

Form A - Annual Review 8844

Print Inspection Record PHMSA Pipeline Regulations PHMSA Advisory Bulletins Print Blank Form

Inspector and Operator Information

Inspection ID 8844	Inspection Link 8844	Inspector - Lead Lex Vinsel	Inspector - Assist
Operator City of Ellensburg	Unit City of Ellensburg	OPID # 4400	Records Location - City & State Ellensburg Washington
Inspection Start Date 06-11-2024	Inspection Exit Interview Date 06-14-2024	Engineer Submit Date	

Inspection Summary

You must include the following in your inspection summary:

- \*Inspection Scope and Summary
- \*Facilities visited and Total AFOD
- \* Summary of Significant Findings
- \* Primary Operator contacts and/or participants

\*Inspection Scope and Summary

Standard Annual Review

\*Facilities visited and Total AFOD

Ellensburg City Office

AFOD Estimate 4

\* Summary of Significant Findings

\* Primary Operator contacts and/or participants

Darren Larsen, Ellensburg, Assistant Utilities Director, 509-962-7227 O; 509929-7227 M

Darin Yusi, Ellensburg, Gas Engineer, 509-962-7229 O; 509-607-3035 M

Heidi Behrends Cerniway, Ellensburg, City Manager, 509-962-7221 O

Ryan Iyyski, Ellensburg, Public Works and Utilities Director, 509-962-7238

Instructions and Ratings Definitions

INSPECTION RESULTS: Annual Review

Satisfactory Responses <b>20</b>	Satisfactory List <b>1,5,9,10,12,13,14,15,18,21,24,25,26,27,28,31,32,35,37,</b>	Number of Unanswered Questions <b>0</b>	Unanswered List
Unsatisfactory Responses <b>0</b>	Unsatisfactory List		
Area of Concern Responses <b>0</b>	Area of Concern List		
Not Applicable Responses <b>18</b>	Not Applicable List <b>3,4,6,7,8,16,17,19,20,22,23,29,30,39,40,42,43,44</b>		
Yes Responses <b>2</b>	Yes List <b>34,36,</b>	No Responses <b>2</b>	No List <b>38,41</b>
Not Checked / Evaluated Responses <b>0</b>	Not Checked / Evaluated List		

\*\*If an item is marked Unsat, AOC, N/A, or N/C, an explanation must be included in the "Notes" block for that question and also summarized in the " SUMMARY OF REQUIRED COMMENTS" section at the end of this inspection form.

Crew Inspection History

Click Link for Full List of Crew Inspections

Determination crew inspection Date	Inspector	Operator	Unit	Type of Work	Foreman Name	Contractor Name	Comments / Observations for Operator
08-19-2024	Anthony Dorough	City of Ellensburg	City of Ellensburg - 7910	New Service			Staff observed that the crew was not on site and the work had been completed. Construction Contractor on site indicated that the new service pipeline had been covered with sand and they were completing the back-fill work.
08-19-2024	Anthony Dorough	City of Ellensburg	City of Ellensburg - 7910	Other	Logan Graham		Staff observed Meter Man while he operated a 2-inch PE gas main valve (2004) as part of routine maintenance schedule. Valve box was found to be clear with a low amount of ground water. Results: Valve was operated, no leaks detected. Calibration audit: Gas Scope (Sensit) #50244 due 8/30/24
07-01-2024	Scott Anderson	City of Ellensburg	City of Ellensburg - 7910	Other			
02-06-2023	Scott Anderson	City of Ellensburg	City of Ellensburg - 7910	New Service	Chad Weeks		

Facility Inspection History

Link for Full List of Facility Inspections

Date	Inspection ID	Form A Operator Name	Other Company	Inspector	Type of Inspection	Do you have inspection pictures or file attachments?
07-01-2024	7910	City of Ellensburg		Scott Anderson	Facility	
05-09-2024	7910	City of Ellensburg		Scott Anderson	Facility	
05-02-2024	7910	City of Ellensburg		Thomas Green	Facility	Yes
05-02-2024	7910	City of Ellensburg		Thomas Green	Facility	Yes
05-02-2024	7910	City of Ellensburg		Thomas Green	Facility	Yes
05-02-2024	7910	City of Ellensburg		Thomas Green	Facility	Yes
12-04-2023	7910	City of Ellensburg		Scott Anderson	Facility	
10-18-2023	7910	City of Ellensburg		Thomas Green	Facility	Yes
10-18-2023	7910	City of Ellensburg		Thomas Green	Facility	Yes
10-18-2023	7910	City of Ellensburg		Thomas Green	Facility	Yes
10-18-2023	7910	City of Ellensburg		Thomas Green	Facility	Yes
10-18-2023	7910	City of Ellensburg		Thomas Green	Facility	Yes
10-18-2023	7910	City of Ellensburg		Thomas Green	Facility	Yes
10-18-2023	7910	City of Ellensburg		Thomas Green	Facility	Yes
10-18-2023	7910	City of Ellensburg		Thomas Green	Facility	Yes
10-18-2023	7910	City of Ellensburg		Thomas Green	Facility	Yes
10-18-2023	7910	City of Ellensburg		Thomas Green	Facility	Yes
10-18-2023	7910	City of Ellensburg		Thomas Green	Facility	Yes
01-11-2023	7910	City of Ellensburg		David Cullom	Pre-Field	Yes
01-11-2023	7910	City of Ellensburg		David Cullom	Pre-Field	Yes

Scheduled Inspection History

Annual Review Inspection History

Year of Inspection	Facility - Operator	Unit Name	Inspection ID	Inspection Type	Inspection Status	Closed Date	Next Inspection Interval	SHAREPOINT
City of Ellensburg (15 Inspection records)								
2024	City of Ellensburg	City of Ellensburg	8778	DA - Drug & Alcohol	Complete	06-27-2024	06-12-2028	Documents
2024	City of Ellensburg	City of Ellensburg	8844	Standard - Annual Review	Complete	08-08-2024	06-11-2025	Documents
2023	City of Ellensburg	City of Ellensburg	8576	Standard - Annual Review	Complete	08-29-2023	07-26-2024	Documents
2023	City of Ellensburg	City of Ellensburg	8577	OQ - Operator Qualification	Complete	03-16-2023	02-28-2027	Documents
2023	City of Ellensburg	City of Ellensburg	8578	DIMP - Gas Distribution Integrity Management	Complete	03-16-2023	02-28-2026	Documents
2023	City of Ellensburg	City of Ellensburg	8579	Standard Comprehensive - GD	Complete	08-30-2023	07-26-2026	Documents
2022	City of Ellensburg	City of Ellensburg	8428	OM PPR GAS - Operations & Maintenance, Plans & Procedures Review	Complete	06-13-2022	06-07-2026	Documents
2022	City of Ellensburg	City of Ellensburg	8429	Standard - Annual Review	Complete	06-13-2022	06-07-2023	Documents
2022	City of Ellensburg	City of Ellensburg	8500	Section 114	Complete	07-07-2022	06-07-2027	Documents
2021	City of Ellensburg	City of Ellensburg	8261	PA - Public Awareness	Complete	06-28-2021	06-23-2025	Documents
2021	City of Ellensburg	City of Ellensburg	8262	Standard - Annual Review	Complete	06-28-2021	06-23-2022	Documents
2020	City of Ellensburg	City of Ellensburg	8066	Standard Comprehensive - GD	Complete	01-06-2021	10-29-2023	Documents

Year of Inspection	Facility - Operator	Unit Name	Inspection ID	Inspection Type	Inspection Status	Closed Date	Next Inspection Interval	SHAREPOINT
2020	City of Ellensburg	City of Ellensburg	8067	DA - Drug & Alcohol	Complete	08-26-2020	08-18-2024	Documents
2020	City of Ellensburg	City of Ellensburg	8068	DIMP - Gas Distribution Integrity Management	Complete	10-22-2020	09-30-2023	Documents
2020	City of Ellensburg	City of Ellensburg	8069	Standard - Annual Review	Complete	06-16-2020	06-11-2021	Documents

## GAS System Operations History

### Annual Report - Miles of Main

Year	Operator	SYSTEM TOTAL Miles of Main	Miles of Service	SYSTEM TOTAL NO. of Services	Average Service Length
2023	City of Ellensburg	140,159	81.07	5096	84
2022	City of Ellensburg	139,414	79.40	4991	84
2021	City of Ellensburg	137,388	78.27	4920	84
2020	City of Ellensburg	135,097	75.87	4885	82
2019	City of Ellensburg	133,123	74.98	4828	82
2018	City of Ellensburg	132,638	64.12	4775	70.9
2017	City of Ellensburg	129,626	63.29	4713	70.9
2016	City of Ellensburg	128,312	62.49	4647	71
2015	City of Ellensburg	127,412	61.84	4599	71

### Annual Report GAS Transmission Miles

YEAR	Total Total Miles	e. Total tool mileage inspected in calendar year using in-line inspection tools
No Report records found		

### Annual Report - Leaks

Year	Operator	Cause of Leak Mains Total	Cause of Leak Mains Hazardous Total	Cause of Leak Services Total	Cause of Leak Services Hazardous Total	NUMBER OF KNOWN SYSTEM LEAKS AT END OF YEAR SCHEDULED FOR REPAIR
2023	City of Ellensburg	0	0	16	5	0
2022	City of Ellensburg	1	1	28	8	0
2021	City of Ellensburg	1	1	11	2	0
2020	City of Ellensburg	0	0	15	5	0
2019	City of Ellensburg	2	1	20	4	0
2018	City of Ellensburg	1	1	9	1	0
2017	City of Ellensburg	1	1	12	2	0
2016	City of Ellensburg	0	0	11	3	0
2015	City of Ellensburg	2	1	7	3	0

### Annual Report - EFV

Operator	Year	Number of EFV's Installed This Calendar Year on Single Family Residential Services:	Estimated Number of EFV's in the system at the End of The Year:	Total Number of Services with EFV Installed During Year:	Estimated Number of Services with EFV In The System At The End of The Year:	* Total Number of Manual Service Line Shut-off Valves Installed During Year:	* Estimated Number of Services with Manual Service Line Shut-off Valves Installed in the System at End of Year:
City of Ellensburg	2023						
City of Ellensburg	2022	102	1075	3			153
City of Ellensburg	2021			58	973	4	155
City of Ellensburg	2020			59	915	3	152
City of Ellensburg	2019			52	856	8	149
City of Ellensburg	2018			71	804	1	137
City of Ellensburg	2017	74	731			1	136
City of Ellensburg	2016	66	657				
City of Ellensburg	2015	58	591				
City of Ellensburg	2014	51	533				
City of Ellensburg	2013	34	482				
City of Ellensburg	2012	34	448				
City of Ellensburg	2011	47	414				
City of Ellensburg	2010	49	367				
<b>TOT</b>		<b>515</b>	<b>5298</b>	<b>243</b>	<b>3548</b>	<b>17</b>	<b>882</b>

## HL System Operations History

### ANNUAL REPORT: ACCURACY/TRENDS

<p><b>Question #1.</b> Was the Annual Report reviewed for accuracy and trends? If any trends were discovered, please describe.</p> <p><b>Question 1-a. Are Operator Manuals Up to Date?</b> WAC 480-93-180(2) / WAC 480-75-660(2) requires operators to provide manual updates to the UTC.</p> <p><b>Question 1-b. Are Operator Contacts Up to Date?</b> WAC 480-93-200(11) Requires operators to notify the UTC of changes to company contacts. HL does not have a corresponding rule.</p> <p><b>1. Notes</b></p>	<p><b>1. Result</b> Satisfactory</p> <p><b>1a. Result</b> Satisfactory</p> <p><b>1b. Result</b> Satisfactory</p>
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## DAMAGE PREVENTION

<p><b>Question #2.</b> Review the following damage prevention items:</p> <p><b>Q2. Is the damage prevention information in the annual report complete?</b> Yes appears to be</p> <p><b>Q2.d Does the operator follow a process to evaluate the cause of "locating practices not sufficient" category?</b> No excavation damage for this category.</p> <p><b>Q2.g. What is the number of damages resulting from mismarks?</b> 0 - zero, no mismarks</p> <p><b>Q2.j. Are mapping corrections timely and according to written procedures?</b> Yes Section 1.2.4 A - every 6 months</p> <p><b>2. Notes</b></p>	<p><b>Q2.b. Is the annual report damages root cause information complete and accurate?</b> Yes, appears complete</p> <p><b>Q2.e. Is the operator or its contractor qualified and following procedures for locating and marking facilities?</b> Yes, Operators are qualified through EWN</p> <p><b>Q2.h. What is the number of damages resulting from not locating within the time requirements?</b> None</p> <p><b>Q2.k. Does the operator follow a process to evaluate causes for damages listed "Excavation Practices Not Sufficient"?</b> Yes, see DIRT report.</p>	<p><b>Q2.c. Does the operator have a process to evaluate the cause of "One-call notification practices not sufficient" category?</b> Yes, do Root Cause Analysis on every damage through the DIRT report.</p> <p><b>Q2.f. Is the operator appropriately requalifying locators to address performance deficiencies?</b> No, no deficiencies to date.</p> <p><b>Q2.i. Is the operator appropriately addressing discovered mapping errors resulting in excavation damage?</b> No damages due to mapping errors.</p> <p><b>Q2.l. Is the operator appropriately focusing damage prevention education and training to address the causes of excavation damage?</b> Yes, Section 14 of O&amp;M manual -</p>
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## NPMS SUBMISSIONS/CHANGES

<p><b>Question #3.</b> For transmission operators, has the operator submitted information to the NPMS database, along with changes made after the original submission?</p> <p><b>3. Notes</b> No transmission in system.</p>	<p><b>3. Result</b> Not Applicable</p>
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## INCIDENT/SRC/AOC REPORTS REVIEW

### Annual Report Damage Prevention data

Year	Operator	Number of Excavation Tickets	Total Number of Excavation Damages By Apparent Root Cause:	Locating Practices Not Sufficient:	One-Call Notification Practices Not Sufficient:	Excavation Practices Not Sufficient:	Other:	Number of Services	Total Leaks - Excavation Damage	Total Main Leaks	Miles of Service MAIN	Number of Leaks per Mile of MAIN	Total Leaks Per 1,000 Locates	Number of Hits Per 1,000 Ticket Requests	Number of Hits Per 10,000 Services	Number of Hits of Tickets
2023	City of Ellensburg	1592	6	0	1	5	0	5096	4	0	140,159	0	2.5125628140704	3.7688442211055	11.773940345369	0.38%
2022	City of Ellensburg	1977	7	0	1	6	0	4991	1	1	139,414	0.0071728807723758	0.50581689428427	3.5407182599899	14.025245441795	0.35%
2021	City of Ellensburg	1314	6	0	2	4	0	4920	1	137,388	78.27	1.7553085473361	0.76103500761035	4.5662100456621	12.19512195122	0.46%
2020	City of Ellensburg	1209	3	0	0	2	1	4885	2	0	135,097	0	1.6542597187758	2.4813895781638	6.1412487205732	0.25%
2019	City of Ellensburg	1093	3	0	0	2	1	4828					0	2.7447392497713	6.2137531068766	0.27%
2018	City of Ellensburg	1223	2	0	2	0	0	4775					0	1.6353229762878	4.1884816753927	0.16%
2017	City of Ellensburg	1142	1	0	1	0	0	4713					0	0.87565674255692	2.121790791428	0.09%
2016	City of Ellensburg	1146	2	0	0	2	0	4647					0	1.7452006980803	4.303851947493	0.17%

Year	Operator	Number of Excavation Tickets	Total Number of Excavation Damages By Apparent Root Cause:	Locating Practices Not Sufficient:	One-Call Notification Practices Not Sufficient:	Excavation Practices Not Sufficient:	Other:	Number of Services	Total Leaks - Excavation Damage	Total Main Leaks	Miles of Service MAIN	Number of Leaks per Mile of MAIN	Total Leaks Per 1,000 Locates	Number of Hits Per 1,000 Ticket Requests	Number of Hits Per 10,000 Services	Number of Hits to Tickets
2015	City of Ellensburg	1030	1	0	0	1	0	4599					0	0.97087378640777	2.1743857360296	0.10%

**Question #4**  
Were there any federally reportable incidents during the previous year? Are there any discernable trends to these incidents?

**4. Results**  
Not Applicable

**4. Notes**  
N/A - NO Federal Reportables.

**Q4: Federally reportable incidents**

NotificationID	Operator	Company	NRC #	Assigned Engineer	Date & Time of Incident	Street Address of event/incident	Incident Address: City	Closure Date	Reporting Level
No Incident Notification records found									

**Question #5.**  
Review operator records of previous year's accidents and failures including reported third party damage and leak response. Is the operator ensuring appropriate evaluation and response as required in 192.617 (Gas) or 195.402 (HL) to determine cause of failure? Is the operator taking appropriate steps to minimize the possibility of reoccurrence?

**5. Result**  
Satisfactory

**5. Notes**  
Reviewed sample of repair records for last years incidents.

**Question #6.**  
Review incident reports for the previous year for accuracy and identify any trends. If any trends discovered please describe. (Please see list of incident data at end of this report)

**Q6: Incident Reports**

NotificationID	Inspector	Company	Street Address of event/incident	Date & Time of Incident	Is 30-Day Report Received?	Reporting Level
No Incident Notification records found						

**6. Result**  
Not Applicable

**6. Notes**  
No incidents this year

**Question #7.**  
Were there reportable or unreportable safety related conditions during the previous year? If yes please describe.

**Q7: Report of SRCs**

NotificationID	Company	Safety-Related Condition	SafetyRelatedConditionChoices	Reportable?	Date & Time of Incident	Company Notified Date	Report Date
No Incident Notification records found							

**7. Result**  
Not Applicable

**7. Notes**  
No safety related conditions

**Question #8.**  
For transmission systems, were there any abnormal operating conditions (as described in 192.605 (c) or 195.402(d)) since the last annual review? If yes please describe.

**8. Result**  
Not Applicable

**8. Notes**  
No transmission

**O&M & EMERGENCY PROGRAMS**

**Question #9.**  
Is the O&M Manual up to date and were changes made in the previous year?

Operator Manuals on Sharepoint

**9. Result**  
Satisfactory

**9. Notes**  
Section 15 revised 9/2023, Section 16 had no changes for 09/2023

**Question #10.**  
If changes to the O&M were made, are changes acceptable?

**10. Result**  
Satisfactory

**10. Notes**  
Changes to Procedures appear adequate.

**Question #11.**  
Were emergency plans changed during the previous year?

**11. Result**  
Satisfactory

**11. Notes**  
Section 15 revised, changes appear adequate.

**Question #12.**  
Were any changes to emergency plans satisfactory?

**12. Result**  
Satisfactory

**12. Notes**  
Section 15 revised, changes appear adequate.

**INTEGRITY MANAGEMENT PROGRAMS**

**Question #13**  
Were there changes to the Integrity Management programs (TIMP, DIMP or both, as applicable)?

**13. Result**  
Satisfactory

**13. Notes**  
Section 23 Revised 02/2023 and 12/2023

**Question #14.**  
Is the DIMP/TIMP up to date? What are the results of the operator's program review (effectiveness evaluation) (DIMP every 5 years)?

**14. Result**  
Satisfactory

**14. Notes**  
Ellensburg does the effectiveness every year. Section 23.6

**Question #15**  
Are IMP program changes acceptable?

**15. Result**  
Satisfactory

**15. Notes**  
Program changes appear acceptable.

**Question #16**  
Was appropriate assessment/ repair work conducted during the past year? (monitor progress of IMP activities)

**16. Results**  
Not Applicable

**16. Notes**  
Section 23 Appendix B no assessment or repair work

**Question #17**  
Does the operator's HCA location data correspond to the positional data located in UTC GIS?

**17. Results**  
Not Applicable

**17. Notes**  
No HCAs in system.

**Question #18**  
What assessment work is planned for the upcoming year?

**18. Results**  
Satisfactory

**18. Notes**  
Will add two additional valves to minimise shutdown time and additional ballards as required.

**Question #19**  
Within the operator's DIMP, are low pressure systems evaluated for overpressure threats?

**19. Results**  
Not Applicable

**19. Notes**  
No low pressure systems.

**Question #20**  
Did the operator develop and follow specific procedures for low pressure system construction or maintenance projects? (Note: this question is revisited in greater detail in the ADB review section)

**20. Results**  
Not Applicable

**20. Notes**  
No low pressure systems.

**Question #21**  
Are plastic pipe and components that have shown a record of defects/leaks being mitigated through the DIMP plans?

**21. Results**  
Satisfactory

**21. Notes**  
Drisco HDPE in system, no issues found. Replace as required.

**Question #22**  
Has appropriate DIMP remediation work occurred during the past year? (monitor progress of DIMP activities)

**22. Results**  
Not Applicable

**22. Notes**  
No remedation issues at this time.

**Question #23**  
What DIMP remediation work is anticipated for upcoming year?

**23. Results**  
Not Applicable

**23. Notes**  
No remedial work is planned for this year.

**OQ PROGRAM**

**Question #24**  
Is the OQ program up to date? Were there changes to the Operator Qualification (OQ) program in the last year? If yes, please describe.

**24. Results**  
Satisfactory

**24. Notes**

Section 13 revised in 6/2023. Revised table 13.14 - Covered task List added reference numbers to the table for each task.

**Question #25**  
Are the OQ plan updates satisfactory?

**25. Results**  
Satisfactory

**25. Notes**  
Changes appear adequate.

**Question #26**  
Are personnel performing covered tasks (including contractors) properly qualified and requalified at intervals determined in the operator's plan?

**26. Results**  
Satisfactory

**26. Notes**  
Ellensburg uses Energy World Net to track OQ tasks and qualifications.

## PUBLIC AWARENESS PROGRAM

**Question #27**  
Is the PA program up to date? And were there changes to the Public Awareness (PA) program within the last year?

**27. Results**  
Satisfactory

**27. Notes**  
Section 14 revised 08/2023 and added Appendix B to cover additional events and actions related to Damage Prevention.

**Question #28**  
Are changes to the PA program satisfactory?

**28. Results**  
Satisfactory

**28. Notes**  
Changes appear adequate.

## CONTROL ROOM PROGRAM

**Question #29**  
Is the CRM program up to date? And were there changes to the Control Room Management (CRM) program within the last year?

**29. Results**  
Not Applicable

**29. Notes**  
No control room in system

**Question #30**  
Are the CRM program changes satisfactory?

**30. Results**  
Not Applicable

**30. Notes**  
No control room in system

## SAFETY MANAGEMENT SYSTEM API 1173

**Question #31**  
Is the operator developing and implementing an API 1173 Safety Management System?

**31. Results**  
Satisfactory

**31. Notes**  
Currently working on Safety Management System (Section 26) with implementation scheduled for later in the year.

## INSPECTOR ASSESSMENT OF INSPECTION UNITS

**Question #32**  
Are inspection units broken down appropriately? Do you recommend any changes to inspection units?

**32. Results**  
Satisfactory

**32. Notes**  
Inspection units appear appropriate, no recommended changes.

### Q32: List of current inspection units

Unit Name	Distribution/Transmission	Intrastate or Interstate?	GAS or LIQUID	Operator - OPID	Unit ID	Date Created
City of Ellensburg (1 Unit)						
City of Ellensburg	Distribution	Intrastate	Gas	4400	City of Ellensburg	02-06-2019 10:50 AM

## OPERATOR'S PUBLIC WEB PAGE

**Question #33**  
For informational purposes: Using the drop down selections available in the "Results" block, indicate whether the operator's web page contains the information listed by placing a check in the box adjacent to all items that are present.

**33. Results**  
Q33.A Pipeline Purpose and Reliability ; Q33.B Damage Prevention ; Q33.C Pipe Location Information ; Q33.D How to get additional information ; Q33.E National Pipeline Mapping System ; Q33.F On Call Requirements ; Q33.G Potential Hazards ; Q33.H Prevention Measures ; Q33.I Leak/Damage Recognition ; Q33.J ROW Encroachment ; Q33.K Pipeline Location Information ; Q33.L Integrity Management Programs ; Q33.M Emergency Preparedness

**33. Notes**  
Web page appears adequate. Contains all required elements.

## ADVISORY BULLETIN REVIEW

**Question #34**  
Is there potential for damage to the operator's pipeline facilities caused by flooding, river scour, or channel migration?

**ADB 2019-01**  
ADB 2019-01 Flood Mitigation

**34. Results**  
YES

**34. Notes**  
Secion 9.1.2 (B) - No river crossings.

**Question #35**  
If "YES" to Q34, did the operator take appropriate action in accordance with the guidance contained ADB 2019-01? Discuss ADB's guidance with operator's representative, and annotate any concerns.

**ADB 2019-01**  
ADB 2019-01: Flood Mitigation

**35. Results**  
Satisfactory

**35. Notes**  
Pipeline Patrol is Ellensburgs action. Patrols are done six(6) times a year with guidance to look for signs of flooding.

**Question #36**  
Is there potential for the operator's system to be damaged by earth movement or other seismic/geological activities?

**ADB 2019-02**  
ADB 2019-02: Earth Movement/Geological Hazards

**36. Results**  
YES

**36. Notes**  
DIMP plan page 37. DIMP plan covers threat assessment for earth movement and/or seismic events.

**Question #37**  
If "YES" to Q36, did the operator take appropriate action according to ADB 2019-02? Discuss suggested actions from ADB with operator's representative and annotate any concerns.

**ADB 2019-02**  
ADB 2019-02: Earth Movement/Geological Hazards

**37. Results**  
Satisfactory

**37. Notes**  
No additiona action required at this time.

**Question #38**  
Does the operator have any indoor meter sets or regulators in their system?

**ADB 2020-01**  
ADB 2020-01 Inside Meter Sets

**38. Results**  
NO

**38. Notes**  
No indoor meter sets.

**Question #39**  
If operator's system has indoor meter sets/regulators, did the operator review ADB 2020-0115? Discuss ADB guidance with operator's representative and annotate any concerns. Particular attention must be given to the operator's plan to conduct leak surveys, AC inspections, and other maintenance activities in locations that are difficult to access, as well as the inclusion of inside meters/regulators within the operator's DIMP plan, as applicable.

**ADB 2020-01**  
ADB 2020-01 Inside Meter Sets

**39. Results**  
Not Applicable

**39. Notes**  
No indoor meter sets.

**Question #40**  
Is the operator's record of locations for all indoor meter sets/regulators within their system complete and sufficiently detailed??

**ADB 2020-01**  
ADB 2020-01 Inside Meter Sets

**40. Results**  
Not Applicable

**40. Notes**  
No indoor meter sets.

**Question #41**  
Does the operator have any low pressure systems?

**ADB 2020-02**  
ADB 2020-02 Low Pressure Systems

**41. Results**  
NO

**41. Notes**  
No low pressure systems in unit.

**Question #42**  
If "YES" to Q41, did the operator review ADB 2020-0025 for Overpressure Protection of Low-Pressure Natural Gas Distribution Systems? Review ADB guidance with operator and annotate any concerns.

**ADB 2020-02**  
ADB 2020-02 Low Pressure Systems

**42. Results**  
Not Applicable

**42. Notes**  
No low pressure systems in unit.

**Question #43**  
For low pressure construction/maintenance projects, does the operator have a process for review of engineering plans and constructibility reviews that are carried out through all applicable departments? Do all applicable departments review project plans for accuracy, completeness and correctness? How are control procedures developed that could identify system threats that could result in a common failure mode? How is the operator mitigating risk in their low presure system?

ADB 2020-02  
ADB 2020-02 Low Pressure Systems

43. Results  
Not Applicable

**43. Notes**  
No low pressure systems in unit.

**Question #44**  
Does the operator include all low-pressure system risks in their DIMP program appropriately?

ADB 2020-02  
ADB 2020-02 Low Pressure Systems

44. Results  
Not Applicable

**44. Notes**  
No low pressure systems in unit.

## SUMMARY OF REQUIRED COMMENTS

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COMMENTS: Required for any ratings other than Satisfactory. Summarize/consolidate entries from the "Notes" blocks above. Ensure you annotate the question number for each comment.