



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

1200 New Jersey Avenue SE  
Washington DC 20590

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# Pipeline Safety

## 2018 Gas Base Grant Progress Report

for

PUBLIC UTILITIES COMMISSION NEVADA

**Please follow the directions listed below:**

1. Review the entire document for completeness.
2. Review and have an authorized signatory sign and date page 2.
3. Scan the signed document to your computer and email it to [Carrie.Winslow@dot.gov](mailto:Carrie.Winslow@dot.gov).



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Electronic Submission Date: 3/5/2019 8:48:40 PM



Pipeline and Hazardous Materials Safety Administration  
1200 New Jersey Avenue, SE  
Washington DC 20590

OFFICE OF PIPELINE SAFETY  
2018 Gas Base Grant Progress Report

Office: PUBLIC UTILITIES COMMISSION NEVADA

Neil Pascual

\_\_\_\_\_  
Authorized Signature

Neil Pascual

\_\_\_\_\_  
Printed Name

Inspector

\_\_\_\_\_  
Title

3/5/2019 8:48:40 PM

\_\_\_\_\_  
Date



## PROGRESS REPORT ATTACHMENTS (GAS )

PHMSA Form No. PHMSA F 999-92

### INSTRUCTIONS:

These attachments request information either for the entire calendar year (CY 2018: January 1 through December 31, 2018) or as of (or on) December 31, 2018. Please report actual as opposed to estimated numbers on the attachments. Be careful to provide complete and accurate information since the PHMSA State Programs will be validating the attachments during the state's next annual evaluation.

- **Attachment 1: State Jurisdiction and Agent Status Over Facilities.** Requires the state to indicate those pipeline operator types over which the state agency has jurisdiction under existing law. If the state does not have jurisdiction over an operator type, indicate why not in the column designated No, using the one alpha code (A or B) which best describes the reason. If the state agency has jurisdiction over an operator type, place an X in the column designated Yes and provide information on the number of operators, the number and percent of operators inspected, the number of inspection units, and the number and percent of inspection units inspected. If the jurisdiction over a type of operator is under a Section 60106 Agreement, indicate X/60106 in the column designated Yes. If an operator has multiple types of system (i.e. gas distribution and intrastate transmission), each type should be counted in corresponding category. Total operator count listed in Attachment 3 may not match Attachment 1 totals due to multiple types of systems per operator. If the same operator/inspection unit is visited more than once during the year, count only once under number of operators inspected/number of inspection units inspected on Attachment 1. The multiple visits would, however, be reflected under total inspection person-days in Attachment 2.
- **Attachment 2: Total State Field Inspection Activity.** Requires the state to indicate by operator type the number of inspection person-days spent during CY 2018 on inspections; standard comprehensive; design, testing, and construction; on-site operator training; integrity management; operator qualification; investigating incidents or accidents; damage prevention activities; and compliance follow-up. Attachment 2 should include drug and alcohol inspections. Counting "In Office" Inspection Time - An inspector may choose to review pipeline company procedure manuals or records away from the company facility in order to effectively use on-site inspection time. The amount of time spent reviewing procedures and records may be counted as part of the inspection process. It is important that an inspector only record time for activities that normally would be completed as part of an on-site inspection. For example, an inspector may attribute the three hours he or she spent reviewing a pipeline operator's procedure manual and records prior to an on-site inspection towards the total inspection time. Each supervisor must carefully review the reported time to ensure the time attributed is consistent with the activity completed and is carefully delineated from normal office duties.
- **Attachment 3: Facility Subject to State Safety Jurisdiction.** States should only list the facilities that are jurisdictional under Parts 192 and 193 (Gas) and Part 195 (Hazardous Liquid) of which the state has safety authority over. This attachment requires the business name and address of each person subject to the pipeline safety jurisdiction of the state agency as of December 31, 2018. Also indicate the operator type (e.g., intrastate transmission) consistent with the listing in Attachment 1 and include the number of inspection units in each operator's system. The operator identification number (OPID) assigned by PHMSA must also be included on this attachment. If an operator has multiple types of system (i.e. gas distribution and intrastate transmission), each type should be counted in corresponding category. Total operator count listed in Attachment 3 may not match Attachment 1 totals due to multiple types of systems per operator.
- **Attachment 4: Pipeline Incidents.** Requires a list of incidents investigated by or reported to the state agency that involved personal injury requiring hospitalization, a fatality, property damage exceeding \$50,000, and others deemed significant by the operator. Clearly identify the operator's reported cause AND the state's determination of the cause of the incident using the one most appropriate alpha code footnoted in the attachment. We summarize this information for Congress by classifying the cause into one of eight top-level categories: (A) corrosion failure; (B) natural force damage; (C) excavation damage; (D) other outside force damage; (E) material failure of pipe or weld; (F) equipment failure; (G) incorrect operation; (H) other accident cause. Within each top-level cause you will find multiple sub-causes, select the appropriate cause code. You can also choose (IP) Investigation Pending for those incidents remaining under investigation as of December 31. Then provide a summary of incident investigations.

- **Attachment 5: State Compliance Actions.** This requires a summary of state pipeline inspection and compliance actions. [In the Number of Compliance Actions Taken column, keep in mind one compliance action can cover multiple probable violations.]
- **Attachment 6: State Record Maintenance and Reporting.** Requires a list of records and reports maintained and required by the state agency.
- **Attachment 7: State Employees Directly Involved in the Pipeline Safety Program.** This attachment requires a list by name and title of each employee directly involved in the pipeline safety program. Be sure to include the percentage of time each employee has been involved in the pipeline safety program during 2018. If an employee has not been in the pipeline safety program the full year of 2018, please note the number of months working on the program. Indicate a Qualification Category for each of the state's inspectors (see Attachment 7a). The categories are shown in descending order of education and experience. Please enter the number of the highest description applicable to each inspector. For each inspector and supervisor, indicate the month and year he/she successfully completed the training courses at the Pipeline Safety Office of Training and Qualifications in Oklahoma City, OK. Finally, provide in summary form the number of all staff (supervisors, inspectors/investigator, damage prevention/technical and clerical/administrative) working on the pipeline safety program and the person-years devoted to pipeline safety. Person-years should be reported in hundreds (e.g., 3.25).
- **Attachment 8: State Compliance with Federal Requirements.** This requires the state to indicate whether it is in compliance with applicable federal requirements. If a particular requirement is not applicable to the state (e.g. offshore inspections), indicate NA in the column designated Y/N/NA and indicate in the notes section why the regulation is not applicable. If a regulation has been adopted, indicate the date adopted (e.g., 05/01/04) in the appropriate column. If the regulation is applicable but has not been adopted indicate N in the Y/N/NA column and explain why not in the appropriate column (e.g., requires legislative action). If the state has not adopted the maximum penalty amounts for a related series of violations please indicate civil penalty levels in effect in the state as of December 31. For State Adoption of Part 198 State One Call Damage Prevention Program if a state has any penalty amount for its damage prevention law please mark item 7.h as “Adopted but Different Dollar Amounts” and list the penalty amount in the Note section. Note at the end of Attachment 8 we are requesting each state to indicate the frequency its legislature meets in general session. This information will be taken into account when determining if applicable federal regulations have been adopted within 24 months of the effective date or two general sessions of the state legislature.
- **Attachment 10: Performance and Damage Prevention Questions.** This attachment requires a narrative of each states goals and accomplishments. In addition it requires a narrative on each states progress toward meeting the nine elements of an effective damage prevention program as described in the PIPES Act of 2006.



## DEFINITIONS

- **Inspection Unit.** An inspection unit is all or part of an operator's pipeline facilities that are under the control of an administrative unit that provides sufficient communication and controls to ensure uniform design, construction, operation, and maintenance procedures for the facilities. (See Glossary of Terms in Guidelines for States Participating in the Pipeline Safety Program for application of the inspection unit concept to transmission and hazardous liquid pipeline systems, distribution systems, liquefied gas systems, municipality, master meter system, regulated gathering pipeline systems, and propane-air systems/petroleum gas systems.)
- **Inspection Person-Day.** An inspection person-day is all or part of a day spent by a state agency representative including travel in an on-site examination or evaluation of an operator or his system to determine if the operator is in compliance with federal or state pipeline safety regulations, in an on-site investigation of a pipeline incident, or in job-site training of an operator. Time expended on such activities should be reported as one inspection person-day for each day devoted to safety issues, regardless of the number of operators visited during that day.
- **Probable Violation.** A probable violation is a non-compliance with any section or, where a section is divided into subsections (a), (b), (c), etc., any subsection of federal or state pipeline regulations. Each numbered section should be counted separately. Multiple non-compliances of a numbered section discovered on the same inspection should be counted as one probable violation with multiple pieces of evidence.
- **Compliance Action.** A compliance action is an action or series of sequential actions taken to enforce federal or state pipeline regulations. One compliance action can cover multiple probable violations. A compliance action may take the form of a letter warning of future penalties for continued violation, an administratively imposed monetary sanction or order directing compliance with the regulations, an order directing corrective action under hazardous conditions, a show-cause order, a criminal sanction, a court injunction, or a similar formal action.



## Attachment 1 - Stats on Operators

### STATE JURISDICTION AND AGENT STATUS OVER GAS FACILITIES AS OF DECEMBER 31, 2018

Operator Type	State Agency Jurisdiction/ Agent Status		No. of Operators	Operators Inspected		No. of Inspection Units	Units Inspected	
	No <sup>1</sup>	Yes		#	%		#	%
<b>Distribution</b>								
Private		X/60105	2	2	100.0%	3	3	100.0%
Municipal		X/60105	0	0	N/A	0	0	N/A
Master Meter		X/60105	1	1	100.0%	1	1	100.0%
LPG		X/60105	5	5	100.0%	22	22	100.0%
Other		X/60105	0	0	N/A	0	0	N/A
<b>Transmission</b>								
Intrastate		X/60105	7	7	100.0%	8	8	100.0%
Interstate	F		0	0	N/A	0	0	N/A
<b>LNG</b>								
Intrastate		X/60105	0	0	N/A	0	0	N/A
Interstate	F		0	0	N/A	0	0	N/A
<b>Other</b>								
Gathering Lines	A		0	0	N/A	0	0	N/A
Offshore Facilities	A		0	0	N/A	0	0	N/A
<b>Total</b>			<b>15</b>	<b>15</b>	<b>100.0%</b>	<b>34</b>	<b>34</b>	<b>100.0%</b>

<sup>1</sup>Codes: A - None in state and does not have jurisdiction;

B - State does not have jurisdictional authority (Provide current status or action being taken to obtain authority in notes section below)

F - No, State is currently not an interstate agent.

X/60105P = Yes, I have Section 60105 (Certification) over some of the operator type (meaning: I have 60105 authority over some, but not all of this operator type and do not have a 60106 agreement with PHMSA to inspect them). These operators are identified in the notes below.

X/IA - Yes, I have Interstate Agent jurisdiction over this type of operator

Distribution "Other" - ie Co-ops, Public Utility Districts, etc.

States should explain any special circumstances

**General Instructions** - All above facilities should only include facilities as defined by federal pipeline regulations and should not include extended jurisdiction by state regulation.

#### Attachment 1 Notes:

Nevada pipeline safety program (PSP) experienced several changes in 2018 regarding the number of jurisdictional

operators it is reporting as well as the number of inspection units. Those changes are as follows:

1. In 2018, AmeriGas made piping modifications on one (1) jurisdictional LPG systems in Nevada, resulting in this systems no longer being jurisdictional. This change results in the number of LPG inspections units falling from 16 (as reported in 2017) to 15 (in 2018). The one AmeriGas change occurred at the Reds Candy Shop LPG system in Virginia City, NV. The system configuration was changed to a single tank, single customer LPG system, making it non-jurisdictional. Since AmeriGas operates all of its LPG systems under its corporate name (OPID #32013), this reduction in an LPG system inspection unit did not impact the number of LPG operators listed for Nevada.

2. In 2012, as part of Docket No. 12-06043, the PUCN approved a plan to have aging master meter systems located within the LDC's service territories replaced by new modern plastic systems owned and operated by the LDC. To-date approximately ten (10) of these such conversions have occurred. These conversions have resulted in the number of master meter systems in Nevada to continually decline over the past 4 years. Conversion on the Carefree Mobile Home Park (OPID #37062) started in June 2017 and final conversion occurred on January 6, 2018. As such, Nevada's pipeline safety program is no longer listing Carefree MHP as a master meter operator. Jamerson Pender at PHMSA was notified of this change on February 2, 2018, and was asked to remove Carefree MHP from the Nevada operator list in the Pipeline Data Mart (PDM) system.

3. The Three Crowns MHP (OPID #37240) master meter system was approved for conversion in 2017 (via Docket No. 16-10026) and conversion work began in March 2018. Final conversion of the Three Crowns MHP master meter system occurred on November 3, 2018, so Nevada's pipeline safety program is no longer listing Three Crowns MHP as a master meter operator. Jamerson Pender at PHMSA was notified of this change on November 5, 2018, and was asked to remove the Three Crowns from the Nevada operator list in the PDM system.

With the two master meter system conversions outlined above that is why Nevada is showing its number of operators as being fifteen (15) compared to seventeen (17) in the 2017 Progress Report.

Private Distribution - Nevada has 2 private LDC operators, those being Southwest Gas Corporation (SWG) and Sierra Pacific Power Company (d/b/a NV Energy). SWG is broken up into two units, Southern Nevada Divisions (SND) and Northern Nevada Division (NND), and that is how the three Inspection Unit figure outlined in the table above is derived.

Municipal Distribution - Nevada does not have any Municipal Distribution natural gas or LNG facilities operating in its state.

Master Meter - There is only one (1) remaining known master meter natural gas systems in Nevada, that being Docs Cottages. However, in 2018 Nevada's PSP performed a detailed investigation into the Docs Cottages system and no longer believes it qualifies as a jurisdictional master meter system. On September 19, 2018, Nevada PSP sent an interpretation request letter to PHMSA asking PHMSA if it agreed with Nevada PSP's conclusion that Docs Cottages did not meet the definition of a master meter system as outlined in 49 CFR 191.3. Because a response to that interpretation letter was not received by the end of 2018, Nevada PSP is still listing Docs Cottages as a jurisdictional master meter system in this 2018 Progress Report.

LPG - AmeriGas performed conversion work on one LPG system making that system (Red's Candy Shop) no longer jurisdictional which reduced the number of jurisdictional LPG systems AmeriGas operates in Nevada from 16 to 15. Therefore the current jurisdictional LPG operators (which makes up the 22 Inspection Units) in Nevada are as follows: AmeriGas - 15 jurisdictional units; Western States Propane - 1 jurisdictional unit; Wendover Gas - 4 jurisdictional units (all located in the City of West Wendover, NV and these units are all inspected together at the same time); NV Energy - 1 jurisdictional system (operated as part of its LDC and inspected as part of the LDC); Mt. Charleston Cabins - 1 jurisdictional system

The number of LPG operators and inspection units is likely to change from year to year going forward. As Nevada's PSP enforces the provision of 49 CFR 192 on these small systems, which typically have annual profit margins of \$1000 per year per system (or less), operators are likely to continue to convert the systems to non-jurisdictional systems as AmeriGas did in 2018 and 2017, and as Suburban Propane did in 2016.

Transmission Intrastate - No new transmission operators were added or deleted in 2018. Two of the existing intrastate transmission pipelines continued to be in idle status in 2018. The first idle pipeline is the 36 mile Empire Mining Pipeline OPID 39536, (formerly owned by US Gypsum) which taps off of the interstate Tuscarora pipeline. The pipeline is currently physically disconnected from the Tuscarora pipeline and it is filled with a small amount of pressurized nitrogen. Depending on economic conditions it is unclear if this pipeline will ever be placed back in-service, but the operator, Empire Mining, currently wants to keep the pipeline viable just in case.

The second pipeline in idle status is the 1700 foot RYZE Renewable Reno, LLC (formerly known as RESC, LLC, formerly owned by Advanced Refining Concepts ("ARC") which also taps off the interstate Tuscarora pipeline. In 2015, ARC experienced financial problems and let go all of the Staff at its G-Diesel production facility, which is the facility the pipeline served. After receiving this information, Nevada's PSP became concerned with the operation of the pipeline and requested that TransCanada Pipeline Company (in consultation with PHMSA Western Region), the owner/operator of the interstate Tuscarora pipeline, physically disconnect the ARC pipeline. This physical isolation occurred in June 2015. ARC sold its G-Diesel facility and its pipeline to RESC, LLC in late 2016. In early 2018, RESC, LLC, via a merger, changed its name to RYZE Renewable Reno, LLC, and submitted the appropriate name change/OPID transfer paperwork with PHMSA. RYZE has stated it plans to place the pipeline back into operation in 2019.

Intrastate LNG - There are currently no Intrastate LNG facilities in Nevada, but Nevada has adopted 49 CFR 193, so the current assumption is that if an Intrastate LNG facility were to be constructed it would be state jurisdictional.





## Attachment 2 - State Inspection Activity

### TOTAL STATE FIELD INSPECTION ACTIVITY AS OF DECEMBER 31, 2018

Operator Type	Standard Comprehensive	Design, Testing and Construction	On-Site Operator Training	Integrity Management	Operator Qualification	Investigating Incidents or Accidents	Damage Prevention Activities	Compliance Follow-up	Total
<b>Distribution</b>									
Private	138.5	264.25	3.5	18.25	10.25	15.25	36.5	16.25	502.75
Municipal	0	0	0	0	0	0	0	0	0
Master Meter	4	0	0	0	0	0	1	0.25	5.25
LPG	41.5	4.5	6.25	0	3.5	0	0.5	5.25	61.5
Other	0	0	0	0	0	0	0	0	0
<b>Transmission</b>									
Intrastate	42.75	2.75	3.25	9.25	4.25	0	0.25	0.5	63
Interstate	0	0	0	0	0	0	0	0	0
<b>LNG</b>									
Intrastate	0	0	0	0	0	0	0	0	0
Interstate	0	0	0	0	0	0	0	0	0
<b>Other</b>									
Gathering Lines	0	0	0	0	0	0	0	0	0
Offshore Facilities	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>226.75</b>	<b>271.5</b>	<b>13</b>	<b>27.5</b>	<b>18</b>	<b>15.25</b>	<b>38.25</b>	<b>22.25</b>	<b>632.5</b>

#### Drug and Alcohol

Total Count of Drug and Alcohol Inspections	7
---------------------------------------------	---

#### Attachment 2 Notes

The numbers above are based upon an inspection day being a full 8 hours. Multiple operator type are sometimes inspected in the same day therefore the time on those days must be allocated between the different operator types. Additionally, multiple inspection types are often performed on the same operator during multi-day inspections therefore the time has to be allocated to each inspection type being performed during these multi-day inspections (example: 4 hours OQ, 4 hours DIMP, 16 hours Standard). Adjustments are made for those inspections that are performed in excess of 8 hours in a single day in order to not overstate the figures for those

limited instances in which the inspector is in the field for greater than 8 hours in a single day.

Additionally, because Nevada PSP inspectors also perform One-Call inspections of excavators in the field (via a One-Call grant provided by PHMSA) to ensure that those excavators are complying with Nevada's One-Call Law (NRS 455) when excavating around underground natural gas facilities, these One-Call inspections must be tracked separately from the gas field inspections that are performed pursuant to 49 CFR 192 and 199. Nevada's PSP tracks these different inspections hours separately, so the numbers above do not include the approximately 200 plus field inspection and enforcement activities relating to protecting natural gas facilities (including PHMSA jurisdictional pipelines) via Nevada's One-Call Law.

The strong number of field days in 2018 was mainly a result of Nevada's PSP being fully staffed and having additional qualified gas field personnel participating in inspection related activities. Nevada also had no employee turnover in 2018, and with Nevada sending inspectors to the lowest number of T&Q classes in the past 5 years (because they are all fully trained), this allowed more field inspection work to occur. The strong Standard inspection days were a result of:

- Performing more focused quarterly audits of both Local Distribution Companies ("LDC"), which includes NV Energy and both Southwest Gas Corporation inspection units;
- Performing numerous field inspections of LDC and LPG Operator standard inspection work activities including:
  - Leak survey work;
  - Valve maintenance work;
  - Numerous leak repairs;
  - MAOP Testing;
  - Reg. Maintenance;
  - Etc.

Other key aspects of the field inspection data above are as follows:

- The strong construction inspection day figure is associated with the following:

Nevada being the fastest growing State and the significant new construction that is occurring statewide.

Southwest Gas replacing 100 miles of higher risk, more leak prone, PVC pipelines in its southern Nevada division.

Southwest Gas replacing the Three Crowns master meter system.

Southwest Gas replacing the 6 mile high pressure pre-code distribution lateral that serves the Town of Battle Mountain.

NV Energy replacing a major high pressure distribution underwater river crossing.

- The seven (7) Drug and Alcohol Audits being reported in 2018 are associated with Timet (OPID 39236), Sierra Pacific Power Company d/b/a/ NV Energy (OPID 18308), Southwest Gas (OPID 18536), Prospector Pipeline (OPID 38923), Empire Mining (OPID 39536), RESC, LLC/RYSE Renewable Reno, LLC (OPID 39590) and Newmont Mining (OPID 30052).

- The LPG on-site operator training was mainly associated with Staff attending and assisting AmeriGas and other LPG operators understanding the requirements of complying with 49 CFR 192. Additionally, Nevada held its 3-year operator training seminar, and that also contributed to the operator training number.

- The vast majority of the Incident Investigation inspection days were associated with the four Federal Reportable Incidents outlined in Attachment 4, but there were a couple of other small State reportable type incidents that were investigated as well.

-DIMP audits were performed on both large LDCs, those being Southwest Gas and NV Energy.

-Several TRIMP field In-Line-Inspections were observed in 2018, and several additional ILI runs will be inspected in 2019.

-Nevada PSP did perform one (1) interstate transmission construction inspection on the 10 mile, 20-inch Paiute Pipeline upgrade that was occurring in and around Carson City. This inspection was performed in conjunction with PHMSA Western Region inspector Jason Dunphy. Nevada PSP is not reporting this inspection in the table above and has removed the 8 hours of inspector cost associated with this inspection from its Base Grant cost reimbursement request. However, given that Nevada PSP and the PUCN is responsible for protecting this interstate transmission pipeline under Nevada's damage prevention law (NRS 455), it is critical that Nevada PSP know where this critical pipeline is located and when it is being relocated or upgraded.

-The continued decline in the number of master meter operator inspections in 2018 is a direct result of the master meter replacement program underway in Nevada. The decline in the number of master meter operators has allowed for increased inspections of larger LDC operators, such as the strong construction inspections number outlined for 2018.



### Attachment 3 - List of Operators

## GAS FACILITIES SUBJECT TO STATE SAFETY JURISDICTION AS OF DECEMBER 31, 2018

Operator  Business Name Operator ID Address	Distribution (Operator type & Inspection Units)					Transmission (Operator type & Inspection Units)		LNG(Operator type & Inspection Units)		Other (Operator type & Inspection Units)	
	Private	Municipal	Master Meter	LPG	Other	Intrastate	Interstate	Intrastate	Interstate	Gathering Lines (Jurisdictional)	Offshore Facilities (State Waters)
<b>Amerigas Consolidated Systems</b> 32013 460 N Gulph Rd, King of Prussia, PA 89415	0	0	0	15	0	0	0	0	0	0	0
<b>Docs Cottages</b> 37064 P.O. Box 3626, Stateline, NV 89449	0	0	1	0	0	0	0	0	0	0	0
<b>Empire Mining Co, LLC</b> 39536 Nevada Highway 447 - MP 68, Empire, NV 89405	0	0	0	0	0	1	0	0	0	0	0
<b>Mount Charleston Resort Cabins</b> 36756 5355 Kyle Canyon Road, Las Vegas, NV 89124	0	0	0	1	0	0	0	0	0	0	0
<b>Newmont Mining Corporation</b> 30052 1655 Mountain City Highway, Elko, NV 89822	0	0	0	0	0	2	0	0	0	0	0
<b>NV Energy (dba Sierra Pacific Power Company)</b> 18308 6100 Neil Road, P.O. Box 10100 Reno, NV 89520	1	0	0	1	0	1	0	0	0	0	0
<b>Prospector Pipeline Company</b> 38923 2981 Gold Canal Drive, Rancho cordova, CA 95670	0	0	0	0	0	1	0	0	0	0	0
<b>Ryze Renewables Reno, LLC</b> 39590 14830 Kivett Lane, Reno, NV 89521	0	0	0	0	0	1	0	0	0	0	0

<b>Southwest Gas Corporation</b> 18536 5241 Spring Mountain Road, Las Vegas, NV 89150	2	0	0	0	0	1	0	0	0	0	0
<b>Timet Titanium Metals Corporation</b> 39236 181 North Water Street Gate 3 BMI Park, Henderson, WV 89015	0	0	0	0	0	1	0	0	0	0	0
<b>Wendover Gas Company</b> 31497 460 Mesa Street, Wendover, NV 89883	0	0	0	4	0	0	0	0	0	0	0
<b>Western States Propane Company (dba Spring Creek Plaza)</b> 36244 1207 Water Street, Elko, NV 89801	0	0	0	1	0	0	0	0	0	0	0



	Distribution (Operator type & Inspection Units)					Transmission (Operator type & Inspection Units)		LNG(Operator type & Inspection Units)		Other (Operator type & Inspection Units)	
	Private	Municipal	Master Meter	LPG	Other	Intrastate	Interstate	Intrastate	Interstate	Gathering Lines (Jurisdictional)	Offshore Facilities (State Waters)
<b>Inspection Unit totals by type</b>	<b>3</b>	<b>0</b>	<b>1</b>	<b>22</b>	<b>0</b>	<b>8</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

## Total Operators

12

### Attachment 3 Notes:

The Operators listed above as well as the number of inspection units matches the number reported in Attachment 1 of this Progress Report, when considering that NV Energy operates three types of systems (LPG, Transmission and LDC/Private) and Southwest Gas operates two types of systems (Transmission and LDC/Private).

AmeriGas reconfigured one (1) of its LPG systems making it non-jurisdictional (change from 16 units in 2017 to 15 in 2017). Carefree and Three Crowns mobile home parks were both converted in 2018 and are no longer master meter operators. As such both Carefree and Three Crowns were removed from Attachment 3 and that reduced the number of Operators being reported from 14 (in 2017) to 12 (in 2018).

Two of the existing intrastate transmission pipelines continued to be in idle status in 2017. The first idle pipeline is the 36 mile Empire Mining Pipeline OPID 39536, (formerly owned US Gypsum) which taps off of the interstate Tuscarora pipeline. The pipeline is currently physically disconnected from the Tuscarora pipeline and it is filled with a small amount of pressurized nitrogen. Depending on economic conditions it is unclear if this pipeline will ever be placed back in-service, but the operator, Empire Mining, currently wants to keep the pipeline viable just in case.

The second pipeline in idle status is the 1700 foot RESC, LLC pipeline (formerly owned by Advanced Refining Concepts ("ARC")) which also taps off the interstate Tuscarora pipeline. In 2015, ARC experienced financial problems and let go all of the Staff at its G-Diesel production facility, which is the facility the pipeline served. After receiving this information, Nevada's PSP became concerned with the operation of the pipeline and requested that TransCanada Pipeline Company (in consultation with PHMSA Western Region), the owner/operator of the interstate Tuscarora pipeline, physically disconnect the ARC pipeline. This physical isolation occurred in June 2015. ARC sold its G-Diesel facility and its pipeline to RESC, LLC in late 2016. The pipeline remains in an idle status charged with approximately 15 PSI of nitrogen. In early 2018, RESC, LLC, via a merger, changed its name to RYZE, and

submitted the appropriate name change/OPID transfer paperwork with PHMSA. RYZE has stated it plans to place the pipeline back into operation in 2019.



## Attachment 4 - Incidents/Accidents

### SIGNIFICANT<sup>4</sup> GAS INCIDENTS/ACCIDENTS JANUARY 1, THROUGH DECEMBER 31, 2018

Date of Incident	Location - City/County/etc.	System Type	Injuries #	Fatalities #	Property Damage <sup>3</sup> \$	Cause Code <sup>1</sup>	State Cause Code <sup>1</sup>
01/15/2018	Hawk Springs and Mesa Park Drive	GD	0	0	\$111,720.00	E1	E1
<p>Name of Operator: Southwest Gas Corp</p> <p>Operator ID: 18536 Report No: 20180024</p> <p>Summary<sup>2</sup></p> <p>The Operator responded to an odor complaint where a hazardous Grade 1 leak was discovered on a 2005 vintage 4-inch 8100 PE natural gas pipeline near the intersection of Hawk Springs Road and Mesa Park Drive in Las Vegas, Nevada. Taking the section out of service for repairs caused an outage to 1,768 customers and resulted in the Incident exceeding the \$50K threshold.</p> <p>The origin of the leak was a butt fusion construction defect due to poor workmanship in 2005.</p> <p>Based upon Staff's investigation, Staff identified one (1) Probable Violation ("PV") regarding the cause of the leak, and one (1) Issue of Concern ("IOC") regarding SWG's emergency response activities during the Incident. This PVs and IOC were outlined in a May 14, 2018, NOPV letter sent to Southwest Gas. Additionally, Staff outlined six (6) corrective actions Southwest Gas needed to take as a result of this Incident.</p> <p>At the time of the filing of this Progress Report, Staff and Southwest Gas have reached a tentative settlement agreement regarding a civil penalty associated with this incident and that agreement is expected to be filed in the next month or so.</p>							

03/22/2018	324 Eureka Avenue	GD	0	0	\$352,692.00	C2	C2
<p>Name of Operator: NV Energy</p> <p>Operator ID: 18308 Report No: 20180043</p> <p>Summary<sup>2</sup></p> <p>The incident was caused by a leak from a crack in the black iron pipe used for a temporary service connection for the neighboring property of 614 Eureka Avenue. The gas migrated into the basement of 624 Eureka Avenue in Reno, Nevada (the incident house). The leaking natural gas traveled through the service trench and was ignited by the furnace in the basement. A subsequent explosion damaged the home. Two individuals were in the residence at the time of the explosion but did not sustain any injuries.</p> <p>The leak was due to mechanical overloading on the horizontal section of the service connection during compaction of sand around the connection due to insufficient cover. The backfill and compaction work was being performed in order to address a road compaction quality issue above the pipeline.</p>							



Based upon Staff's investigation, on August 9, 2018, Staff issued a Notice of Probable Violation letter to NV Energy outlining that it had identified six (6) Probable Violations and two (2) Issues of Concern regarding the cause of the Incident and NV Energy's emergency response activities to the Incident. Staff also outlined twelve (12) corrective actions that it believe NV Energy needed to address.

On December 24, 2018, Staff and NV Energy filed a Joint Petition/Stipulation (in Docket No. 18-12022) resolving all of the violations associated with this incident. In that Joint Petition/Stipulation NV Energy agreed to pay a \$500,000 civil penalty, NV Energy agreed to spend an additional \$120,000 on gas safety public awareness and education messages in 2019, and NV Energy agreed to not seek cost recovery of several other items, including the cost of the incident. NV Energy also committed to hire additional manpower to implement the expanded OQ program corrective actions Staff had outlined. On February 15, 2019, the Commission approved the Joint Petition/Stipulation.

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06/14/2018	99 Convention Center Drive	GD	0	0	\$78,343.00	D7	D7
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Name of Operator:	Southwest Gas Corp		
Operator ID:	18536	Report No:	20180091

Summary<sup>2</sup>

A hazardous grade 1 leak was discovered (via odor call) on a 1955 vintage 4-inch steel pipeline in the area of 99 Convention Center Drive in Las Vegas. The gas pipeline wall had been eroded through due to an adjacent water line that was damaged and jetting out water, causing a mixture of pressurized water, soil and sand to continuously impinge upon the gas pipeline. The incident was reported to the NRC due to the property damage exceeding \$50,000. The leak occurred just off the Las Vegas Strip where excavation costs and street resurfacing is very expensive.

Staff has not yet finalized its investigation into this Incident but to-date Staff has not identified any Probable Violation or Issues of Concern.

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09/20/2018	Buckskin Avenue and Shady Timber Street	GD	0	0	\$121,108.00	B4	B4
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Name of Operator:	Southwest Gas Corp		
Operator ID:	18536	Report No:	20180096

Summary<sup>2</sup>

A leak survey contractor for the Operator discovered a hazardous Grade 1 leak on a 1997 vintage 2-inch M8000 PE natural gas pipeline at the 2"x1" continental tapping saddle near the intersection of Buckskin Avenue and Shady timber Street in Las Vegas, Nevada. The shutdown of gas to the section cause an outage to 1,722 customers.

An investigation determined that the tapped hole in the pipe was axially displaced approximately one inch with respect to the tapping tee's original position. The movement of the pipe, likely due to thermal contraction, resulted in the displacement of the saddle-to-pipe O-ring, breaking the gas-tight seal resulting in the leak. The leak survey work that found that leak was an accelerated special M7000/8000 leak survey patrol that Southwest Gas was performing as part of its DIMP Program.

Based upon Staff's investigation to-date, on January 18, 2019, Staff issued a Notice of Probable Violation letter to Southwest Gas outlining that it had identified one (1) Probable Violations regarding the cause of the Incident. Staff also outlined three (3) corrective actions that it believed Southwest Gas needed to address.

Staff has not yet concluded its investigation into the Incident, but Staff does not currently envision seeking a civil penalty for this Incident in part because it was Southwest Gas's proactive safety actions (i.e., accelerated leak patrols) that discovered the leak and it was those proactive safety actions, along with the quick shutdown of the pipeline that resulted in this Incident causing no deaths, injuries or significant property damage.

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**<sup>1</sup>High Level Cause Codes: A - Corrosion failure; B - Natural Force Damage; C - Excavation Damage; D - Other Outside Force Damage; E - Pipe, Weld or Joint Failure; F - Equipment Failure; G - Incorrect Operation; H - Other Incident Cause; IP - Investigation Pending;**

**<sup>2</sup>Please provide a brief summary of the incident.**

**<sup>3</sup>Interstate agents should use the 191.3 Incident definition for listing incidents investigated on interstate facilities.**

**<sup>4</sup>Significant: Investigated by or reported to the state agency, involving personal injury requiring hospitalization, fatality, property damage exceeding \$50,000 and other incidents otherwise considered significant which involved jurisdictional facilities.**

**Attachment 4 Notes**

Three (3) of the four (4) Federal Reportable Incidents in 2018 were a result of construction related issues. This is why Nevada's PSP believes it is so important to devote a large amount of inspection time and resources to performing new construction inspections.

Nevada PSP's final investigation reports into the above four (4) Federal Reportable Incidents have been or will be filed publicly with the Public Utilities Commission of Nevada in Docket No. 18-01001.



## Attachment 5 - Stats on Compliance Actions

### STATE COMPLIANCE ACTIONS -- CALENDAR YEAR (CY) 2018

Probable Violation Categories	Intrastate	Interstate
Number carried over from all previous CY's	19	0
Number Found During CY	33	0
Number submitted for DOT action [60106 Agreement agent only]	0	0
Number corrected during CY (including carry over from previous year(s))	39	0
Number to be corrected at end of CY (including carry over)	13	0

**Number of Compliance Actions Taken <sup>1</sup>**  
 (see definition) 30

**Civil Penalties**

Number assessed during CY	2
Dollars assessed during CY	\$40,000.00
Number collected during CY	2
Dollars collected during CY	\$40,000.00

<sup>1</sup>**Do not double count for a related series of actions.**

**Attachment 5 Notes**

The \$40,000 issued in 2018 was comprised of two different proceedings. A third civil penalty (a \$500,000 civil penalty) was filed in late December 2018 and that Docket (18-12022) was associated with the March 22, 2018, Eureka Avenue Federal Reportable Incident reported by NV Energy. However, because the civil penalty in that Docket was not approved by the PUCN until mid-February 2019, that civil penalty is not being reported in this 2018 Progress Report but will instead be reported in the 2019 Progress Report.

The following is a summary of the two (2) civil penalty cases assessed in 2018 that comprises the \$40,000 being reported:

#1 - A civil penalty totaling \$35,000 was assessed to AmeriGas Corporation ("AmeriGas"), OPID 32013, regarding the LPG systems it operates in Nevada. The \$35,000 civil penalty was associated with AmeriGas failing to promptly address a leak on the indoor meters located at the Ponderosa Saloon in Virginia City, Nevada. AmeriGas' failure to address the indoor leak was a violation of 49 CFR 192.703(c). On February 28, 2018, Staff and AmeriGas reached a settlement agreement and filed a Stipulation outlining the \$35,000 civil penalty as well as an agreement to have AmeriGas leak survey the indoor meters and piping located at the Ponderosa Saloon every quarter, which exceeds the leak survey requirement outlined in 49 CFR 192.723. On April 13, 2018, the PUCN accepted the Stipulation and civil penalty in Docket No. 18-02026. The civil penalty payment amount of \$35,000 was paid by AmeriGas on May 10, 2018.

#2 - A civil penalty totaling \$5,000 was assessed to Suburban Propane, LP ("Suburban"), OPID 18684, regarding it working on and modifying an AmeriGas jurisdictional LPG system in Nevada. The \$5,000 civil penalty was associated with Suburban working on and modifying a jurisdictional LPG system without proper procedures and without qualified personnel, which are violations of 49 CFR 192.13, 49 CFR 192.605(a) and 49 CFR 192.805. On March 20, 2018, Staff and Suburban reached a settlement agreement and filed a Stipulation outlining the \$5,000 civil penalty as well as an agreement to have Suburban ensure its does not work on other jurisdictional LPG systems owned by other entities in Nevada. On May 7, 2018, the PUCN accepted the Stipulation and civil penalty in Docket No. 18-02026. The civil penalty payment amount of \$5,000 was paid by Suburban on June 1, 2018.

Nevada's PSP and the PUCN also assessed \$74,500 (19 different cases) in civil penalties to excavators/operators for violations of Nevada's One-Call Law (NRS 455). Because these violations were not associated with 49 CFR 192, they have not been included in the civil penalty figures above. However, Nevada's PSP believes it is important to inform PHMSA of these penalties given that PHMSA is evaluating States as to whether they have an effective One-Call Law/Enforcement.



## **Attachment 6 - List of Records Kept**

### **GAS STATE RECORD MAINTENANCE AND REPORTING DURING CY 2018**

#### **Records Maintained by the State Agency**

Records of inspections, probable violations, follow-up actions and enforcement activities.  
Records of expenditures for the Gas Pipeline Safety Program.  
Letters, directives, correspondence, certification, authorizations, etc.  
Requested Interpretation Requests and Waiver Request Information.  
Some NTSB reports and various safety releases.  
Guidelines for States participating in the Gas Pipeline Safety Program.  
Pipeline Safety Regulations (49 CFR Parts 191, 192, 193 and 199) including amendments.  
Information related to T&Q training.  
Records and correspondence from PHMSA program evaluations.  
Some NAPSRS correspondence.  
Incident Reports and Investigation Documentation.  
Probable Violation Log.  
One-Call Enforcement Log.  
Pipeline Safety Manual / Procedures  
Records for Pipeline Safety personnel Activity Tracking

#### **Reports Required from Operators**

Incident reports.  
Annual reports.  
Annual Results of Drug and Alcohol testing for applicable operators.  
Operations Manuals.  
LDC quarterly/yearly damage cause data.  
Notification emails on excavation damages from larger operators.  
Some misc. audit related documents, such as leak trend analyses, ILI Reports, ECDA Reports, etc.



#### **Attachment 6 Notes**

## Attachment 7 - Staffing and TQ Training

### STATE EMPLOYEES DIRECTLY INVOLVED IN THE GAS PIPELINE SAFETY PROGRAM DURING CY 2018

Name/Title	% Time	# Months	Qual. Cat.
<b>Supervisor</b>			
<b>Pascual, Neil</b> Senior Gas Pipeline Engineer	49	12	II
<b>Maguire, Paul</b> Manager Engineering	34	12	II
<b>Inspector/Investigator</b>			
<b>Rogers, Craig</b> Gas Pipeline Engineer	68	12	II
<b>Neil Pascual</b> Senior Gas Pipeline Engineer	49	12	II
<b>Kenneth Saarem</b> Gas Pipeline Engineer	97	12	I
<b>Kelly Everson</b> Gas Pipeline Engineer	95	12	II
<b>Mike Evans</b> Gas Pipeline Engineer	97	12	III
<b>Adelere Adesina</b> Gas Pipeline Engineer	99	12	I
<b>Paul Maguire</b> Manager Engineering	8	12	II
<b>Clerical and Administrative Support</b>			
<b>Cyndi Martin</b> Administrative Assistant, Carson City	31	12	IV

**Summary**

<u>Employee Type</u>	<u>No. of Staff</u>	<u>Person-Years</u>
Supervisor	2	0.83
Inspectors/Investigators	7	5.13
Damage Prevention/Technical	0	
Clerical/Administrative	1	0.31
<b>Total</b>	<b>10</b>	<b>6.27</b>

<b>Last Name</b>	<b>First Name</b>	<b>Course</b>	<b>Completion Date</b>
ADESINA	ADELERE (DANIEL)	PHMSA-PL3306 External Corrosion Direct Assessment (ECDA) Field Course	03/15/2018
ADESINA	ADELERE (DANIEL)	PHMSA-PL3292 Safety Evaluation of Inline Inspection (ILI)/Pigging Programs Course	06/22/2018
ADESINA	ADELERE (DANIEL)	PHMSA-PL3291 Fundamentals of (SCADA) System Technology and Operation Course	03/30/2018
ADESINA	ADELERE (DANIEL)	PHMSA-PL3267 Fundamentals of Integrity Management Course	04/27/2018
ADESINA	ADELERE (DANIEL)	PHMSA-PL1297 Gas Integrity Management (IM) Protocol Course	07/27/2018
ADESINA	ADELERE (DANIEL)	PHMSA-PL1250 Safety Evaluation of Gas Pipeline Systems Course	2/5/2016
ADESINA	ADELERE (DANIEL)	PHMSA-PL3257 Pipeline Safety Regulation Application and Compliance Procedures Course	3/25/2016
ADESINA	ADELERE (DANIEL)	PHMSA-PL1245 Safety Evaluation of Distribution Integrity Management Programs (DIMP) Course	3/2/2017
ADESINA	ADELERE (DANIEL)	PHMSA-PL3322 Evaluation of Operator Qualification (OQ) Programs Course	1/20/2017
ADESINA	ADELERE (DANIEL)	PHMSA-PL3256 Pipeline Failure Investigation Techniques Course	10/28/2016
ADESINA	ADELERE (DANIEL)	PHMSA-PL1310 Plastic and Composite Materials Course	7/29/2016
ADESINA	ADELERE (DANIEL)	PHMSA-PL1255 Gas Pressure Regulation and Overpressure Protection Course	3/3/2016

ADESINA	ADELERE (DANIEL)	PHMSA-PL3293 Corrosion Control of Pipeline Systems Course	3/18/2016
ADESINA	ADELERE (DANIEL)	PHMSA-PL30Q Operator Qualification WBT Course	7/11/2016
ADESINA	ADELERE (DANIEL)	PHMSA-PL3IC - Investigating and Managing Internal Corrosion of Pipelines WBT Course	3/5/2016
ADESINA	ADELERE (DANIEL)	PHMSA-PL3242 Welding and Welding Inspection of Pipeline Materials Course	2/26/2016
EVANS	MICHAEL	PHMSA-PL1297 Gas Integrity Management (IM) Protocol Course	07/27/2018
EVANS	MICHAEL	PHMSA-PL3267 Fundamentals of Integrity Management Course	04/27/2018
EVANS	MICHAEL	PHMSA-PL3292 Safety Evaluation of Inline Inspection (ILI)/Pigging Programs Course	06/22/2018
EVANS	MICHAEL	PHMSA-PL1250 Safety Evaluation of Gas Pipeline Systems Course	8/28/2015
EVANS	MICHAEL	PHMSA-PL3DA Drug and Alcohol Testing for the Pipeline Industry WBT	5/29/2015
EVANS	MICHAEL	PHMSA-PL30Q Operator Qualification WBT Course	12/1/2015
EVANS	MICHAEL	PHMSA-PL1255 Gas Pressure Regulation and Overpressure Protection Course	3/3/2016
EVANS	MICHAEL	PHMSA-PL3242 Welding and Welding Inspection of Pipeline Materials Course	2/26/2016
EVANS	MICHAEL	PHMSA-PL3257 Pipeline Safety Regulation Application and Compliance Procedures Course	3/25/2016
EVANS	MICHAEL	PHMSA-PL4253 Liquefied Natural Gas (LNG) Safety Technology and Inspection Course	1/29/2016
EVANS	MICHAEL	PHMSA-PL3306 External Corrosion Direct Assessment (ECDA) Field Course	7/27/2017
EVANS	MICHAEL	PHMSA-PL3291 Fundamentals of (SCADA) System Technology and Operation Course	8/25/2017
EVANS	MICHAEL	PHMSA-PL5342 Safety Evaluation of Liquefied Petroleum Gas (LPG)	3/3/2017
EVANS	MICHAEL	PHMSA-PL3322 Evaluation of Operator Qualification (OQ) Programs Course	2/24/2017
EVANS	MICHAEL	PHMSA-PL1245 Safety Evaluation of Distribution Integrity Management Programs (DIMP) Course	11/16/2017
EVANS	MICHAEL	PHMSA-PL3IC - Investigating and Managing Internal Corrosion of Pipelines WBT Course	12/7/2015
EVANS	MICHAEL	PHMSA-PL1310 Plastic and Composite Materials Course	5/20/2016
EVANS	MICHAEL	PHMSA-PL3256 Pipeline Failure Investigation Techniques Course	1/8/2016
EVANS	MICHAEL	PHMSA-PL3293 Corrosion Control of Pipeline Systems Course	3/18/2016
EVERSON	KELLY	PHMSA-PL5342 Safety Evaluation of Liquefied Petroleum Gas (LPG)	05/25/2018
EVERSON	KELLY	PHMSA-PL3267 Fundamentals of Integrity Management Course	2/26/2016
EVERSON	KELLY	PHMSA-PL1297 Gas Integrity Management (IM) Protocol Course	8/5/2016
EVERSON	KELLY	PHMSA-PL3306 External Corrosion Direct Assessment (ECDA) Field Course	7/15/2016
EVERSON	KELLY	PHMSA-PL3291 Fundamentals of (SCADA) System Technology and Operation Course	9/30/2016
EVERSON	KELLY	PHMSA-PL3256 Pipeline Failure Investigation Techniques Course	11/21/2014
EVERSON	KELLY	PHMSA-PL3DA Drug and Alcohol Testing for the Pipeline Industry WBT	8/21/2015
EVERSON	KELLY	PHMSA-PL1255 Gas Pressure Regulation and Overpressure Protection Course	3/5/2015
EVERSON	KELLY	PHMSA-PL3355 Safety Evaluation of Control Room Management Programs	6/9/2017



EVERSON	KELLY	PHMSA-PL3600 Root Cause/Incident Investigation Course	3/24/2017
EVERSON	KELLY	PHMSA-PL3257 Pipeline Safety Regulation Application and Compliance Procedures Course	6/27/2014
EVERSON	KELLY	PHMSA-PL1245 Safety Evaluation of Distribution Integrity Management Programs (DIMP) Course	4/23/2015
EVERSON	KELLY	PHMSA-PL3322 Evaluation of Operator Qualification (OQ) Programs Course	8/6/2015
EVERSON	KELLY	PHMSA-PL3293 Corrosion Control of Pipeline Systems Course	8/8/2014
EVERSON	KELLY	PHMSA-PL30Q Operator Qualification WBT Course	8/18/2013
EVERSON	KELLY	PHMSA-PL3IC - Investigating and Managing Internal Corrosion of Pipelines WBT Course	7/7/2014
EVERSON	KELLY	PHMSA-PL1250 Safety Evaluation of Gas Pipeline Systems Course	12/13/2013
EVERSON	KELLY	PHMSA-PL3242 Welding and Welding Inspection of Pipeline Materials Course	3/14/2014
EVERSON	KELLY	PHMSA-PL1310 Plastic and Composite Materials Course	9/26/2014
EVERSON	KELLY	PHMSA-PL3292 Safety Evaluation of Inline Inspection (ILI)/Pigging Programs Course	6/19/2015
MAGUIRE	PAUL	PHMSA-PL1255 Gas Pressure Regulation and Overpressure Protection Course	01/11/2018
MAGUIRE	PAUL	PHMSA-PL3293 Corrosion Control of Pipeline Systems Course	06/08/2018
MAGUIRE	PAUL	PHMSA-PL3256 Pipeline Failure Investigation Techniques Course	11/21/2014
MAGUIRE	PAUL	PHMSA-PL3257 Pipeline Safety Regulation Application and Compliance Procedures Course	3/13/2015
MAGUIRE	PAUL	PHMSA-PL1255 Gas Pressure Regulation and Overpressure Protection Course	1/11/2018
MAGUIRE	PAUL	PHMSA-PL1310 Plastic and Composite Materials Course	7/1/2016
MAGUIRE	PAUL	PHMSA-PL3242 Welding and Welding Inspection of Pipeline Materials Course	1/29/2016
MAGUIRE	PAUL	PHMSA-PL1250 Safety Evaluation of Gas Pipeline Systems Course	5/16/2014
PASCUAL	NEIL	PHMSA-PL3600 Root Cause/Incident Investigation Course	06/22/2018
PASCUAL	NEIL	PHMSA-PL3355 Safety Evaluation of Control Room Management Programs	07/13/2018
PASCUAL	NEIL	PHMSA-PL-WK3IA Inspection Assistant Training Workshop	11/07/2018
PASCUAL	NEIL	PHMSA-PL1297 Gas Integrity Management (IM) Protocol Course	9/18/2015
PASCUAL	NEIL	PHMSA-PL3267 Fundamentals of Integrity Management Course	7/31/2015
PASCUAL	NEIL	PHMSA-PL3292 Safety Evaluation of Inline Inspection (ILI)/Pigging Programs Course	6/17/2016
PASCUAL	NEIL	PHMSA-PL3DA Drug and Alcohol Testing for the Pipeline Industry WBT	8/24/2015
PASCUAL	NEIL	PHMSA-PL5342 Safety Evaluation of Liquefied Petroleum Gas (LPG)	12/16/2016
PASCUAL	NEIL	PHMSA-PL3291 Fundamentals of (SCADA) System Technology and Operation Course	3/11/2016
PASCUAL	NEIL	PHMSA-PL3322 Evaluation of Operator Qualification (OQ) Programs Course	1/21/2016
PASCUAL	NEIL	PHMSA-PL1250 Safety Evaluation of Gas Pipeline Systems Course	6/15/2012
PASCUAL	NEIL	PHMSA-PL30Q Operator Qualification WBT Course	10/11/2012
PASCUAL	NEIL	PHMSA-PL3IC - Investigating and Managing Internal Corrosion of Pipelines WBT Course	2/21/2013
PASCUAL	NEIL	PHMSA-PL3257 Pipeline Safety Regulation Application and Compliance Procedures Course	3/21/2014
PASCUAL	NEIL	PHMSA-PL3242 Welding and Welding Inspection of Pipeline Materials Course	3/8/2013
PASCUAL	NEIL	PHMSA-PL3293 Corrosion Control of Pipeline Systems Course	3/29/2013

PASCUAL	NEIL	PHMSA-PL3306 External Corrosion Direct Assessment (ECDA) Field Course	6/26/2015
PASCUAL	NEIL	PHMSA-PL1245 Safety Evaluation of Distribution Integrity Management Programs (DIMP) Course	10/17/2014
PASCUAL	NEIL	PHMSA-PL1255 Gas Pressure Regulation and Overpressure Protection Course	5/22/2014
PASCUAL	NEIL	PHMSA-PL3256 Pipeline Failure Investigation Techniques Course	5/3/2013
PASCUAL	NEIL	PHMSA-PL1310 Plastic and Composite Materials Course	8/30/2013
ROGERS	CRAIG	PHMSA-PL3322 Evaluation of Operator Qualification (OQ) Programs Course	8/6/2015
ROGERS	CRAIG	PHMSA-PL3DA Drug and Alcohol Testing for the Pipeline Industry WBT	8/24/2015
ROGERS	CRAIG	PHMSA-PL5342 Safety Evaluation of Liquefied Petroleum Gas (LPG)	12/16/2016
ROGERS	CRAIG	PHMSA-PL3OQ Operator Qualification WBT Course	12/2/2010
ROGERS	CRAIG	PHMSA-PL3293 Corrosion Control of Pipeline Systems Course	4/3/2009
ROGERS	CRAIG	PHMSA-PL3292 Safety Evaluation of Inline Inspection (ILI)/Pigging Programs Course	6/8/2012
ROGERS	CRAIG	PHMSA-PL1245 Safety Evaluation of Distribution Integrity Management Programs (DIMP) Course	6/21/2012
ROGERS	CRAIG	PHMSA-PL3291 Fundamentals of (SCADA) System Technology and Operation Course	1/13/2012
ROGERS	CRAIG	PHMSA-PL1310 Plastic and Composite Materials Course	6/27/2008
ROGERS	CRAIG	PHMSA-PL3242 Welding and Welding Inspection of Pipeline Materials Course	6/27/2008
ROGERS	CRAIG	PHMSA-PL3267 Fundamentals of Integrity Management Course	12/7/2012
ROGERS	CRAIG	PHMSA-PL3306 External Corrosion Direct Assessment (ECDA) Field Course	5/17/2013
ROGERS	CRAIG	PHMSA-PL1297 Gas Integrity Management (IM) Protocol Course	1/11/2013
ROGERS	CRAIG	PHMSA-PL3355 Safety Evaluation of Control Room Management Programs	12/6/2013
ROGERS	CRAIG	PHMSA-PL3600 Root Cause/Incident Investigation Course	8/23/2013
ROGERS	CRAIG	PHMSA-PL1255 Gas Pressure Regulation and Overpressure Protection Course	3/12/2009
ROGERS	CRAIG	PHMSA-PL1250 Safety Evaluation of Gas Pipeline Systems Course	1/11/2008
ROGERS	CRAIG	PHMSA-PL3256 Pipeline Failure Investigation Techniques Course	1/29/2010
ROGERS	CRAIG	PHMSA-PL3257 Pipeline Safety Regulation Application and Compliance Procedures Course	4/2/2010
ROGERS	CRAIG	PHMSA-PL3254 Joining of Pipeline Materials Course	6/27/2008
SAAREM	KEN	PHMSA-PL5342 Safety Evaluation of Liquefied Petroleum Gas (LPG)	05/25/2018
SAAREM	KEN	PHMSA-PL3306 External Corrosion Direct Assessment (ECDA) Field Course	7/15/2016
SAAREM	KEN	PHMSA-PL1297 Gas Integrity Management (IM) Protocol Course	8/5/2016
SAAREM	KEN	PHMSA-PL3291 Fundamentals of (SCADA) System Technology and Operation Course	3/11/2016
SAAREM	KEN	PHMSA-PL3322 Evaluation of Operator Qualification (OQ) Programs Course	8/6/2015
SAAREM	KEN	PHMSA-PL1245 Safety Evaluation of Distribution Integrity Management Programs (DIMP) Course	4/23/2015
SAAREM	KEN	PHMSA-PL3267 Fundamentals of Integrity Management Course	2/26/2016
SAAREM	KEN	PHMSA-PL3DA Drug and Alcohol Testing for the Pipeline Industry WBT	8/24/2015

SAAREM	KEN	PHMSA-PL3355 Safety Evaluation of Control Room Management Programs	10/21/2016
SAAREM	KEN	PHMSA-PL3600 Root Cause/Incident Investigation Course	3/24/2017
SAAREM	KEN	PHMSA-PL3292 Safety Evaluation of Inline Inspection (ILI)/Pigging Programs Course	6/17/2016
SAAREM	KEN	PHMSA-PL3242 Welding and Welding Inspection of Pipeline Materials Course	1/17/2014
SAAREM	KEN	PHMSA-PL1255 Gas Pressure Regulation and Overpressure Protection Course	5/22/2014
SAAREM	KEN	PHMSA-PL30Q Operator Qualification WBT Course	2/26/2014
SAAREM	KEN	PHMSA-PL3IC - Investigating and Managing Internal Corrosion of Pipelines WBT Course	7/3/2014
SAAREM	KEN	PHMSA-PL1310 Plastic and Composite Materials Course	6/13/2014
SAAREM	KEN	PHMSA-PL3257 Pipeline Safety Regulation Application and Compliance Procedures Course	8/29/2014
SAAREM	KEN	PHMSA-PL3293 Corrosion Control of Pipeline Systems Course	7/18/2014
SAAREM	KEN	PHMSA-PL3256 Pipeline Failure Investigation Techniques Course	3/28/2014
SAAREM	KEN	PHMSA-PL1250 Safety Evaluation of Gas Pipeline Systems Course	6/14/2013





## Attachment 7 Notes

List of employees and time percentages in Pipeline Safety

- Neil was split 50/50 between Supervisor and Inspector
- Paul spent approximately 42% of his time on pipeline safety base grant activities, with 8.5% of that time being an inspector and 33% of that time as supervisor.

2019 Scheduled training:

- Daniel 2 T&Q (LPG, Root Cause)
- Craig 0
- Kelly 0 for T&Q - 1 for NACE Level 1 Corrosion
- Ken 0
- Mike 1 T&Q (Root Cause)
- Neil 0
- Paul 2 T&Q (LPG, OQ)

The number of Nevada PSP inspectors was stable and fully staffed in 2018, with no employee turnover and no new hires.

The Senior Gas Pipeline Engineer position is a half-inspector/half-supervisor position that is why Neil's position is broken up as 50 percent Supervisor and 50 percent Inspector. 97.1% of his time was split between the two positions with the remaining 2.9% on State One-Call inspections and enforcement issues which is not allocated against the Base Grant, but instead is charged against Nevada's One Call Grant or paid for by the State itself.

Engineering Manager, Paul Maguire, completed his seventh core class in 2018 and is now fully qualified to lead standard and construction inspection work. As such, it is estimated that Paul Maguire will perform roughly 8 to 10 inspections per year, which equates to 8 to 10 percent of the time he spends on pipeline safety activities. The other time Mr. Maguire spends is supervisory in nature, including being on the NARUC pipeline safety Staff subcommittee.

The other Inspectors listed above also perform One-Call inspections and enforcement of Nevada's Call Before Your Dig Law ("NRS 455") and that is why each of those Inspector's time is less than 100 percent. The time spent inspecting and enforcing NRS 455 are tracked separately and those costs are not included in the Base Grant.

In 2016, Engineering Manager, Paul Maguire was required to step-in as temporary Pipeline Safety Program Manager (for a 4 month period) until a new Senior Gas Pipeline Engineer could be named. That is why Paul Maguire's time in 2016 was in the 60 percent range. This normalized in 2017 and again in 2018 and Mr. Maguire's time is back in the 40% range.

All of the Nevada PSP Inspectors have completed their core classes and all the IMP classes. Nevada PSP has only five (5) scheduled enrollments for 2019 those being LPG, Root Cause and OQ classes. Four (4) of Nevada's six (6) inspectors currently have the Root Cause class, and that includes inspectors located in both Northern and Southern Nevada.

NV Energy, our LDC company in Northern Nevada will be having their next scheduled ILI runs in 2019/2020, and all three Northern Nevada inspectors (Ken Saarem, Mike Evans, and Daniel Adesina) now have all of the required IMP classes to inspect this upcoming work.

## Attachment 8 - Compliance with Federal Regulations

### STATE COMPLIANCE WITH FEDERAL REQUIREMENTS AS OF DECEMBER 31, 2018

No.	Effective Date	Impact	Adoption Date	Adoption Status
1		<b>Maximum Penalties Substantially same as DOT (\$213,268/\$2,132,268). State must adopt minimum penalties of at least (\$100,000/\$1,000,000). Indicate actual amount in notes.</b>	05/2015	Adopted (\$200,000/\$2,000,000)
Note <sup>1</sup>		The PUCN was successful in getting Senate Bill 86 passed during the 2015 Nevada Legislative Session, which increased Nevada's pipeline safety civil penalty authority amount to the new Federal civil penalty standard of \$200,000 per incident and a maximum of \$2 million.		
2		<b>191.23 and 191.25 Safety-Related Conditions(through current amendment 191-14)</b>	10/1993	Adopted
Note <sup>1</sup>				
3		<b>Part 192 Amendments</b>		
01-90	Pre 2002	[All applicable amendments prior to and including 2002]	10/2004	Adopted
Note <sup>1</sup>				
91	4/23/2004	Definition of high consequence areas for gas transmission lines	10/2005	Adopted
Note <sup>1</sup>				
92	9/4/2003	Procedures for Producer-operated outer continental shelf natural pipelines that cross directly into state waters	10/2004	Adopted
Note <sup>1</sup>				
93	10/15/2003	various changes to gas pipeline safety standards from NAPSRS recommendations	10/2004	Adopted
Note <sup>1</sup>				
94	5/6/2005	Modification to the definition of a Transmission Line	06/2006	Adopted
Note <sup>1</sup>				

95 Note <sup>1</sup>	5/26/2004	Pipeline integrity management for transmission lines in HCAs	10/2005	Adopted
96 Note <sup>1</sup>	9/14/2004	Pressure limiting and regulating stations	10/2005	Adopted
97 Note <sup>1</sup>	7/28/2004	Passage of internal inspection devices on new and retrofitted transmission pipelines	10/2005	Adopted
98 Note <sup>1</sup>	9/9/2004	Performance of periodic underwater inspections	10/2005	Adopted
99 Note <sup>1</sup>	6/20/2005	API RP 1162 Public awareness campaign	06/2006	Adopted
100 Note <sup>1</sup>	7/15/2005	PSIA Statuory changes to Operator Qualification Program	06/2006	Adopted
101 Note <sup>1</sup>	11/25/2005	Adoption of NACE Standard as a direct assesment standard	06/2006	Adopted
102 Note <sup>1</sup>	4/14/2006	Definition of a Gathering Line	10/2010	Adopted
103 Note <sup>1</sup>	7/10/2006	Incorporate by Reference various Standards	10/2010	Adopted
103a Note <sup>1</sup>	2/1/2007	Update Incorporated by Reference and Corrcrection	10/2010	Adopted
72 FR 20055 Note <sup>1</sup>	4/23/2007	Design and Construction Standards to Reduce Internal Corrosion in Gas Transmission Pipelines	10/2010	Adopted
104 Note <sup>1</sup>	5/23/2007	Integrity Management Program Modifications and Clarifications	10/2010	Adopted

105 Note <sup>1</sup>	12/13/2007	Applicability of Public Awareness Regulations to Certain Gas Distribution Operators	10/2010	Adopted
106-73 FR 16562 Note <sup>1</sup>	3/28/2008	Administrative Procedures, Updates and Technical Amendments (73 FR 16562)	10/2010	Adopted
107-73 FR 62147 Note <sup>1</sup>	10/17/2008	Standards for Increasing the Maximum Allowable Operating Pressure for Gas Transmission Pipelines (73 FR 62147)	10/2010	Adopted
108-73 FR 79002 Note <sup>1</sup>	12/24/2008	PA-11 Design Pressures (73 FR 79005)	10/2010	Adopted
109-74 FR 2889 Note <sup>1</sup>	1/16/2009	Administrative Procedures, Address Updates , and Technical Amendments	10/2010	Adopted
110-74 FR 17099 Note <sup>1</sup>	4/14/2009	Incorporation by Reference Update: American Petroleum Institute (API) Standards 5L and 1104	10/2010	Adopted
111-74 FR 62503 Note <sup>1</sup>	11/30/2009	Editorial Amendments to Pipeline Safety Regulations	10/2010	Adopted
112-74 FR 63310 Note <sup>1</sup>	12/3/2009	Control Room Management/Human Factors	10/2010	Adopted
113-74 FR 63906 Note <sup>1</sup>	12/4/2009	Integrity Management Program for Gas Distribution Pipelines	10/2010	Adopted
114 - 75 FR 48593 Note <sup>1</sup>	8/11/2010	Periodic Updates of Regulatory References to Technical Standards and Miscellaneous Edits	10/2010	Adopted
115 - 75 FR 72878 Note <sup>1</sup>	11/26/2010	Updates to Pipeline and Liquefied Gas Reporting Requirements	11/2010	Adopted



116 - 76 FR 5494 Note <sup>1</sup>	4/4/2011	Mechanical Fitting Failure Reporting Requirements	04/2011	Adopted
117-76 FR 35130 Note <sup>1</sup>	8/15/2011	Control Room Management/Human Factors	08/2011	Adopted
118 - 78 FR 58897 Note <sup>1</sup>	9/28/2013	Administrative Procedures, Updates, and Technical Corrections (Not applicable to States)	09/2013	Adopted
119 - 80 FR 168 Note <sup>1</sup>	3/6/2015	Periodic Updates of Regulatory References to Technical Standards and Miscellaneous Edits	03/2015	Adopted
120 - 80 FR 12779 Note <sup>1</sup>	10/1/2015	Miscellaneous Changes to Pipeline Safety Regulations (Part 192.305 DELAYED)	10/2015	Adopted
121 - 81 FR 70989 Note <sup>1</sup>	4/14/2017	Expanding the Use of Excess Flow Valves in Gas Distribution Systems to Applications Other Than Single-Family Residences	4/2017	Adopted
122 - 82 FR 7972 Note <sup>1</sup>	3/24/2017	Operator Qualification, Cost Recovery, Accident and Incident Notification, and Other Pipeline Safety Changes	3/2017	Adopted
<b>4</b>	<b>Part 193 Amendments (applicable only where state has jurisdiction over LNG)</b>			
01-17 Note <sup>1</sup>	Pre 2002	[All applicable amendments prior to and including 2002]	10/2010	Adopted
18 Note <sup>1</sup>	4/9/2004	Updated LNG standards by section	10/2010	Adopted
19 Note <sup>1</sup>	7/10/2006	Incorporate by Reference various Standards	10/2010	Adopted

20-73 FR 16562	3/28/2008	Administrative Procedures, Updates and Technical Amendments (73 FR 16562)	10/2010	Adopted
Note <sup>1</sup>				
21-74 FR 2889	1/16/2009	Administrative Procedures , Address Updates and Technical Amendments	10/2010	Adopted
Note <sup>1</sup>				
22 - 75 FR 48593	8/11/2010	Periodic Updates of Regulatory References to Technical Standards and Miscellaneous Edits	10/2010	Adopted
Note <sup>1</sup>				
23 - 75 FR 72878	11/26/2010	Updates to Pipeline and Liquefied Gas Reporting Requirements	11/2010	Adopted
Note <sup>1</sup>				
24 - 78 FR 58897	9/28/2013	Administrative Procedures, Updates, and Technical Corrections	09/2013	Adopted
Note <sup>1</sup>				
25 - 80 FR 168	3/6/2015	Periodic Updates of Regulatory References to Technical Standards and Miscellaneous Edits	03/2015	Adopted
Note <sup>1</sup>				
<b>5</b>		<b>Part 199 - Drug Testing</b>	<b>04/2000</b>	Adopted
Note <sup>1</sup>				
<b>6</b>		<b>Part 199 Amendments</b>		
01-19	Pre 2002	[All applicable amendments prior to and including 2002]	10/2004	Adopted
Note <sup>1</sup>				
20	3/12/2003	Definition of Administrator	10/2004	Adopted
Note <sup>1</sup>				
21	12/31/2003	Instructions for Single Use Form for MIS	10/2004	Adopted
Note <sup>1</sup>				
22	7/14/2004	New address for reporting	10/2004	Adopted
Note <sup>1</sup>				

23 Note <sup>1</sup>	3/8/2005	Administration name change	10/2005	Adopted
24-73 FR 16562 Note <sup>1</sup>	3/28/2008	Administrative Procedures, Updates and Technical Amendments (73 FR 16562)	10/2010	Adopted
25 - 78 FR58897 Note <sup>1</sup>	9/28/2013	Administrative Procedures, Updates, and Technical Corrections	09/2013	Adopted
26 - 80 FR 168 Note <sup>1</sup>	3/6/2015	Periodic Updates of Regulatory References to Technical Standards and Miscellaneous Edits	03/2015	Adopted
27 - 82 FR 7972 Note <sup>1</sup>	3/24/2017	Operator Qualification, Cost Recovery, Accident and Incident Notification, and Other Pipeline Safety Changes	3/2017	Adopted

**7 State Adoption of Part 198 State One-Call Damage Prevention Program**

a. Note <sup>1</sup>		Mandatory coverage of areas having pipeline facilities	07/1987	Adopted
b. Note <sup>1</sup>		Qualification for operation of one-call system	07/1987	Adopted
c. Note <sup>1</sup>		Mandatory excavator notification of one-call center	07/1987	Adopted
d. Note <sup>1</sup>		State determination whether calls to center are toll free	07/1987	Adopted
e. Note <sup>1</sup>		Mandatory intrastate pipeline operator participation	07/1987	Adopted
f. Note <sup>1</sup>		Mandatory operator response to notification	07/1987	Adopted

g. Note <sup>1</sup>	Mandatory notification of excavators/public	07/1987	Adopted
h. Note <sup>1</sup>	Civil penalties/injunctive relief substantially same as DOT Civil penalty amounts were increased in 2015 as part of Senate Bill 86. See Note Below.	10/1991	Adopted

**If Adoption Status is No, Please provide an explanation**

State Attendance at 2018 NAPS Regional Meeting:  
 Frequency of General Legislative Session: Biennially

Attended full time (Lead rep or alternative pipeline staff)

**Attachment 8 Notes**

The PUCN was successful in getting Senate Bill 86 passed during the 2015 Nevada Legislative Session, which increased Nevada's pipeline safety civil penalty authority amount to the new Federal civil penalty standard of \$200,000 per incident and a maximum of \$2 million.

The PUCN has not currently decided to submit legislation to adopt the new Federal inflation adjusted civil penalty amount. The PUCN will have to study this inflation adjustment language more closely as it could be problematic to adjust the civil penalty authority amount every year.

The PUCN was also successful in getting a Senate Bill passed that increased Nevada One-Call civil penalty amount from \$1000 per violation per day to \$2,500 per violation per day. The new legislation also defined high consequence underground facilities (such as gas pipelines operating above 100 PSI) and allowed the new larger civil penalty amount to triple should excavators and operators fail to follow Nevada's One-Call Law (NRS 455) with respect to correctly marking and properly protecting these high consequence facilities.

There were no Safety Related Conditions during this reporting period.

# Attachment 10 - Performance and Damage Prevention Questions

## CALENDAR YEAR (CY) 2018

### Planned Performance: What are your Planned Annual and Long-term goals for your Pipeline Safety Program?

- 1) With the final Master Meter Mobile Home park replaced by the LDC in 2018 and Nevada being one of the fastest growing states in the Nation; the Nevada Pipeline Safety Program (PSP) will continue to focus on construction inspections.
- 2) The largest LDC in Nevada has plans to expand their territory into the town of Mesquite, Nevada. This expansion will begin with the construction of a "Virtual Pipeline", which is a pipeline that will be fed by compressed natural gas tanks until the town can be tied into the main system. The Nevada PSP plans to spend some time there inspecting the new construction and effort to be present during key processes (gas up and purge, installation of the regulator stations, etc.)
- 3) There is also the possibility that Nevada's largest LDC will expand into the Spring Creek area of Elko, Nevada. If or when this occurs, the Nevada PSP will also spend time inspecting this project.
- 4) There are also various initiatives to replace early vintage plastic pipeline in Nevada's system and the Nevada PSP will continue to focus on these construction inspections.
- 5) Staff development is a key element to the Nevada PSP. As such, various inspectors will have the opportunity to lead LDC, LPG and transmission company audits. In addition, the Nevada PSP will encourage team members that have completed their Federal Training (TQ in Oklahoma) to continue their education in alternative venues such as NACE training or various committees.
- 6) The rapid growth in Nevada brings upon challenges of new excavation contractors, new and less experience employees with existing contractors as well as rush projects. As such, the Nevada PSP will strive to keep pipeline damages low. Some activities to accomplish this are random one-call inspections, excavator training, penalties and fines, and post-damage on-scene inspections.

### Past Performance: What did the Pipeline Safety Program accomplish during the subject year (to this document) to contribute toward the program's annual and long-term goals?

- 1) The final master meter mobile home park was replaced by the LDC in 2018. This leaves only one master meter in Nevada (a small hotel in the Lake Tahoe area). This operator has historically had issues in the past but the PUCN PSP does not believe this operator meets that actual definition of a master meter operator pursuant to 49 CFR 191.3. Nevada PSP has asked PHMSA for an interpretation request on this subject.
- 2) Even through the accelerated growth in Nevada, we have had successful efforts in keeping Pipeline Damages low (around 3 damages per 1000 tickets) through inspections, education/training and enforcement.
- 3) The Nevada PSP continued to have a high ranking with the Pipeline Safety Trust.
- 4) For the second year in a row, Nevada PSP had no employee turnover, this allowed for more trained inspectors to be in the field doing inspection/audit activities and led to the strong inspection/field day numbers being reported in Attachment 2.
- 5) The PUCN issued two civil penalties to jurisdictional operators in 2018. The Nevada PSP continues to recommend the use of civil penalties when circumstances warrant.

### 1. Has the state or agency reviewed the Damage Prevention Assistance Program (DPAP) document in the last twelve months?

Yes

### 2. Has the state or agency developed or is in the process of developing a plan to address the nine elements contained in the PIPES Act of 2006 for an effective State Damage Prevention Program?

**If yes to question 2, where does the state or agency stand on implementation of the nine elements contained in the PIPES Act of 2006? Please provide a description of how the state or agency has or will meet each element. If not, please provide a brief passage explaining the reasons why the state or agency has not.**

All 9 Elements have been implemented by Nevada. The majority of the Elements have been implemented through the Nevada Regional Common Ground Alliance ("NRCGA"). Implementation of Elements 6 and 7 (Enforcement) is primarily a function of the Public Utilities Commission of Nevada ("PUCN"), its pipeline safety program ("PSP") and its Staff legal department.

Element (1), Enhanced Communications between operators and excavators.

Nevada's One-Call Center, USA North ("USAN"), is a member of the NRCGA and participates in the monthly NRCGA meetings. These meetings and USAN's participation gives all stakeholders (operators and excavators) the opportunity to discuss the operations of the One-Call Center.

Element (2), Fostering Support and partnership of all stakeholders.

This has been accomplished through the participation of operators, excavators, USAN, and the PUCN pipeline safety program Staff during the monthly NRCGA meetings. At least one member of the PUCN's pipeline safety group typically attends the monthly NRCGA meetings which are video linked to both Reno and Las Vegas.

Element (3), Operator use of performance measures for locators.

The two local distribution companies ("LDCs") Southwest Gas and NV Energy have Quality Assurance/Quality Control ("QA/QC") measures for locators and use the QA/QC measures to drive improvements. Additionally, both operators track the cause of each damage, including miss-marks and report that data on an annual basis to the CGA DIRT database. These damage numbers are reviewed at least quarterly/yearly, in order to track locating company performance.

Element (4), Stakeholder partnership in employee training.

Excavator training has been developed and implemented through the NRCGA with the assistance of the PUCN pipeline safety group and LDC operators. Training sessions are held on a regular basis, and on-site training sessions is available and are often put on at excavating company offices in order to allow for more training and easier access. Request for training as well as historic training records are all available on the NRCGA website at nrcga.org.

Element (5), Partnership in Public Education.

The PUCN has membership with the Nevada Regional Common Ground Alliance (NRCGA) and partners with them to enhance the 811 Damage Prevention message. Included in this partnership are several public outreach events (home/trade show booths, etc.), an annual Locate Rodeo and Excavator of the Year event. The PUCN is currently seeking further efforts to fund the NRCGA and enhance public education efforts.

Element (6), Enforcement agencies role to help resolve issues.

The PUCN has authority to enforce Nevada's One-Call Law (NRS 455). Verbal warnings are given in the field for minor violations that are discovered. If the verbal warnings are not effective and repeat violations are observed, a formal written Warning Letter is sent from the PUCN Staff Legal Counsel to the violating operator/excavator. If further violations are found after a Warning Letter has been issued or if egregious acts are discovered, the PUCN Staff can file a Formal Complaint Petition with the PUCN requesting civil penalties be assessed against those operators/excavators who continually violate and/or egregiously violate NRS 455. As outlined in Attachment 5, the PUCN issued 19 civil penalty enforcement actions in 2018.

Element (7), Fair and consistent enforcement of the law.

Nevada's One-Call Statute, NRS 455 was revised during the 2007 legislative session to include Enforcement by the PUCN Staff. Since that time the PUCN Staff, with the help of its Staff Counsel Division, has developed procedures for enforcing NRS 455. Additionally, in 2015 the civil penalty amounts outlined in NRS 455 were increased from \$1000 per day per violation to \$2,500 per day per violation. Also, there is now a provision in the law that allows the civil penalty amount to be tripled if the violation involves high consequence facilities, such as pipelines operating above 90 PSI. In 2018, the PUCN assessed nineteen (19) different natural gas pipeline related One-Call civil penalties, totaling \$74,500. The PUCN also issued 16 written warning letters and issued approximately 256 verbal field warnings.

Element (8), Use of Technology to improve the locating process.

The NRCGA is continually looking at new locating technology. In 2016 NRCGA received a TAG grant from PHMSA to provide line locator training to its members. This line locating occurred in 2016, it was put on by line locating experts, and it involved the utilization of the latest line locating technologies. The NRCGA also holds an annual line locate rodeo in which new line locating techniques are outlined and used. The NRCGA also has a best practices sub-committee that is always discussing industry

improvements including the use of new technologies.

Element (9), Data analysis to continually improve program effectiveness.

The primary measure of program effectiveness is the number of dig-ins by year and the number of damages per 1000 tickets. Nevada has been tracking this data since 2000. In 2000, the damages per 1000 tickets was 14.24 and has trended down since. In 2018, Nevada had 3.10 damages per 1000 tickets, which is the second lowest damage rate in recorded history, just up from the 3.06 figure reported for 2017.

## **Attachment 10 Notes**

