

Inspection Output (IOR)

Generated on 2023.June.30 13:45

Report Filters

Assets Gas Distribution Integrity Management Inspection / HQ DIMP

Results All

Inspection Information

Inspection Name	8624 PSE HQ DIMP	Operator(s)	PUGET SOUND ENERGY (22189)	Plan Submitted	06/01/2023
		Lead	Anthony Dorrrough	Plan Approval	06/05/2023 by Dennis Ritter
Status	PLANNED	Supervisor	Dennis Ritter	All Activity Start	05/23/2023
Start Year	2023	Director	Scott Rukke	All Activity End	05/24/2023
System Type	GD			Inspection Submitted	--
Protocol Set ID	WA.GD.2023.01			Inspection Approval	--

Inspection Summary

Inspection Scope and Summary

This was a 2023 PSE HQ DIMP (Distribution Gas Integrity Management) inspection. The last inspection was in 2017, the plan contains Form 22 (Program) and Form 24 (District implementation activities for Pierce, Kittitas and Thurston/Lewis). The operator does not have DIMP information aggregated by districts that were inspected during that cycle.

Facilities visited and Total AFOD = 2

Summary of Significant Findings

There were no significant findings or areas of concern.

Primary Operator contacts and/or participants

Justin Wahlborg, Pipeline Safety Compliance Manager, PSE, (425) 766-1811 justin.wahlborg@pse.com

Cameron Williams, Sr. Regulatory Compliance Analyst, PSE (425) 424-6596 cameron.williams@pse.com

Operator executive contact and mailing address for any official correspondence

Dan Koch, Vice President of Operations, PSE, (425) 301-8778 dan.koch@pse.com

355 110th Ave NE, Bellevue, WA 98004

Scope (Assets)

Short # Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total	Required % Complete
1. HQ DIMP	Gas Distribution Integrity Management Inspection	unit	--	Bottle/Pipe - Holders Offshore GOM OCS Cast or Ductile Iron Copper Pipe Aluminum/Amphoteric	81	81	81	81	100.0%

1. Percent completion excludes unanswered questions planned as "always observe".

Plans

#	Plan Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent	Notes
1.	HQ DIMP	--	GDIM	P, R, O	Detail	--

Plan Implementations

Activity #	SMART Name	SMART Act#	Start Date	End Date	Focus Directives	Involved Groups/Subgroups	Assets	Qst Type(s)	Planned	Required	Inspected	Total	Required % Complete
1.	HQ DIMP	--	05/23/2023	05/24/2023	--	all planned questions	all assets	all types	81	81	81	81	100.0%

1. Since questions may be implemented in multiple activities, but answered only once, questions may be represented more than once in this table.
2. Percent completion excludes unanswered questions planned as "always observe".
3. Question counts and completion percents are filtered to include only questions planned for and results applied to the filtered Assets.

Forms

No.	Entity	Form Name	Status	Date Completed	Activity Name	Asset
1.	Attendance List	HQ DIMP 4	COMPLETED	06/30/2023	HQ DIMP	HQ DIMP

Results (all values, 81 results)

GDIM.PM: Preventive and Mitigative Actions

1. Question Result, ID, References [Sat, GDIM.PM.IDENTIFYMEASURES.P, 192.1007\(d\)](#)
 Question Text *Does the plan include procedures to identify when measures, beyond minimum code requirements specified outside of Part 192 Subpart P, are required to reduce risk?*
 Assets Covered [HQ DIMP](#)
 Result Notes [Located in Section 7 : Mitigating Measures and Accelerated Actions](#)
2. Question Result, ID, References [Sat, GDIM.PM.IDENTIFYMEASURES.R, 192.1007\(d\)](#)
 Question Text *When measures, beyond minimum code requirements specified outside of Part 192 Subpart P, are required to reduce risk, does the plan identify the measures selected, how they will be implemented, and the risks they are addressing?*
 Assets Covered [HQ DIMP](#)
 Result Notes [Located in Summary of Additional and Accelerated Actions](#)
3. Question Result, ID, References [Sat, GDIM.PM.LEAKMANAGEMENT.P, 192.1007\(d\)](#)
 Question Text *Does the plan include an effective leak management program (unless all leaks are repaired when found)?*
 Assets Covered [HQ DIMP](#)
 Result Notes [Located in Section 8: Leak Management Program](#)
4. Question Result, ID, References [Sat, GDIM.PM.IMPLEMENTPM.R, 192.1007\(d\)](#)
 Question Text *Do records demonstrate implementation of the measures, required by Part 192 Subpart P, to reduce risk?*
 Assets Covered [HQ DIMP](#)
 Result Notes [Reviewed AA'S & Summary Table](#)

GDIM.IM: Plan Implementation

5. Question Result, ID, References [Sat, GDIM.QA.PLANIMPLEMENT.P, 192.1005](#)

Question Text *Was the plan written and implemented per the requirement of 192.1005 by 08/02/2011?*

Assets Covered HQ DIMP

Result Notes The DIMP plan was implemented on 8/2/2011, and completed on 8/2/2017.

6. Question Result, ID, References Sat, GDIM.RA.SOURCES.P, 192.1007(a)(1)

Question Text *Do the procedures identify or reference the appropriate sources used to determine certain characteristics (e.g., Design, Operating Conditions, Operating Environmental Factors) necessary to assess the threats and risks to the pipeline?*

Assets Covered HQ DIMP

Result Notes Located in Appendix B - Section 4 -Knowledge of the distribution system

GDIM.KN: Knowledge of the System

7. Question Result, ID, References Sat, GDIM.RA.INFORMATION.P, 192.1007(a)(2)

Question Text *Do the procedures require the consideration of information gained from past design, operations, and maintenance (e.g., O&M activities, field surveys, One-Call system information, excavation damage, etc.)?*

Assets Covered HQ DIMP

Result Notes Located in the Periodic Evaluation - Section 9 - #7

8. Question Result, ID, References Sat, GDIM.RA.GAPS.P, 192.1007(a)(3)

Question Text *Does the plan contain procedures to identify additional information that is needed to fill gaps due to missing, inaccurate, or incomplete records?*

Assets Covered HQ DIMP

Result Notes Located in Section 4: Existing System knowledge - Additional data capture to enhance knowledge of the system.

9. Question Result, ID, References Sat, GDIM.RA.INFONEEDS.P, 192.1007(a)(3)

Question Text *Do the procedures specify the means to collect the additional information needed to fill gaps due to missing, inaccurate, or incomplete records (e.g., O&M activities, field surveys, One-Call System, etc.)?*

Assets Covered HQ DIMP

Result Notes Located in Section 4: Existing System knowledge - Additional data capture to enhance knowledge of the system.

10. Question Result, ID, References Sat, GDIM.RA.INFONEEDS.R, 192.1007(a)(3)

Question Text *Does the plan list the additional information needed to fill gaps due to missing, inaccurate, or incomplete records?*

Assets Covered HQ DIMP

Result Notes Located in Section 4: Existing System knowledge - Additional data capture to enhance knowledge of the system. CS Report Initiatives' Table

11. Question Result, ID, References Sat, GDIM.RA.NEWPIPEDATA.P, 192.1007(a)(5)

Question Text *Do the procedures require the capture and retention of data on any new pipeline installed?*

Assets Covered HQ DIMP

Result Notes Located in Section 4 - New Construction Knowledge.

12. Question Result, ID, References Sat, GDIM.RA.NEWPIPEDATA.R, 192.1007(a)(5)

Question Text *Does the data required for capture and retention include, at a minimum, the location where the new pipeline is installed and the material from which it is constructed?*

Assets Covered HQ DIMP

Result Notes Per. the following:

Gas Operating Standard 2500.0500

Gas Operating Standard 2500.1700

As-Built and Gas Operating Standard 2500.1800

13. Question Result, ID, References **Sat, GDIM.RA.DEMOKNOWLEDGE.R, 192.1007(a)**
Question Text *Do records demonstrate implementation of the element "Knowledge of the System"?*
Assets Covered **HQ DIMP**
Result Notes **Located in Appendix B**
14. Question Result, ID, References **Sat, GDIM.RA.DEMOUNDERSTANDING.R, 192.1007(a)**
Question Text *Has the operator demonstrated an adequate understanding of the system?*
Assets Covered **HQ DIMP**
Result Notes **Reviewed GIS system for leak tracking, and reviewed DGLI**

GDIM.TH: Identify Threats

15. Question Result, ID, References **Sat, GDIM.RA.INFOCONSIDERED.P, 192.1007(b)**
Question Text *Did the operator consider the information that was reasonably available to identify existing and potential threats?*
Assets Covered **HQ DIMP**
Result Notes **Located in Section 5 - Threat Assessment and Identification and CS Report Appendix C**
16. Question Result, ID, References **Sat, GDIM.RA.INFOCONSIDERED.R, 192.1007(b)**
Question Text *In identifying threats did the information considered include all of the required data and information sources?*
Assets Covered **HQ DIMP**
Result Notes **Located in Section 5- Using SME input and results in CS Report Part 5 : System Trends**
17. Question Result, ID, References **Sat, GDIM.RA.OUTSIDESOURCES.P, 192.1007(b)**
Question Text *Do the procedures consider, in addition to the operator's own information, data from external sources (e.g. trade associations, government agencies, or other system operators, etc.) to assist in identifying potential threats?*
Assets Covered **HQ DIMP**
Result Notes **Located in Section 4 - Existing System Knowledge and CS Report Part 4 - Periodic Evaluation Improvement**
18. Question Result, ID, References **Sat, GDIM.RA.THREATCATEGORIES.P, 192.1007(b)**
Question Text *In identifying threats, do the procedures include consideration of all of the required threat categories to each gas distribution pipeline?*
Assets Covered **HQ DIMP**
Result Notes **Located in Section 5 : Threat Assessment & Appendix C Potential Threats - Stop Light Chart - Appendix A**
19. Question Result, ID, References **Sat, GDIM.RA.IMPLEMENTTH.R, 192.1007(b)**
Question Text *Do records demonstrate implementation of the element "Identify Threats"?*
Assets Covered **HQ DIMP**
Result Notes **Located in Section 5 - Appendix C & CS Report - Emerging Threats**

GDIM.RR: Evaluate and Rank Risk

20. Question Result, ID, References **Sat, GDIM.RA.RISKRANKING.P, 192.1007(c)**

Question Text *Do the procedures contain the method(s) and/or a model used to determine the relative importance of each threat and estimate and rank the risks posed?*

Assets Covered HQ DIMP

Result Notes Located in Section 6 : Risk Evaluation and Prioritization Process & Appendix C - Risk Evaluation and Prioritization

21. Question Result, ID, References Sat, GDIM.RA.THREATSCONSIDERED.P, 192.1007(c)

Question Text *Do the procedures to evaluate and rank risk consider each applicable current and potential threat?*

Assets Covered HQ DIMP

Result Notes Located in Section 6: & Appendix C

22. Question Result, ID, References Sat, GDIM.RA.LIKELIHOOD.P, 192.1007(c)

Question Text *Do the procedures to evaluate and rank risk consider the likelihood of failure associated with each threat?*

Assets Covered HQ DIMP

Result Notes Located on Page 13- Risk Evaluation and Prioritization.

23. Question Result, ID, References Sat, GDIM.RA.CONSEQUENCE.P, 192.1007(c)

Question Text *Do the procedures to evaluate and rank risk consider the potential consequence of failure for all applicable threats?*

Assets Covered HQ DIMP

Result Notes Located in Section 6 & Appendix C

24. Question Result, ID, References Sat, GDIM.RA.SUBDIVIDE.R, 192.1007(c)

Question Text *If subdivision of system occurs, does the plan subdivide the system into regions with similar characteristics and for which similar actions are likely to be effective in reducing risk?*

Assets Covered HQ DIMP

Result Notes Located in Section 6 & Appendix C

25. Question Result, ID, References Sat, GDIM.RA.RESULTS.R, 192.1007(c)

Question Text *Are the results of the risk ranking supported by the risk evaluation model/method?*

Assets Covered HQ DIMP

Result Notes Located in DIMP Appendix C

26. Question Result, ID, References Sat, GDIM.RA.RESULTSVALIDATION.R, 192.1007(c)

Question Text *Did the operator validate the results generated by the risk evaluation model/method?*

Assets Covered HQ DIMP

Result Notes Held an SME Review meeting which included PSE Directors.

27. Question Result, ID, References Sat, GDIM.RA.IMPLEMENTRR.R, 192.1007(c)

Question Text *Do records demonstrate implementation of the element "Evaluate and Rank Risk"?*

Assets Covered HQ DIMP

Result Notes Located in Appendix B & CS Report

GDIM.EV: Measure Performance and Evaluate Effectiveness

28. Question Result, ID, References Sat, GDIM.QA.PERFMEASUREBASELINE.P, 192.1007(e)

Question Text *Does the plan contain procedures for how the operator established a baseline for each performance measure?*

Assets Covered HQ DIMP

Result Notes Located in CS Report - Section 3 Performance Measures - Introduction

29. Question Result, ID, References Sat, GDIM.QA.PERFMEASUREBASELINE.R, 192.1007(e)

Question Text *Does the plan establish a baseline for each performance measure?*

Assets Covered **HQ DIMP**

Result Notes **Reviewed CS Report & AA's**

30. Question Result, ID, References **Sat, GDIM.QA.PERFMEASUREDATA.P, 192.1007(e)**

Question Text *Does the operator have procedures to collect the data for each performance measure?*

Assets Covered **HQ DIMP**

Result Notes **Located in Section 7 & Section 4**

31. Question Result, ID, References **Sat, GDIM.QA.PERFMEASUREMONITOR.P, 192.1007(e)**

Question Text *Do the procedures require the operator to monitor each performance measure?*

Assets Covered **HQ DIMP**

Result Notes **Located in Section 7 & Section 4**

32. Question Result, ID, References **Sat, GDIM.QA.MEASUREEFFECTIVENESS.P, 192.1007(e)**

Question Text *When measures are required to reduce risk, does the plan provide/describe what type and/or what specific performance measures will be used to measure effectiveness?*

Assets Covered **HQ DIMP**

Result Notes **Measures are required when they have an AA and a Specific Performance.**

33. Question Result, ID, References **Sat, GDIM.QA.IMPLEMENTEV.R, 192.1007(e)**

Question Text *Do records demonstrate implementation of the element "Measure Performance, Monitor Results, and Evaluate Effectiveness"?*

Assets Covered **HQ DIMP**

Result Notes **Located in Section 8 - & CS Report Summary of AA's**

GDIM.PE: Periodic Evaluation

34. Question Result, ID, References **Sat, GDIM.CA.PERIODICEVAL.P, 192.1007(f)**

Question Text *Do the procedures for periodic evaluation include all of the requirements of §192.1007(f)?*

Assets Covered **HQ DIMP**

Result Notes **Located in Section 9 - Periodic Evaluation**

35. Question Result, ID, References **Sat, GDIM.CA.PERIODICEVAL.R, 192.1007(f)**

Question Text *Do records demonstrate implementation of the element "Periodic Evaluation and Improvement"?*

Assets Covered **HQ DIMP**

Result Notes **Located in CS Report - Part 4**

GDIM.RP: Reporting

36. Question Result, ID, References **Sat, GDIM.RR.ANNUALREPORT.P, 192.1007(g)**

Question Text *Does the plan contain or reference procedures for reporting, on an annual basis, the four measures listed in 192.1007(e)(1)(i) through (e)(1)(iv) to PHMSA as part of the annual report required by 191.11 and the State regulatory authority?*

Assets Covered **HQ DIMP**

Result Notes **Located in Section 10 : Reporting**

37. Question Result, ID, References **Sat, GDIM.RR.SUBMITREPORTS.R, 192.1007(g)**

Question Text *Has the operator submitted the required reports?*

Assets Covered **HQ DIMP**

Result Notes **Reviewed 2020-22 annual reports.**

GDIM.RC: Records Required to be Kept

38. Question Result, ID, References **Sat, GDIM.QA.RECORDREQUIREMENTS.P, 192.1011**
Question Text *Are there procedures specifying which records demonstrating compliance with Subpart P will be maintained for at least 10 years?*
Assets Covered **HQ DIMP**
Result Notes **Located in Section 11 : Record Keeping**
39. Question Result, ID, References **Sat, GDIM.QA.PLANRETENTION.P, 192.1011**
Question Text *Are there procedures specifying that copies of superseded integrity management plans will be maintained for at least 10 years?*
Assets Covered **HQ DIMP**
Result Notes **Located in DIMP Section 11: Record Keeping**
40. Question Result, ID, References **Sat, GDIM.QA.RECORDREQUIREMENTS.R, 192.1011**
Question Text *Has the operator maintained the required records?*
Assets Covered **HQ DIMP**
Result Notes **Reviewed DIRT records and DIMP plans.**

GDIM.IMPL: GDIM Implementation

41. Question Result, ID, References **Sat, GDIM.QA.ISSUESIMPL.R, 192.1005**
Question Text *Have all issues raised in previous DIMP inspections been satisfactorily addressed?*
Assets Covered **HQ DIMP**
Result Notes **No significant changes were identified.**
42. Question Result, ID, References **Sat, GDIM.RA.OUTSIDESOURCESIMPL.R, 192.1007(b)**
Question Text *Has the operator identified information or data from external sources (e.g. trade associations, operator's consultants, government agencies, other operators, manufacturers, etc.) that may require re-evaluation of threats and risks?*
Assets Covered **HQ DIMP**
Result Notes **Established threats from NTSB Reports, AGA, WEI, government agencies and other operators, etc... were used.**
43. Question Result, ID, References **Sat, GDIM.RA.GAPSIMPL.R, 192.1007(a)(3)**
Question Text *Is missing or incomplete system information and data needed to fill knowledge gaps to assess existing and potential threats being collected?*
Assets Covered **HQ DIMP**
Result Notes **Located in Part 4 - CS Report Data Initiatives Section - PSE has hired a mapping analyst, a new gas specific position since last inspection.**
44. Question Result, ID, References **Sat, GDIM.RA.SYSINFONEEDSIMPL.R, 192.1007(a)(3)**
Question Text *Is missing or incomplete system information and data using the procedures prescribed in the DIMP plan being collected?*
Assets Covered **HQ DIMP**
Result Notes **Located in CS Report Section 4**
45. Question Result, ID, References **Sat, GDIM.RA.OMINFONEEDSIMPL.R, 192.1007(a)(3)**
Question Text *Has any new or missing information identified or acquired during normal operations, maintenance, and inspection activities been incorporated into the DIMP plan?*
Assets Covered **HQ DIMP**
Result Notes **Located in DIMP Plan - Appendix B (PE pipe history)**

46. Question Result, ID, References **Sat, GDIM.RA.NEWPIPEIMPL.R, 192.1007(a)(5)**
 Question Text *Have required data on any new pipeline installations since August 2, 2011 been captured (e.g., location, wall thickness/SDR, manufacturer, lot/production number)?*
 Assets Covered **HQ DIMP**
 Result Notes **Located in DIMP Plan - Section 4**
47. Question Result, ID, References **Sat, GDIM.RA.DATAFORMIMPL.R, 192.1007(a)**
 Question Text *Are data collection forms used in conjunction with the operator's DIMP plan being fully and accurately completed?*
 Assets Covered **HQ DIMP**
 Result Notes **Reviewed SAP Leak Management System. PSE doesn't utilize forms of its own.**
48. Question Result, ID, References **Sat, GDIM.RA.SMEIMPL.R, 192.1007(a)**
 Question Text *If Subject Matter Experts (SMEs), is their documented knowledge and experience being appropriately used in the DIMP Program?*
 Assets Covered **HQ DIMP**
 Result Notes **Located in DIMP Plan Section 2- Responsibilities and Qualifications - PSE doesn't have any third party risk models right now which would lend to using an outside SME.**
49. Question Result, ID, References **Sat, GDIM.RA.DEMOUNDERSTANDINGIMPL.O, 192.1007(a)**
 Question Text *Do operator personnel in the field understand their responsibilities under the DIMP plan?*
 Assets Covered **HQ DIMP**
 Result Notes **PSE conducted outreach presentations for leak management personnel, They have a training course for Dupont and buried meters as well - Reviewed the presentation for gas workers.**
50. Question Result, ID, References **Sat, GDIM.RA.THREATCATEGORIESIMPL.R, 192.1007(b)**
 Question Text *Has the operator acquired any new information relevant to system knowledge that may affect its threat identification?*
 Assets Covered **HQ DIMP**
 Result Notes **Valve Security, Station Hardening, No Record Facilities (no records to confirm retirement) are incorporated in CS Report.**
51. Question Result, ID, References **Sat, GDIM.RA.INFOCONSIDEREDIMPL.R, 192.1007(b)**
 Question Text *Have any changes occurred that require re-evaluation of threats and risks?*
 Assets Covered **HQ DIMP**
 Result Notes **Located in Appendix C Section Part 2 - Annually reviews sub-threats - shows on risk matrix (Stop Light)**
52. Question Result, ID, References **Sat, GDIM.RA.IMPLEMENTTHUPDATEIMPL.R, 192.1007(c)**
 Question Text *Since the last DIMP plan review by the regulatory agency, has the threat identification and risk assessment been updated based on newly acquired information or data relevant to system knowledge?*
 Assets Covered **HQ DIMP**
 Result Notes **Reviewed Stop Light - Annually updated based on the new data.**
53. Question Result, ID, References **Sat, GDIM.RA.IMPLEMENTTHUPDATEPLANIMPL.R, 192.1007(c)**
 Question Text *If the threat identification and risk evaluation and ranking have been modified, were the revisions made in accordance with the procedure in the DIMP plan?*
 Assets Covered **HQ DIMP**
 Result Notes **Located in Appendix C - Outlines the process procedures (Table Cloth).**
54. Question Result, ID, References **Sat, GDIM.RA.SUBDIVIDEADEQIMPL.R, 192.1007(c)**
 Question Text *Does the current subdivision process (grouping of materials, geographic areas, etc.) adequately meet the need to properly evaluate and rank the existing and potential threats to the integrity of the system?*
 Assets Covered **HQ DIMP**

Result Notes Sub-divided based on Asset Category and Threats.

55. Question Result, ID, References Sat, GDIM.RA.SUBDIVIDEUPDATEIMPL.R, 192.1007(c)
Question Text *Have the system subdivisions within the risk evaluation and ranking been added to or modified since the last plan review by the regulatory agency?*
Assets Covered HQ DIMP
Result Notes Yes. Cyber Security, and Wildfires.
56. Question Result, ID, References Sat, GDIM.RA.SUBDIVIDEDIMPIMPL.R, 192.1007(c)
Question Text *If system subdivisions have been added or modified, was it done in accordance with the procedures described in the DIMP plan?*
Assets Covered HQ DIMP
Result Notes Located in Appendix C - Prioritizing System Risks
57. Question Result, ID, References Sat, GDIM.RA.SUBDIVIDERESULTIMPL.R, 192.1007(c)
Question Text *If system subdivisions have been added or modified, did the new system subdivision result in modifications to the risk evaluation and ranking?*
Assets Covered HQ DIMP
Result Notes Reviewed (Stop Light)
58. Question Result, ID, References Sat, GDIM.PM.IMPLEMENTPMIMPL.R, 192.1007(d)
Question Text *Does documentation reviewed demonstrate that measures to reduce risks per the DIMP plan are being implemented?*
Assets Covered HQ DIMP
Result Notes Appendix D - Mitigative measures
59. Question Result, ID, References Sat, GDIM.PM.IMPLEMENTPMCOMPLETEIMPL.R, 192.1007(d)
Question Text *Have any measures to reduce risks resulting in the elimination/mitigation of the associated identified threat been completed (e.g., pipe replacement program completed, etc.)?*
Assets Covered HQ DIMP
Result Notes Located in DGLI Program WA - WSAP (wrapped steel associated program) viewed list of eliminated programs
60. Question Result, ID, References Sat, GDIM.PM.IMPLEMENTPMREEVALIMPL.R, 192.1007(d)
Question Text *Have risks been re-evaluated and re-ranked because of the elimination/mitigation of an identified threat?*
Assets Covered HQ DIMP
Result Notes PSE Generally doesn't drop threats, even if they don't exist anymore they will keep it on the list.
61. Question Result, ID, References Sat, GDIM.PM.IMPLEMENTPMSPECIFRISKIMPL.R, 192.1007(d)
Question Text *Does each implemented risk reduction measure identified in the DIMP plan address a specific risk or group of risks?*
Assets Covered HQ DIMP
Result Notes Reviewed table for each accelerated action.
62. Question Result, ID, References Sat, GDIM.PM.LEAKMANAGEMENTIMPL.R, 192.1007(d)
Question Text *Can the operator provide documentation to demonstrate that an effective leak management program is being implemented (answer "N/A" if all leaks are repaired when found)?*
Assets Covered HQ DIMP
Result Notes Located in Part 4 - PSE is still using leak management system but completing them faster.
63. Question Result, ID, References Sat, GDIM.QA.IMPLEMENTEVDATAIMPL.R, 192.1007(e)
Question Text *Is data being collected for the required performance measures in 192.1007(e)?*
Assets Covered HQ DIMP

Result Notes Located in CS Report Part 3 - Performance Measures.

64. Question Result, ID, References Sat, GDIM.QA.IMPLEMENTEVDATADIMPIMPL.R, 192.1007(e)
Question Text *Based on field observations and/or record reviews, is the data used to measure performance being accurately collected in accordance with the procedures in its DIMP plan?*
Assets Covered HQ DIMP
Result Notes Reviewed CS Report
65. Question Result, ID, References Sat, GDIM.QA.IMPLEMENTEVBASELINEIMPL.R, 192.1007(e)
Question Text *Is each performance measure being monitored from an established baseline?*
Assets Covered HQ DIMP
Result Notes Located in CS Report Part 3 - Performance Measures
66. Question Result, ID, References Sat, GDIM.QA.IMPLEMENTEVRISKIMPL.R, 192.1007(e)
Question Text *Is each performance measure added since the DIMP plan was last updated tied to a specific risk reduction measure or group of measures?*
Assets Covered HQ DIMP
Result Notes PSE has a low pressure program for retiring those systems, and an older wrapped steel pipe program. No steps taken yet towards decision on PE requirement.
67. Question Result, ID, References Sat, GDIM.CA.PERIODICEVALFREQIMPL.R, 192.1007(f)
Question Text *Have periodic evaluations of the DIMP plan been performed on the frequency specified in the plan? [If a periodic evaluation has not been required since plan implementation or the last inspection, mark questions 27-32 as "N/A".]*
Assets Covered HQ DIMP
Result Notes Last up date 2017, 2020, 2021 and 2022 (threshold changes)
68. Question Result, ID, References Sat, GDIM.CA.PERIODICEVALREQTSIMPL.R, 192.1007(f)
Question Text *Did the periodic evaluation include all required elements?*
Assets Covered HQ DIMP
Result Notes Located in DIMP, Sections 4 - CS Periodic Evaluation and 9 - Improvement Report
69. Question Result, ID, References Sat, GDIM.CA.PERIODICEVALHIRISKIMPL.R, 192.1007(f) (192.1007(e))
Question Text *If any established performance measures indicated an increase in risk beyond an acceptable level (as established in the DIMP plan), were new risk reduction measures implemented along with their associated performance measures?*
Assets Covered HQ DIMP
Result Notes New or Emerging Threats, nothing else rose to that level - No record facilities' (NRF)
70. Question Result, ID, References Sat, GDIM.CA.PERIODICEVALRISKREDIMPL.R, 192.1007(f)
Question Text *If the periodic evaluation indicates that implemented measures to reduce risks are NOT effective, were risk reduction measures modified, deleted or added?*
Assets Covered HQ DIMP
Result Notes PSE has not said that anything is not effective, but maybe on a program specific level - a good example, moving toward mitigating Buried MSA.
71. Question Result, ID, References Sat, GDIM.CA.PERIODICEVALPRFMESIMPL.R, 192.1007(f)
Question Text *Did the periodic evaluation indicate that the selected performance measures are assessing the effectiveness of risk reduction measures, and, if not, were performance measures modified, deleted or added?*
Assets Covered HQ DIMP
Result Notes Located in CS Report & Part 4
72. Question Result, ID, References Sat, GDIM.CA.PERIODICEVALDIMPIMPL.R, 192.1007(f)

Question Text *Were procedures followed in conducting periodic evaluations and program improvements?*

Assets Covered HQ DIMP

Result Notes Located in CS- Report - Part 4 Evaluation Table

73. Question Result, ID, References Sat, GDIM.RR.SUBMITREPORTSIMPL.R, 192.1007(g)

Question Text *Were Parts C and D of the PHMSA Distribution Annual Report (Form 7100.1-1) completed in the submission to PHMSA and the state regulatory authority having jurisdiction, if required, for each year since the last inspection?*

Assets Covered HQ DIMP

Result Notes Located in Annual DOT Report - Reviewed 2022

74. Question Result, ID, References Sat, GDIM.QA.RECORDREQUIREMENTSIMPL.R, 192.1011

Question Text *Are records retained demonstrating compliance with Subpart P, as specified in its DIMP plan, for 10 years (or since 08/02/2011)?*

Assets Covered HQ DIMP

Result Notes PSE keeps all records, not limited to 10 years.

75. Question Result, ID, References Sat, GDIM.QA.RECORDREQTSRETAINIMPL.R, 192.1011

Question Text *Were copies of superseded DIMP plans retained for 10 years (or since 08/02/2011)?*

Assets Covered HQ DIMP

Result Notes PSE retains all records for the life of the pipeline.

76. Question Result, ID, References Sat, GDIM.QA.RECORDREQTSDIMPIMPL.R, 192.1011

Question Text *Were DIMP procedures followed as applicable to records retention?*

Assets Covered HQ DIMP

Result Notes Located in Appendix B

77. Question Result, ID, References NA, GDIM.PI.PERIODICINSPDEVAPPRVIMPL.R, 192.1013(c)

Question Text *Has approval been requested or received from PHMSA or the appropriate State Regulatory Authority for alternate (less strict than code) periodic inspection intervals? [If no, mark Subgroup GDIM.IMPL questions 40-44 "N/A".]*

Assets Covered HQ DIMP

Result Notes No such activity/condition was observed during the inspection.

78. Question Result, ID, References NA, GDIM.PI.PERIODICINSPDEVPERFRMIMPL.R, 192.1013(c)

Question Text *Have the periodic inspections been implemented and have they been conducted at the specified (approved) alternate intervals?*

Assets Covered HQ DIMP

Result Notes No such activity/condition was observed during the inspection.

79. Question Result, ID, References NA, GDIM.PI.PERIODICINSPDEVREQTIMPL.R, 192.1013(c)

Question Text *Have all conditions been complied with that were required as part of the alternate inspection interval approval?*

Assets Covered HQ DIMP

Result Notes No such event occurred, or condition existed, in the scope of inspection review.

80. Question Result, ID, References NA, GDIM.PI.PERIODICINSPDEVPRFMESIMPL.R, 192.1013(c)

Question Text *Do performance measure records indicate that deviation inspection resources were assigned to higher risk threat(s) and/or that that decreased inspection intervals contributed to an equal or greater overall level of safety has been achieved since the alternate inspection frequency was implemented?*

Assets Covered HQ DIMP

Result Notes No such activity/condition was observed during the inspection.

81. Question Result, ID, References **NA, GDIM.PI.PERIODICINSPDEVACTIONIMPL.R, 192.1013(c)**

Question Text *If that an equal or greater overall level of safety has not been achieved, has corrective action been taken?*

Assets Covered **HQ DIMP**

Result Notes **No such activity/condition was observed during the inspection.**

Except as required to be disclosed by law, any inspection documentation, including completed protocol forms, summary reports, executive summary reports, and enforcement documentation are for internal use only by federal or state pipeline safety regulators. Some inspection documentation may contain information which the operator considers to be confidential. In addition, supplemental inspection guidance and related documents in the file library are also for internal use only by federal or state pipeline safety regulators (with the exception of documents published in the federal register, such as advisory bulletins). Do not distribute or otherwise disclose such material outside of the state or federal pipeline regulatory organizations. Requests for such information from other government organizations (including, but not limited to, NTSB, GAO, IG, or Congressional Staff) should be referred to PHMSA Headquarters Management.