9 GOMI PO-IF-001

13. Liaison with Public Officials (detail) *Does the process include steps for establishing and maintaining liaison with appropriate fire, police and other public officials and utility owners?* (EP.ERG.LIAISON.P) (detail)

192.615(c) (192.615(c)(1); 192.615(c)(2); 192.615(c)(3); 192.615(c)(4); ADB-05-03)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Emergency Plan Section 10

Procedures - Public Awareness Program

1. Public Education Program (detail) *Has the continuing public education (awareness) program been established as required?* (PD.PA.PROGRAM.P) (detail)

192.616(a) (192.616(h))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Public Awareness Plan (PAP)

2. Management Support of Public Awareness Program (detail) *Does the operator's program documentation demonstrate management support?* (PD.PA.MGMTSUPPORT.P) (detail)

192.616(a) (API RP 1162 Section 2.5; API RP 1162 Section 7.1)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: PAP page 3

3. Asset Identification (detail) *Does the program clearly identify the specific pipeline systems and facilities to be included in the program, along with the unique attributes and characteristics of each?* (PD.PA.ASSETS.P) (detail)

192.616(b) (API RP 1162 Section 2.7 Step 4)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: PAP page 6

4. Audience Identification (detail) *Does the program establish methods to identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents?* (PD.PA.AUDIENCEID.P) (detail)

192.616(d) (192.616(e); 192.616(f); API RP 1162 Section 2.2; API RP 1162 Section 3)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: PAP pages 13-18

5. Messages, Delivery Methods, and Frequencies (detail) *Does the program define the combination of messages, delivery methods, and delivery frequencies to comprehensively reach all affected stakeholder audiences in all areas where gas is transported?* (PD.PA.MESSAGES.P) (detail)

192.616(c) (API RP 1162 Section 3; API RP 1162 Section 4; API RP 1162 Section 5)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: PAP pages 21-23

6. Consideration of Supplemental Enhancements (detail) *Were relevant factors considered to determine the need for supplemental public awareness program enhancements for each stakeholder audience, as described in API RP 1162?* (PD.PA.SUPPLEMENTAL.P) (detail)

192.616(c) (API RP 1162 Section 6.2)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: PAP page 24 section 3.6.2

7. Other Languages (detail) *Does the program require that materials and messages be provided in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?* (PD.PA.LANGUAGE.P) (detail)

192.616(g) (API RP 1162 Section 2.3.1)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: Only if census data supports as described in API RP 1162. Discussed further study to determine if excavator community census would support non-English messaging.

8. Evaluation Plan (detail) *Does the program include a process that specifies how program implementation and effectiveness will be periodically evaluated?* (PD.PA.EVALPLAN.P) (detail)

192.616(i) (192.616(c); API RP 1162 Section 8; API RP 1162 Appendix E)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: PAP Section 4 page 27

9. Master Meter and Petroleum Gas Systems (detail) *Does the master meter or petroleum gas system operator's process meet the requirements of 192.616(j)?* (PD.PA.MSTRMETER.P) (detail)

192.616(j) (192.616(h))	Sat+	Sat	Concern	Unsat	NA	NC
					X	

Notes

Procedures - Failure Investigationn

1. Incident Investigation (detail) *Does the process include procedures for analyzing accidents and failures, including the selection of samples of the failed facility or equipment for laboratory examination, where appropriate, for the purpose of determining the causes of the failure and minimizing the possibility of recurrence?* (EP.ERG.INCIDENTANALYSIS.P) (detail)

192.617	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: GOM&I-PO-IF 001 Section 6.1

Procedures - MAOP

1. Maximum Allowable Operating pressure Determination (detail) *Does the process include procedures for determining the maximum allowable operating pressure for a pipeline segment in accordance with 192.619?* (MO.GOMAOP.MAOPDETERMINE.P) (detail)

192.605(b)(1) (192.619(a); 192.619(b); 192.621(a); 192.621(b); 192.623(a); 192.623(b))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: GOM&I PO-MA-001

Procedures - Pressure Test

1. Test Acceptance Criteria and Procedures (detail) *Were test acceptance criteria and procedures sufficient to assure the basis for an acceptable pressure test?* (AR.PTI.PRESSTESTACCEP.P) (detail)

192.503(a) (192.503(b); 192.503(c); 192.503(d); 192.505(a); 192.505(b); 192.505(c); 192.505(d); 192.505(e); 192.507(a); 192.507(b); 192.507(c))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOMI PO-TE-001

Procedures - Odorization Of Gas

1. Odorization of Gas (detail) *Does the process ensure appropriate odorant levels are contained in its combustible gases in accordance with §192.625?* (MO.GOODOR.ODORIZE.P) (detail)

192.605(b)(1) (192.625(a); 192.625(b); 192.625(c); 192.625(d); 192.625(e); 192.625(f))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOMI PO-OD-001 Injection sites located at City Gate and at Compressor stations relating to storage.

Procedures - Tapping Pipelines Under Pressure

1. Tapping Pipelines Under Pressure (detail) *Is the process adequate for tapping pipelines under pressure?* (AR.RMP.HOTTAP.P) (detail)

192.605(b)(1) (192.627)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOM&I PO-TA-001 Procedure 6

2. Qualification of Personnel Tapping Pipelines under Pressure (detail) *Does the process require taps on a pipeline under pressure (hot taps) to be performed by qualified personnel?* (TQ.QU.HOTTAPQUAL.P) (detail)

192.627 (192.805(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: OQ Plan Section B Pages 13-14

Procedures - Pipeline Purging

1. Pipeline Purging (detail) *Does the process include requirements for purging of pipelines in accordance with 192.629?* (MO.GOODOR.PURGE.P) (detail)

192.605(b)(1) (192.629(a); 192.629(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOM&I PO-PU-001 Section 6 Procedures

Procedures – Control Room Management

See separate Control Room Management question set. *(Not performed during this inspection)*

Procedures - Transmission Lines - Patrolling & Leakage Survey

1. Patrolling Requirements (detail) *Does the process adequately cover the requirements for patrolling the ROW and conditions reported?* (PD.RW.PATROL.P) (detail)

192.705(a) (192.705(b); 192.705(c))	Sat+	Sat	Concern	Unsat	NA	NC
						X

Notes: To be inspected during 2019 Transmission inspection

2. Leakage Surveys (detail) *Does the process require leakage surveys to be conducted?* (PD.RW.LEAKAGE.P) (detail)

192.706 (192.706(a); 192.706(b))	Sat+	Sat	Concern	Unsat	NA	NC
						X

Notes: To be inspected during 2019 Transmission inspection

Procedures - Distribution System Patrolling & Leakage Survey

1. Distribution System Leakage Surveys (detail) *Does the process require distribution system patrolling and leakage surveys to be conducted?* (PD.RW.DISTLEAKAGE.P) (detail)

192.721 (192.721(a); 192.721(b); 192.723(a); 192.723(b))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: GOM&I PO-PA-001 and 007

Procedures - Line Marker

1. ROW Markers Requirements (detail) *Does the process adequately cover the requirements for placement of ROW markers?* (PD.RW.ROWMARKER.P) (detail)

192.707(a) (192.707(b); 192.707(c); 192.707(d); CGA Best Practices, v4.0, Practice 2-5; CGA Best Practices, v4.0, Practice 4-20)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: GOMI-PO-005 Section 6.8

Procedures - Transmission Record Keeping

1. Transmission Lines Record Keeping (detail) *Does the process include a requirement that the operator maintain a record of each pipe/"other than pipe" repair, NDT required record, and (as required by subparts L or M) patrol, survey, inspection or test?* (MO.GM.RECORDS.P) (detail)

192.605(b)(1) (192.709(a); 192.709(b); 192.709(c); 192.743(f))	Sat+	Sat	Concern	Unsat	NA	NC
						X

Notes: To be inspected during 2019 Transmission inspection

Procedures - Transmission Field Repair

1. Transmission Lines Permanent Field Repair of Defects (detail) *Is the process adequate for the permanent field repair of defects in transmission lines?* (AR.RMP.FIELDREPAIRDEFECT.P) (detail)

192.605(b)(1) (192.713(a); 192.713(b))

Sat+	Sat	Concern	Unsat	NA	NC
					X

Notes: To be inspected during 2019 Transmission inspection

2. Transmission Lines Permanent Field Repair of Welds (detail) *Is the process adequate for the permanent field repair of welds?* (AR.RMP.FIELDREPAIRWELDS.P) (detail)

192.605(b) (192.715(a); 192.715(b); 192.715(c))

Sat+	Sat	Concern	Unsat	NA	NC
					X

Notes: To be inspected during 2019 Transmission inspection

3. Transmission Lines Permanent Field Repair of Leaks (detail) *Is there an adequate process for the permanent field repair of leaks on transmission lines?* (AR.RMP.FIELDREPAIRLEAK.P) (detail)

192.605(b) (192.717(a); 192.717(b))

Sat+	Sat	Concern	Unsat	NA	NC
					X

Notes: To be inspected during 2019 Transmission inspection

4. Transmission Lines Testing of Repairs (detail) *Is the process adequate for the testing of replacement pipe and repairs made by welding on transmission lines?* (AR.RMP.WELDTEST.P) (detail)

192.605(b) (197.719(a); 197.719(b))

Sat+	Sat	Concern	Unsat	NA	NC
					X

Notes: To be inspected during 2019 Transmission inspection

Procedures - Test Requirements For Reinstating Service Lines

1. Test Reinstated Service Lines (detail) *Is the process adequate for the testing of disconnected service lines?* (AR.RMP.TESTREINSTATE.P) (detail)

192.605(b) (197.725(a); 197.725(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOM&I PO-TE-001 Section 6.11 Construction Standards GCS 20-10-005

Procedures - Abandonment Or Deactivation Of Facilities

1. Abandonment or Deactivation of Pipe and Facilities (detail) *Does the process include procedures for the abandonment and deactivation of pipelines that are in accordance with 192.727?* (MO.GM.ABANDONPIPE.P) (detail)

192.605(b)(1) (192.727(a); 192.727(b); 192.727(c); 192.727(d); 192.727(e); 192.727(f); 192.727(g))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOM&I PO-AB-001

Procedures - Pressure Limiting And Regulating Station

1. Pressure Limiting and Regulating Stations Inspection and Testing (detail) *Does the process include procedures for inspecting and testing each pressure limiting station, relief device, and pressure regulating station and their equipment at intervals not exceeding 15 months, but at least once each calendar year as required?* (MO.GMOPP.PRESSREGTEST.P) (detail)

192.605(b)(1) (192.739(a); 192.739(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOM&I PO-RS-001 Section 4.2.1 Procedures as outlined in 192.730

2. Pressure Telemetering or Recording Gauges (detail) *Does the process require telemetering or recording gauges be utilized as required for distribution systems?* (MO.GMOPP.PRESSREGMETER.P) (detail)

192.605(b)(1) (192.741(a); 192.741(b); 192.741(c))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOM&I PO-RS-001 Section 6.3

3. Pressure Limiting and Regulating Stations Capacity of Relief Devices (detail) *Does the process include procedures for ensuring, either by testing or a review of calculations, at intervals not exceeding 15 months, but at least once each calendar year, that the capacity of each pressure relief device at pressure limiting stations and pressure regulating stations has sufficient capacity, and for installing a new or additional device if a relief device is determined to have insufficient capacity?* (MO.GMOPP.PRESSREGCAP.P) (detail)

192.605(b)(1) (192.743(a); 192.743(b); 192.743(c))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOM&I PO-RS-001 Section 6.2.3

Procedures - Valve And Vault Maintenance

1. Valve Maintenance Transmission Lines (detail) *Does the process include procedures for inspecting and partially operating each transmission line valve that might be required in an emergency at intervals not exceeding 15 months, but at least once each calendar year and for taking prompt remedial action to correct any valve found inoperable?* (MO.GM.VALVEINSPECT.P) (detail)

192.605(b)(1) (192.745(a); 192.745(b))

Sat+	Sat	Concern	Unsat	NA	NC
					X

Notes: To be inspected during 2019 Transmission inspection

2. Valve Maintenance Distribution Lines (detail) *Does the process include procedures for inspecting and partially operating each distribution system valve that might be required in an emergency at intervals not exceeding 15 months, but at least once each calendar year and for taking prompt remedial action to correct any valve found inoperable?* (MO.GM.DISTVALVEINSPECT.P) (detail)

192.605(b)(1) (192.747(a); 192.747(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOM&I PO-VM-002 Section 6.1

Procedures - Vault Inspection

1. Vault Inspection (detail) *Does the process provide adequate direction for inspecting vaults having a volumetric internal content of 200 cubic feet (5.66 cubic meters) or more that house pressure regulating/limiting equipment and are inspections to be performed at the required interval?* (FS.FG.VAULTINSPECTFAC.P) (detail)

192.605(b)(1) (192.749(a); 192.749(b); 192.749(c); 192.749(d))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes: All vaults are below code 192.749(a) size requirement (internal content < 200 cubic feet) for inspections.

Procedures - Prevention Of Accidental Ignition

1. Prevention of Accidental Ignition (detail) *Does the manual include procedures for minimizing the danger of accidental ignition where gas constitutes a hazard of fire or explosion?* (MO.GM.IGNITION.P) (detail)

192.605(b)(1) (192.751(a); 192.751(b); 192.751(c))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOM&I PO-AI-001

Procedures - Caulked Bell And Spigot Joints

1. Bell and Spigot Joints (detail) *Does the process require that caulked bell and spigot joints be correctly sealed?* (MO.GM.BELLSPIGOTJOINT.P) (detail)

192.753(a) (192.753(b))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes: Cast iron effectively removed. If found on system the B&S Joints will be removed from service.

Procedures - Protecting Cast-Iron Pipeline

1. Protecting Cast-Iron Pipeline (detail) *Does the process require adequate protection for segments of a buried cast-iron pipeline for which support has been disturbed?* (MO.GM.CASTIRONPROTECT.P) (detail)

192.755(a) (192.755(b))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes: No known cast iron pipeline in system.

Procedures - Welding And Weld Defect Repair/Removal

1. Welding Procedures (detail) *Does the process require welding to be performed by qualified welders using qualified welding procedures and are welding procedures and qualifying tests required to be recorded in detail?* (DC.WELDPROCEDURE.WELD.P) (detail)

192.225(a) (192.225(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: OQ Plan Section B pages 13-14 Welding Manual 4.1.1

*** 2. Qualification of Welders (detail)** *Does the process require welders to be qualified in accordance with API 1104 or the ASME Boiler & Pressure Vessel Code?* (TQ.QUOMCONST.WELDER.P) (detail)

192.227(a) (192.225(a); 192.225(b); 192.328(a); 192.328(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: OQ Plan Section B

3. Qualification of Welders for Low Stress Pipe (detail) *Does the process require welders who perform welding on low stress pipe on lines that operate at < 20% SMYS to be qualified under Section I of Appendix C to Part 192, and are welders who perform welding on service line connection to a main required to be qualified under Section II of Appendix C to Part 192?* (TQ.QUOMCONST.WELDERLOWSTRESS.P) (detail)

192.227(b) (192.225(a); 192.225(b); 192.805(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: per Appendix C, all are required--Welding Manual

4. Limitations on Welders (detail) *Does the process require certain limitations be placed on welders?* (DC.WELDERQUAL.WELDERLIMITNDT.P) (detail)

192.303 (192.229(a); 192.229(b); 192.229(c); 192.229(d))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Welding Manual Section 4.1.1

5. Welding Weather (detail) *Does the process require welding to be protected from weather conditions that would impair the quality of the completed weld?* (DC.WELDPROCEDURE.WELDWEATHER.P) (detail)

192.303 (192.231)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Inspection Guidelines Section 6.2.7 Welding Manual Section 10.1

6. Miter joints (detail) *Does the process prohibit the use of certain miter joints?* (DC.WELDPROCEDURE.MITERJOINT.P) (detail)

192.303 (192.233(a); 192.233(b); 192.233(c))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Welding Manual Section 7.0 (Weld Joint Fit Up)

7. Preparation for Welding (detail) *Does the process require certain preparations for welding, in accordance with §192.235?* (DC.WELDPROCEDURE.WELDPREP.P) (detail)

192.303 (192.235)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

8. Inspection and Test of Welds (detail) *Does the process require visual inspections of welds to be conducted by qualified inspectors?* (DC.WELDINSP.WELDVISUALQUAL.P) (detail)

192.303 (192.241(a); 192.241(b); 192.241(c))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Welding Inspection Guidelines Section 6.0

9. Repair or Removal of Weld Defects (detail) *Does the process require welds that are unacceptable to be removed and/or repaired as specified by 192.245?* (DC.WELDINSP.WELDREPAIR.P) (detail)

192.303 (192.245(a); 192.245(b); 192.245(c))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: Welding Inspection Section 6.5

Procedures - Nondestructive Testing

1. Nondestructive Test and Interpretation Procedures (detail) *Is there a process for nondestructive testing and interpretation?* (DC.WELDINSP.WELDNDT.P) (detail)

192.243(a) (192.243(b); 192.243(c); 192.243(d); 192.243(e).)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: Welding Manual Section 5 page 2

Procedures - Joining Of Pipeline Materials

1. Plastic Pipe Joints (detail) *Does the process require plastic pipe joints to be designed and installed in accordance with 192.281?* (DC.CO.PLASTICJOINT.P) (detail)

192.303 (192.273(b); 192.281(a); 192.281(b); 192.281(c); 192.281(d); 192.281(e))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: Plastic Welding Manual (Fusion) Section 1.0

2. Plastic pipe - Qualifying Joining Procedures (detail) *Does the process require plastic pipe joining procedures to be qualified in accordance with §192.283, prior to making plastic pipe joints?* (DC.CO.PLASTICJOINTPROCEDURE.P) (detail)

192.273(b) (192.283(a); 192.283(b); 192.283(c); 192.283(d))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: Plastic Welding Manual (Fusion) Section 6.0

3. Plastic pipe - Qualifying Joining Procedures (detail) *Is a process in place to ensure that personnel making joints in plastic pipelines are qualified?* (DC.CO.PLASTICJOINTQUAL.P) (detail)

192.285(d) (192.285(a); 192.285(b); 192.285(c); 192.805)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: OQ Plan Section B pages 13-14

4. Qualification of Personnel Inspecting Joints in Plastic Pipelines (detail) *Is a process in place to assure that persons who inspect joints in plastic pipes are qualified?* (DC.CO.PLASTICJOINTINSP.P) (detail)

192.287 (192.805(h))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: OQ Plan Section A pages 22-23; Section B pages 13-15

Procedures - Corrosion Control

1. Corrosion Control Personnel Qualification (detail) *Does the process require corrosion control procedures to be carried out by, or under the direction of, qualified personnel?* (TQ.QU.CORROSION.P) (detail)

192.453 (192.805(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: OM&I- CC-AC-001; OQ Plan Section B Pages 12-15

2. New Buried Pipe Coating (detail) *Does the process require that each buried or submerged pipeline installed after July 31, 1971, be protected against external corrosion with an adequate coating unless exempted by §192.455(b)?* (TD.COAT.NEWPIPE.P) (detail)

192.605(b)(2) (192.455(a); 192.461; 192.463; 192.483(a))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOMI-CC-EC-001 and 002

3. Conversion to Service - Pipe Coating (detail) *Does the process require that each buried or submerged pipeline that has been converted to gas service and was installed after July 31, 1971, be protected against external corrosion with an adequate coating unless exempted by 192.455(b)?* (TD.COAT.CONVERTPIPE.P) (detail)

192.605(b)(2) (192.452(a); 192.455(a); 192.455(b); 192.461(a))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOMI-CC-EC-002

4. Cathodic Protection post July 1971 (detail) *Does the process require that each buried or submerged pipeline installed after July 31, 1971, be protected against external corrosion with a cathodic protection system within 1 year after completion of construction, conversion to service, or becoming jurisdictional onshore gathering?* (TD.CP.POST1971.P) (detail)

192.605(b)(2) (192.455(a); 192.457(a); 192.452(a); 192.452(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOMI Section 6.1.3

5. Use of Aluminum (detail) *Does the process give adequate guidance for the installation of aluminum in a submerged or buried pipeline?* (TD.CP.ALUMINUM.P) (detail)

192.605(b)(2) (192.455(e))

Sat+	Sat	Concern	Unsat	NA	NC
				X	

Notes: Discussed in GOMI 6.1.2

6. Cathodic Protection pre August 1971 (detail) *Does the process require that pipelines installed before August 1, 1971 (except for cast and ductile iron lines) which are 1) bare or ineffectively coated transmission lines or 2) bare or coated pipes in compressor, regulator or meter stations must be cathodically protected in areas where active corrosion is found in accordance with Subpart I or Part 192?* (TD.CP.PRE1971.P) (detail)

192.605(b)(2) (192.457(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: GOMI-CC Section 6.1.4

7. Examination of Exposed Portions of Buried Pipe (detail) *Does the process require that exposed portions of buried pipeline must be examined for external corrosion?* (TD.CPEXPOSED.EXPOSEINSPECT.P) (detail)

	Sat+	Sat	Concern	Unsat	NA	NC
192.605(b)(2) (192.459)		X				

Notes: GOMI-CC Section 6.4 (3 feet in both directions of exposed corroded pipe)

8. Further Examination of Exposed Portions of Buried Pipe (detail) *Does the process require further examination of exposed buried pipe if corrosion is found?* (TD.CPEXPOSED.EXPOSECORRODE.P) (detail)

	Sat+	Sat	Concern	Unsat	NA	NC
192.605(b)(2) (192.459)		X				

Notes; GOMI-CC Section 6.4.4

9. Cathodic Protection Monitoring Criteria (detail) *Does the process require CP monitoring criteria to be used that is acceptable?* (TD.CPEXPOSED.MONITORCRITERIA.P) (detail)

	Sat+	Sat	Concern	Unsat	NA	NC
192.605(b)(2) (192.463(a); 192.463(c))		X				

Notes: GOMI-CC Section 6.5.2

10. Cathodic Protection of Amphoteric Metals (detail) *Does the process describe criteria to be used for cathodic protection of amphoteric metals (aluminum) that are included in a steel pipeline?* (TD.CP.AMPHOTERIC.P) (detail)

	Sat+	Sat	Concern	Unsat	NA	NC
192.605(b)(2) (192.463(b); 192.463(c))		X				

Notes: GOMI-CC Section 6.1. and 6.2.7 (None know to be in the system would be replaced if found)

11. Cathodic Protection Monitoring (detail) *Does the process adequately describe how to monitor CP that has been applied to pipelines?* (TD.CPMONITOR.TEST.P) (detail)

	Sat+	Sat	Concern	Unsat	NA	NC
192.605(b)(2) (192.465(a))		X				

Notes: GOMI-CC Section 6.3

12. Rectifiers or other Impressed Current Sources (detail) *Does the process give sufficient details for making electrical checks of rectifiers or impressed current sources?* (TD.CPMONITOR.CURRENTTEST.P) (detail)

	Sat+	Sat	Concern	Unsat	NA	NC
192.605(b)(2) (192.465(b))		X				

Notes: GOMI-CC Section 6.3.2 (38 total on system including Transmission)

13. Bonds, Diodes and Reverse Current Switches (detail) *Does the process give sufficient details for making electrical checks of interference bonds, diodes, and reverse current switches?* (TD.CPMONITOR.REVCURRENTTEST.P) (detail)

	Sat+	Sat	Concern	Unsat	NA	NC
192.605(b)(2) (192.465(c))		X				

Notes: GOMI-CC Section 6.3.2

14. Correction of Corrosion Control Deficiencies (detail) *Does the process require that the operator correct any identified deficiencies in corrosion control?* (TD.CPMONITOR.DEFICIENCY.P) (detail)

192.605(b)(2) (192.465(d))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: GOMI-CC Section 6.3.3

15. Unprotected Buried Pipelines (typically bare pipelines) (detail) *Does the process give sufficient direction for the monitoring of external corrosion on buried pipelines that are not protected by cathodic protection?* (TD.CP.UNPROTECT.P) (detail)

192.605(b)(2) (192.465(e))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: GOMI-CC Section 6.3.3 (Monitors but addressing bare areas through replacement program)

16. Isolation from Other Metallic Structures (detail) *Does the process give adequate guidance for electrically isolating each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?* (TD.CP.ELECISOLATE.P) (detail)

192.605(b)(2) (192.467(a); 192.467(b); 192.467(c); 192.467(d); 192.467(e))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: GOMI-CC EC-003 Section 6

17. Test Leads Installation (detail) *Does the process provide adequate instructions for the installation of test leads?* (TD.CPMONITOR.TESTLEAD.P) (detail)

192.605(b)(2) (192.471(a); 192.471(b); 192.471(c); 192.469)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: GOMI-CC-EC-001 Section 6.5.2

18. Interference Currents (detail) *Does the process give sufficient guidance and detail for identifying areas of potential stray current so the detrimental effects of stray currents can be minimized through a continuing program?* (TD.CPMONITOR.INTFRCURRENT.P) (detail)

192.605(b)(2) (192.473(a))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: GOMI-CC-EC-001 Section 6.6.1; 6.6.2; 6.6.3

19. Internal Corrosion (detail) *If the process does not preclude corrosive gas to be transported by pipeline, does the process also require that the corrosive effect of the gas on the pipeline be investigated and steps be taken to minimize internal corrosion?* (TD.ICP.CORRGAS.P) (detail)

192.605(b)(2) (192.475(a))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: GOMI-CC IC-001 (All transmission gas is monitored at the take station and potential issues are addressed prior to entering the Distribution system)

20. Internal Corrosion in Cutout Pipe (detail) *Does the process direct personnel to examine removed pipe for evidence of internal corrosion?* (TD.ICP.EXAMINE.P) (detail)

192.605(b)(2) (192.475(a); 192.475(b))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: GOMI-CC-EC-001 Section 6.5 and 6.6

21. Internal Corrosion Control: Design and Construction (192.476) (detail) *Does the process require that the transmission line project has features incorporated into its design and construction to reduce the risk of internal corrosion, as required of §192.476?* (DC.DPC.INTCORRODE.P) (detail)

192.453 (192.476(a); 192.476(b); 192.476(c))	Sat+	Sat	Concern	Unsat	NA	NC
						X

Notes: To be inspected during 2019 Transmission inspection

22. Internal Corrosion Corrosive Gas Actions (detail) *Does the process give adequate direction for actions to be taken if corrosive gas is being transported by pipeline?* (TD.ICP.CORRGASACTION.P) (detail)

192.605(b)(2) (192.477)	Sat+	Sat	Concern	Unsat	NA	NC
						X

Notes: To be inspected during 2019 Transmission inspection

23. Atmospheric Corrosion (detail) *Does the process give adequate guidance for protecting above ground pipe from atmospheric corrosion?* (TD.ATM.ATMCORRODE.P) (detail)

192.605(b)(2) (192.479(a); 192.479(b); 192.479(c))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: GOMI-CC-AC-001 Section 6.1 and for bridge crossings Section 6.2.4

24. Atmospheric Corrosion Monitoring (detail) *Does the process give adequate instruction for the inspection of aboveground pipeline segments for atmospheric corrosion?* (TD.ATM.ATMCORRODEINSP.P) (detail)

192.605(b)(2) (192.481(a); 192.481(b); 192.481(c))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: GOMI-CC-AC-001 Section 6.2

25. Repair of Corroded Pipe (detail) *Does the process give sufficient guidance for personnel to repair or replace pipe that has corroded to an extent that there is no longer sufficient remaining strength in the pipe wall?* (AR.RCOM.REPAIR.P) (detail)

192.491(c) (192.485(a); 192.485(b); 192.487(a); 192.487(b))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: GOMI-CC-RM-001 Section 6.3

26. Evaluation of Internally Corroded Pipe (detail) *Does the process give sufficient guidance for personnel to evaluate the remaining strength of pipe that has been internally corroded?* (TD.ICP.EVALUATE.P) (detail)

192.605(b)(2) (192.485(c))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: GOMI-CC-RM-001 Section 6.7.2

27. Graphitization of Cast Iron and Ductile Iron (detail) *Does the process give adequate guidance for remediation of graphitization of cast iron or ductile iron pipe?* (TD.CP.GRAPHITIZE.P) (detail)

192.605(b)(2) (192.489(a); 192.489(b))	Sat+	Sat	Concern	Unsat	NA	NC
					X	

Notes: No known cast or Ductile Iron. If found would be replaced

28. Corrosion Control Records (detail) *Does the process include records requirements for the corrosion control activities listed in 192.491?* (TD.CP.RECORDS.P) (detail)

192.605(b)(2) (192.491(a); 192.491(b); 192.491(c))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: GOMI-CC-RM-001 Section 11

Field Review - Pipeline Inspection (Field)

1. Transmission Line Valve Spacing (detail) *Are transmission line valves being installed as required of 192.179?* (DC.DPC.VALVESPACE.O) (detail)

192.141 (192.179(a); 192.179(b); 192.179(c); 192.179(d))	Sat+	Sat	Concern	Unsat	NA	NC
						X

Notes: To be inspected during 2019 Transmission inspection

2. Cathodic Protection Monitoring Criteria (detail) *Are methods used for taking CP monitoring readings that allow for the application of appropriate CP monitoring criteria?* (TD.CPMONITOR.MONITORCRITERIA.O) (detail)

192.463(a)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes

3. Rectifier or other Impressed Current Sources (detail) *Are impressed current sources properly maintained and are they functioning properly?* (TD.CPMONITOR.CURRENTTEST.O) (detail)

192.465(b)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes

4. Internal Corrosion Control: Design and Construction (192.476) (detail) *Does the transmission project's design and construction comply with 192.476?* (DC.DPC.INTCORRODE.O) (detail)

192.476(a) (192.476(b); 192.476(c))	Sat+	Sat	Concern	Unsat	NA	NC
						X

Notes: To be inspected during 2019 Transmission inspection

5. Atmospheric Corrosion Monitoring (detail) *Is pipe that is exposed to atmospheric corrosion protected?* (TD.ATM.ATMCORRODEINSP.O) (detail)

192.481(b) (192.481(c); 192.479(a); 192.479(b); 192.479(c))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes

6. Normal Operations and Maintenance Procedures - Review (detail) *Are operator personnel knowledgeable of the procedures used in normal operations?* (MO.GO.OMEFFECTREVIEW.O) (detail)

192.605(b)(8)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes

7. Placement of ROW Markers (detail) *Are line markers placed and maintained as required?* (PD.RW.ROWMARKER.O) (detail)

192.707(a) (CGA Best Practices, v4.0, Practice 2-5; CGA Best Practices, v4.0, Practice 4-20)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

8. Placement of ROW Markers (detail) *Are line markers placed and maintained as required for above ground pipelines?* (PD.RW.ROWMARKERABOVE.O) (detail)

192.707(c) (CGA Best Practices, v4.0, Practice 2-5; CGA Best Practices, v4.0, Practice 4-20)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

9. Transmission Lines Testing of Repairs (detail) *Does the operator properly test replacement pipe and repairs made by welding on transmission lines?* (AR.RMP.WELDTEST.O) (detail)

192.719(a) (192.719(b))

Sat+	Sat	Concern	Unsat	NA	NC
					X

Notes: To be inspected during 2019 Transmission inspection

10. Pressure Telemetering or Recording Gauges (detail) *Are telemetering or recording gauges properly utilized as required for distribution systems?* (MO.GMOPP.PRESSREGMETER.O) (detail)

192.741(a) (192.741(b); 192.741(c))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

11. Pressure Limiting and Regulating Stations Inspection and Testing (detail) *Are field or bench tests or inspections of regulating stations, pressure limiting stations or relief devices adequate?* (MO.GMOPP.PRESSREGTEST.O) (detail)

192.739(a) (192.739(b); 192.743)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

12. Valve Maintenance Transmission Lines (detail) *Are field inspection and partial operation of transmission line valves adequate?* (MO.GM.VALVEINSPECT.O) (detail)

192.745(a) (192.745(b))

Sat+	Sat	Concern	Unsat	NA	NC
					X

Notes: To be inspected during 2019 Transmission inspection

13. Prevention of Accidental Ignition (detail) *Perform observations of selected locations to verify that adequate steps have been taken by the operator to minimize the potential for accidental ignition.* (AR.RMP.IGNITION.O) (detail)

192.751(a) (192.751(b); 192.751(c))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

Records - Regulatory Reporting Performance

1. Immediate Reporting: Incidents (detail) *Do records indicate immediate notifications of incidents were made in accordance with 191.5?* (RPT.RR.IMMEDREPORT.R) (detail)

	Sat+	Sat	Concern	Unsat	NA	NC
191.5(a) (191.7(a))		X				

Notes

2. Incident Reports (detail) *Do records indicate reportable incidents were identified and reports were submitted to DOT on Form 7100.2 (01-2002) within the required timeframe?* (RPT.RR.INCIDENTREPORT.R) (detail)

	Sat+	Sat	Concern	Unsat	NA	NC
191.15(a)		X				

Notes: Example—Hurstborne/Taylorsville Road damage

3. Supplemental Incident Reports (detail) *Do records indicate accurate supplemental incident reports were filed and within the required timeframe?* (RPT.RR.INCIDENTREPORTSUPP.R) (detail)

	Sat+	Sat	Concern	Unsat	NA	NC
191.15(c)		X				

Notes

4. Annual Report Records (detail) *Have complete and accurate Annual Reports been submitted?* (RPT.RR.ANNUALREPORT.R) (detail)

	Sat+	Sat	Concern	Unsat	NA	NC
191.17(a)		X				

Notes

5. Safety Related Condition Reports (detail) *Do records indicate safety-related condition reports were filed as required?* (RPT.RR.SRCR.R) (detail)

	Sat+	Sat	Concern	Unsat	NA	NC
191.23(a) (191.25(a); 191.25(b))		X				

Notes: None reported

6. Customer Notification (detail) *Do records indicate the customer notification process satisfies the requirements of 192.16?* (MO.GO.CUSTNOTIFY.R) (detail)

	Sat+	Sat	Concern	Unsat	NA	NC
192.16(d) (192.16(a); 192.16(b); 192.16(c))		X				

Notes

7. NPMS: Abandoned Underwater Facility Reports (detail) *Do records indicate reports were filed for abandoned offshore pipeline facilities or abandoned onshore pipeline facilities that crosses over, under or through a commercially navigable waterway?* (RPT.RR.NPMSABANDONWATER.R) (detail)

	Sat+	Sat	Concern	Unsat	NA	NC
192.727(g)					X	

Notes

Records - Construction Performance

1. Welding Procedures (detail) *Do records indicate weld procedures are being qualified in accordance with 192.225?* (DC.WELDPROCEDURE.WELD.R) (detail)

192.225(a) (192.225(b))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: Records reviewed. WPS-GMAW-DH-ER 705-6

2. Qualification of Welders (detail) *Do records indicate adequate qualification of welders?* (TQ.QUOMCONST.WELDER.R) (detail)

192.227(a) (192.227(b); 192.229(a); 192.229(b); 192.229(c); 192.229(d); 192.328(a); 192.328(b); 192.807(a); 192.807(b))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: Records reviewed. Welder Certification required twice annually then proceed to OQ.

3. Inspection and Test of Welds (detail) *Do records indicate that individuals who perform visual inspection of welding are qualified by appropriate training and experience, as required by §192.241(a)?* (DC.WELDINSP.WELDVISUALQUAL.R) (detail)

192.241(a) (192.241(b); 192.241(c); 192.807(a); 192.807(b))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: Records reviewed. OQ Plan Section J page 27

4. Qualification of Nondestructive Testing Personnel (detail) *Do records indicate the qualification of nondestructive testing personnel?* (TQ.QUOMCONST.NDT.R) (detail)

192.243(b)(2) (192.807(a); 192.807(b); 192.328(a); 192.328(b))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: Records reviewed. OQ Section J page 27

5. Nondestructive Test and Interpretation Procedures (detail) *Do records indicate that NDT implementation is adequate?* (DC.WELDINSP.WELDNDT.R) (detail)

192.243(a) (192.243(b)(1); 192.243(b)(2); 192.243(c); 192.243(a))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes

6. Transmission Lines Record Keeping (detail) *Do records indicate that records are maintained of each pipe/"other than pipe" repair, NDT required record, and (as required by subparts L or M) patrol, survey, inspection or test?* (MO.GM.RECORDS.R) (detail)

192.605(b)(1) (192.243(f); 192.709(a); 192.709(b); 192.709(c))	Sat+	Sat	Concern	Unsat	NA	NC
						X

Notes: To be inspected during 2019 Transmission inspection

7. Plastic pipe - Qualifying Joining Procedures (detail) *Have plastic pipe joining procedures been qualified in accordance with 192.283?* (DC.CO.PLASTICJOINTPROCEDURE.R) (detail)

192.273(b) (192.283(a); 192.283(b); 192.283(c); 192.283(d))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes

8. Plastic pipe - Qualifying Joining Procedures (detail) *Do records indicate persons making joints in plastic pipelines are qualified in accordance with 192.285?* (DC.CO.PLASTICJOINTQUAL.R) (detail)

	Sat+	Sat	Concern	Unsat	NA	NC
192.285(d) (192.285(a); 192.285(b); 192.285(c); 192.807(a); 192.807(b))		X				

Notes; Records Reviewed

9. Qualification of Personnel Inspecting Joints in Plastic Pipelines (detail) *Do records indicate persons inspecting the making of plastic pipe joints have been qualified?* (DC.CO.PLASTICJOINTINSP.R) (detail)

	Sat+	Sat	Concern	Unsat	NA	NC
192.287 (192.807(a); 192.807(b))		X				

Notes: Records Reviewed

10. Underground Clearance (detail) *Do records indicate pipe is installed with clearances in accordance with 192.325, and (if plastic) installed as to prevent heat damage to the pipe?* (DC.CO.CLEAR.R) (detail)

	Sat+	Sat	Concern	Unsat	NA	NC
192.325(a) (192.325(b); 192.325(c))		X				

Notes: Records reviewed. GCS 1040100 Section 9.0

11. Depth of Cover - Onshore (detail) *Is onshore piping minimum cover as specified in 192.327?* (DC.CO.COVER.R) (detail)

	Sat+	Sat	Concern	Unsat	NA	NC
192.327(a) (192.327(b); 192.327(c), 192.327(d); 192.327(e))				X		

Notes: This requirement is covered in GCS 1040100 Section 9.4. However, the Commission's Dig Law Enforcement staff reported to Pipeline Safety staff a reported facility damage incident at 630 South Main Street in Louisville at which a 4 inch Low Pressure main under approximately 7 inches of cover was damaged. This is listed as a Probable Violation in the report.

12. EFV Installation (detail) *Do records indicate the EFV program satisfies the requirements for installation and performance?* (MO.GO.EFVINSTALL.R) (detail)

	Sat+	Sat	Concern	Unsat	NA	NC
192.383(b) (192.381(a); 192.381(b); 192.381(c); 192.381(d); 192.381(e); 192.383(a); 192.383(c))		X				

Notes: Records reviewed including 2018 Annual Report

13. Cathodic Protection post July 1971 (detail) *Do records document that each buried or submerged pipeline installed after July 31, 1971, has been protected against external corrosion with a cathodic protection system within 1 year after completion of construction, conversion to service, or becoming jurisdictional onshore gathering?* (TD.CP.POST1971.R) (detail)

	Sat+	Sat	Concern	Unsat	NA	NC
192.491(c) (192.455(a); 192.457(a); 192.452(a); 192.452(b))		X				

Notes: Records reviewed

Records - Operations And Maintenance Performance

1. Strength Test Requirements for SMYS > 30%. (detail) *Is pressure testing conducted in accordance with 192.505?* (DC.PT.PRESSTESTHIGHSTRESS.R) (detail)

192.517(a) (192.505(a); 192.505(b); 192.505(c); 192.505(d); 192.505(e))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes

2. Strength Test Duration Requirements for SMYS < 30% (detail) *Do records indicate that pressure testing is conducted in accordance with 192.507?* (DC.PTLOWPRESS.PRESSTESTLOWSTRESS.R) (detail)

192.517(a) (192.507(a); 192.507(b); 192.507(c))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: Records reviewed

3. Strength Test Requirements for Operations < 100 psig (detail) *Do records indicate that pressure testing is conducted in accordance with 192.509(a)?* (DC.PTLOWPRESS.PRESSTEST100PSIG.R) (detail)

192.517(a) (192.509(a); 192.509(b))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: Records reviewed

4. Test Requirements for Plastic Pipe (detail) *Do records indicate that pressure testing is conducted in accordance with 192.513?* (DC.PT.PRESSTESTPLASTIC.R) (detail)

192.517(a) (192.513(a); 192.513(b); 192.513(c); 192.513(d))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: Records reviewed

5. Normal Maintenance and Operations (detail) *Has the operator conducted annual reviews of the written procedures in the manual as required?* (MO.GO.OMANNUALREVIEW.R) (detail)

192.605(a)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes

6. Normal Operations and Maintenance Procedures - History (detail) *Are construction records, maps and operating history available to appropriate operating personnel?* (MO.GO.OMHISTORY.R) (detail)

192.605(a) (192.605(b)(3))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes

7. Normal Operations and Maintenance Procedures - Review (detail) *Do records indicate periodic review of the work done by operator personnel to determine the effectiveness, and adequacy of the procedures used in normal operations and maintenance and modifying the procedures when deficiencies are found?* (MO.GO.OMEFFECTREVIEW.R) (detail)

192.605(a) (192.605(b)(8))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: Records reviewed

8. Abnormal Operations (Review) (detail) *Do records indicate periodic review of work done by operator personnel to determine the effectiveness of the abnormal operation procedures and corrective action taken where deficiencies are found?* (MO.GOABNORMAL.ABNORMALREVIEW.R) (detail)

192.605(a) (192.605(c)(4))	Sat+	Sat	Concern	Unsat	NA	NC

Notes: Records reviewed

9. Damage Prevention Program (detail) *Does the damage prevention program meet minimum requirements specified in 192.614(c)?* (PD.OC.PDPROGRAM.R) (detail)

192.614(c)	Sat+	Sat	Concern	Unsat	NA	NC
				X		

Notes: Records indicate non-compliance in responding to locate requests. More explanation in Summary and Probable Violations included in this report.

10. Change in Class Location Required Study (detail) *Do records indicate performance of the required study whenever the population along a pipeline increased or there was an indication that the pipe hoop stress was not commensurate with the present class location?* (MO.GOCLASS.CLASSLOCATESTUDY.R) (detail)

192.605(b)(1) (192.609(a); 192.609(b); 192.609(c); 192.609(d); 192.609(e); 192.609(f))	Sat+	Sat	Concern	Unsat	NA	NC
						X

Notes: To be inspected during 2019 Transmission inspection.

11. Emergency Response Performance (detail) *Do records indicate review of employee activities to determine whether the procedures were effectively followed in each emergency?* (EP.ERG.POSTEVNTREVIEW.R) (detail)

192.605(a) (192.615(b)(1); 192.615(b)(3))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: Records reviewed

12. Emergency Response Training (detail) *Has the operator trained the appropriate operating personnel on emergency procedures and verified that the training was effective in accordance with its procedures?* (EP.ERG.TRAINING.R) (detail)

192.605(a) (192.615(b)(2))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes

13. Liaison with Public Officials (detail) *Do records indicate liaisons established and maintained with appropriate fire, police and other public officials and utility owners in accordance with procedures?* (EP.ERG.LIAISON.R) (detail)

192.605(a) (192.615(c)(1); 192.615(c)(2); 192.615(c)(3); 192.615(c)(4); ADB-05-03)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: Records reviewed.

14. Incident Investigation (detail) *Do records indicate actions initiated to analyze accidents and failures, including the collection of appropriate samples for laboratory examination to determine the causes of the failure and minimize the possibility of recurrence, in accordance with its procedures?* (EP.ERG.INCIDENTANALYSIS.R) (detail)

192.605(a) (192.617)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: Records reviewed.

15. General - Testing Requirements (detail) *Do records indicate that pressure testing is conducted in accordance with 192.503?* (DC.PT.PRESSTEST.R) (detail)

192.503(a) (192.503(b); 192.503(c); 192.503(d))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Records reviewed.

16. Audience Identification Records (detail) *Do records identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents to which it sends public awareness materials and messages?* (PD.PA.AUDIENCEID.R) (detail)

192.616(d) (192.616(e); 192.616(f); API RP 1162 Section 2.2; API RP 1162 Section 3)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Records reviewed.

17. Educational Provisions (detail) *Did delivered messages specifically include provisions to educate the public, emergency officials, local public officials, and excavators on: (1) Use of a one-call notification system prior to excavation and other damage prevention activities; (2) Possible hazards associated with unintended releases from a gas pipeline facility; (3) Physical indications of a possible release; (4) Steps to be taken for public safety in the event of a gas pipeline release; and (5) Procedures to report such an event?* (PD.PA.EDUCATE.R) (detail)

192.616(d) (192.616(f))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Records reviewed.

18. Maximum Allowable Operating pressure (detail) *Do records indicate determination of the MAOP of pipeline segments in accordance with 192.619 and limiting of the operating pressure as required?* (MO.GOMAOP.MAOPDETERMINE.R) (detail)

192.709 (192.619; 192.621; 192.623)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Records reviewed.

19. Messages on Pipeline Facility Locations (detail) *Were messages developed and delivered to advise affected municipalities, school districts, businesses, and residents of pipeline facility locations?* (PD.PA.LOCATIONMESSAGE.R) (detail)

192.616(e) (192.616(f))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Records reviewed.

20. Odorization of Gas (detail) *Do records indicate appropriate odorization of its combustible gases in accordance with its procedures and conduct of the required testing to verify odorant levels met requirements?* (MO.GOODOR.ODORIZE.R) (detail)

192.709(c) (192.625(a); 192.625(b); 192.625(c); 192.625(d); 192.625(e); 192.625(f))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Records reviewed.

21. Baseline Message Delivery Frequency (detail) *Did the delivery of materials and messages meet or exceed the baseline delivery frequencies specified in API RP 1162, Table 2-1 through Table 2.3?* (PD.PA.MESSAGEFREQUENCY.R) (detail)

192.616(c) (API RP 1162 Table 2-1; API RP 1162 Table 2-2; API RP 1162 Table 2-3)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: Records Reviewed.

22. Patrolling Requirements (detail) *Do records indicate that ROW surface conditions have been patrolled as required?* (PD.RW.PATROL.R) (detail)

192.709(c) (192.705(a); 192.705(b); 192.705(c))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: Records reviewed.

23. Liaison with Emergency and Other Public Officials (detail) *Have liaisons been established and maintained with appropriate fire, police, and other public officials?* (PD.PA.LIAISON.R) (detail)

192.616(c) (API RP 1162 Section 4.4)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: Records reviewed.

24. Leakage Surveys (detail) *Do records indicate leakage surveys conducted as required?* (PD.RW.LEAKAGE.R) (detail)

192.709(c) (192.706; 192.706(a); 192.706(b))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: Records Reviewed.

25. Other Languages (detail) *Were materials and messages developed and delivered in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?* (PD.PA.LANGUAGE.R) (detail)

192.616(g) (API RP 1162 Section 2.3.1)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: Census data did not meet the threshold for supplying materials in other non-english languages.

26. Distribution Leakage Surveys (detail) *Do records indicate distribution leakage surveys were conducted as required?* (PD.RW.DISTLEAKAGE.R) (detail)

192.603(b) (192.721(a); 192.721(b); 192.723(a); 192.723(b))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: Records reviewed. First main was in Business District requiring annual surveys. Other 2 outside of BD (3yr)
Used this record review to inspect OQ personnel records.
Main #445703 surveyed '16 by KP; '17 by RL;'18 by ML. Each meet required survey date. All personnel OQ current.
Main #261271 surveyed '17 by ML;--previous '14 survey; verified OQ current
Main #346463 surveyed '17 by SW—previous '14 survey; verified OQ current

27. Test Reinstated Service Lines (detail) *From the review of records, did the operator properly test disconnected service lines?* (AR.RMP.TESTREINSTATE.R) (detail)

192.603(b) (192.725(a), 192.725(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Work orders reviewed. Used this record review to inspect OQ personnel records.
5012 Lively Ct. Louisville 100psi/10 minutes by HS; verified OQ current
1207 N. 3rd Street Bardstown 100 psi/10 minutes by CB; verified OQ current
4139 Bardstown Rd Louisville 100psi/10 minutes by JL; verified OQ current

28. Evaluate Program Implementation (detail) *Has an audit or review of the operator's program implementation been performed annually since the program was developed?* (PD.PA.EVALIMPL.R) (detail)

192.616(c) (192.616(i); API RP 1162 Section 8.3)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Records reviewed.

29. Acceptable Methods for Program Implementation Audits (detail) *Was one or more of the three acceptable methods (i.e., internal assessment, 3rd-party contractor review, or regulatory inspections) used to complete the annual audit or review of program implementation?* (PD.PA.AUDITMETHODS.R) (detail)

192.616(c) (192.616(i); API RP 1162 Section 8.3)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Records reviewed.

30. Abandonment or Deactivation of Pipeline and Facilities (detail) *Do records indicate pipelines were abandoned or deactivated as required?* (MO.GM.ABANDONPIPE.R) (detail)

192.709(c) (192.727(a); 192.727(b); 192.727(c); 192.727(d); 192.727(e); 192.727(f); 192.727(g))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Records reviewed

31. Program Changes and Improvements (detail) *Were changes made to improve the program and/or the implementation process based on the results and findings of the annual audit(s)?* (PD.PA.PROGRAMIMPROVE.R) (detail)

192.616(c) (API RP 1162 Section 8.3)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

32. Pressure Limiting and Regulating Stations Inspection and Testing (detail) *Do records indicate inspection and testing of pressure limiting, relief devices, and pressure regulating stations as required and at the specified intervals?* (MO.GMOPP.PRESSREGTEST.R) (detail)

192.709(c) (192.739(a); 192.739(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: The Westport Road and Bardstown Road station records were reviewed. Inspections of facilities for '16, '17 and '18 confirmed compliance with inspection dates and testing performed. Records for LG&E staff conducting the inspections confirmed OQ compliance at the time of the inspection.

33. Evaluating Program Effectiveness (detail) *Have effectiveness evaluation(s) of the program been performed for all stakeholder groups in all notification areas along all systems covered by the program?* (PD.PA.EVALEFFECTIVENESS.R) (detail)

192.616(c) (API RP 1162 Section 8.4)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes

34. Pressure Limiting and Regulating Stations Capacity of Relief Devices (detail) *Do records indicate testing or review of the capacity of each pressure relief device at each pressure limiting station and pressure regulating station as required and a new or additional device installed if determined to have insufficient capacity?* (MO.GMOPP.PRESSREGCAP.R) (detail)

192.709(c) (192.743(a); 192.743(b); 192.743(c))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: Records reviewed.

35. Measure Program Outreach (detail) *In evaluating effectiveness, was actual program outreach for each stakeholder audience tracked?* (PD.PA.MEASUREOUTREACH.R) (detail)

192.616(c) (API RP 1162 Section 8.4.1)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes

36. Valve Maintenance Transmission Lines (detail) *Do records indicate proper inspection and partial operation of transmission line valves that may be required during an emergency as required and prompt remedial actions taken if necessary?* (MO.GM.VALVEINSPECT.R) (detail)

192.709(c) (192.745(a); 192.745(b))	Sat+	Sat	Concern	Unsat	NA	NC
						X

Notes: Records to be reviewed during 2019 Transmission inspection.

37. Measure Understandability of Message Content (detail) *In evaluating program effectiveness, was the percentage of each stakeholder audience that understood and retained the key information from the messages determined?* (PD.PA.MEASUREUNDERSTANDABILITY.R) (detail)

192.616(c) (API RP 1162 Section 8.4.2)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes

38. Valve Maintenance Distribution Lines (detail) *Do records indicate proper inspection and partial operation of each distribution system valve that might be required in an emergency at intervals not exceeding 15 months, but at least once each calendar year, and prompt remedial action to correct any valve found inoperable?* (MO.GM.DISTVALVEINSPECT.R) (detail)

192.603(b) (192.747)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: Critical valves designated as 129:11; 42:10; and 13:02 records were reviewed. Records indicated compliance with inspection dates for years 2016, 2017, and 2018. OQ records for Tech KT were reviewed and in compliance.

39. Vault Inspection (detail) *Do records document inspections at the required interval of all vaults having a volumetric internal content of 200 cubic feet (5.66 cubic meters) or more that house pressure regulating/limiting equipment?* (FS.FG.VAULTINSPECTFAC.R) (detail)

192.709(c) (192.749(a); 192.749(b); 192.749(c); 192.749(d))	Sat+	Sat	Concern	Unsat	NA	NC
					X	

Notes: No vaults meeting the required capacity for inspection.

40. Measure Desired Stakeholder Behavior (detail) *In evaluating program effectiveness, was evaluation made of whether appropriate preventive, response, and mitigative behaviors were understood and likely to be exhibited?* (PD.PA.MEASUREBEHAVIOR.R) (detail)

192.616(c) (API RP 1162 Section 8.4.3)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes

41. Prevention of Accidental Ignition (detail) *Do records indicate personnel followed procedures for minimizing the danger of accidental ignition where the presence of gas constituted a hazard of fire or explosion?* (MO.GM.IGNITION.R) (detail)

192.709 (192.751(a); 192.751(b); 192.751(c))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: Records reviewed.

42. Measure Bottom-Line Results (detail) *Were bottom-line results of the program measured by tracking third-party incidents and consequences including: (1) near misses, (2) excavation damages resulting in pipeline failures, (3) excavation damages that do not result in pipeline failures?* (PD.PA.MEASUREBOTTOM.R) (detail)

192.616(c) (API RP 1162 Section 8.4.4)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes

43. Bell and Spigot Joints (detail) *Do records indicate that caulked bell and spigot joints were correctly sealed?* (MO.GM.BELLSPIGOTJOINT.R) (detail)

192.603(b) (192.753(a); 192.753(b))	Sat+	Sat	Concern	Unsat	NA	NC
					X	

Notes: No known cast in system.

44. Program Changes (detail) *Were needed changes and/or modifications to the program identified and documented based on the results and findings of the program effectiveness evaluations?* (PD.PA.CHANGES.R) (detail)

192.616(c) (API RP 1162 Section 2.7 (Step 12); API RP 1162 Section 8.5)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes

45. Master Meter and Petroleum Gas Systems (detail) *Do records indicate the master meter or petroleum gas system operator has met the requirements of 192.616(j)?* (PD.PA.MSTRMETER.R) (detail)

192.616(j) (192.616(h); API RP 1162 Section 2.7 (Step 12); API RP 1162 Section 8.5)	Sat+	Sat	Concern	Unsat	NA	NC
					X	

Notes

Records - Operator Qualification

1. Qualification Records for Personnel Performing Covered Tasks (detail) *Do records document the evaluation and qualifications of individuals performing covered tasks, and can the qualification of individuals performing covered tasks be verified?* (TQ.OQ.RECORDS.R) (detail)

192.807(b)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: As noted previously, records regarding OQ compliance were reviewed during various inspection areas and all were found to be current and in compliance with the company's OQ Plan.

2. Contractor and Other Entity Qualification (detail) *Are adequate records maintained for contractor personnel qualifications that contain the required elements?* (TQ.OQ.OQCONTRACTOR.R) (detail)

192.807(a) (192.807(b))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Yes, contractor records were reviewed and in compliance with the company's OQ Plan.

Records - Corrosion Control Performance

1. Corrosion Control Records (detail) *Do records indicate the location of all items listed in 192.491(a)?* (TD.CP.RECORDS.R) (detail)

192.491(a)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Records reviewed.

2. Examination of Exposed Portions of Buried Pipe (detail) *Do records adequately document that exposed buried piping was examined for corrosion?* (TD.CPEXPOSED.EXPOSEINSPECT.R) (detail)

192.491(c) (192.459)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Records reviewed.

3. Cathodic Protection Monitoring (detail) *Do records adequately document cathodic protection monitoring tests have occurred as required?* (TD.CPMONITOR.TEST.R) (detail)

192.491(c) (192.465(a))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: 2016, 2017, and 2018 records of monitoring were reviewed at the following locations and found to be in compliance. Also OQ records of AG, DL, and ND (Techs conducting the monitoring) were reviewed and found to be in compliance.
1099966, Glenview Ave., Harwood Road, Woodmont Drive, 10395114, 10186235, Commander Drive, and Herb Lane.

4. Rectifier or other Impressed Current Sources (detail) *Do records document details of electrical checks of sources of rectifiers or other impressed current sources?* (TD.CPMONITOR.CURRENTTEST.R) (detail)

192.491(c) (192.465(b))

Sat+	Sat	Concern	Unsat	NA	NC

Notes: Remote reads are conducted on some rectifier locations and these records were reviewed. Also, the following rectifier records were reviewed and found to be in compliance along with the Tech's OQ records conducting the checks:
20171261 @ English Station City Gate DL
20171304 @ Salt River LW
20171028 @ St Andrew's Church Road LW

5. Bonds, Diodes and Reverse Current Switches (detail) *Do records document details of electrical checks interference bonds, diodes, and reverse current switches?* (TD.CPMONITOR.REVCURRENTTEST.R) (detail)

192.491(c) (192.465(c))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Records reviewed.
Campground and Sandusky area checked by AG. OQ was in compliance.

6. Correction of Corrosion Control Deficiencies (detail) *Do records adequately document actions taken to correct any identified deficiencies in corrosion control?* (TD.CPMONITOR.DEFICIENCY.R) (detail)

192.491(c) (192.465(d))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Reviewed record (10999966) of a remediated isolation at various meter sets which indicated repairs made to correct low readings and indicating CP reading returning back into normal ranges.

7. Unprotected Buried Pipelines (typically bare pipelines) (detail) *Do records adequately document the re-evaluation of buried pipelines with no cathodic protection for areas of active corrosion?* (TD.CP.UNPROTECT.R) (detail)

192.491(c) (192.465(e))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

8. Isolation from Other Metallic Structures (detail) *Do records adequately document electrical isolation of each buried or submerged pipeline from other metallic structures unless they electrically interconnect and cathodically protect the pipeline and the other structures as a single unit?* (TD.CP.ELECISOLATE.R) (detail)

192.491(c) (192.467(a); 192.467(b); 192.467(c); 192.467(d); 192.467(e))

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes

9. Test Leads Installation (detail) *Do records document that pipelines with cathodic protection have electrical test leads installed in accordance with requirements of Subpart I?* (TD.CPMONITOR.TESTLEAD.R) (detail)

192.491(c) (192.471(a); 192.471(b); 192.471(c); 192.469)

Sat+	Sat	Concern	Unsat	NA	NC
	X				

Notes: Reviewed records of the installation of anodes or test station replacement or addition which indicated compliance with company's procedures.

10. Interference Currents (detail) *Do records document that the operator has minimized the detrimental effects of stray currents when found?* (TD.CPMONITOR.INTFRCURRENT.R) (detail)

192.491(c) (192.473(a))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: Records reviewed indicated a bond was installed at 3395 to address an interference with Tennessee Gas pipeline.

11. Internal Corrosion (detail) *Do records document if corrosive gas is being transported by pipeline, including the investigation of the corrosive effect of the gas on the pipeline and steps that have been taken to minimize internal corrosion?* (TD.ICP.CORRGAS.R) (detail)

192.491(c) (192.475(a))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: Monitoring occurs at take stations prior to distribution system.

12. Internal Corrosion in Cutout Pipe (detail) *Do records document examination of removed pipe for evidence of internal corrosion?* (TD.ICP.EXAMINE.R) (detail)

192.491(c) (192.475(a); 192.475(b))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes

13. Internal Corrosion Control: Design and Construction (192.476) (detail) *Do records demonstrate the transmission line project has features incorporated into its design and construction to reduce the risk of internal corrosion, as required of 192.476?* (DC.DPC.INTCORRODE.R) (detail)

192.476(a) (192.476(b); 192.476(c); .476(d))	Sat+	Sat	Concern	Unsat	NA	NC
						X

Notes: To be reviewed during 2019 Transmission inspection.

14. Internal Corrosion Corrosive Gas Actions (detail) *Do records document the actions taken when corrosive gas is being transported by pipeline?* (TD.ICP.CORRGASACTION.R) (detail)

192.491(c) (192.477)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes

15. Atmospheric Corrosion Monitoring (detail) *Do records document inspection of aboveground pipe for atmospheric corrosion?* (TD.ATM.ATMCORRODEINSP.R) (detail)

192.491(c) (192.481(a); 192.481(b); 192.481(c))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes

16. New Buried Pipe Coating (detail) *Do records document that each buried or submerged pipeline installed after July 31, 1971, has been protected against external corrosion with an adequate coating unless exempted under 192.455(b)?* (TD.COAT.NEWPIPE.R) (detail)

192.491(c) (192.455(a)(1); 192.461(a); 192.461(b); 192.483(a))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes

17. Repair of Internally Corroded Pipe (detail) *Do records document the repair or replacement of pipe that has been internally corroded to an extent that there is not sufficient remaining strength in the pipe wall?* (TD.ICP.REPAIR.R) (detail)

192.485(a) (192.485(b))	Sat+	Sat	Concern	Unsat	NA	NC
						X

Notes

18. Evaluation of Internally Corroded Pipe (detail) *Do records document adequate evaluation of internally corroded pipe?* (TD.ICP.EVALUATE.R) (detail)

192.491(c) (192.485(c))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes

Procedures (Distribution Compressor Station) - Compressor Station

1. Compressor Station Design/Construction - Maintenance (detail) *Does the process have sufficient detail for maintaining compressor stations, including provisions for isolating units or sections of pipe and for purging before returning to service?* (FS.CS.CMPMAINT.P) (detail)

192.605(b)(6)	Sat+	Sat	Concern	Unsat	NA	NC
					X	

Notes: No Compressor stations on company's distribution.

2. Compressor Station Design/Construction - Start-Up and Shut-Down (detail) *Does the process for start-up and shut-down have sufficient detail to ensure start-up and shut-down of compressor units in a manner designed to assure operation within the MAOP limits prescribed by this part, plus the build-up allowed for operation of pressure-limiting and control devices?* (FS.CS.CMPSUSD.P) (detail)

192.605(b)(5) (192.605(b)(7))	Sat+	Sat	Concern	Unsat	NA	NC
					X	

Notes

3. Compressor Station Design/Construction - Pressure Relief (detail) *Does the process provide adequate detail for inspection and testing of compressor station pressure relief devices with the exception of rupture disks?* (FS.CSSYSPROT.CMPRELIEF.P) (detail)

192.605(b)(1) (192.731(a); 192.731(b); 192.731(c))	Sat+	Sat	Concern	Unsat	NA	NC
					X	

Notes

4. Compressor stations - Storage of Combustible Materials (detail) *Does the process include requirements for the storage of flammable/combustible materials and specify that aboveground oil or gasoline storage tanks being installed at compressor stations be protected in accordance with NFPA No. 30, as required of §192.735(b)?* (DC.COCMP.CMPCOMBUSTIBLE.P) (detail)

192.303 (192.735(a); 192.735(b))	Sat+	Sat	Concern	Unsat	NA	NC
					X	

Notes

5. Compressor Station Design/Construction - Permanent Gas Detection (detail)
Does the process adequately detail requirements of permanent gas detectors and alarms at compressor buildings? (FS.CSSYSPROT.CMPGASDETREQ.P) (detail)

192.605(b) (192.736(b))	Sat+	Sat	Concern	Unsat	NA	NC
					X	

Notes

Field Review (Distribution Compressor Station) - Compressor Stations Inspection (Field)

1. Compressor Station Design/Construction - Exits (detail) *Does each main compressor building operating floor have at least two separated, easily accessed and unobstructed exits to a place of safety, main compressor building exits that have door latches that can be readily opened without a key, and main compressor building exit doors mounted to swing outward?* (FS.CS.BLDGEXITS.O) (detail)

192.163(c)	Sat+	Sat	Concern	Unsat	NA	NC
					X	

Notes

2. Compressor Station Design/Construction - Fence Gates (detail) *Do fenced areas around compressor stations have at least two gates that provide for easy escape to place of safety, and do gates located within 200 feet of any compressor plant open outward and able to be opened from the inside without a key when the station is occupied?* (FS.CS.FENCEGATES.O) (detail)

192.163(d)	Sat+	Sat	Concern	Unsat	NA	NC
					X	

Notes

3. Compressor Station Design/Construction - NFPA 70 (detail) *Are the proper permits and approvals authorized under NFPA 70 posted or otherwise located at the compressor station?* (FS.CS.CMPNFPA70.O) (detail)

192.163(e)	Sat+	Sat	Concern	Unsat	NA	NC
					X	

Notes

4. Compressor stations Liquid Removal (detail) *Are compressors protected from liquids and, as applicable, liquid separators for compressors installed, in accordance with 192.165?* (DC.DPCCMP.CMPLIQPROT.O) (detail)

192.141 (192.165(a); 192.615(b))	Sat+	Sat	Concern	Unsat	NA	NC
					X	

Notes

5. Compressor Station Design/Construction - ESD Gas Discharge (detail) *Does each compressor station have an emergency shutdown system that is capable of safely discharging blowdown gas from the blowdown piping at a location where the gas will not create a hazard?* (FS.CSSYSPROT.ESDGASDISCH.O) (detail)

192.167(a)(2)	Sat+	Sat	Concern	Unsat	NA	NC
					X	

Notes

6. Compressor Station Design/Construction - ESD Gas Block (detail) *Does each compressor station have an emergency shutdown system that is capable of blocking gas out of the station and blow down the station piping? NOTE: Not required for field compressor stations of 1,000 horsepower (746 kilowatts) or less.* (FS.CSSYSPROT.ESDGASBLK.O) (detail)

192.167(a)(1)	Sat+	Sat	Concern	Unsat	NA	NC

Notes

7. Compressor Station Design/Construction - ESD (detail) *Does each compressor station have an emergency shutdown system that is capable of shutting down gas compressing equipment and gas fires in the vicinity of gas headers and compressor buildings?* (FS.CSSYSPROT.ESDGASSD.O) (detail)

192.167(a)(3)	Sat+	Sat	Concern	Unsat	NA	NC
					X	

Notes

8. Compressor Station Design/Construction - ESD Electrical (detail) *Does each compressor station have an emergency shutdown system that is capable of shutting down electrical facilities (except emergency and equipment protection circuits) near gas headers and within compressor buildings?* (FS.CSSYSPROT.ESDELECSD.O) (detail)

192.167(a)(3)(i) (192.167(a)(3)(ii))	Sat+	Sat	Concern	Unsat	NA	NC
					X	

Notes

9. Compressor Station Design/Construction - ESD Locations (detail) *Does each compressor station have an emergency shutdown system that is capable of being operated from at least two locations which are: 1) Outside the gas area of the station, 2) Near the exit gates, if the station is fenced, or near emergency exits, if not fenced, 3) And not more than 500 feet (153 meters) from the limits of the station?* (FS.CSSYSPROT.ESDLOCATION.O) (detail)

192.167(a)(4)	Sat+	Sat	Concern	Unsat	NA	NC
					X	

Notes

10. Compressor Station Design/Construction - Distribution Supply ESD (detail) *Does each compressor station that supplies gas directly to a distribution system (with no other adequate sources of gas available) have an emergency shutdown system that will not function at the wrong time or cause unintended outages?* (FS.CSSYSPROT.ESDDISTSD.O) (detail)

192.167(b)	Sat+	Sat	Concern	Unsat	NA	NC
					X	

Notes

11. Compressor Station Design/Construction - Unattended Platform ESD (detail) *Does each unattended platform compressor station located offshore or in inland navigable waters have an emergency shutdown system that will actuate automatically in the event of the following occurrences? 1) When gas pressure equals the MAOP plus 15 percent and, 2) When an uncontrolled fire occurs on the platform.* (FS.CSSYSPROT.UNATTPLATCMPSD.O) (detail)

192.167(c)(1)	Sat+	Sat	Concern	Unsat	NA	NC
					X	

Notes

12. Compressor Station Design/Construction - Fire Protection (detail) *Do compressor stations have adequate fire protection facilities?* (FS.CSSYSPROT.CMPFP.O) (detail)

192.171(a)	Sat+	Sat	Concern	Unsat	NA	NC
					X	

Notes

13. Compressor Station Design/Construction - Over-Speed Protection (detail) *Do compressor stations' prime movers other than electrical induction or synchronous motors have automatic shutdown devices that will prevent over-speed of the prime mover or the unit being driven?* (FS.CSSYSPROT.CMPOVSPD.O) (detail)

192.171(b)	Sat+	Sat	Concern	Unsat	NA	NC
					X	

Notes

14. Compressor Station Design/Construction - Lubrication (detail) *Do compressor units have shutdown or alarm devices that will operate in the event of inadequate heating or lubrication?* (FS.CSSYSPROT.CMPLUBPROT.O) (detail)

192.171(c)	Sat+	Sat	Concern	Unsat	NA	NC
					X	

Notes

15. Compressor Station Design/Construction - Gas Engine Shutdown (detail) *Are compressor station gas engines that operate with pressure gas injection equipped so that stoppage of the engine will result in the fuel being automatically shut off and the engine distribution manifold being vented?* (FS.CSSYSPROT.CMPGASENGSD.O) (detail)

192.171(d)	Sat+	Sat	Concern	Unsat	NA	NC
					X	

Notes

16. Compressor Station Design/Construction - Gas Engine Mufflers (detail) *Are gas engines in compressor stations equipped with mufflers that prevent gas from being trapped in the muffler?* (FS.CSSYSPROT.CMPGASENGMFL.O) (detail)

192.171(e)	Sat+	Sat	Concern	Unsat	NA	NC
					X	

Notes

17. Compressor Station Design/Construction - Ventilation (detail) *Are compressor station buildings ventilated to ensure employees are not endangered by accumulation of gas in enclosed areas?* (FS.CS.CMPBLDGVENT.O) (detail)

192.173	Sat+	Sat	Concern	Unsat	NA	NC
					X	

Notes

18. Cathodic Protection of Underground Piping (detail) *Are bare or coated pipes in compressor, regulator or meter stations installed before August 1, 1971 (except for cast and ductile iron lines) cathodically protected in areas where active corrosion was found in accordance with Subpart I or Part 192?* (TD.CP.PRE1971.O) (detail)

192.457(b)	Sat+	Sat	Concern	Unsat	NA	NC
					X	

Notes

19. Atmospheric Corrosion Monitoring (detail) *Is pipe that is exposed to atmospheric corrosion protected?* (TD.ATM.ATMCORRODEINSP.O) (detail)

192.481(b) (192.481(c); 192.479(a); 192.479(b); 192.479(c))	Sat+	Sat	Concern	Unsat	NA	NC
					X	

Notes

20. Start-Stop Procedures (detail) *During startup or shut-in, is it assured that the pressure limitations on the pipeline were not exceeded?* (DC.MO.MAOPLIMIT.O) (detail)

192.605(b)(5)	Sat+	Sat	Concern	Unsat	NA	NC
					X	

Notes

21. Normal Operations and Maintenance Procedures - History (detail) *Are construction records, maps and operating history available to appropriate operating personnel?* (MO.GO.OMHISTORY.O) (detail)

192.605(b)(3)	Sat+	Sat	Concern	Unsat	NA	NC
					X	

Notes

22. Compressor Station - Emergency Response Plan (detail) *Are emergency response plans for selected compressor stations kept on site?* (FS.CS.CMPERP.O) (detail)

192.605(a) (192.615(b))	Sat+	Sat	Concern	Unsat	NA	NC
					X	

Notes

23. MAOP Recording (detail) *Do pressure recording charts or SCADA records indicate that maximum allowable operating pressure limits have been maintained in accordance with 192.619?* (MO.GOMAOP.MAOPRECORDING.O) (detail)

192.605(b)(1) (192.619(a); 192.619(c))	Sat+	Sat	Concern	Unsat	NA	NC
					X	

Notes

24. Placement of ROW Markers (detail) *Are line markers placed and maintained as required?* (PD.RW.ROWMARKER.O) (detail)

192.707(a) (CGA Best Practices, v4.0, Practice 2-5; CGA Best Practices, v4.0, Practice 4-20)	Sat+	Sat	Concern	Unsat	NA	NC
					X	

Notes

25. Placement of ROW Markers (detail) *Are line markers placed and maintained as required for above ground pipelines?* (PD.RW.ROWMARKERABOVE.O) (detail)

192.707(c) (CGA Best Practices, v4.0, Practice 2-5; CGA Best Practices, v4.0, Practice 4-20)	Sat+	Sat	Concern	Unsat	NA	NC
					X	

Notes

26. Compressor Station Design/Construction - Pressure Relief (detail) *Are pressure relief/limiting devices inside a compressor station designed, installed, and inspected properly?* (FS.CSSYSPROT.CMPRELIEF.O) (detail)

192.199 (192.731(a); 192.731(b); 192.731(c))	Sat+	Sat	Concern	Unsat	NA	NC
					X	

Notes

27. Compressor stations - Storage of Combustible Materials (detail) *Are flammable/combustible materials stored as required and aboveground oil or gasoline storage tanks installed at compressor stations protected in accordance with NFPA No. 30, as required by 192.735(b)?* (DC.COCMP.CMPCOMBUSTIBLE.O) (detail)

192.735(a) (192.735(b))	Sat+	Sat	Concern	Unsat	NA	NC
					X	

Notes

28. Compressor Station Gas Detection (detail) *Have adequate gas detection and alarm systems been installed in selected applicable compressor buildings?* (FS.CSSYSPROT.CMPGASDET.O) (detail)

192.736(a) (192.736(b))	Sat+	Sat	Concern	Unsat	NA	NC

Notes

Records (Distribution Compressor Station) - Compressor Station O&M Performance

1. Compressor Station Design/Construction - Pressure Relief (detail) *Do records document with adequate detail that all inspection and testing of compressor station pressure relief devices with the exception of rupture disks have occurred at the required interval?* (FS.CSSYSPROT.CMPRELIEF.R) (detail)

192.709(b) (192.709(c); 192.731(a); 192.731(b); 192.731(c))	Sat+	Sat	Concern	Unsat	NA	NC
					X	

Notes

2. Compressor Station Design/Construction - Gas Detection (detail) *Do records document that all compressor station gas detection and alarm systems are being maintained and tested as required?* (FS.CSSYSPROT.CMPGASDETOM.R) (detail)

192.709(c) (192.736(c))	Sat+	Sat	Concern	Unsat	NA	NC
					X	

Notes

Instructions (See staff report on D&A in separate inspection report # 3667 conducted on 3/25/2019)
1. Use in conjunction with Unit inspections
2. Interview the primary operator contact for the Unit inspection you are conducting and enter their responses.
Do not request the operator substance abuse expert to provide responses to these questions.
3. Send completed form to stanley.kastanas@dot.gov

Name of Operator	Louisville Gas & Electric Company	**Op ID #**	11824
Inspector	David Nash	**Unit #**	
Date of Inspection	3/25/2019		
Inspection Location City & State	Louisville, KY		
Operator Employee Interviewed	**Tanya D. Levine**	**Phone #**	**502-627-3150**
Position/Title			
Operator Designated Employer Representative (DER), (a.k.a. Substance Abuse Program Manager)	**Tanya D. Levine**		
DER Phone #	**502-627-3150**		

§199	Pipeline Safety Regulations Drug and Alcohol Testing	Yes	No	Does Not Know
.3, .101 .201, .245	**1. Does the company have a plan for drug and alcohol testing of employees and contractors performing, or ready to perform, covered functions of operations, maintenance, and emergency response?**	**X**		
Comments				
.3 .105(c) .225(b)	**2. Does the company perform random drug testing and reasonable suspicion drug and alcohol testing of employees performing covered functions? For random drug testing, enter the number of times per year employees are selected and the number of employees in each selection in Comments below.**	**X**		
Comments				
.3 .105(b)	**3. Does the company conduct post-accident/incident drug and alcohol testing for employees who have caused or contributed to the consequences of an accident/incident? Enter the position/title of the employee who would make the decision to conduct post-accident/incident testing in Comments below.**	**X**		
Comments				
.113(c) .117(a)(4) .227(b)(2) .241	**4. Does the company provide training for supervisors on the detection of potential drug abuse (minimum 60 minutes) and alcohol misuse (minimum 60 minutes)?**	**X**		
Comments				
.3 .113(b) .117(a)(4) .239(b)(11)	**5. Does the company give covered employees an explanation of the drug & alcohol policies and distribute information about the Employee Assistance Program, including a hotline number? Provide details in Comments below.**	**X**		
Comments				

Training and Qualification - Operator Qualification

1. Operator Qualification Plan and Covered Tasks (detail) *Is there an OQ plan that includes covered tasks, and the basis used for identifying covered tasks?* (TQ.OQ.OQPLAN.P) (detail)

192.805(a) (192.801(b))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: OQ Plan Section A

2. Reevaluation Intervals for Covered Tasks (detail) *Does the process establish and justify requirements for reevaluation intervals for each covered task?* (TQ.OQ.REEVALINTERVAL.P) (detail)

192.805(g)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: OQ Plan Section B pages 13-15

3. Contractors Adhering to OQ Plan (detail) *Does the process require the OQ plan to be communicated to contractors and ensure that contractors are following the plan?* (TQ.OQ.OQPLANCONTRACTOR.P) (detail)

192.805(b) (192.805(f); 192.805(c))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: OQ Plan Scope page 6 and Appendix I

4. Contractor and Other Entity Qualification (detail) *Does the process require contractor organizations or other entities that perform covered tasks on behalf of the operator to be qualified?* (TQ.OQ.OQCONTRACTOR.P) (detail)

192.805(b) (192.805(c); 192.855(d); 192.805(e); 192.805(f))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: OQ Plan Scope page 6 and Appendix I

6. Contractor and Other Entity Qualification (detail) *Are adequate records maintained for contractor personnel qualifications that contain the required elements?* (TQ.OQ.OQCONTRACTOR.R) (detail)

192.807(a) (192.807(b))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: OQ Plan Section J page 27 and Appendix I Records reviewed.

7. Management of Other Entities Performing Covered Tasks (detail) *Do records document evaluation of the other entity (ies) performing covered task(s) on behalf of the operator (e.g., through mutual assistance agreements) prior to performing task?* (TQ.OQ.OTHERENTITY.R) (detail)

192.805(b) (192.805(c); 192.803)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: OQ Plan Appendix K pages 116-117. Records reviewed.

8. Evaluation Methods (detail) *Are evaluation methods established and documented appropriate to each covered task?* (TQ.OQ.EVALMETHOD.P) (detail)

192.805(b) (192.803; 192.809(d); 192.809(e))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: OQ Plan Section B pages 13-15

9. Evaluation Methods (detail) *Do records indicate evaluation methods are documented for covered tasks and consistent with personnel qualification records?* (TQ.OQ.EVALMETHOD.R) (detail)

192.805(b) (192.803; 192.809(d); 192.809(e))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: OQ Plan Section J page 27 Records reviewed.

10. Abnormal Operating Conditions (detail) *Does the process require: 1) individuals performing covered tasks be qualified to recognize and react to abnormal operating conditions (AOCs), 2) evaluation and qualification of individuals for their capability to recognize and react to AOCs, 3) AOCs identified as those that the individual may reasonably anticipate and appropriately react to during the performance of the covered task, and 4) established provisions for communicating AOCs for the purpose of qualifying individuals?* (TQ.OQ.ABNORMAL.P) (detail)

192.803	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: OQ Plan Section A pages 10-12

11. Abnormal Operating Conditions (detail) *Do records document evaluation of qualified individuals for recognition and reaction to AOCs?* (TQ.OQ.ABNORMAL.R) (detail)

192.807(a) (192.807(b); 192.803)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: OQ Plan Section B pages 13-16. Records reviewed.

12. Qualification Records for Personnel Performing Covered Tasks (detail) *Do records document the evaluation and qualifications of individuals performing covered tasks, and can the qualification of individuals performing covered tasks be verified?* (TQ.OQ.RECORDS.R) (detail)

192.807	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: OQ Plan Section J page 27. Records reviewed

13. Planning for Mergers and Acquisitions (Due Diligence re: Acquiring Qualified Individuals) (detail) *Does the process adequately manage qualifications of individuals performing covered tasks during program integration following a merger or acquisition?* (TQ.OQ.MERGERACQ.P) (detail)

192.805(b) (192.803)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: OQ Plan Appendix K pages 116-117, Appendix A, and I

14. Training Requirements (Initial, Retraining, and Reevaluation) (detail) *Does the OQ program provide for initial qualification, retraining and reevaluation of individuals performing covered tasks?* (TQ.OQ.TRAINING.P) (detail)

192.805(h)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: OQ Plan Section B

16. Covered Task Performed by Non-Qualified Individual (detail) *Are there provisions for non-qualified individuals to perform covered tasks while being directed and observed by a qualified individual, and are there restrictions and limitations placed on such activities?* (TQ.OQ.NONQUALIFIED.P) (detail)

192.805(c)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: OQ Plan Section C page 16

17. Personnel Performance Monitoring (detail) *Does the program include provisions to evaluate an individual if there is reason to believe the individual is no longer qualified to perform a covered task based on: covered task performance by an individual contributed to an incident or accident; other factors affecting the performance of covered tasks?* (TQ.OQ.PERFMONITOR.P) (detail)

192.805(d) (192.805(e))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: OQ Plan Section C page 16

19. Program Performance and Improvement (detail) *Does the process require evaluation of the OQ program and implementation of improvements to enhance the effectiveness of the program?* (TQ.OQ.PROGRAMEVAL.P) (detail)

192.605(a) (192.605(b)(8))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: OQ Plan Appendix I

21. Management of Changes (detail) *Does the OQ program identify how changes to procedures, tools standards and other elements used by individuals in performing covered tasks are communicated to the individuals, including contractor individuals, and how these changes are implemented in the evaluation method(s)?* (TQ.OQ.MOC.P) (detail)

192.805(f)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: OQ Plan Appendix I pages 97-108

22. Notification of Significant Plan Changes (detail) *Does the process require significant OQ program changes to be identified and the Administrator or State agency notified?* (TQ.OQ.CHANGENOTIFY.P) (detail)

192.805(i)	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes: OQ Plan Appendix I

Training and Qualification - OQ Protocol 9

1. Covered Task Performance (detail) *Verify the qualified individuals performed the observed covered tasks in accordance with the operator's procedures or operator approved contractor procedures.* (TQ.PROT9.TASKPERFORMANCE.O) (detail)

192.801(a) (192.809(a))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes:

2. Qualification Status (detail) *Verify the individuals performing the observed covered tasks are currently qualified to perform the covered tasks.* (TQ.PROT9.QUALIFICATIONSTATUS.O) (detail)

192.801(a) (192.809(a))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes

3. Abnormal Operating Condition Recognition and Reaction (detail) *Verify the individuals performing covered tasks are cognizant of the AOCs that are applicable to the tasks observed.* (TQ.PROT9.AOCRECOG.O) (detail)

192.801(a) (192.809(a))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes

4. Verification of Qualification (detail) *Verify the qualification records are current, and ensure the personal identification of all individuals performing covered tasks are checked, prior to task performance.* (TQ.PROT9.VERIFYQUAL.O) (detail)

192.801(a) (192.809(a))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes

5. Program Inspection Deficiencies (detail) *Have potential issues identified by the headquarters inspection process been corrected at the operational level?* (TQ.PROT9.CORRECTION.O) (detail)

192.801(a) (192.809(a))	Sat+	Sat	Concern	Unsat	NA	NC
		X				

Notes

Distribution Integrity Management Program

Implementation Inspection Form

This inspection form is for the evaluation of an operator's implementation of its gas distribution integrity management program (DIMP) through a review of its records and actions performed on pipeline facilities. This inspection form is applicable to operators, other than Master Meter and Small LPG operators, that have developed and implemented a DIMP under §192.1005. The form asks inspectors to review records and perform field observations regarding the implementation of the DIMP required elements. Following a review of the operator's DIMP plan, inspectors will observe actions taken by the operator to ensure that procedures have been followed. There are instances when actions by an operator could be deemed satisfactory by an inspector for an implementation question while still not meeting the procedural requirements in the DIMP plan resulting in an unsatisfactory rating for a corresponding procedural question.

Questions with code references beside them are enforceable. "S/Y" stands for "satisfactory" or "yes"; "U/N" stands for "unsatisfactory" or "no"; "N/A" stands for "not applicable"; and "N/C" stands for "not checked". If an item is marked U/N, N/A, or N/C, an explanation must be included in the comments section. Due to the unique characteristics of some operator's system, there are instances where an operator is not required to perform an action, and some of the questions requesting a review of documents may not apply and would be rated as "N/A" (rather than rating "U/N"). For instance, in Question #8, if the operator has NOT acquired any new information relevant to threat identification, rate as "N/A". Correspondingly, if the operator had acquired new information that needed to be included in the threat identification and had not, then the rating would be "U/N".

This inspection form includes two types of activities – records review and field observation activities:

- The Records Review questions are to be performed on records used by an operator for implementing its DIMP plan. Not all parts of this form may be applicable to a specific Records Review Inspection, and only those applicable portions of this form need to be completed.
- The Field Observation questions are to be used on field activities being performed by an operator in support of its DIMP plan. Field Observation inspection activities may also include review of data, environmental conditions, and assumptions being used by an operator in support of its DIMP plan. Not all parts of this form may be applicable to a specific Field Observation Inspection, and only those applicable portions of this form need to be completed.

A review of applicable Operations and Maintenance (O&M) and DIMP processes and procedures applicable to the field activity being inspected should be considered by the inspector to ensure the operator is implementing its O&M Manuals and DIMP in a consistent manner.

Operator Contact and System Information

Operator Information:

Name of Operator (legal entity):	Louisville Gas & Electric Company
PHMSA Operator ID:	11824
Type of Operator:	☒Investor Owned ☐I Municipal ☐Private ☐LPG ☐Other (Identify - e.g., cooperative)
State(s) included in this inspection	Kentucky
Headquarters Address:	220 West Main Street, P>O> Box 32010
Company Contact:	Joe Ryan
Phone Number:	502-376-5944
Email:	Joe.Ryan@lge-ku
Date(s) of Inspection	4/03/2019
Date of this Report	5/13/2019
Date of Current DIMP Plan/Revision	December 31, 2018

Persons Interviewed:

Persons Interviewed *(list primary contact first)*	**Title**	**Phone Number**	**Email**
Joe Ryan	Manager, Gas Distribution Integrity and Compliance	502-376-5944	Joe.Ryan@lge-ku.com

State/Federal Representatives:

Inspector Name and Agency	**Phone Number**	**Email**
Michael Nantz	502-782-2602	Michael.Nantz@ky.gov

System Description Narrative:

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
	192.1005	**Issues Identified in previous Integrity Management Inspection(s)**				
1	* - If not satisfactory, insert appropriate code section(s)	Have all issues raised in previous DIMP inspections been satisfactorily addressed? Provide comments below.	☒	☐	☐	☐
Inspector Comments						
	192.1007(a)	**Knowledge of the system**				
2	.1007 (a)(3)	Is the operator collecting the missing or incomplete system information and data needed to fill knowledge gaps to assess existing and potential threats?	☒	☐	☐	☐
Inspector Comments						
3	.1007 (a)(3)	Is the operator collecting the missing or incomplete system information and data using the procedures prescribed in its DIMP plan?	☒	☐	☐	☐
Inspector Comments						
4	.1007 (a)(3)	Has the operator incorporated into the DIMP plan any new or missing information identified or acquired during normal operations, maintenance, and inspection activities?	☒	☐	☐	☐
Inspector Comments						
5	.1007(a)(5)	Has the operator captured required data on any new pipeline installations? For pipe, fittings, valves, EFVs, risers, regulators, shut-offs, etc., examples of data and records required to be collected by operator since August 2, 2011 include, but are not limited to, the following: • Location • Material type and size • Wall thickness or SDR • Manufacturer • Lot or production number	☒	☐	☐	☐
Inspector Comments						

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
6	.1007 (a)	Are data collection forms used in conjunction with the operator's DIMP plan being fully and accurately completed? Note: This question can be answered by office review of records and/or comparison of field conditions to information in the reviewed records.	☒	☐	☐	☐
Inspector Comments						
7	.1007 (a)	If new Subject Matter Experts (SMEs) input is incorporated into the DIMP plan, do SMEs have the necessary knowledge and/or experience (skills sets) regarding the areas of expertise for which the SME provided knowledge or supplemental information for input into the DIMP plan?	☒	☐	☐	☐
Inspector Comments						
8	.1007 (a)	Do operator personnel in the field understand their responsibilities under DIMP plan? (Below are possible questions for field personnel) • Would you explain what DIMP training you have received? • What instructions have you received to address the discovery of pipe or components not documented in the company records? • What instructions have you received if you find a possible issue? (ex: corrosion, dented pipe, poor fusion joints, missing coating, excavation damage, mechanical fitting failures) • If you find situations where the facilities examined (e.g., size of the pipe, coating) are different than records indicate, what documentation do you prepare? • If you are repairing a leak and find that a fitting was improperly installed, what documentation do you prepare?	☒	☐	☐	☐
Inspector Comments						

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
	192.1007 (b) and (c)	**Identify Threats; Evaluate and Rank Risk**				
9	.1007(b)	Has the operator acquired any new information relevant to system knowledge that may affect its threat identification?	☒	☐	☐	☐
Inspector Comments						
10	.1007 (b)	Have any changes occurred that require re-evaluation of threats and risks? Examples include, but are not limited to, the following: • Acquisition of new systems • Completion of pipe replacement program • New threats (e.g., first time natural forces damage, etc.) • Increase in existing threats (e.g., washouts, land subsidence, etc.) • Increase in consequences (e.g., new wall-to-wall pavement, etc.) • Organization changes (e.g., downsizing of staff, company restructuring, etc.) • Applicable code revisions • Other (describe below)	☒	☐	☐	☐
Inspector Comments						
11	.1007 (b)	Has the operator identified information or data from external sources (e.g. trade associations, operator's consultants, government agencies, other operators, manufacturers, etc.) that may require re-evaluation of threats and risks?	☒	☐	☐	☐
Inspector Comments						
12	.1007 (c)	Since the last DIMP plan review by the regulatory agency, has the operator updated its threat identification and risk assessment based on newly acquired information or data (see Questions 9, 10, and 11) relevant to system knowledge?	☒	☐	☐	☐
Inspector Comments						

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
13	.1007 (c)	If the operator has modified its threat identification and risk evaluation and ranking, were the revisions made in accordance with the procedure in the operator's DIMP plan?	☒	☐	☐	☐
Inspector Comments						
14	.1007 (c)	Does the operator's current subdivision process (grouping of materials, geographic areas, etc.) adequately meet the need to properly evaluate and rank the existing and potential threats to the integrity of its system?	☒	☐	☐	☐
Inspector Comments						
15	.1007 (c)	Has the operator added or modified system subdivisions within its risk evaluation and ranking since the last plan review by the regulatory agency?	☒	☐	☐	☐
Inspector Comments						
16	.1007 (c)	If the operator has added or modified system subdivisions, was it done in accordance with the procedures described in the operator's DIMP plan?	☒	☐	☐	☐
Inspector Comments						
17	.1007 (c)	If the operator has added or modified system subdivisions, did the new system subdivision result in modifications to the risk evaluation and ranking?	☒	☐	☐	☐
Inspector Comments						

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
	192.1007(d)	**Identify and implement measures to address risks**				
18	.1007 (d)	Does the documentation reviewed demonstrate the operator is implementing the measures to reduce risks per the DIMP plan?	☒	☐	☐	☐
19	.1007 (d)	Has the operator completed any measures to reduce risks resulting in the elimination/mitigation of the associated identified threat? (e.g., pipe replacement program completed, etc.)	☒	☐	☐	☐
Inspector Comments						
20	.1007 (d)	If answering "Satisfactory/Yes" to question 19, has the operator re-evaluated and ranked its risks (1007(c)) because of the elimination/mitigation of an identified threat to ensure that risk reduction measures in place are appropriate?	☒	☐	☐	☐
Inspector Comments						
21	.1007 (d)	Does each implemented risk reduction measure identified in the DIMP plan address a specific risk?	☒	☐	☐	☐
Inspector Comments						
22	.1007 (d)	Can the operator provide documentation to demonstrate that an effective leak management program is being implemented? Important components in an effective program include, but are not limited to, the following: Locate the leaks in the distribution system; Evaluate the actual or potential hazards associated with these leaks; Act appropriately to mitigate these hazards; Keep records; and Self-assess to determine if additional actions are necessary to keep people and property safe. Answer "N/A" if operator repairs all leaks when found.	☒	☐	☐	☐
Inspector Comments						

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
	192.1007(e)	**Measure performance, monitor results, and evaluate effectiveness**				
23	.1007 (e)	Is the operator collecting data for the required performance measures in §192.1007(e)? i) Number of hazardous leaks either eliminated or repaired, categorized by cause? ii) Number of excavation damages? iii) Number of excavation tickets? iv) Total number of leaks either eliminated or repaired, categorized by cause? v) Number of hazardous leaks either eliminated or repaired, categorized by material? (Note: Not required in PHMSA Distribution Annual Report Form 7100.1-1) vi) Any additional measures the operator determines are needed to evaluate the effectiveness of the DIMP plan in controlling each identified threat? (Note: Not required in PHMSA Distribution Annual Report Form 7100.1-1)	☒ ☒ ☒ ☒ ☒	☐ ☐ ☐ ☐ ☐	☐ ☐ ☐ ☐ ☐	☐ ☐ ☐ ☐ ☐
Inspector Comments						
24	.1007 (e)	Based on field observations and/or record reviews, is the operator accurately collecting the data used to measure performance in accordance with the procedures in its DIMP plan?	☒	☐	☐	☐
Inspector Comments						
25	.1007 (e)	Is the operator monitoring each performance measure from an established baseline?	☒	☐	☐	☐
Inspector Comments						
26	.1007 (e)	Is each performance measure added since the DIMP plan was last updated tied to a specific risk reduction measure or group of measures?	☒	☐	☐	☐
Inspector Comments						

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
	192.1007(f)	**Periodic Evaluation and Improvement**				
27	.1007 (f)	Has the operator performed a periodic evaluation of its DIMP plan on the frequency specified in the plan? If a periodic evaluation has not been required since plan implementation or the last inspection, mark questions 27-32 as "N/A".	☒	☐	☐	☐
Inspector Comments						
28	.1007 (f)	Did the periodic evaluation include the following: • Verification of general system information (e.g., contact information; form names; action schedules, etc.)? • New information acquired since the previous evaluation? • Review of threats and risks? • Was the risk model re-run? • Review of performance measures? • Review of measures to reduce risks? • Evaluation of the effectiveness of measures to reduce risks? • Modification of measures to reduce risks, if necessary?	☒ ☒ ☒ ☒ ☒ ☒ ☒ ☒	☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐	☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐	☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐
Inspector Comments						
29	.1007 (e)	If any established performance measures indicated an increase in risk beyond an acceptable level (as established in the DIMP plan), did the operator implement new risk reduction measures along with their associated performance measures?	☒	☐	☐	☐
Inspector Comments						
30	.1007 (f)	If the periodic evaluation indicates that <u>implemented measures to reduce risks</u> are NOT effective, were risk reduction measures modified, deleted or added?	☒	☐	☐	☐
Inspector Comments						

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
31	.1007 (f)	Did the periodic evaluation indicate that the selected performance measures are assessing the effectiveness of risk reduction measures? If not, were performance measures modified, deleted or added? (describe in Inspector comments)	☒	☐	☐	☐
Inspector Comments						
32	.1007 (f)	Did the operator follow its procedures in conducting periodic evaluation and program improvement?	☒	☐	☐	☐
Inspector Comments						
	192.1007 (g)	**Report results**				
33	.1007(g)	Did the operator complete Parts C and D of the PHMSA Distribution Annual Report (Form 7100.1-1) in its submission to PHMSA and the state regulatory authority having jurisdiction, if required, for each year since the last inspection?	☒	☐	☐	☐
Inspector Comments						
	192.1009	**What must an operator report when mechanical fittings fail?**				
34	.1009	Has the operator maintained accurate records documenting mechanical fitting failures resulting in hazardous leaks?	☒	☐	☐	☐
Inspector Comments						

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
35	.1009	Did the operator report all mechanical fitting failures that resulted in a hazardous leak for the previous calendar year to PHMSA and State authorities, as appropriate, by March 15th of the next calendar year? Did the reports contain the information required by Department of Transportation Form PHMSA F-7100.1-2?	☒ ☒	☐ ☐	☐ ☐	☐ ☐
Inspector Comments						
36	.1009	Did the operator follow its procedure(s) for collecting the appropriate information and submitting PHMSA Form F-7100.1-2? Methods to verify include, but are not limited to, the following: • Field observation of the excavation of a failed mechanical fitting • Examination of failed fittings or photographs that have been retained by the operator • Interview with field personnel responsible for collecting information	☒	☐	☐	☐
Inspector Comments						

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
	192.1011	**What records must an operator keep?**				
37	.1011	Is the operator retaining the records demonstrating compliance with Subpart P, as specified in its DIMP plan, for 10 years (or since 08/02/2011)?	☒	☐	☐	☐
Inspector Comments						
38	.1011	Did the operator retain for 10 years (or since 08/02/2011) copies of superseded DIMP plans?	☒	☐	☐	☐
Inspector Comments						
39	.1011	Did the operator follow its DIMP procedures applicable to records retention? If answered "Unsatisfactory/No", then list those procedures not followed below.	☒	☐	☐	☐
Inspector Comments						
	192.1013	**When may an operator deviate from required periodic inspections under this part?**				
40	.1013 (c)	Has the operator received approval from PHMSA or the appropriate State Regulatory Authority for alternate (less strict than code) periodic inspection intervals? (If no, mark questions 40-44 "N/A")	☐	☒	☐	☐
Inspector Comments						
41	.1013 (c)	Has the operator conducted the periodic inspections at the specified alternate intervals?	☐	☐	☒	☐
Inspector Comments						
42	.1013 (c)	Has the operator complied with all conditions that were required as part of the alternate inspection interval approval? If answered "Unsatisfactory/No", then provide comments below.	☐	☐	☒	☐
Inspector Comments						

Question Number	Rule §	Description	S/Y	U/N	N/A	N/C
43	.1013 (c)	Do performance measure records indicate that an equal or greater overall level of safety has been achieved since the alternate inspection frequency was implemented?	☐	☐	☒	☐
Inspector Comments						
44	.1013 (c)	If that an equal or greater overall level of safety has not been achieved, is the operator taking corrective action? Provide comments below regarding corrective actions taken or lack thereof.	☐	☐	☒	☐
Inspector Comments						

Additional Inspector Comments:

SUPPLEMENTAL INSPECTION QUESTIONS	S	U	N/A	N/C
NTSB SUPPLEMENTAL INSPECTION QUESTIONS				
Review operator procedures for determining if exposed cast iron pipe was examined for evidence of graphitization.			x	
If necessary, was remedial action taken?				
Review operator procedures for surveillance of cast iron pipelines			x	
Was appropriate action taken resulting from tracking circumferential cracking failures, study of failures, study of leakage history, or other unusual operating maintenance condition? (See GPTC Appendix G-18 for guidance)				
Review operator emergency response procedures for leaks caused by excavation damage near buildings.	x			
Do procedures adequately address the possibility of multiple leaks and underground migration of gas into nearby buildings (Refer to 4/12/01 letter from PHMSA)	x			
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.	x			
THIRD PARTY/EXCAVATION DAMAGE PREVENTION SUPPLEMENTAL QUESTIONS				
Review directional drilling/boring procedures of operator or its contractor – do they include actions to protect their facilities from the dangers posed by drilling and other trenchless technologies?	x			
Is operator following its written procedures pertaining to notification of excavation, marking, positive response, and the availability and use of the one-call system?		x		
Has operator adopted the CGA Best Practices document as a means of reducing damages to all underground facilities?	Yes			
If no, encourage and promote the adoption of CGA Best Practices document.				
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.	x			
PLASTIC PIPE DEFECTS/LEAKS & NPMS DATABASE SUPPLEMENTAL QUESTIONS				
Has operator identified any plastic pipe and /or components that have shown a record of defects/leaks?	No			
If yes, what is operator doing to mitigate the safety concerns? Any issues addressed though DIMP				
If transmission, has operator submitted information into National Pipeline Mapping System (NPMS) database along with any changes made after original submittal?				x
Comments:				

SUPPLEMENTAL INSPECTION QUESTIONS	S	U	N/A	N/C
PermaLock Mechanical Tapping Tee Assemblies				
Does the operator use PermaLock Mechanical Tapping Tee Assemblies?	No			
If yes, are they experience any issues with these type of installations?				
Comments:				
Are they using best practices recommended by the manufacturer in their O&M Manual and/or distribution integrity management programs?			x	
Are they using the specified tools and methods to correctly install these Assemblies?			x	
Comments:				

CYBERSECURITY QUESTIONNAIRE

49 CFR 192.605 Procedural manual for operations, maintenance, and emergencies.
807 KAR 5:022 Section 13(7) Continuing surveillance of operational systems.

1. *Does the operator utilize any business or operational systems which may be vulnerable to cybersecurity concerns?*

Yes	No	NA	NC
X			

Notes

2. *Has the operator developed and implemented a cybersecurity written plan that includes assessing and mitigating vulnerabilities for critical infrastructure and essential business systems? Describe.*

Yes	No	NA	NC
X			

Notes

3. *Has the operator utilized any internal or external resources and/or personnel assigned specifically with accessing and/or analyzing cybersecurity threats and vulnerabilities? Describe.*

Yes	No	NA	NC
X			

Notes: IT Security initially engaged consultant along with other like utilities Best Practices to develop program.

4. *Are cybersecurity threats considered as part of the operator's overall operations and maintenance plans?*

Yes	No	NA	NC
X			

Notes: Plan last updated 1/01/2019.

5. *Has the operator experienced any cyber-attacks related to its business or operational systems? Describe.*

Yes	No	NA	NC
	X		

Notes

6. *Identify personnel with specific responsibilities for cybersecurity within your organization?*

Yes	No	NA	NC
X			

Notes: Bruce Mannery, director of IT

*Louisville Gas and Electric Company
220 W. Main Street
P. O. Box 32010
Louisville, KY 40232-2010

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Louisville, KY 40232-2010

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Louisville Gas and Electric Company
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P. O. Box 32010
Louisville, KY 40232-2010