



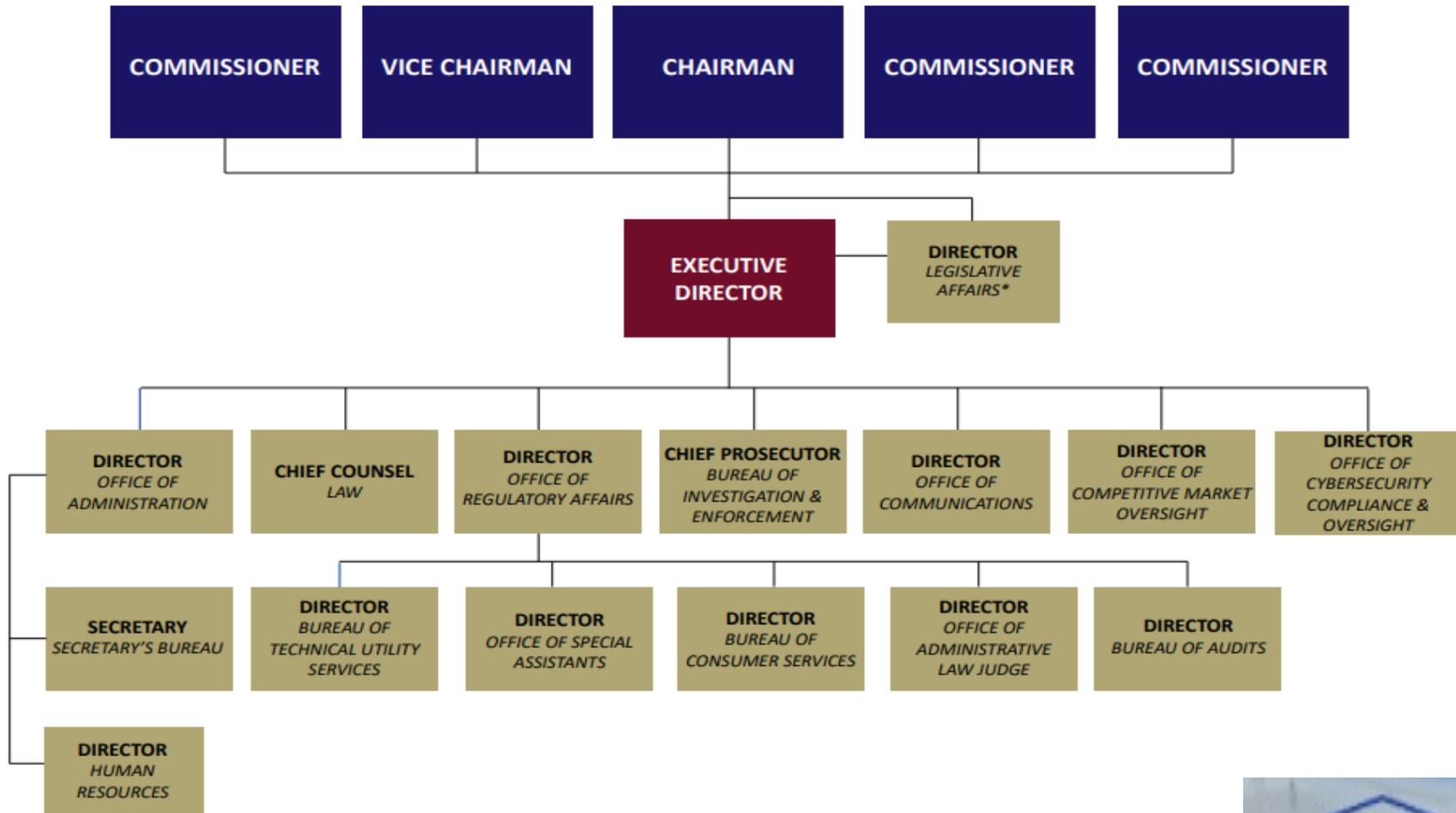
2024 Pipeline Safety Seminar
Via TEAMS LIVE EVENT
September 5, 2024

The PA PUC Mission Statement-

The mission of the Pennsylvania Public Utility Commission is to balance the needs of consumers and utilities; ensure safe and reliable utility service at reasonable rates; protect the public interest; educate consumers to make independent and informed utility choices; further economic development; and foster new technologies and competitive markets in an environmentally sound manner.



PUC ORGANIZATIONAL CHART



*Dual reporting relationship to Commissioners and Executive Director



Opinions and content are that of I&E and I&E does not speak for the Commission

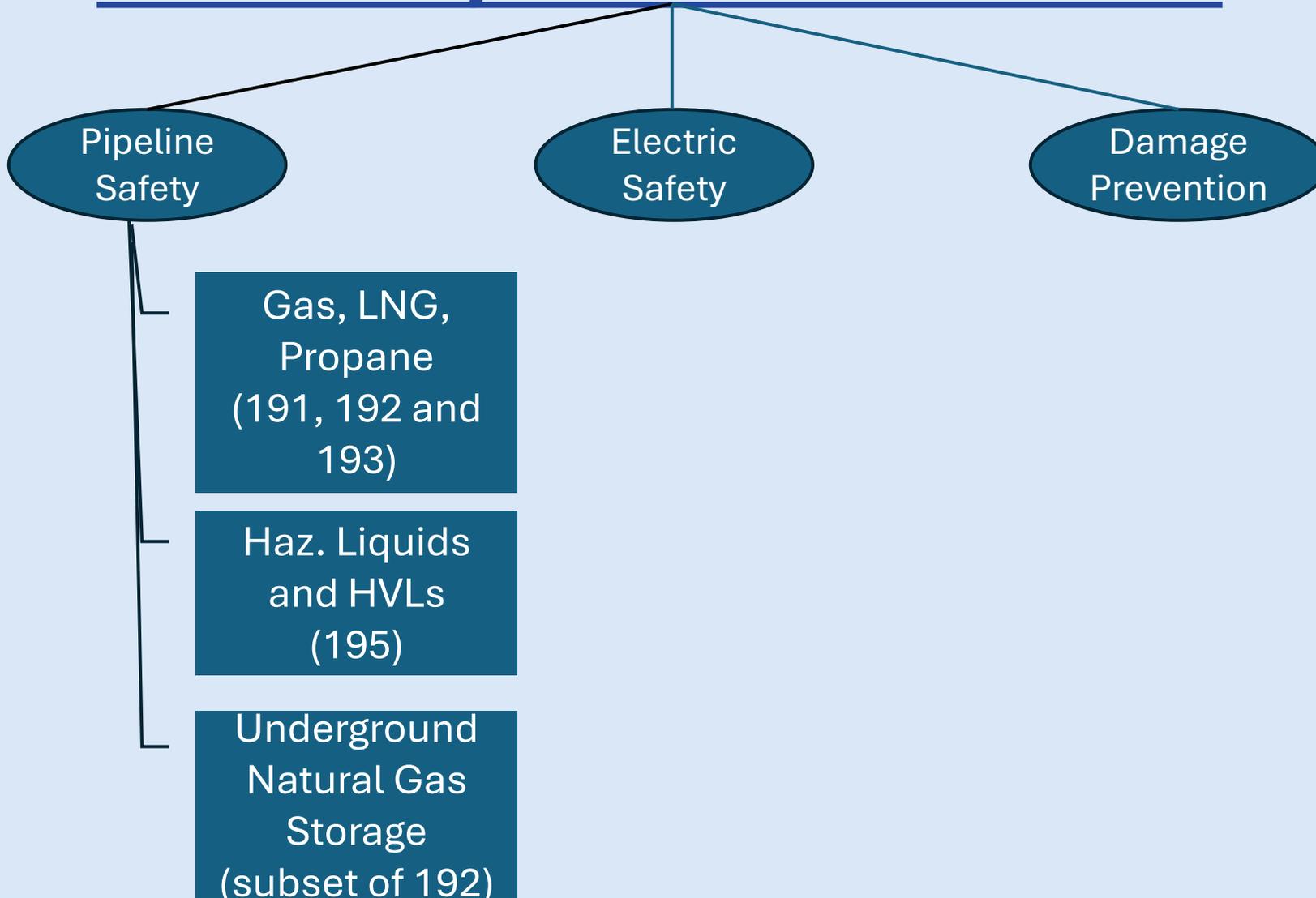


The Bureau of Investigation and Enforcement-

- The Bureau of Investigation and Enforcement, or I&E or BIE, is the independent prosecutor and enforcement arm of the Public Utility Commission.
- While a part of the Commission, I&E is considered independent of the Commission. The Commission does not have the authority to require or instruct I&E to complete an investigation or institute an action.
- I&E handles multiple areas of public utility law, including but not limited to ratemaking, service complaints, rail safety, electric safety, damage prevention and state and federal motor carrier and pipeline safety laws and regulations. I&E has a rates division, an enforcement division, a motor carrier enforcement division, and a safety division.



I&E Safety Division Structure



Safety Structure:

Safety Manager

Administrative Assistant

Damage Prevention

Electric Safety

Pipeline West

Pipeline SE

Pipeline Central

Pipeline North

1 Supervisor
5 Investigators

1 Supervisor
4 Inspectors

1 Supervisor
8 Inspectors

1 Supervisor
6 Inspectors

1 Supervisor
5 Inspectors

1 Supervisor
5 Inspectors





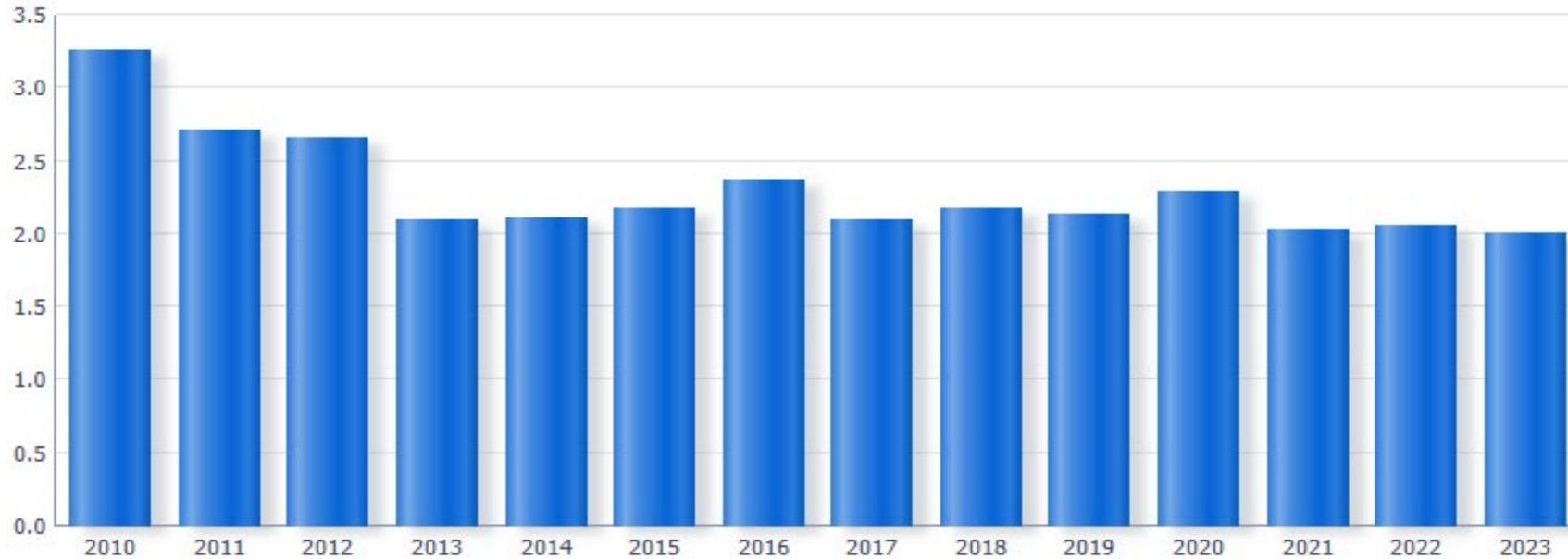
Focus Points:

- Damage Prevention
- Plastic Fusions
- Pipeline Replacement
- NTSB Recommendation
- Geo-hazard resources

Damage Prevention Stats:

- PA-2.00 in 2023
- National- 2.51

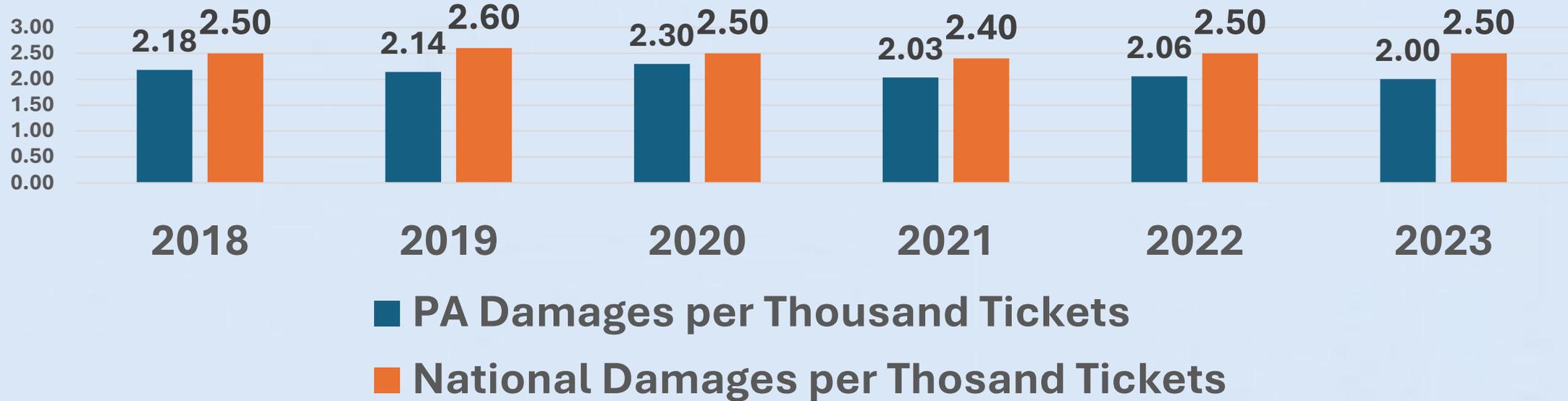
Pennsylvania Public Utility Commission: Natural Gas Distribution
Excavation Damages per 1,000 Tickets



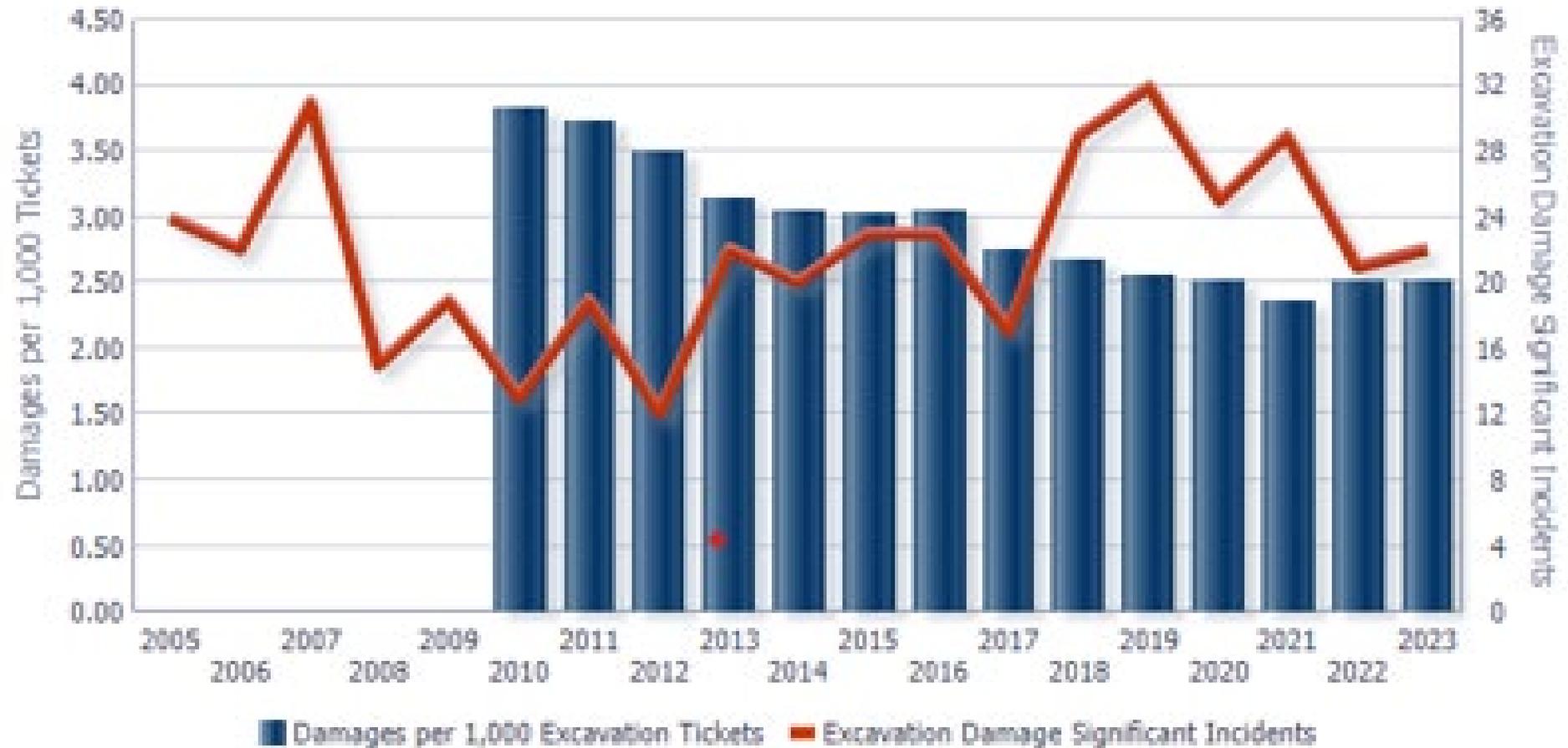
Damage Prevention Natural Gas:

*** Over 1 Million tickets received in PA in 2023**

PA Damages per 1,000 Tickets Vs. National Damages per 1,000 Tickets
2018 through 2023

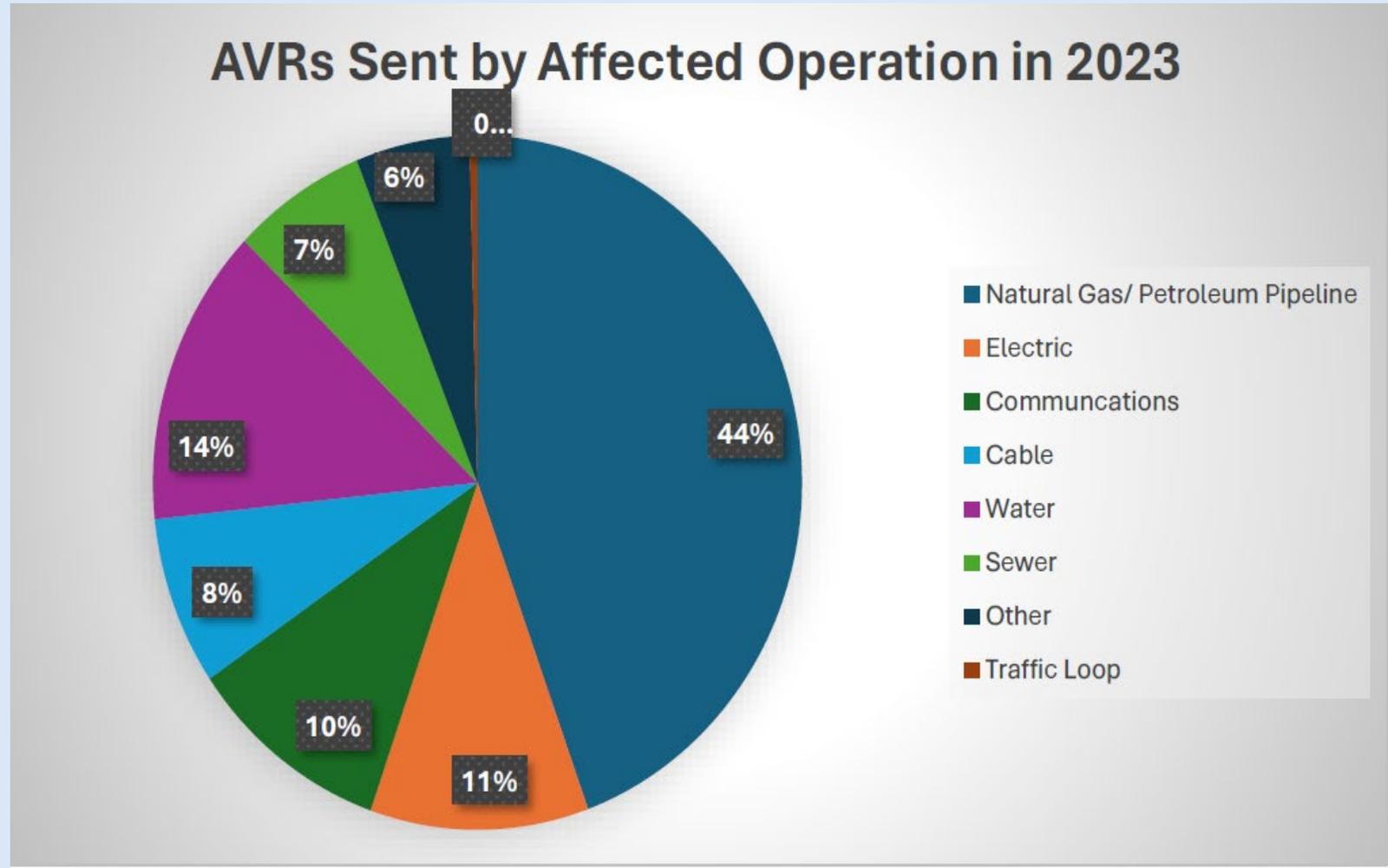


National Data Jurisdictional Pipeline Damages:





Alleged Violation Reports:



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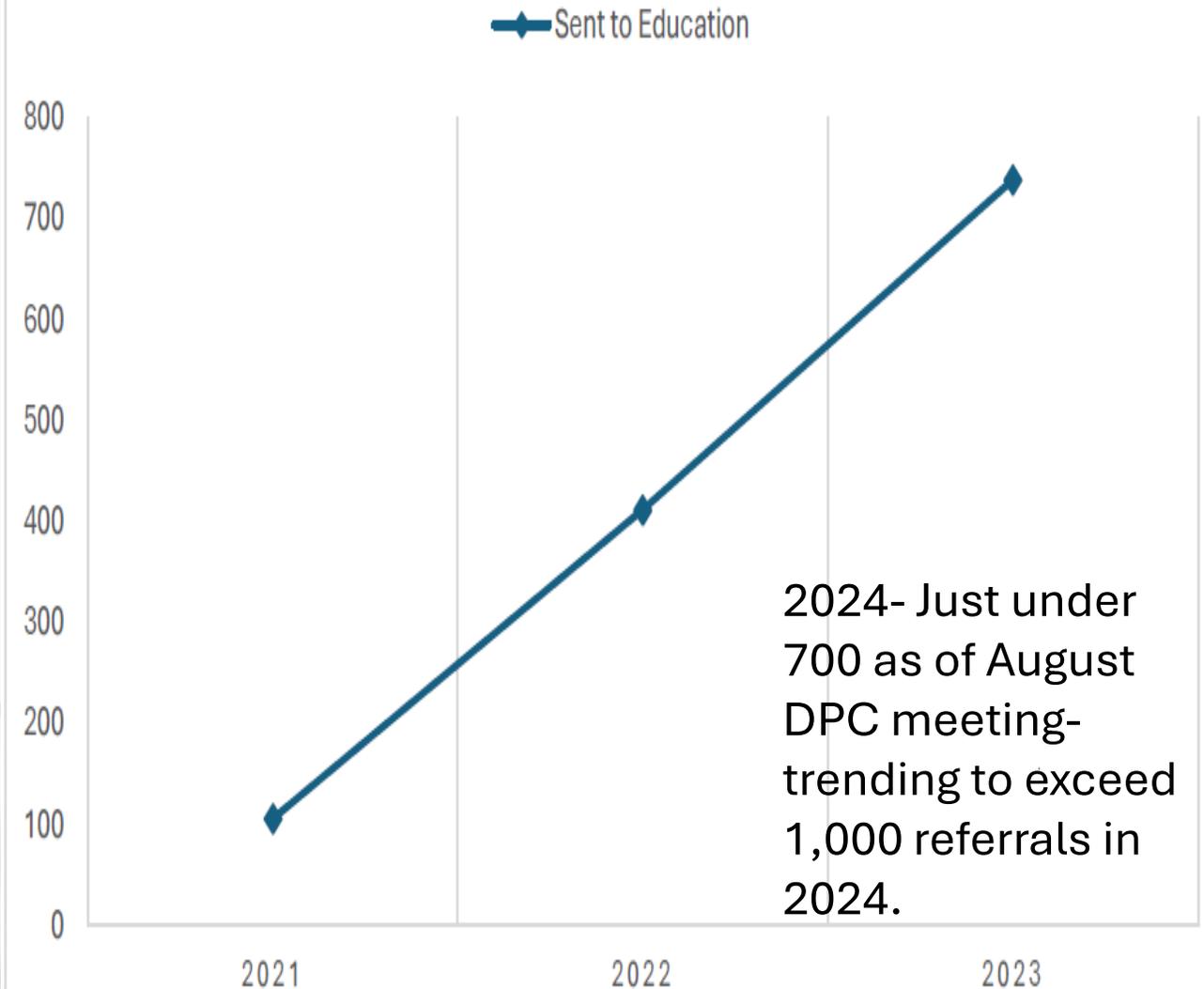
Damage Prevention:

In 2023:

- 53% Excavator
- 27% Locator
- 13% Project Owner
- 7% Designer



EDUCATION REFERRALS 2021-2023



Damage Prevention Statistics for Gas:

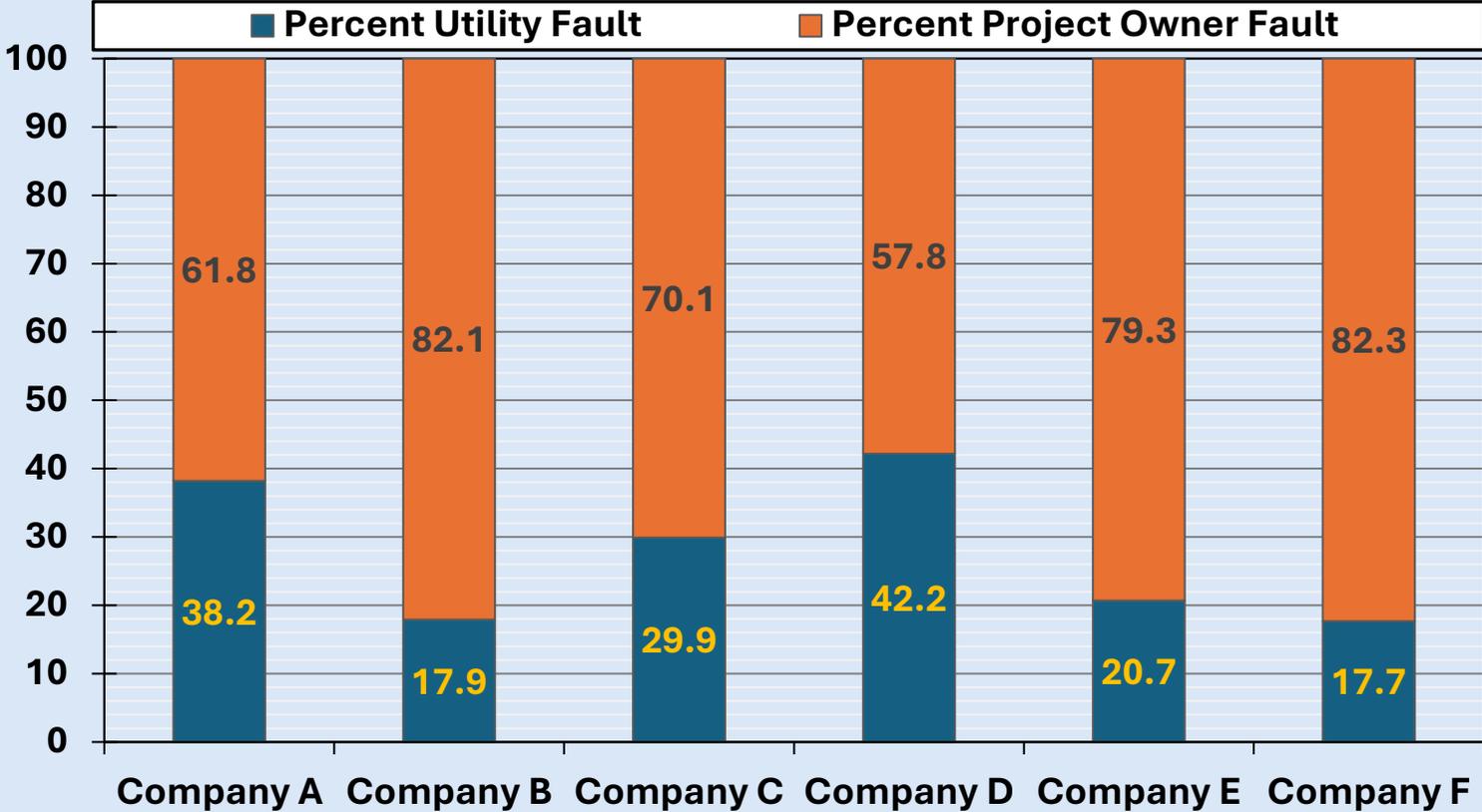
- **262 fewer gas pipeline damages reported in 2023 than 2022**
- **3,678 AVR for pipeline facilities- increase of about 73... Better reporting**
- **Hits per 1,000 tickets also lower in 2023**
- **Removed/replaced more risky main in 2023... Over 500 miles of metallic risky main was removed in 2023 while the average over the previous 4 years was approximately 443 miles.**
- **11 % decrease in gas pipeline damages reported and a 12% increase in pipeline replacement mileage in 2023 and fewer hits per tickets received.**





Room to Improve:

Utility vs Project Owner



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Annual Report Data for PA:

Calendar Year	Number of Excavation Tickets	Number of Excavation Damages	Damages per Thousand Tickets	One-Call Notification Practices Not Sufficient	Locating Practices Not Sufficient	Excavation Practices Not Sufficient	Other	One-Call Notification Practices Not Sufficient	Locating Practices Not Sufficient	Excavation Practices Not Sufficient	Other
2023	1,078,834	2,002	1.9	340	590	1,015	57	17%	29%	51%	3%
2022	1,101,066	2,264	2.1	437	661	1,138	28	19%	29%	50%	1%
2021	1,083,909	2,202	2.0	465	686	1,011	40	21%	31%	46%	2%
2020	1,042,019	2,393	2.3	473	805	1,079	36	20%	34%	45%	2%
2019	1,120,277	2,396	2.1	488	811	1,058	39	20%	34%	44%	2%
2018	1,072,779	2,339	2.2	432	582	1,123	202	18%	25%	48%	9%
2017	993,722	2,079	2.1	448	478	1,002	151	22%	23%	48%	7%
2016	920,280	2,182	2.4	422	310	962	488	19%	14%	44%	22%
2015	949,833	2,065	2.2	428	363	871	403	21%	18%	42%	20%



Damage Prevention Findings:

- Karl Responses need to be FINAL and not INTERIM
- Karl response at the legal dig date needs to be FINAL
- Operators need to track and set a 100% compliance goal for:
 - Final Response on all Tickets
 - Ontime locates on ONECALL Tickets
 - Track and conduct cause analysis on Late Locates
 - Track and conduct cause analysis non-marked ONECALL Tickets
 - Track and conduct cause analysis for inaccurate facility locates for ONECALL Tickets



Damage Prevention Events:

- 13 Non-Compliance Letters sent in 2023/2024 regarding damages
- 5 active Enforcement Cases with I&E Enforcement involving damages:
 - Incidents
 - Death and Injury
 - Explosions
 - Fires
 - Outages
 - Loss of property
 - Building
 - Machinery





Plastic Fusions:

- The number of investigations into plastic failures continues to grow.
- Recently installed projects with high percentage of fusion that fail visual and/or destructive testing.
 - Qualifications, testing and training
 - Procedures and practices
 - Fusion/ construction oversight
 - Span of control
 - QA/QC
 - Accountability
 - Random testing
 - Pre-job testing of pipe material, machines, fusers
 - Locations and detail of fusion records.
 - Fusion documentation records and photographic records
 - Fusion failure analysis- root cause

PHMSA Oversight

State Programs

- **Progress report**
- **Base grant**
- **Records Audit**
- **Field Audit**
- **Financial Audit**

PHMSA Training and Qualifications

- **Inspectors must be trained and qualified**
- **Continuing education**
- **Inspection Days-SICT**
- **20% construction**
- **Risk analysis**
- **Data collections**

Grants

- **Pennsylvania has 4 federal grants for the Pipeline Section:**
 - **ONECALL Enforcement Grant**
 - **Gas Program**
 - **Hazardous Liquid Program**
 - **Underground Natural Gas Storage Program**



National Topics:



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NTSB Recommendations to PHMSA: P-24-2- SMS Systems

- Mandate SMS Implementation
 - The NTSB strongly advocates that PHMSA should mandate all pipeline operators to adopt and actively utilize a comprehensive SMS system. API RP 1173
- Enhance Risk Assessment-IM
 - Identify High Risk Areas
 - Prioritize Safety Measures
- Incident Reporting Analysis
 - Robust reporting procedures
 - Include Near-miss
 - Effective Analysis and Preventative Actions
- Corrective Action Plan with clear and actionable corrective plans
- The NTSB encourages a culture of continuous improvement within pipeline operations, where safety performance is regularly monitored and updated based on learnings.

[Pipeline Safety Management Systems \(nts.gov\)](https://www.nts.gov/pipeline-safety-management-systems)

Pennsylvania Topics

- **Enforcement Investigations/Complaints**
- **Ratecases**
- **Interpretation request**
- **Press releases**
- **LNG: PUC/PHMSA Partnership**
- **2025 Safety Seminar**
 - **Planning Underway**
 - **State College**
- **Cast Iron Replacement Grants- “NGDISM”**
 - **Natural Gas Distribution Infrastructure Safety & Modernization Grant**
- **Hiring and onboarding**
- **Strategic Planning Initiative**
- **Plastic Pipeline Replacement-Tentative Order**
- **HL Public Utility Rulemaking**
- **ONECALL Reauthorization**
- **Plastic Fusions**
- **Damage Prevention**

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PHMSA meeting reminders...

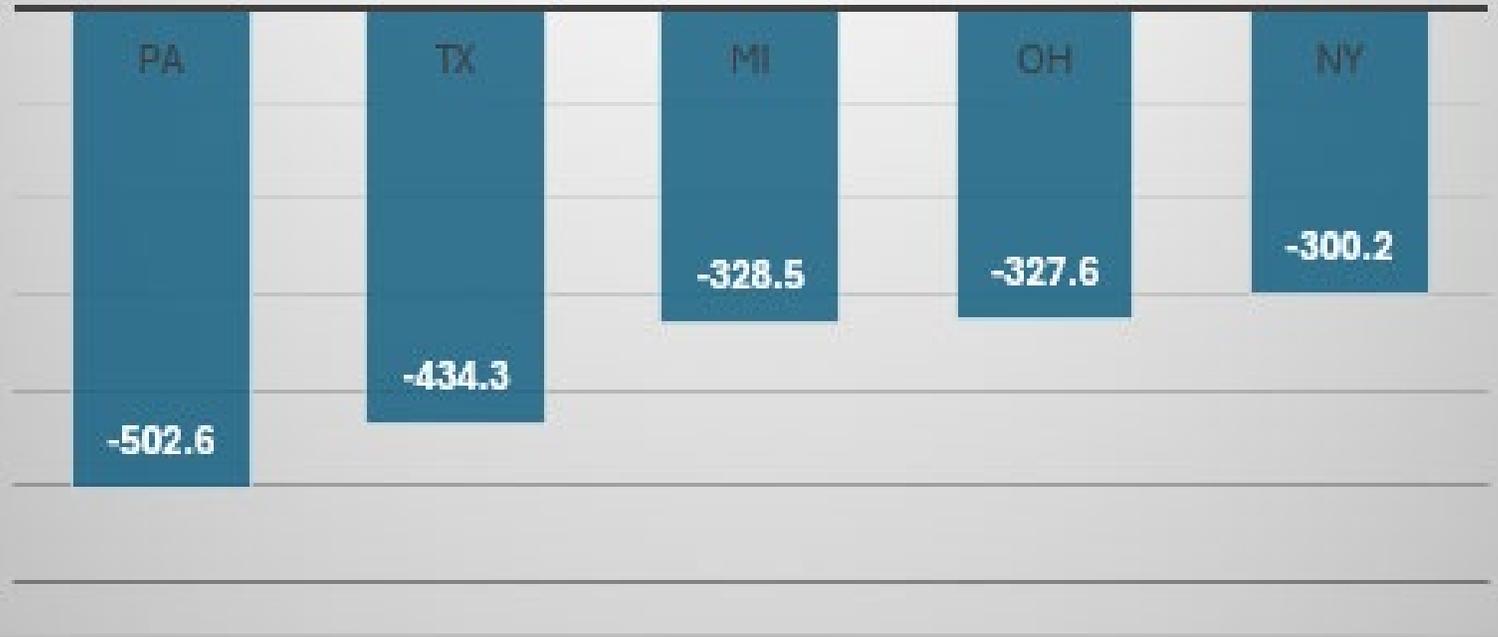
- **DIMP Pilot Project**
- **Focus on Damage Prevention**
- **Stop Work Authority**
 - **Trenching and shoring**
 - **Confined Space Entry**
 - **PPE**
 - **Machinery Safety**
 - **Overall unsafe work practices**
- **Potential Language change in Non-Compliance Letters. PHMSA has a requirement to include language regarding the potential civil penalty.**
- **FL Data Requests**
 - **Gas Distribution**
 - **Transmission**
 - **HL**
 - **Gas Gathering and non-public utility**
- **The Role of the State Pipeline Safety Programs - PHMSA partnership with the states is critical in advancing the safety of our nation's 3.2 million miles of pipelines. Over 80% of the pipeline miles fall under the safety jurisdiction of states.**





PA Pipeline Replacement

Total Miles of At-Risk Metallic Main Removed in 2023 (Top 5 States)





PA Pipeline Replacement

Miles of At-Risk Metallic Main Remaining in 2023 (Top 5 States)



Earthquake FL-3:

- On April 5, 2024, a 4.7 magnitude earthquake centered in Whitehouse Station NJ was felt in several counties in PA.
- Operators reminded to implement procedures for earth movement
- Operators not affected reminded to review procedures
- Revisit **Advisory Bulletin (ADB-2019-02)**



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
COMMONWEALTH KEYSTONE BUILDING
400 NORTH STREET, HARRISBURG, PA 17120

BUREAU OF
INVESTIGATION
&
ENFORCEMENT

April 5, 2024

REFERENCE:
FL-3-24

VIA EMAIL DELIVERY

Pennsylvania Pipeline Operators

Dear Jurisdictional Pipeline Operators,

At 1023 hours a Magnitude 4.7 Earthquake was felt in multiple states and Commonwealth Counties. The earthquake originated in the vicinity of Whitehouse Station, New Jersey per USGS's Earthquake report.

For those entities affected, please review and implement pertinent procedures and plans for post-earthquake actions and O&M activities. Included with email is PHMSA Advisory Bulletin 2019-02 regarding Earth movement and Geologic Hazards.

For those entities not affected, please take this opportunity to review your plans and procedures. Post earthquake aftershocks are common and may require additional and continued actions by the operators.

Local Pipeline Safety engineers and supervisors will follow up with affected companies and shops as time allows, or during their next visit. Please reach out to me and the local supervisor directly if you have integrity impacts from this event.

We appreciate your actions to promote safety in Pennsylvania. Thank you.

Yours truly,

A handwritten signature in black ink that reads 'Robert Horensky'.

Robert Horensky, Manager
Safety Division
Bureau of Investigation and Enforcement

RH:rb

PC: Allison Kaster, Director, I&E

ADB-2019-02

Potential Damage to Pipeline Facilities Caused by External Loads Imposed by Earth Movement and Other Geologic Hazards on and Adjacent to Pipeline Right of Way Corridors:

Advisory: All owners and operators of gas and hazardous liquid pipelines are reminded that earth movement, particularly in variable, steep, and rugged terrain and with varied geological subsurface conditions, can pose a threat to the integrity of a pipeline if those threats are not mitigated. Pipeline operators should consider taking the following actions to ensure pipeline safety:



API RP 1187

- API Enhances Pipeline Safety Against Geohazards with New Standard
 - Not incorporated by reference in federal code
 - **Key Features and Enhancements**
API RP 1187 addresses the unique challenges of landslide hazards and their impact on transmission pipelines by establishing robust management practices.
 - It provides comprehensive guidance for all aspects of landslide hazard management, including threat management, decision making and change process management, along with recommendations associated with screening techniques, monitoring areas of concern and mitigation activities.



FL-4 Construction Notices and FL-5 Meter Testing: Both must be filed with the PA PUC Secretary's Bureau



COMMONWEALTH OF PENNSYLVANIA
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COMMONWEALTH KEYSTONE BUILDING
400 NORTH STREET, HARRISBURG, PA 17120

BUREAU OF
INVESTIGATION
&
ENFORCEMENT

May 2, 2024

REFERENCE:
FL-4-24

VIA EMAIL DELIVERY

Pennsylvania Public Utility Operators

Dear Pennsylvania Public Utility Operator,

The Safety Division is sending this correspondence to emphasize the requirement to satisfy compliance with PA Code §59.38 Filing of Major Construction Reports. The reports must be submitted to the PA PUC Secretary's Bureau through eFiling at efiling.puc.pa.gov using existing Case M-2020-3021947 docket. Attached in this email are our eFiling user guides for those who are not familiar with our eFiling system for your convenience.

Additionally, a courtesy copy of the reports should be sent to the Safety Division at RA-PC-PipelineSafety@pa.gov and TCSmith@pa.gov@pa.gov; paper copies will no longer be accepted. This process is in effect immediately.

If you should have any questions, feel free to contact us. We appreciate your actions to promote safety in Pennsylvania. Thank you.

Yours truly,

Robert Horensky, Manager
Safety Division
Bureau of Investigation and Enforcement

RH:rb
PC: Allison Kaster, Director, I&E



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BUREAU OF
INVESTIGATION
&
ENFORCEMENT

May 2, 2024

REFERENCE:
FL-5-24

VIA EMAIL DELIVERY

Pennsylvania Public Utility Operators

Dear Pennsylvania Public Utility Operator,

The Safety Division is sending this correspondence with respect to Meter Testing/Accuracy Filings for gas as required by PA Codes §59.19 through §59.21. The reports must be submitted to the PA PUC Secretary's Bureau through eFiling at efiling.puc.pa.gov using existing Docket # M-2024-3047438. Attached in this email are our user guides for those who are not familiar with our eFiling system for your convenience.

Additionally, a courtesy copy of the reports should be sent to the Safety Division at RA-PC-PipelineSafety@pa.gov and TCSmith@pa.gov@pa.gov; paper copies will no longer be accepted. This process is in effect immediately.

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Safety Division
Bureau of Investigation and Enforcement



PUC and PHMSA:

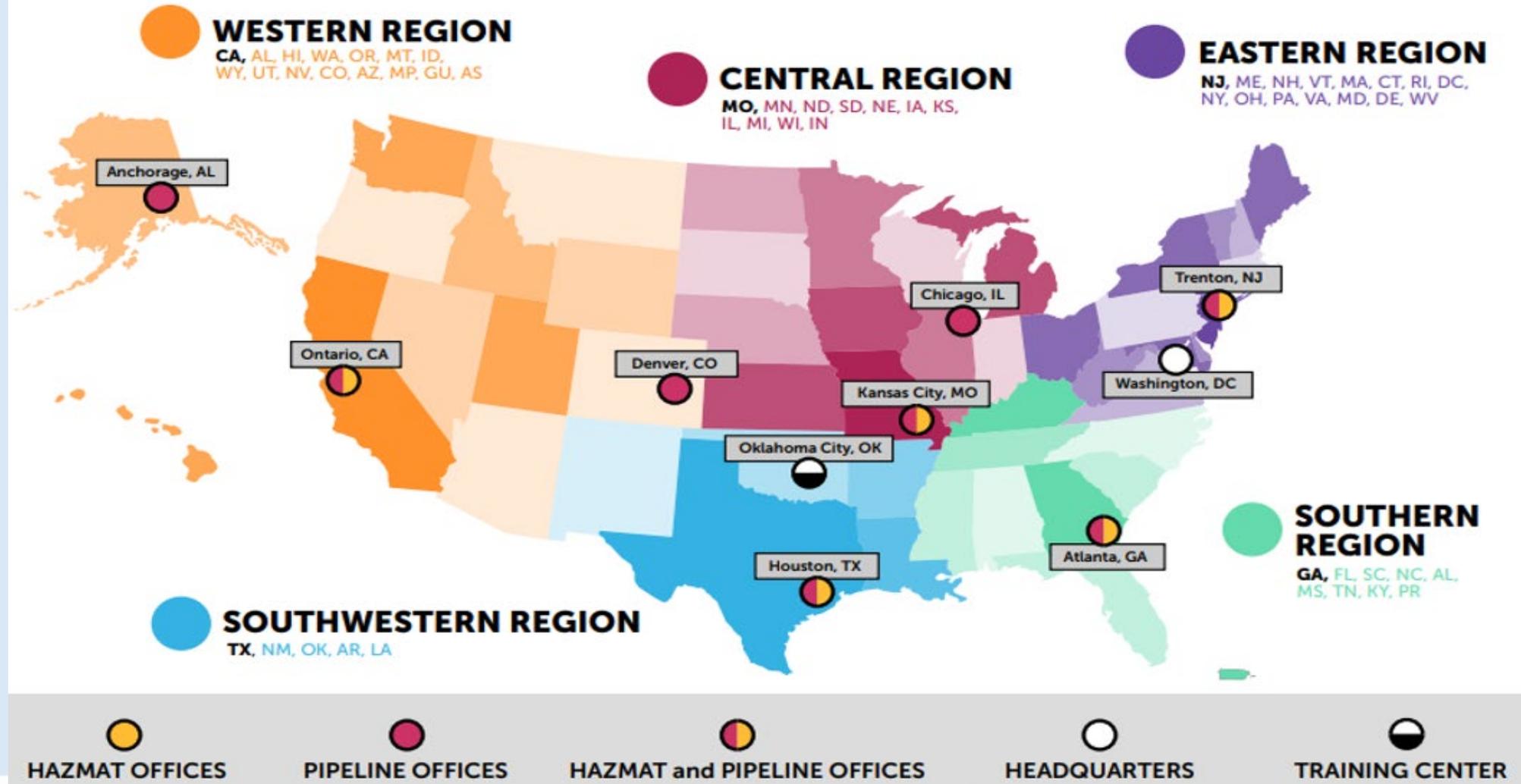
The Commission is annually authorized and certified to enforce federal safety standards by the U.S. Department of Transportation's Office of Pipeline Safety per 49 U.S.C. 60105. Under a *60105 Certification*, the State Agency assumes inspection and enforcement responsibility with respect to intrastate facilities over which it has jurisdiction under State law. With a Certification, the State Agency may adopt additional or more stringent standards for intrastate pipeline facilities provided such standards are compatible with Federal regulations. 49 U.S.C. Chapter 601 provides the statutory basis for the pipeline safety program and establishes a framework for promoting pipeline safety through exclusive Federal authority for regulation of interstate pipeline facilities and State authority for all or part of the intrastate pipeline facilities under annual Certification.





- The pipeline safety statutes allow for States to assume safety authority over intrastate gas pipelines, hazardous liquid pipelines, and underground natural gas storage through Certifications and Agreements with PHMSA under 49 U.S.C. §§ 60105- 60106.
- District of Columbia and Puerto Rico
- Hawaii and Alaska do not participate

NAPSR and PHMSA Regions



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THANK YOU!

