



MISS DIG
24th Annual Meeting
January 22, 2019

Agenda

- Authority
- Damage Reporting
- Damage Prevention Statistics
- PHMSA Audit
- Complaints
- Incidents
- Investigation Process
- Future Planning

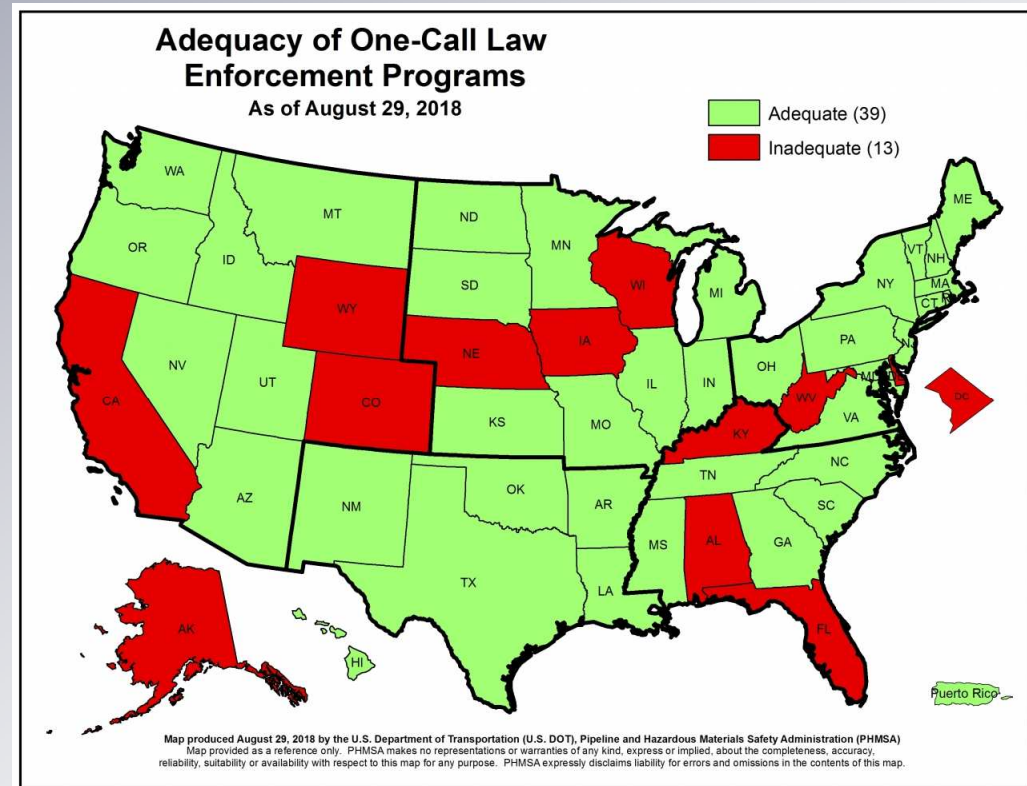
Authority

- State

- Public Act 174 of 2013
- Michigan Underground Facility Owners and Operators (Rules)
- Public Act 165 of 1969
- Michigan Gas Safety Standards (Rules)

- Federal

- Protecting our Infrastructure of Pipelines Enhancing Safety (PIPES) Act of 2016
- 49 CFR Part 196 (Rules)
 - No Exemptions



Damage Reporting

- MCL 460.731 – The commission shall:
 - Establish requirements for reporting incidents
MPSC / Documents Library
<http://www.michigan.gov/mpsc/0,4639,7-159-16370---,00.html>
 - Maintain information on damaged facilities
 - Make any information maintained under this subsection publicly available
MPSC / Natural Gas / Documents Library
http://www.michigan.gov/mpsc/0,4639,7-159-16385_17143---,00.html

Damage Reporting

- MISS DIG Underground Facility Damage Prevention and Safety Rule 460.40 – Facility owners, facility operators, or excavators shall:
 - Provide damage information to the commission upon commission request
MPSC / Documents Library / Administrative Rules/Laws
http://www.michigan.gov/mpsc/0,4639,7-159-16370_52012---,00.html
- Memo To: Michigan Underground Facility Owners and Operators
 - On June 15, 2015, facility owners or operators were requested to file data involving damage to underground facilities with the MPSC
(See Link: Establish requirements for reporting incidents)
- 2018 CGA DIRT form updates
 - Letters will be sent out to facility owners or operators regarding the changes made to the CSV file to be consistent with the CGA form changes

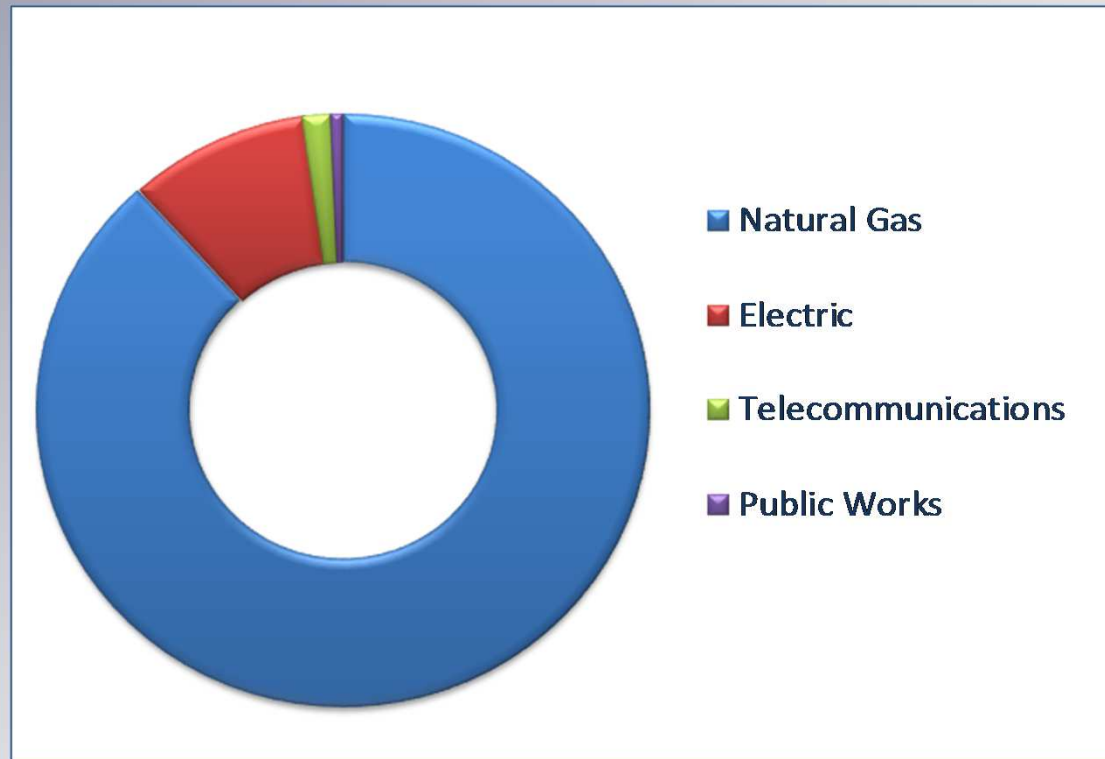
Damage Reporting

2016 Data

> 90% of natural gas distribution customers are accounted

< 50% of electric distribution customers are accounted for

Poor response from others



Damage Reporting

CGA Changes Include:

- Cross Bore
- Depth from Grade
- White Lined
- ~~Facility Marks~~
- ~~Facility Marks Correct~~
- ~~Facility Damage~~
- ~~People Injured~~
- ~~Fatalities~~



Damage Reporting

- MPSC Database Project to be Launched in April 2019
 - Data will be Automatically Directed to the New Database System
- Submittals from other Parties will be Accepted
- Data Collected is Consistent with CGA DIRT so Data can be Shared
- MISS DIG 811-Gold Shovel Standard – FAQ
 - The Utility that Sustained the Damage should Report the Damage to the MPSC per Public Act 174
 - The Entity that Caused the Damage to the Utility would Report the Damage on the GSS Website
 - Data Collected from GSS will be Shared with DIRT



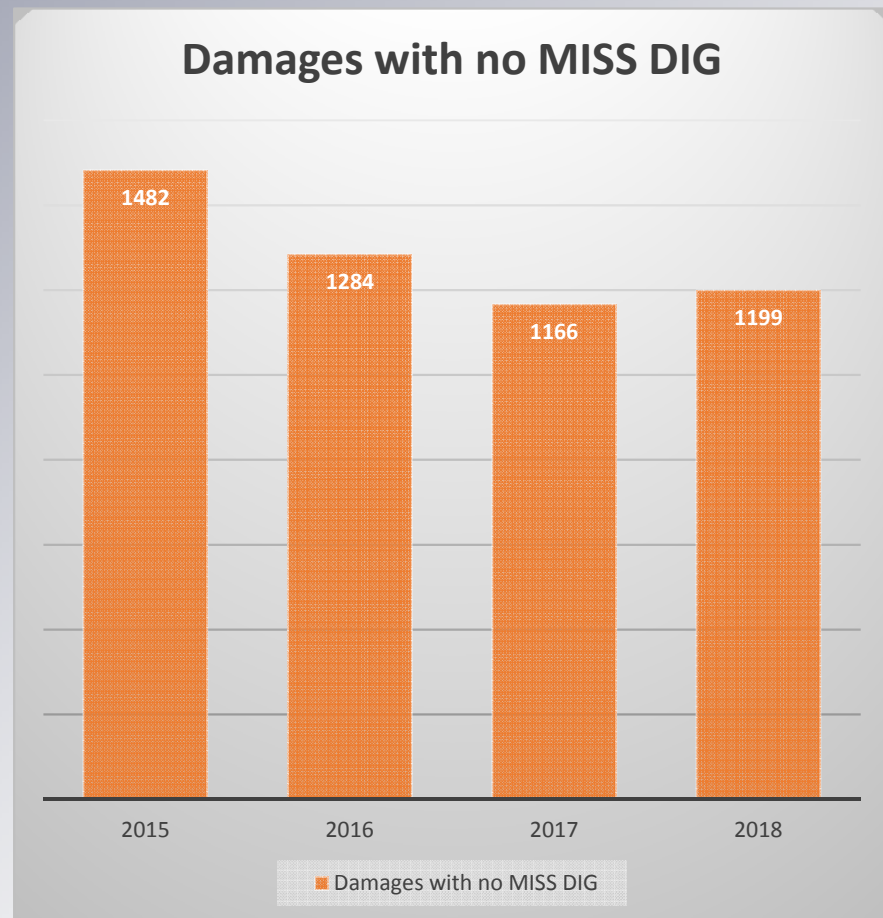
Damage Reporting

- Data collection through CGA VPD
 - Permission with Third Party Data Accessibility
 - Limitations on Data Fields (State Required Fields)
 - Limited Control of the Data Submitted to CGA
 - Multi-State Operators
 - Interstate Operators

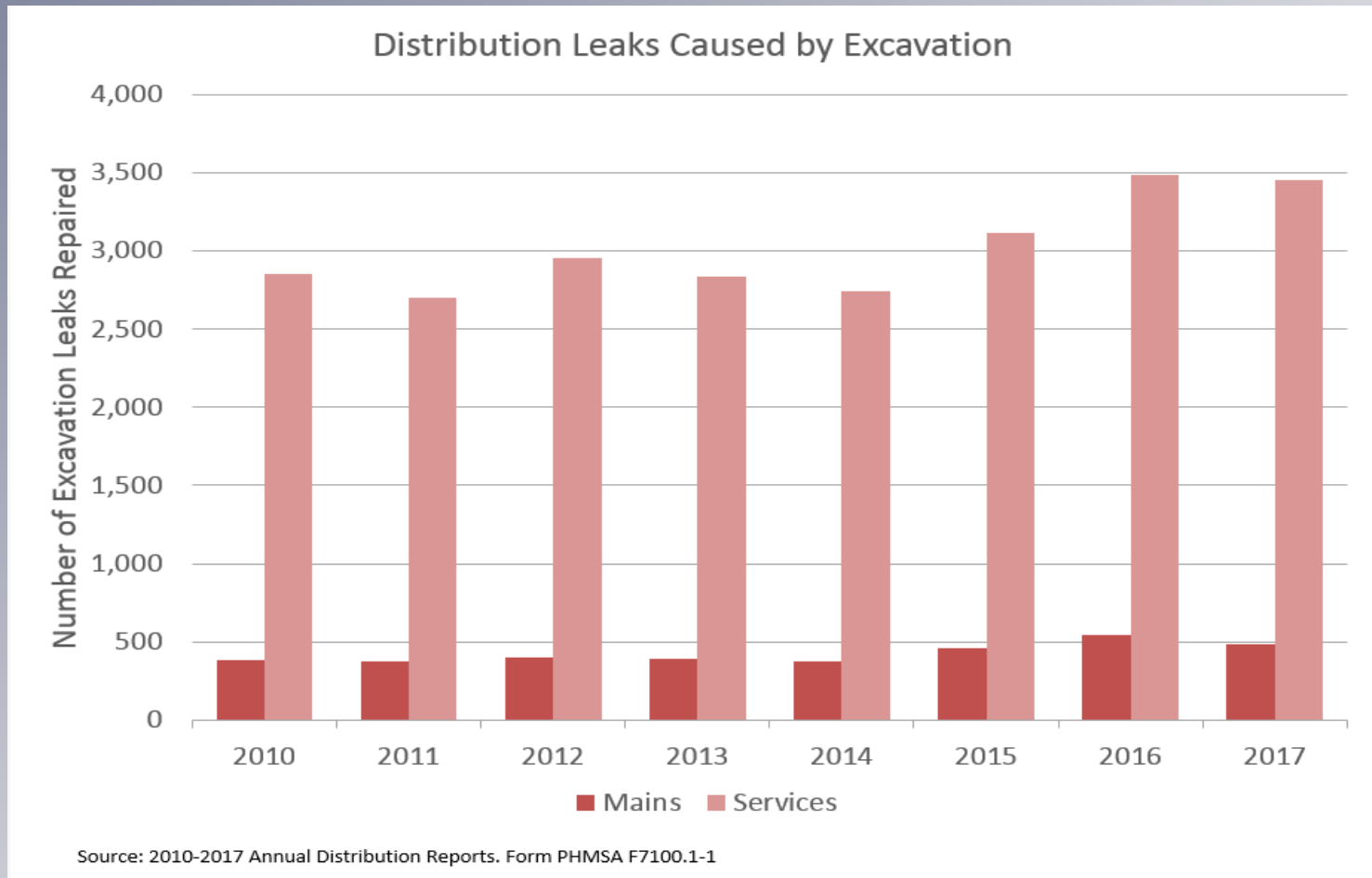
Damage Prevention Statistics

(Third Quarter Comparison)

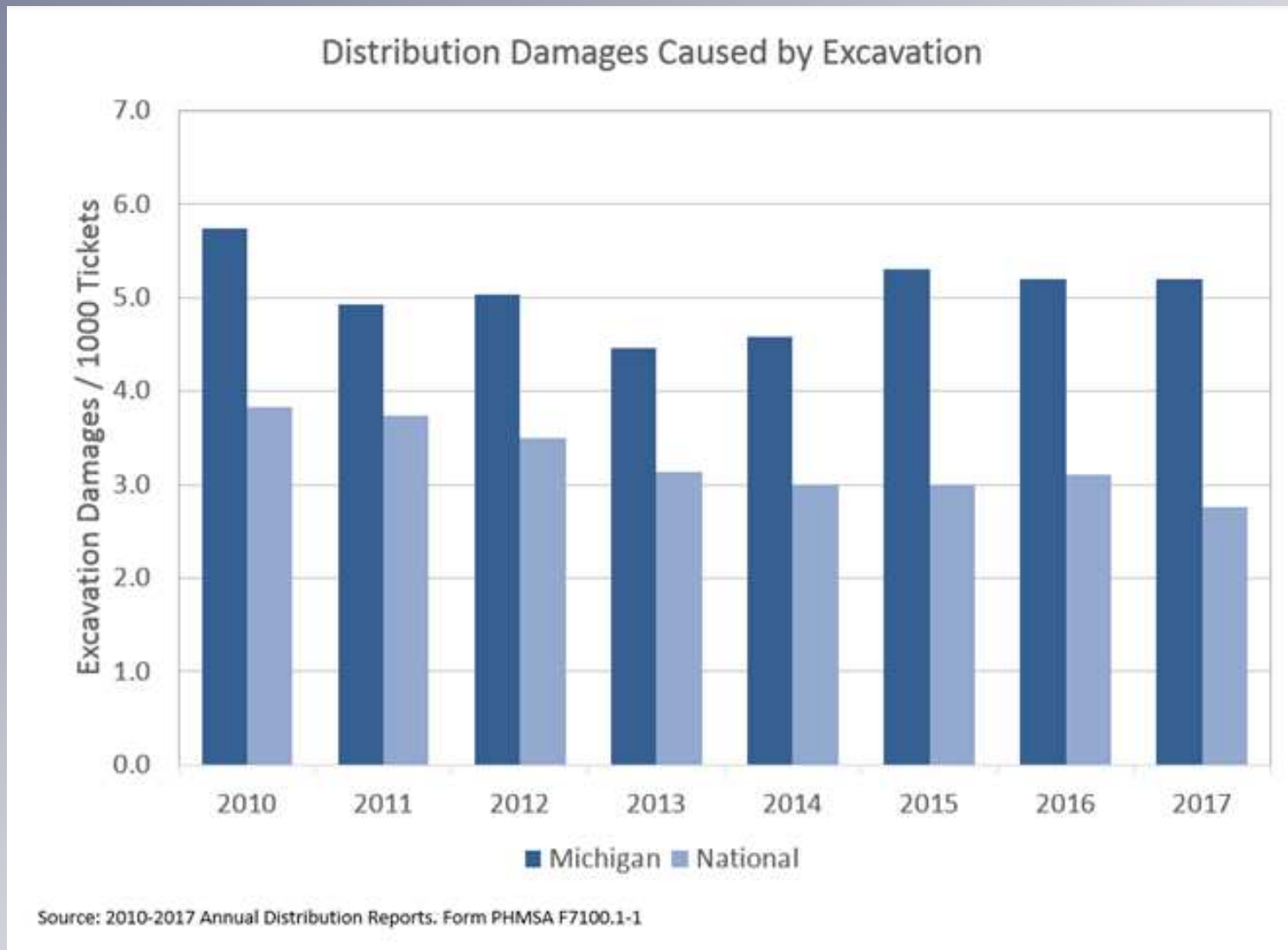
- Damages
 - 2015 – 3670
 - 2016 – 3695
 - 2017 – 3545
 - 2018 – 3731
- Damages with No MISS DIG Ticket
 - 2015 – 1482
 - 2016 – 1284
 - 2017 – 1166
 - 2018 – 1199



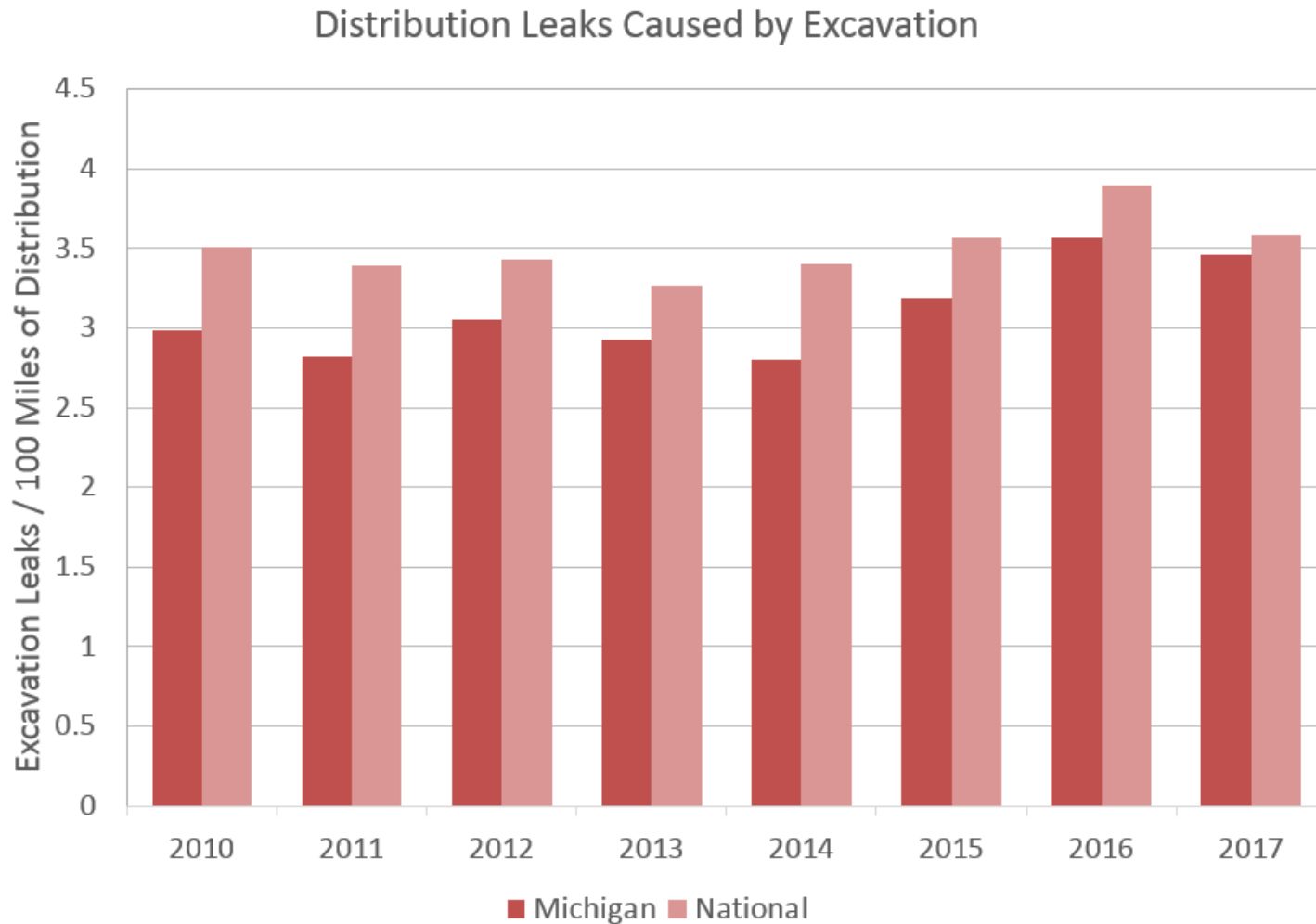
Damage Prevention Statistics



Damage Prevention Statistics



Damage Prevention Statistics



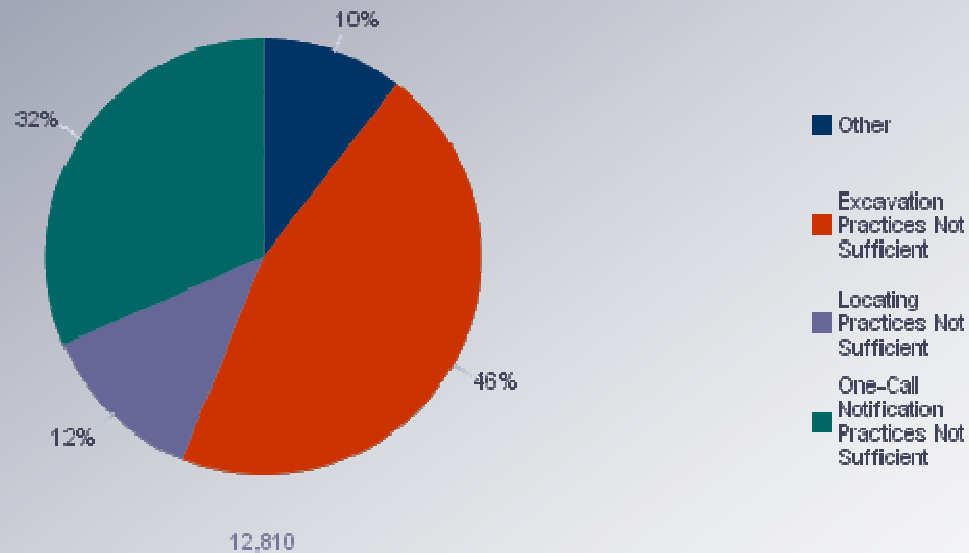
Source: 2010-2017 Annual Distribution Reports. Form PHMSA F7100.1-1

Damage Prevention Statistics

Gas Distribution Pipeline Excavation Damages by Root Cause 2015 - Present

Time run: 1/18/2019 9:03:02 AM

Data Source: US DOT Pipeline and Hazardous Materials Safety Administration
 Portal Data as of 12/20/2018 10:17:35 PM
 State:MICHIGAN



Calendar Year	Number of Excavation Tickets	Number of Excavation Damages	One-Call Notification Practices Not Sufficient	Locating Practices Not Sufficient	Excavation Practices Not Sufficient	Other	One-Call Notification Practices Not Sufficient	Locating Practices Not Sufficient	Excavation Practices Not Sufficient	Other
2017	822,578	4,271	1,238	636	2,108	289	29%	15%	49%	7%
2016	827,516	4,272	1,361	466	1,999	446	32%	11%	47%	10%
2015	796,641	4,267	1,451	481	1,727	608	34%	11%	40%	14%

PHMSA Audit

- Authority to Stop Excavation
 - Increase Field Presence
 - Cease and Desist
- Damage Citations Posted on Website
 - Frequent Offenders
 - Assessed Civil Fines
- Consider Ways to Improve/Investigate Locator Performance
- High Number of Tickets “Late Notification – 999”
- Investigate High Number of
 - Second Party Damages
 - Hand Digging Damages
 - Damages with Tickets
- Website Presence Improvements

PHMSA Audit

- PHMSA Conducted an Adequacy Evaluation of Michigan's Enforcement of PA 174 on October 10, 2018
- Result was "Adequate" (Verbally)
- Official Results Pending

Complaints

- 133 complaints filed since PA 174 became effective on April 1, 2014
 - 30 complaints filed in 2018
 - 0 complaints filed in 2019
- 22 complaints warranted investigation under PA 174
 - 2 were issued warning letters
 - 5 were issued with civil fines
 - 8 complainant could not provide more information/evidence or resolved by both parties
 - 7 are still pending for more information
- Fines assessed under PA 174
 - \$500 - \$11,000

Excavation Damage Incidents

- In 2018, there were 42 damages reported under Rule 460.20503 which were subject to investigation for violations of PA 174
 - 13 were issued warning letters
 - 29 were issued with civil fines
- Civil fines assessed:
 - \$5000 - \$15,000

Investigation Process

Damage Prevention

- Complaint Driven
- Remote Investigations
- Request Data
 - Excavator(s)
 - Facility Owner

Pipeline Safety

- Incident Report Driven
- Remote Investigation
- Onsite Investigations
- Request Data
 - Excavator(s)
 - Facility Owner
 - Third Parties (ER)

Investigation Process

- Complaints
- Incidents
- Onsite Damage Investigations
 - Reported incidents per Public Act 165 of 1969
 - Staff initiated
- Real time Damage notifications
 - No MISS DIG Ticket
 - Improper Positive Response
 - Short Notices/Non-Emergency Tickets
- Data Analysis and Investigations
 - Areas with High Occurrences of Damages
 - Late or No Positive Response
 - No MISS DIG Ticket

Investigation Process

- Evidence Typically Reviewed:
 - Complaint Form or Incident Report
 - MISS DIG Ticket(s)
 - Follow-up Information Requests
 - Facility Operator's Maps/Records/Sketches
 - Photographs (before and after)
 - Reports/Field Notes Documenting the Damage
 - Any Additional Evidence Provided by the Parties Involved

Investigation Process

- Damage Prevention Complaint Form
MPSC / Consumer Information / Inquiries and Complaints
https://w2.lara.state.mi.us/MPSC_Forms/complaint
- All Excavation Damage Incidents Reported per R 460.20503 Since April 1, 2014, are Investigated for Violations of Act 174

Evidence and Documentation

- Pre-damage
 - MISS DIG Ticket Information
 - Communications with Excavator/Facility Owner/Locator
 - Photos/Videos
- Post-Damage
 - Communications with Excavator/Facility Owner/Locator
 - Photos/Videos
 - Maps, Drawings, and Sketches of Site with Measurements
 - Damage Report, Employee Statements, and Third Party Statements
 - On-going Communication Documentation and/or Records
- MISS DIG System Document Saving/Sharing Option
 - Communications Between Parties
 - Maps, Plans, Photos, Reports, etc.

Planning

1. Soft Excavation
2. Increased Enforcement
3. Exemptions
4. Data Sharing
5. Procedures
6. Data Analysis
7. Performance Metrics
8. Stakeholder Engagement
9. Other

Public Service Commission
Gas Operations
LARA-MPSC-Operations@michigan.gov



Incidents

- 10/2/2018
- 6" Steel, 60 psig
- Directional Drilling
- \$25,000 Property Damage
- 847 mcf Gas Loss
- Enforcement
 - Operator Only
 - 192.614
 - Marking Inaccurate
 - Proposed \$5,000



Incidents

- 10/26/2018
- Secondary Ignition of Gas
- Service Cut and Capped
- \$212,000 Property Damage
- Fatality
- Liquid Pipeline Company on Property
- Response to E-ticket not within 3 Hours
- Enforcement
 - Gas (Pending)
 - Liquid (Follow-up Recieved)



Incidents

- 11/29/2018
- 4" Steel, 60 psig
- Direction Drilling
- \$143,000 E-Response
- Under Detroit River
- Enforcement
 - Excavator (Pending)
 - Operator (Pending)

