2020 Communication Meeting

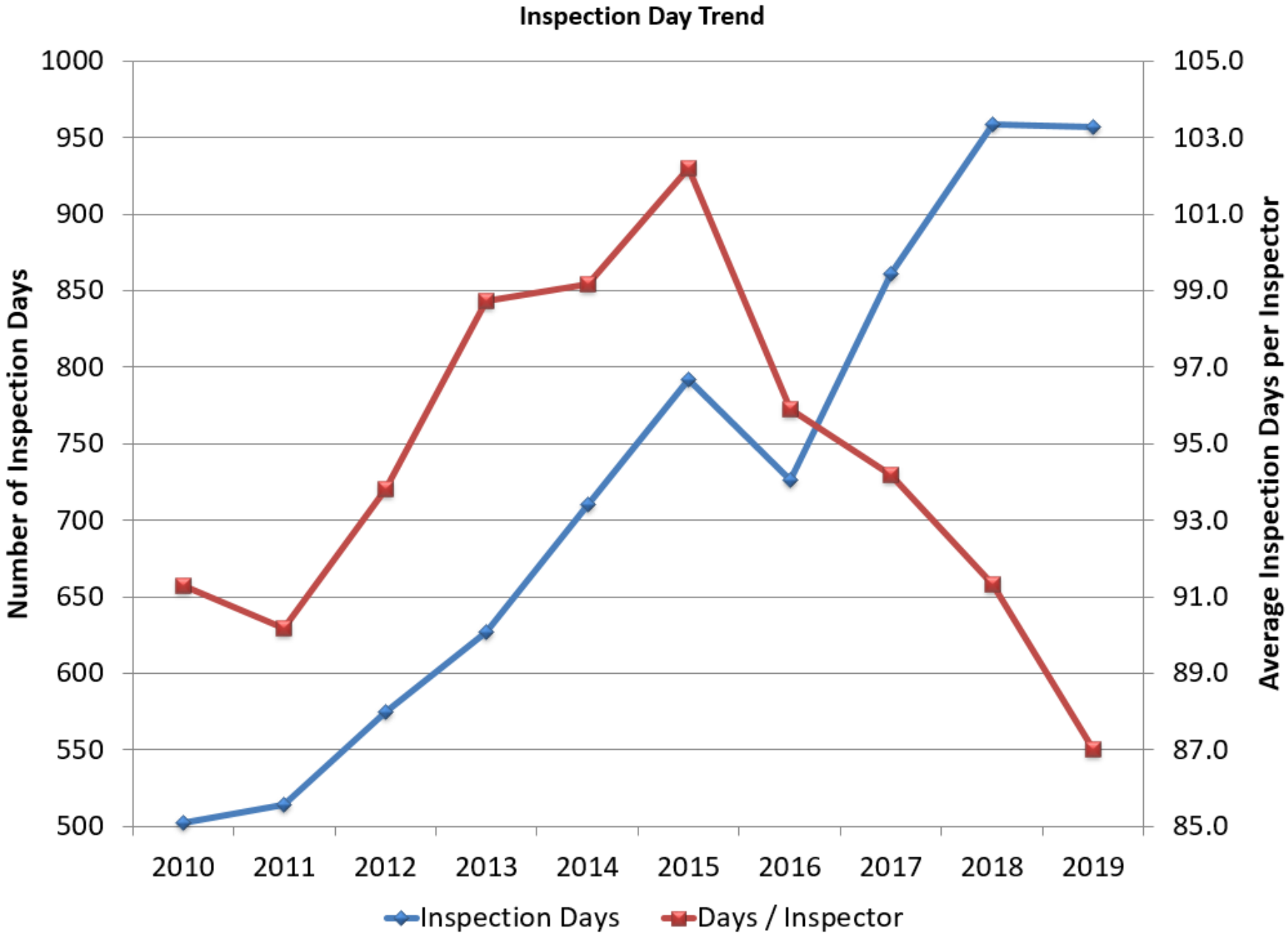
Michigan Public Service Commission

Energy Operations Division

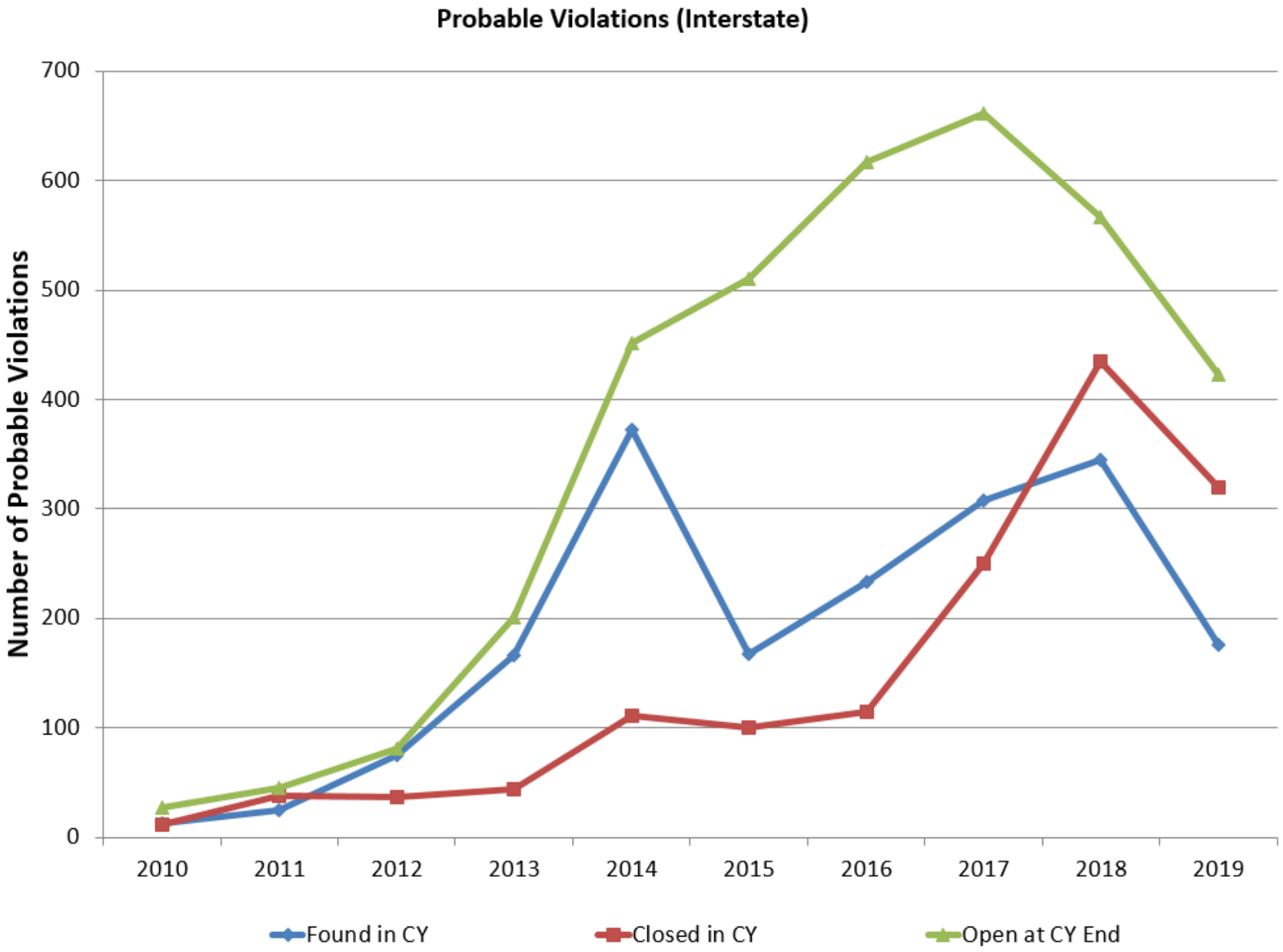
MPSC

Michigan Public Service Commission

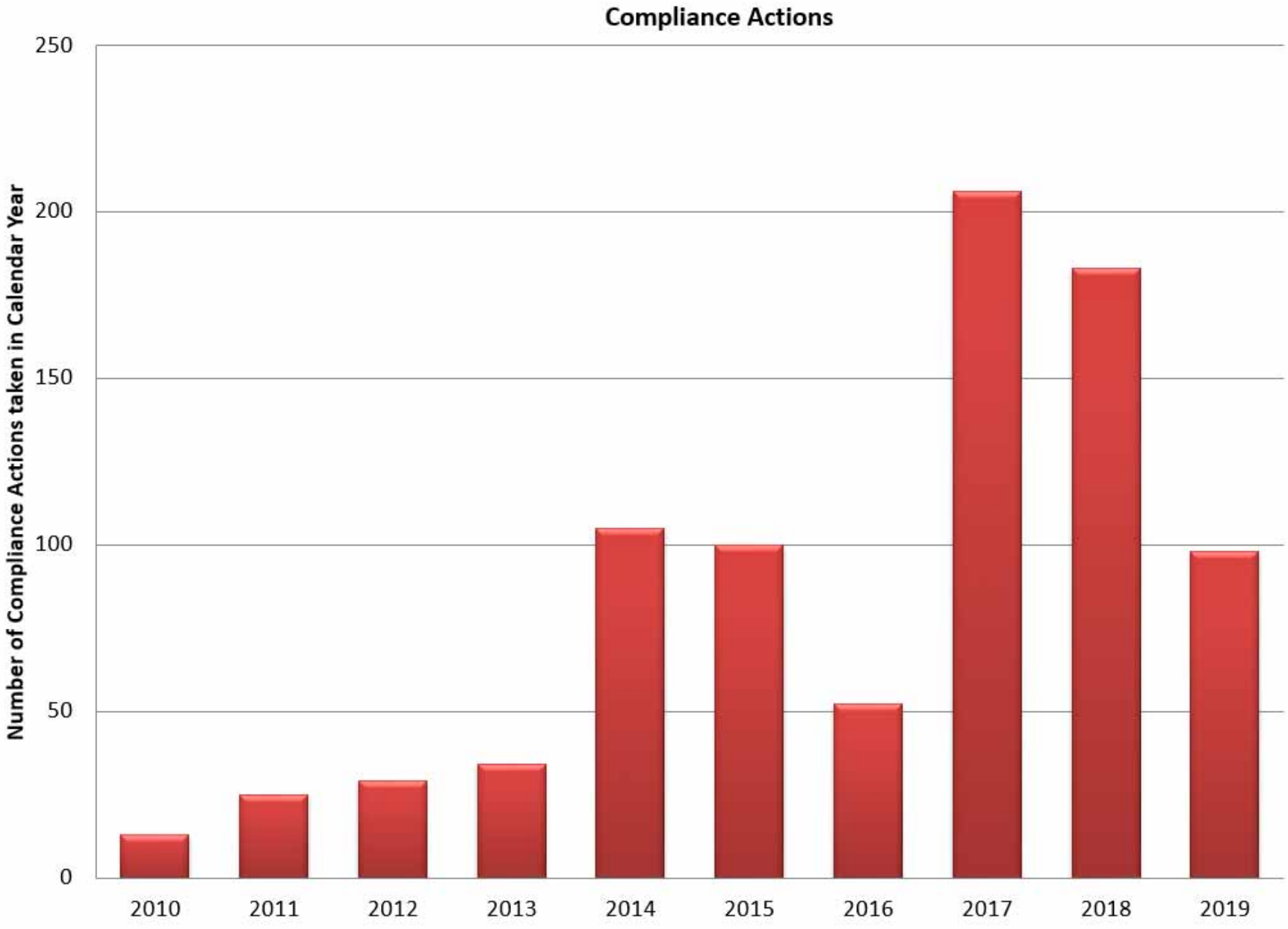
Gas Safety Program Statistics



Gas Safety Program Statistics



Gas Safety Program Statistics



Damage Prevention Statistics

Gas Facility Damages Per 1000 Tickets

2018 Excavation Damages

Michigan	
Total Excavation Damages	4,054
Total Excavation Tickets	819,538
Excavation Damages / 1000 Tickets	4.9

National	
Excavation Damages / 1000 Tickets	2.7

Source: 2018 Annual Distribution Reports. Form PHMSA F7100.1-1

Damage Prevention Statistics

Gas Leaks Per Unit of Infrastructure

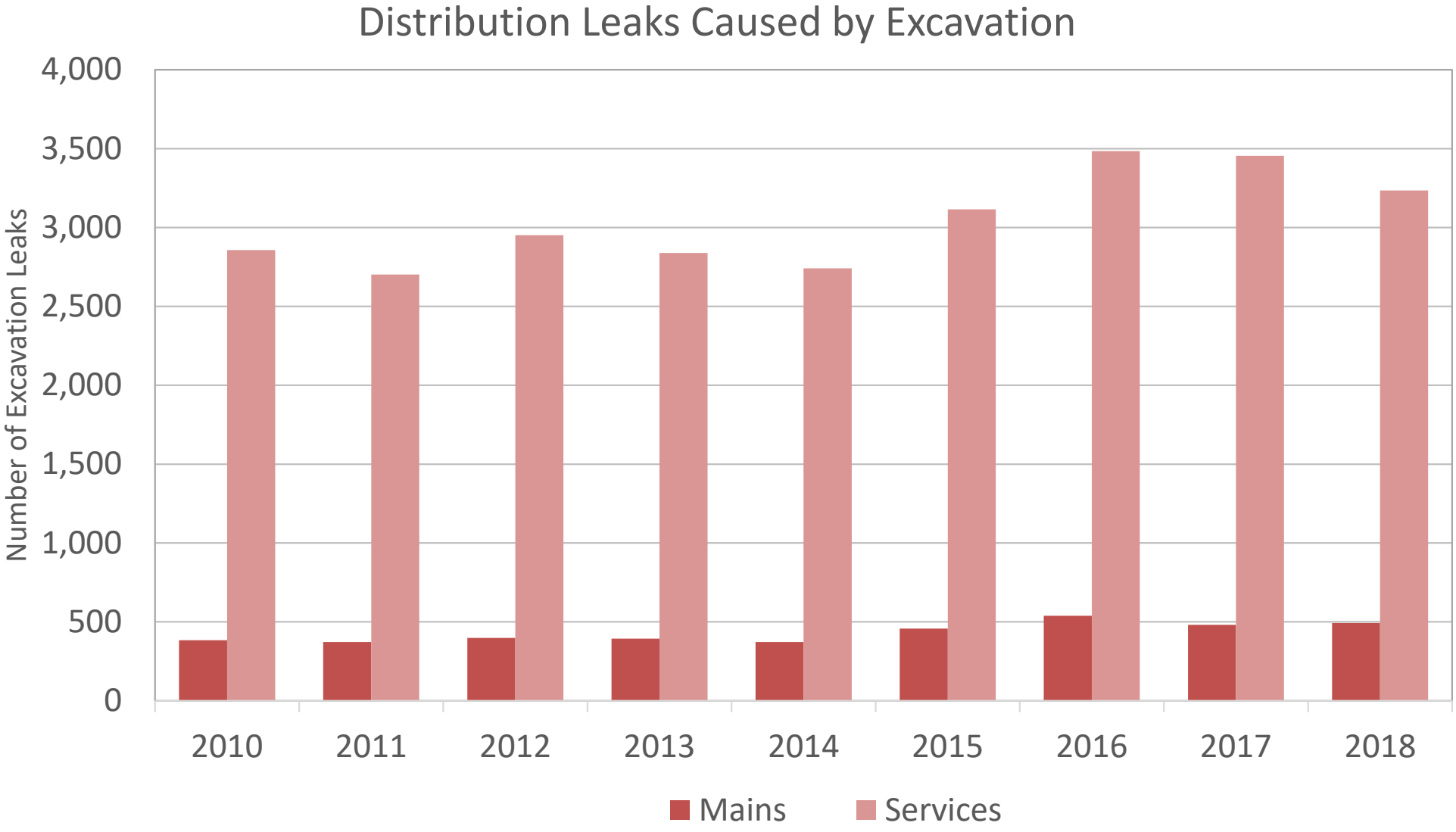
2018 Michigan Leak Summary

Mains	
Excavation Leaks	493
Leaks / 100 Miles of Main	0.83

Services	
Excavation Leaks	3235
Leaks / 1000 Services	0.98

Source: 2018 Annual Distribution Reports. Form PHMSA F7100.1-1

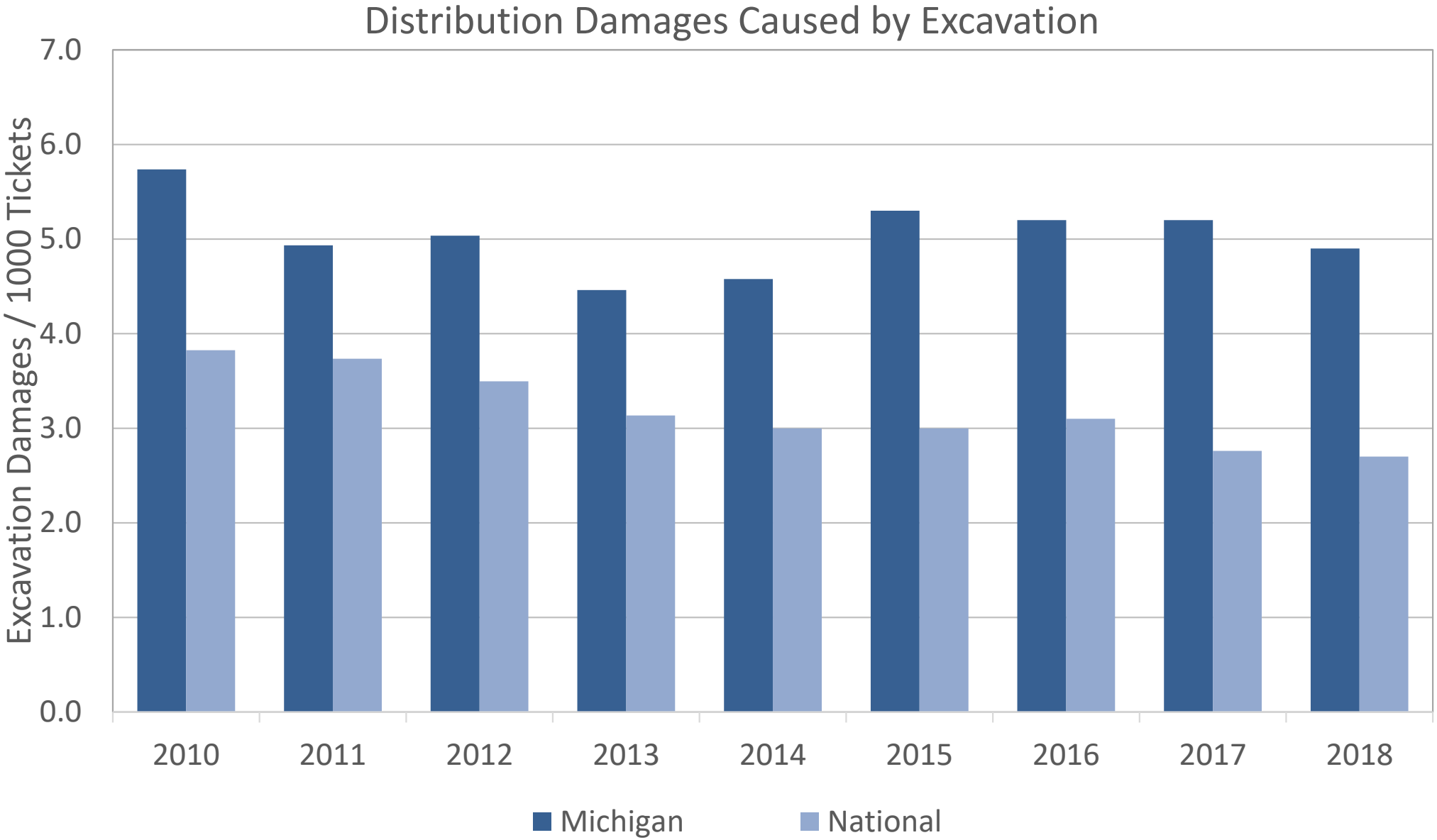
Damage Prevention Statistics



Source: 2010-2018 Annual Distribution Reports. Form PHMSA F7100.1-1

Damage Prevention Statistics

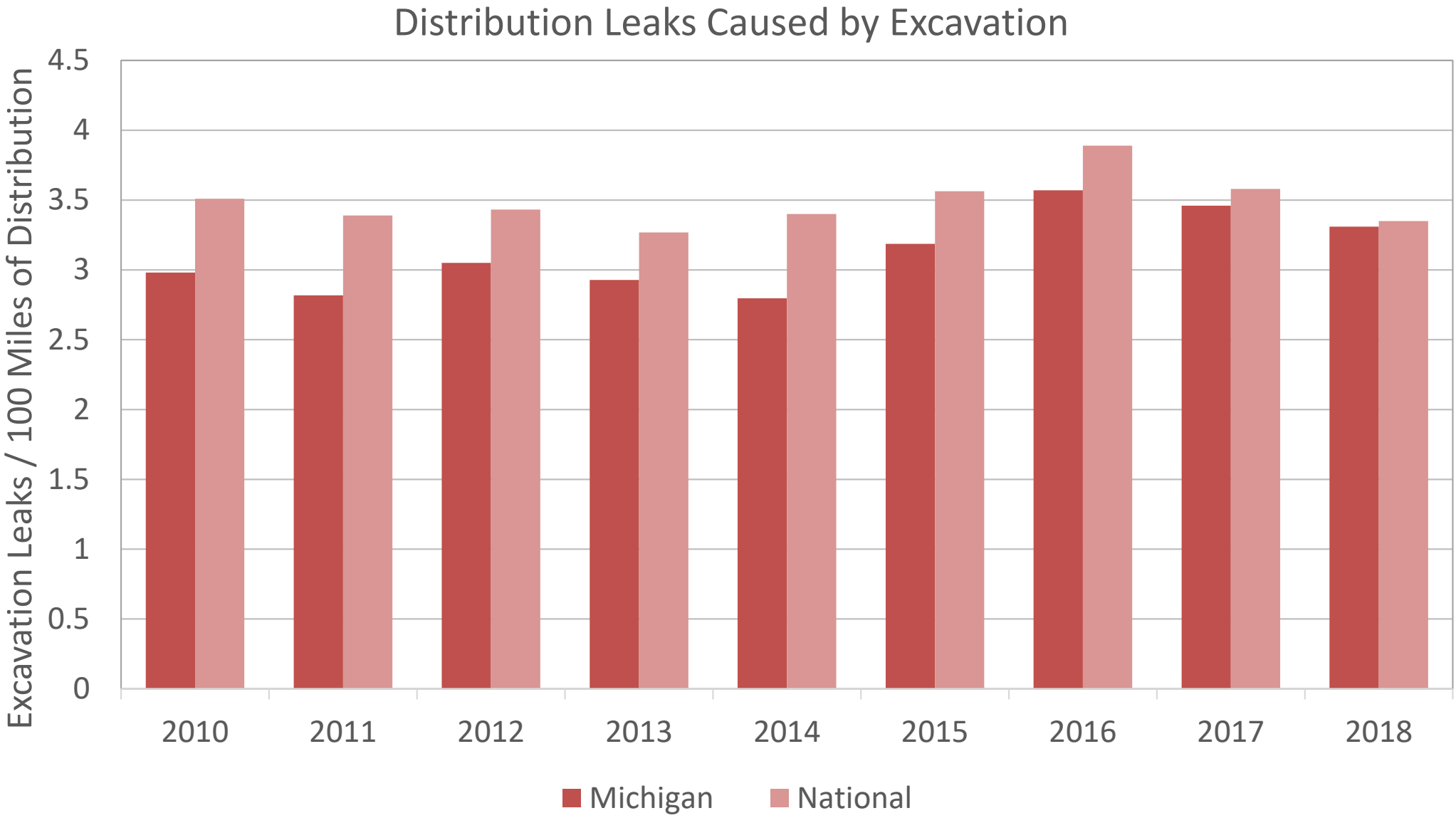
Gas Facility Damages Per 1000 Tickets



Source: 2010-2018 Annual Distribution Reports. Form PHMSA F7100.1-1

Damage Prevention Statistics

Gas Leaks Per Unit of Infrastructure



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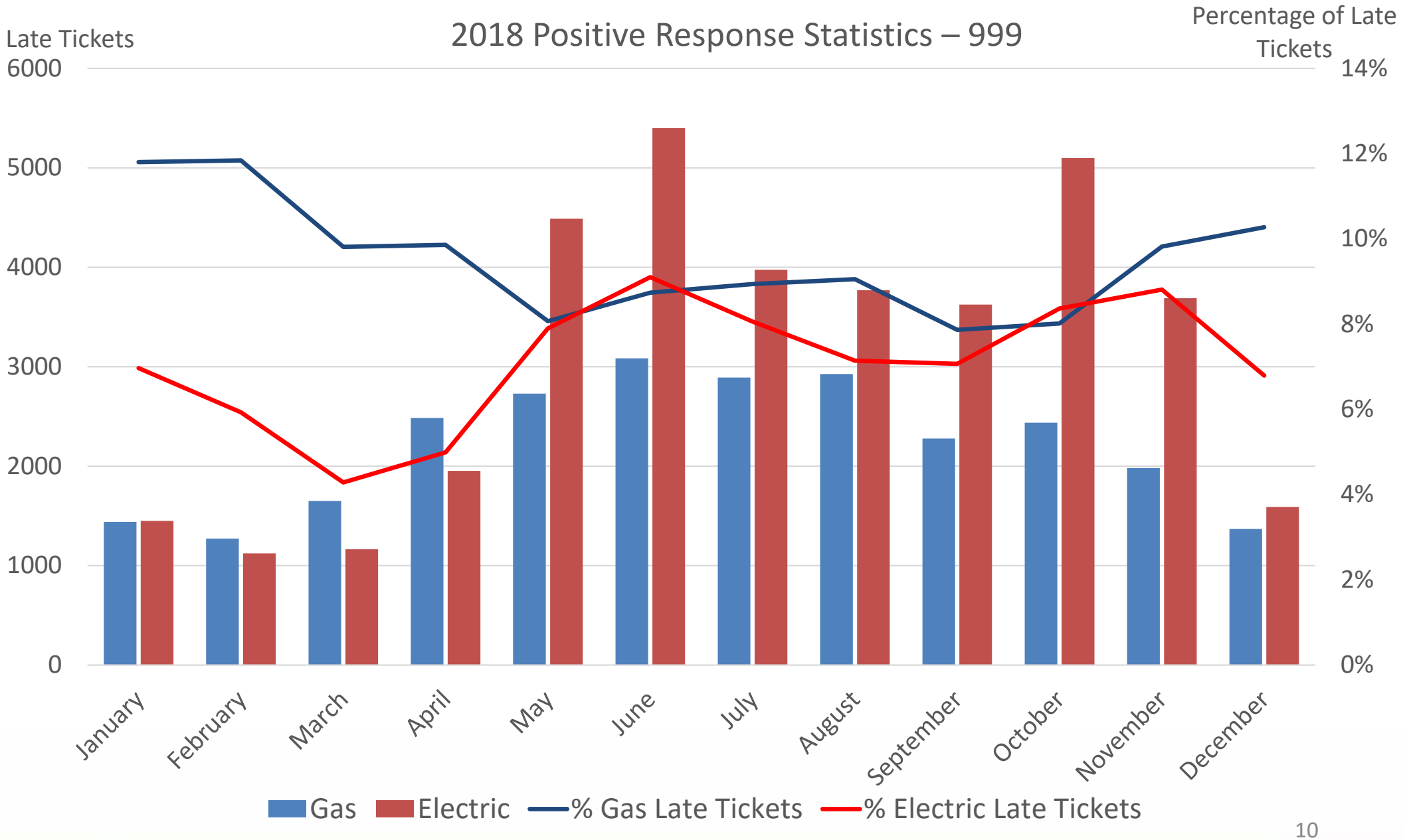
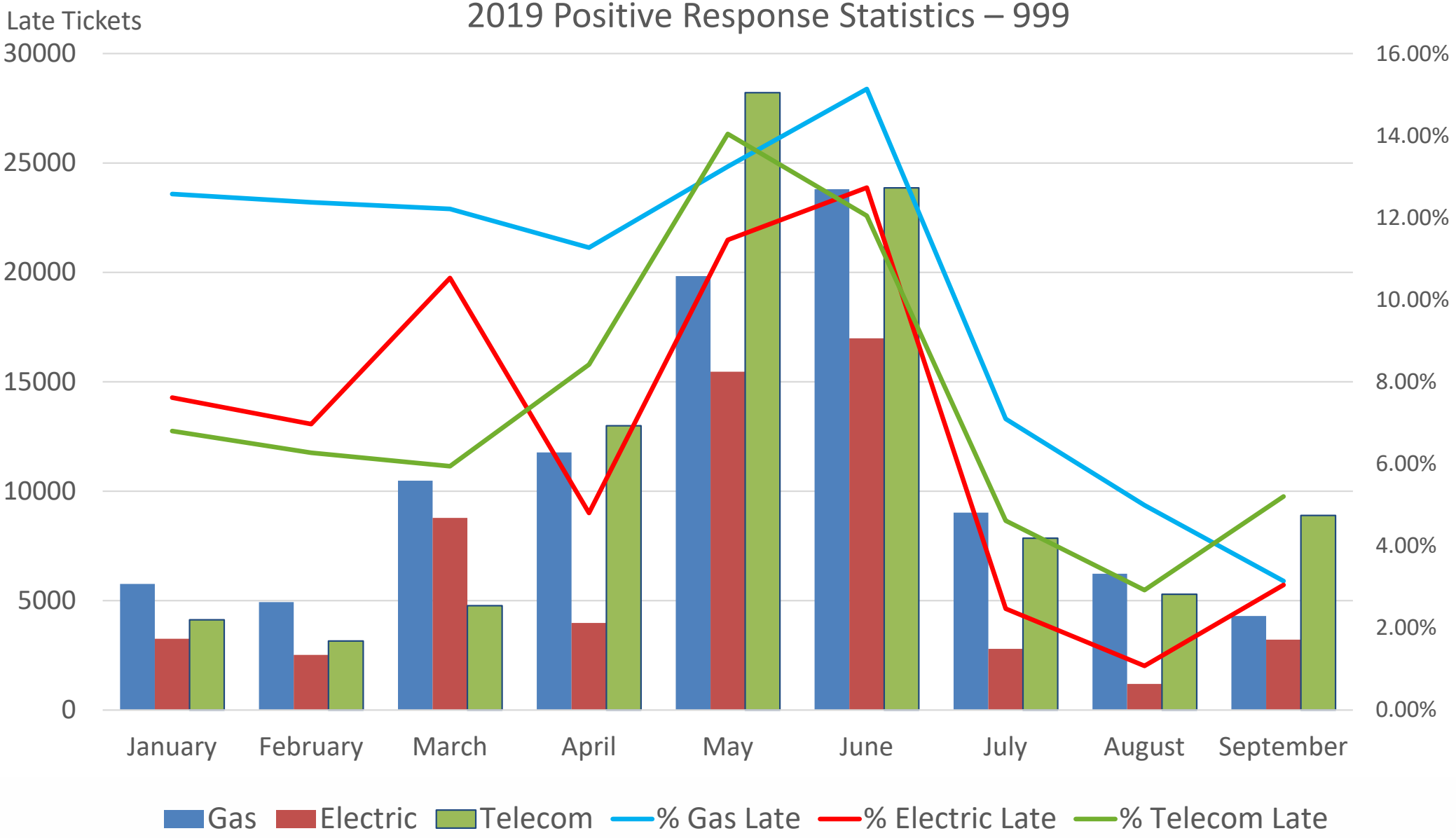
Damage Prevention Statistics



Damage Prevention Statistics



Heather David

- Area of Responsibility:
  - Central Michigan
  - Construction Inspections
  - Incident Investigations

- Cell: 517-256-0342
- Email: davidh@michigan.gov

Significant Incident – 3105

- Type: Equipment Failure
- Characteristics:
  - Venting Slug Catcher Relief
  - 4” modulating relief valve manufactured by Anderson Greenwood.
  - Placed into service on January 10, 2019.
- Description:
  - External temperatures and moisture content of the natural gas caused internal components of the relief valve to freeze
  - Freezing caused the valve to actuate below its set pressure.
  - Heat trace and insulation was installed per manufacturer’s recommendation.

Significant Incident – 3105

- Recommend Operator refrain from placing equipment that has failed back into service prior to determining the cause of failure.
- Recommend Operator refrain from isolating pressure relief valves on equipment even if the operating pressure is below the equipment's MAOP, unless a lock-out tag-out procedure is developed that encompasses all equipment that could cause the operating pressure to exceed the MAOP.
- Recommend Operator conduct a system-wide investigation for similar configurations where heat trace and insulation may be needed to prevent freezing of a pilot and conduct necessary enhancements.
- Recommend Operator provide training to Gas System Planning on how to calculate gas loss.

Significant Incident – 3632

- Type:
  - Third-party Damage
- Characteristics:
  - 12-inch steel main installed in 1942.
- Description:
  - Excavator working under expired one-call ticket at time of damage.
  - Excavator believed there were no gas facilities present because operator's staking contractor previously cleared the distribution gas facilities associated with expired ticket.
  - Misunderstanding based on a conversation between the excavator and staking contractor.

Significant Incident – 3632

Significant Incident – 3632

- Violations:
  - 192.614 (a): Failure to provide temporary marking of buried pipelines in the area of excavation activity before, as far as practical, the activity begins. Operator's staking contractor cleared gas distribution facilities and posed a "No-Conflict" positive response.

Staker notes: Spoke to [*excavator*] at 10:28am 7-19-19 he doesn't need entire square marked he needs the field e of Hacket that isn't planted marked.

Significant Incident – 3632

- 192.235: Failure to preserve the alignment that provides the most favorable condition for depositing the root bead. Contractor welders did not maintain a minimum of 1/16-inch root opening per welding procedure.
- 192.241(a)(1) - Failure to ensure that the welding is performed in accordance with the welding procedure. CWI failed to recognize that the welders did not maintain a minimum of 1/16-inch root opening prior to depositing the root bead.

Significant Incident – 3652

- Type:
  - Apartment explosion
- Description:
  - Outside force damage caused by a lawnmower.
  - Mower driver claimed he did not know he hit meter and therefore did not notify operator.
  - Downstream fuel line separated causing gas to migrate into apartment.
  - Meter data indicates explosion occurred approximately 2 hours after damage.

Significant Incident – 3824

- Type:
  - Third-party Damage
- Characteristics:
  - 3’ long service stub connected to a 6” steel main.
- Description:
  - Maps and records indicate that service was cut and plugged at the main in 1990.
  - Excavator had a valid one-call ticket but did not call in a restake request when marking were destoyed.

Significant Incident – 3824

- Violations:
  - 192.225(a) – Failure to follow welding procedure. Outside of the amperage range for in-service welds.
  - 192.614(a) – Inaccurate maps and records.
  - MCL 460.725(7) – Failure to provide notification to the notification system when facility markings are destroyed or covered by excavation or blasting activity.

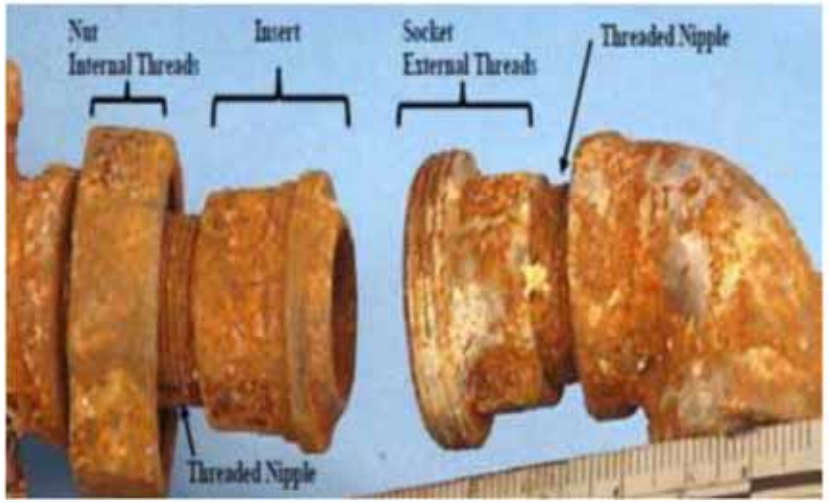
Significant Incident – 3979

- Type:
  - House Explosion
- Characteristics:
  - 2” steel main and ¾” steel service installed 1959.
  - Plastic riser installed 2008 after meter was moved outside.
- Description:
  - No gas reads obtained on the day of the explosion.
  - Corrosion leak on the main discovered 2 days following the explosion. Gas spread extended 19’ from house that exploded.
  - Ongoing investigation.

Significant Incident – 3979

Silver Springs, Maryland Incident

- Explosion/fire at apartment complex in 2016.
- 14 units collapsed.
- 7 fatalities and 68 injuries.
- Inside meters.
- Mercury regulator.
- Cause: Unthreaded union in the vent line that allowed gas to accumulate in meter room.

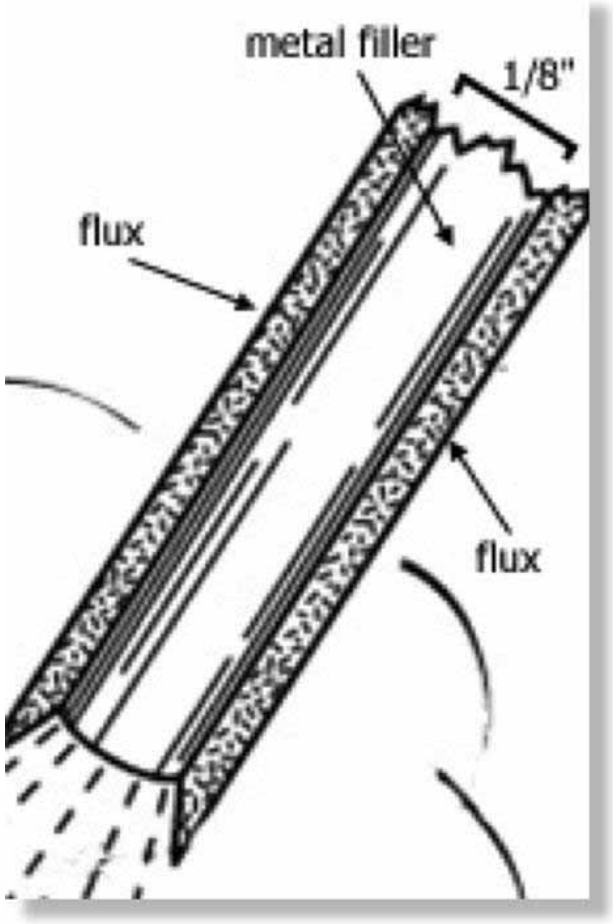


Silver Springs, Maryland Incident

- NTSB Recommendations:
  - Require that all new service regulators be installed outside occupied structures.
  - Require existing interior service regulators be relocated outside occupied structures whenever the gas service line, meter, or regulator is replaced. In addition, multifamily structures should be prioritized over single-family dwellings.
  - Identify mercury service regulators and expedite replacement that prioritizes multifamily dwellings with inside meters.
  - Technicians should verify integrity of vent lines following testing of indoor service regulators.
  - Require methane detection systems for all types of residential occupancies with gas service. This includes installation, maintenance, placement, and testing.

State-wide NDT Reject Rates

Process	# welds	# rejects	Reject Rate	Welders
SMAW	16,320	389	2.38%	Contractor welders
GMAW	1,790	123	6.87%	Company welders



State-wide NDT Reject Rates

Process	# welds	# rejects	Reject Rate	Welders
SMAW	16,320	389	2.38%	Contractor welders
GMAW	1,790	123	6.87%	Company welders

- Common GMAW rejects:
  - Incomplete fusion due to cold lap (IFD). IFD is common with GMAW process used for production welding in field.
  - Porosity (P). P is caused by trapped gas.
  - Inadequate penetration due to high-low (IPD). IPD is typically caused by bad fit up.
  - Incomplete fusion (IF). IF is a welder problem sometimes concentrated specific welders.
- Recommendations:
  - Operators should consider what process is the most appropriate for the application (SMAW vs GMAW).
  - Operators should analyze NDT results to identify higher than normal reject rates and if rejects are concentrated to a specific welder. Do this as the project is ongoing in order to make alterations.
  - Consider placing welding inspectors on projects to oversee work.

Significant Non-Compliances

- 192.225(a) – Failure to use the correct welding procedure for Grade B pipe [35,000 psig YS]. Welding procedure utilized only applies to pipe and fitting materials “API 5L Specifications greater than Grade X42 up to/ including X60 pipe.”
- 192.227(a) – Failure to follow API 1104 Section 5.6.3.1 when qualifying welders. As part of the preparation for nick-break testing, welders notched the external and internal reinforcement of the test specimen. SMAW manual process.

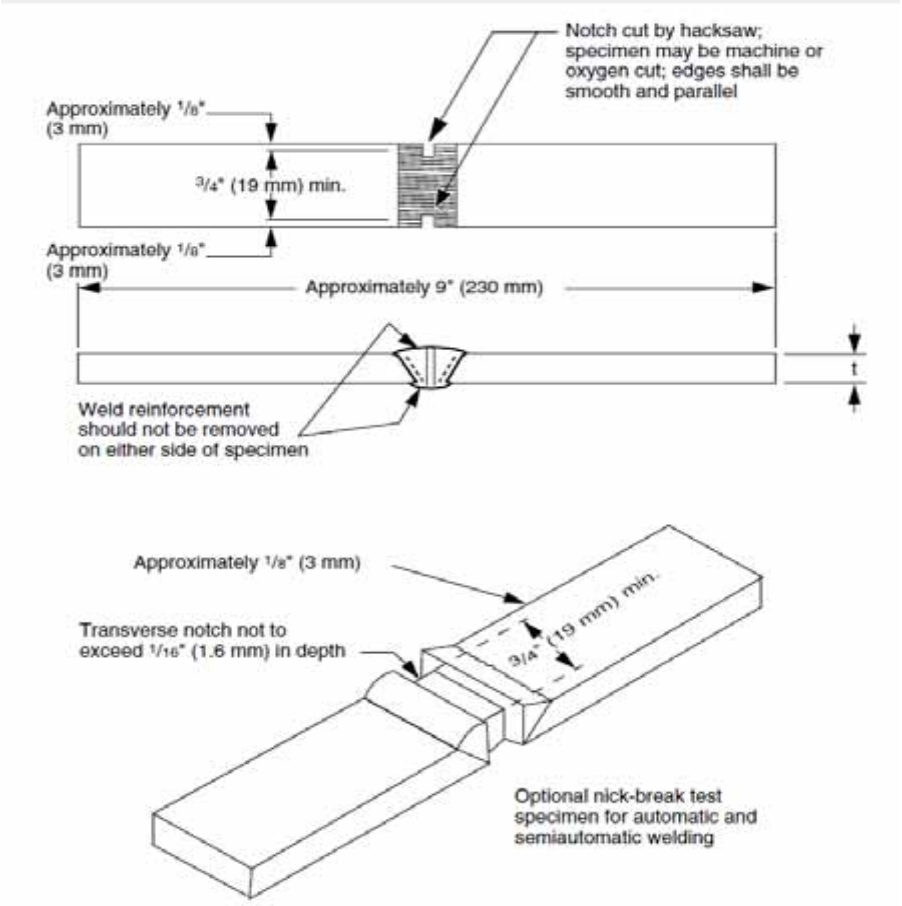
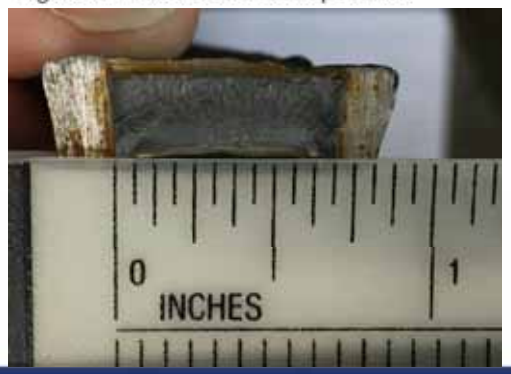


Figure 5—Nick-break Test Specimen



Significant Non-Compliances

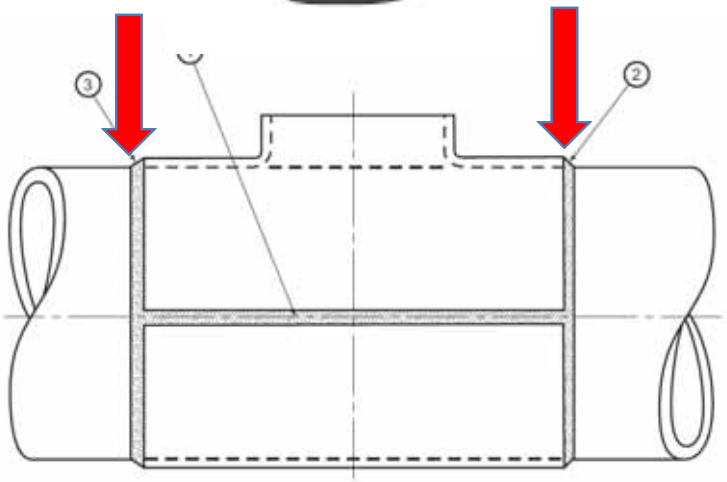
- 192.227(a): Failure to have a qualified welder. Test records indicate welder did not follow specified welding procedure when qualifying. Used wrong electrode.
- 192.379 - Failure to provide each service line that is not placed in service upon completion of installation with a locking device on the valve that is closed to prevent the flow of gas to the customer, a mechanical device or fitting that will prevent the flow of gas in the service line or in the meter assembly, or physically disconnect the customer's piping from the gas supply and seal the open ends. Customer not home.

Significant Non-Compliances

- 192.457(b)(3) – Failure to cathodically protect an unprotected main in area where active corrosion was found. No anode installed during corrosion leak repair (-0.540 volts).
- 192.469: Failure to provide sufficient test stations. Test station not repaired after it was damaged by construction activity. Sector only had one functional test station.
- 192.491(c) – Failure to maintain a record of external corrosion inspection when a buried pipeline is exposed. No pipe-to-soil reading.

Significant Non-Compliances

- R460.20332 - Failure to discontinue an inactive service line with components located inside a structure within 9 months of becoming inactive (no customer on record for a continuous 24-month period).
- R460.20304b – Failure to use in-service welding procedure to weld a bottom out pressure control fitting on a transmission line. Welding procedure must be qualified to Appendix B for in-service welding.



Notes:
1. This is the suggested welding sequence; others may be followed at the discretion of the company.
2. When in operation, the fitting is at pipeline pressure.

Figure B-9—Encirclement Tee

Tim Dombrowski

- Area of Responsibility:
  - Upper Peninsula

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Significant Incident – 3482 / 3877

- Type:
  - Third Party Damage
- Characteristics:
  - 3” Plastic Main
  - 1-way feed (2-legs of the main squeezed to stop gas flow)
  - 111 outages (14.3 hours)
  - $30k Property Damage, 8.16 MMcf gas lost.
- Description:
  - Excavator exposed 1.25” main, but failed to soft excavate the perpendicular 3” main. 3” main was hit near 1.25” tee.
  - Violations: Warning letter sent to Excavator.

Significant Incident – 4013

- Type:
  - Carbon Monoxide Poisoning resulting from snow accumulation.
  - Significant near miss for an entire family.
- Description
  - Family of 4 taken to hospital
  - Furnace and water heater vented from same stack. Snow had built-up and blocked the vent. While furnace continued operating, exhaust was trapped, and CO re-circulated into water heater outlet. Family-members nauseous, 1-person lost consciousness.
  - No natural gas presence.

Kyle Friske

- Area of Responsibility:
  - Southeast Michigan
  - TIMP and DIMP

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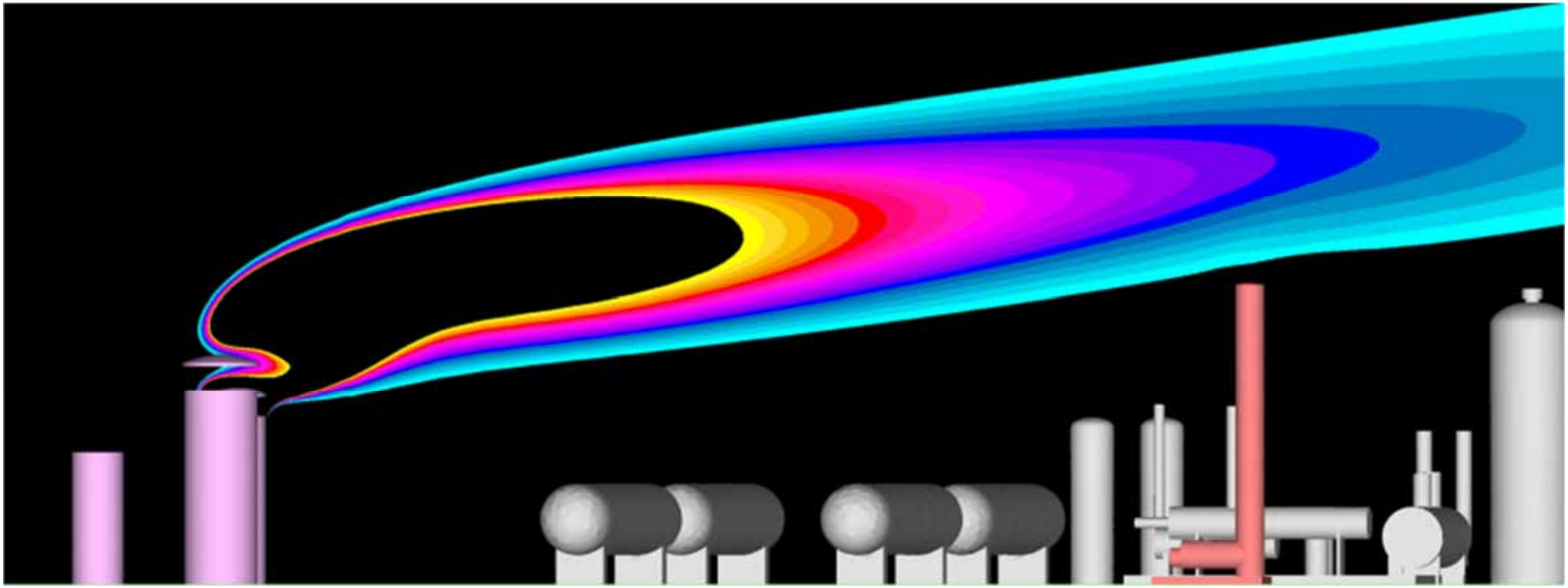
Significant Incident – 478629

- Compressor station blowdown fire.
- Emergency Shut-Down of Plant 3 allowed gas plume to contact Plant 2 thermal oxidizer, igniting.
- Operator identified fire and activated ESD for Plants 1 and 2, adding additional fuel to the fire at the blowdown silencers.

Significant Incident – 478629



Significant Incident — 478629

- Cause of initial Plant 3 ESD:
  - Grounding issue interfering with the communication system.
- Solution:
  - Move the grounding systems further apart.

Significant Incident – 478629

- Cause of ignition:
  - Low velocity of gas discharge from blowdown silencer in conjunction with a close proximity to the thermal oxidizer.
- Solution:
  - Remove the silencers and install straight pipe blowdowns.

Significant Incident – 4052

- Compressor station dehy fire.
- Glycol reboiler fire-tube miter weld crack.
- Glycol entered fire tube and leaked out of end burner box and ignited.
- Still under investigation.

Significant Incident – 4052

Significant Non-Compliances

- 192.911(f) / 192.937(b): Plan not containing prescriptiveness for the TIMP periodic evaluation.
- 192.911(i) / 192.945(a): Plan not containing prescriptiveness for the TIMP effectiveness review.
- 192.911(l) / B31.8S-2004, Section 12: Plan not containing prescriptiveness for the TIMP quality assurance process.

Significant Non-Compliances

- 192.911(k) / B31.8S-2004, Section 11: Plan not containing prescriptiveness for the MOC process.
  - This needs to be more than a record to document that a change occurred.
  - The MOC process needs to **manage** the changes, major and minor.
  - There can be separate sub-procedures for specific minor changes.
    - BAP/AP updates
    - Data integration changes
    - Assessment information updates
    - Other continual updates/changes

Significant Non-Compliances

- 192.921(a): Not assessing for threats that ILI/PT/DA don't cover.
  - Construction / Equipment / Mechanical Damage / Incorrect Operations / Outside Force
  - Refer to ASME B31.8S-2004, Appendix A1-9 for guidance on what "counts" as an assessment. The plan needs to be prescriptive on the assessment process for each threat.

Significant Non-Compliances

- 192.933(a): Not ensuring a pressure reduction is maintained.
  - Treat it like a reduced MAOP
  - Set SCADA alarms and redundancy to prevent “overpressure.”
  - Maintain records to demonstrate that was maintained.

Significant Non-Compliances

- 192.935(a): Not selecting additional actions / P&M Measures to prevent or mitigate risk.
  - Must be able to tie this selection process to the risk assessment and target HCA's.
  - Make sure they are truly over-and-above code requirements, even over 192.917(e) and 192.935(b)-(e).

Brian Gauthier

- Areas of Responsibility:
  - Southeast Michigan
  - Northeast Lower Peninsula
  - Drug & Alcohol Program Inspections

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Significant Incident – Case 3622

- Type:
  - Second-party Damage
- Characteristics:
  - Large Main Replacement Project
  - New MDPE 4-inch DR-11 plastic pipe
  - 60 PSIG system
- Description:
  - Operator's contractor working on making a tie-in as part of a main replacement project.
  - Seconds into the fuse, gas release & ignition lasted nearly 2 hours
  - Accidental ignition due to operator error.

Significant Incident – Case 3622

- Description:
  - Fuser prepared to complete a 2-inch coupling electrofusion, but mistakenly connected the fuse leads to a previously completed electrofusion tee that was already tapped and operating at 60 psig.
  - Pipe, fittings, tools, accessories and fusing equipment were destroyed.
  - No Injuries.
- Violations:
  - 192.273(b): Failure to make each joint in accordance with written procedures that have been proven by test or experience to produce strong gastight joints.

Significant Incident – Case 3622

Significant Non-Compliances

- 192.481(a): Failure to inspect each pipeline or portion that is exposed to the atmosphere for evidence of atmospheric corrosion, at least every 3 years, NTE 39 months.
- 192.467(c): Failure to electrically isolate each pipeline from metallic casings … if impractical, take measures to minimize pipeline corrosion.
- 192.605(b)(8): Failure to periodically review the work done by personnel to determine the effectiveness, and adequacy of the OM procedures and modifying them when deficiencies are found.

Robert Gregg

- Area of Responsibility:
  - West Michigan
  - Drug & Alcohol Program Inspections

- Cell: 517-930-5269
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Significant Incident – 3306/3565

- Type:
  - Third Party Damage
- Characteristics:
  - 4” High Pressure Distribution
  - 1-way feed
  - 10 outages (40 hours)
  - $79k in Property Damages, 1.773MMcf gas lost.
- Description:
  - Excavator nearly completed storm/sanitary sewer construction. While performing final grading with bulldozer, broke service tee off main.
  - Repaired by constructing permanent bypass.

Significant Incident – 3306/3565

Significant Incident – 3306/3565

Significant Incident – 3306/3565

- Violations:
  - 460.725(5): The excavator failed to establish the precise location of facilities in the caution zone prior to using power equipment.
- Key Takeaways:
  - A minor incident became a costly and potentially dangerous incident on a high-pressure system.
  - A small error by an inexperienced equipment operator resulted in a significant incident in terms of costs and potential customer impact.

Karen Krueger

- Area of Responsibility:
  - South-Central Michigan
  - Operator Qualifications

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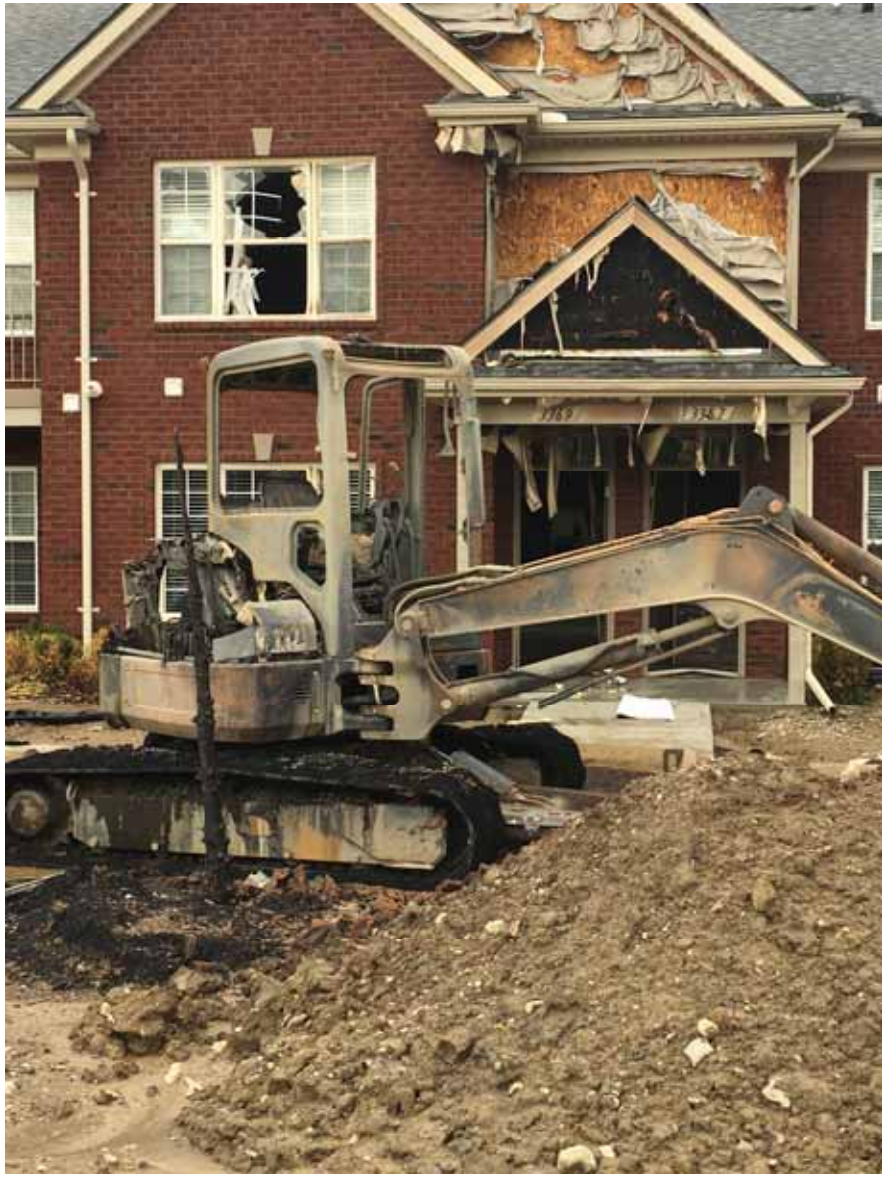
Significant Incident – 3314

- Type:
  - First Party Damage with Ignition
- Characteristics:
  - 2” PE Main
  - $120,203 in Damages
- Description:
  - Distribution crew hit main during pipe lowering project. While attempting to expose the damage, crew contacted an electric service line located in joint trench, causing ignition and injury.

Significant Incident – 3314



Significant Incident – 3314

- Violations:
  - 192.605(a) – Failure to have a gas detector present at squeeze off point, prior to cutting into the pipe to cap it. After Staff inquired if there was a gas detector nearby, Operator's technician had to retrieve one from their truck.
  - 192.751(a) - Operator of the backhoe continued to operate the equipment in the presence of blowing gas, ultimately resulting in their injury after the operator damaged an electrical conductor sharing the same trench as the distribution main.

Significant Incident – 3314

- Violations:
  - MCL 460.725(5) - Operator failed to adequately expose the marked gas main and electric facilities located in a joint trench in the caution zone prior to excavation with power equipment. Both the gas main and electric facilities were damaged by the backhoe, resulting in an employee injury.

Significant Incident – 3093

- Type:
  - House Explosion with Fire
- Characteristics:
  - Leak on Service Line at Connection to a buried regulator operating at 265 psig.
  - 8” HP Main, installed 1948
  - $93,067 in damages
- Description:
  - Operator employee onsite investigating the gas leak one block away.

Significant Incident – 3093

- Description:
  - Gas in sanitary sewer and migrated into several houses.
  - When gas shut off at buried regulator, all gas readings dissipated in the sewers.
  - Resident injured.

Significant Incident – 3093

Significant Incident – 3093

- Violations:
  - 192.605(a): Employee did not complete required documentation to demonstrate that the gas migration boundaries were determined.
  - 192.605(a): Employee responding to the original leak call did not have access to the current service line map.

Significant Incident – 3093

- Violations:
  - 192.605(a): Employee did not determine the gas migration boundaries of the leak at the buried service regulator.
    - Employee indicated that the ground was too hard to bar hole because of the frost, and instead the area was surveyed using a drag tube. O&M Procedure states drag tube is only acceptable to locate potential leak sources; after this point, bar hole testing must be conducted to pinpoint and classify the leak.
    - Gas was detected in the sewer, but the extent of this gas migration was not determined nor documented.

Significant Incident – 3093

- Recommendations:
  - Recommend operator consider in their DIMP plan if there is a threat associated with buried regulators.
  - Recommend operator reevaluate the applicability of using a drag tube in frost conditions to establish underground gas migration.
  - Recommend elevating leak response procedures when multiple leaks are in a single area with a known leak.

Significant Incident – 3115

- Type:
  - Corrosion Failure
- Characteristics:
  - 6” Steel Distribution Main - 1962
  - Operating at 55 psig
  - $59,393 in Damages
- Description:
  - Staff was initially notified that the leak was anticipated to reach $10,000. It was repaired and back into service the next day. Staff and NRC were notified 3 weeks later that the damages were in excess of $50,000.

Significant Incident – 3115

- Violations:
  - 192.605(a): Employee did not document the gas migration boundaries although two home evacuations did occur due to inside gas reads.
  - R460.20503(2): Failure to make a supplemental telephone report to MPSC as soon as practicable if additional information indicates a different cause, more serious injury, or more serious property damage than was initially reported.

Significant Non-Compliances

- 192.53(c): Failure to qualify materials for pipe and components in accordance with the applicable requirements of subpart B.
  - A stainless-steel braided hose was connected from a meter run to a temporary methanol pump was unable to demonstrate the braided hose was qualified.

Significant Non-Compliances

- 192.195(b)(2): Failure to design each distribution system supplied from a source of gas that is at a higher pressure than the MAOP for the system to prevent accidental overpressuring.
  - No overpressure protection at newly replaced valve, that was an MAOP break between two lines operating at 320 psig and another operating at 260 psig.
- 192.225(b): Failure to record each welding procedure in detail, including the results of the qualifying tests. This record must be retained and followed whenever the procedure is used.
  - Welder installed a shim between a pressure control fitting and vintage pipe to fill in the gap. However, this modified the joint design.

Significant Non-Compliances

- MI R 460.20304 (b): Failure to ensure that a welding procedure is qualified under Appendix B of API 1104 for pipelines operating at greater than 60 psig.
  - Records for a project installing pressure control fittings on a pipeline with an MAOP of 329 psig only had records showing it used a procedure that was not qualified to Appendix B.

Significant Non-Compliances

- 192.243 (f): Failure to retain, for the life of the pipeline, a record showing by milepost, engineering station, or by geographic feature, the number of girth welds made, the number nondestructively tested, the number rejected, and the disposition of the rejects.
  - Records for a regulator station project showed multiple record errors where dispositions of welds were missing or had incorrect data.
- 192.481 (a): Failure to inspect each pipeline or portion of pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion at least once every 3 years, but with intervals not exceeding 39 months.
  - Records for a corrosion leak where the riser was “rotted at ground level” was inspected for atmospheric corrosion 6 months prior and failed to identify any corrosion.

Jotham Povich

- Area of Responsibility:
  - Northern Lower Michigan

- Cell: 231-357-8816
- Email: povichj1@michigan.gov

Significant Incident – 3342

- Type:
  - Third-party damage
- Characteristics:
  - 4” Steel Sales Line
  - ~1200 PSI
- Description:
  - Excavator was installing new power poles and had valid Miss Dig Ticket. Excavator requested and had a joint meet with Gas Operator staking contractor at project site.
  - Staking Contractor cleared ticket.

Significant Incident – 3342

- Description (Continued):
  - Excavator struck and punctured pipeline while auguring for new power pole.
  - Immediate shutdown response by Gas Operator due to staffed compressor station near project site.
  - No injuries or ignition.

Significant Incident – 3342

- Violations:
  - 192.614 (a): Failure to provide temporary marking of buried pipelines in the area of excavation activity before, as far as practical, the activity begins. Operators Staking Contractor did not fully investigate the extent of the project before clearing the request.

Derrick Schimming

- Area of Responsibility:
  - Southwest Michigan
  - Control Room Management

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Significant Incident - 3518

- Type:
  - Third-party damage
- Characteristics:
  - 4” Plastic Main
  - 2-way feed
  - $8,380 Property Damage.
- Description:
  - Excavator moved further south than what was described in the ticket. The pipe was not marked nor soft exposed.
- Violations: Civil penalty is being sent to the excavator.

Significant Incident - 3518

- Description:
  - During the investigation, it was found that the Operator had not located tickets for the project.
- Violations:
  - 192.614(c)(5): Provide for temporary markings of buried pipelines in the area of excavation activity before, as far as practical, the activity begins.

Significant Incident - 3346

- Type:
  - Loss of customers that became a third-party damage
- Characteristics
  - 10” Steel Main
  - 1-way feed
  - $42,391 Property Damage.
- Description
  - The incident was originally notified as a large outage of approximately 125 customers.
  - There was construction in the area, but was thought not to be involved through preliminary investigation.

Significant Incident - 3346

- Description
  - After further investigation, it was found that a directional bore had gone through the 10” Steel.
- Violations: Civil penalty is being sent to the excavator.

Significant Non-Compliances

- 192.605(b)(1) – Failure to follow purging procedures.
- 192.629(a) – Failure to purge pipeline of gas in a way that gas is released into one end of the pipe in a moderately rapid and continuous flow.

Eleanor Mundorf

- Area of Responsibility:
  - Southeast Michigan
  - Damage Prevention

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Significant Incident – 477834

- Type:
  - Compressor Emergency Shut-Down
- Characteristics:
  - Compressor Station Pilot Gas System
  - Gas Loss of 32.5 MMcf
- Description:
  - Catalytic heater failed, allowing regulator on pilot gas system to freeze.
  - Slow leaks on pilot gas system caused pressure drop, simulating activation of ESD system, causing blowdown valves to activate.
  - While attempting to restore facility, a blowdown valve stuck open and could not be closed by the responding technician.

Significant Incident – 477834

- Technician pulled ESD to stop gas flow, and one of the isolation valves failed to close.
- Recommend operator repair leaks on the pilot gas system.
- Recommend operator repair catalytic heaters or replace with equipment better-suited for the operating conditions.

Significant Incident – 3704

- Type:
  - Leak on Transmission Pipeline Operated by Distribution
- Characteristics:
  - 300 MAOP
  - 36” Steel
- Description:
  - Crew conducting valve inspections discovered large patch of dead vegetation. Initial investigation found 90% gas reads and ~30’ spread. Investigation discovered the completion plug on a stopple fitting had become unseated in a 20” stub.

Significant Non-Compliances

- 192.303: Failure to follow construction procedures during an isolation procedure causing outage to 197 customers.
- 192.303: Failure to follow API 1104 as required in construction procedures. Section 7.8.2 of API 1104 does not allow the crown surface to fall below the outside surface of the pipe.

Significant Non-Compliances

- 192.513(a): Failure to test each segment of plastic pipe. During a construction inspection, a pipe and cap assembly, which were not pretested, were taken into an excavation to cap an active main. The assembly was scraped, fitted into a coupling, and clamped in preparation for an electrofusion.

Kristen Lawless

- Area of Responsibility:
  - North-Central Michigan
  - Damage Prevention

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Significant Incident – 3484

- Type:
  - Transmission Leak
- Characteristics:
  - 16” line installed in 1968.
  - MAOP 913 psig, OP 495 psig at incident
  - 3.5 days from discovery to normal operation
- Description:
  - Leak located at creek crossing under 6’ of water.
  - External corrosion leak located under concrete swamp weight. Coating damage and disbondment.

Significant Incident – 3484

Significant Incident – 3484

Significant Incident – 3914

- Type:
  - Third Party Damage
- Characteristics:
  - Service tee pulled from 12” main, OP 100 psig
- Description:
  - Main was marked, service was not
  - Temporary plug welded in and PLICO installed for permanent repair.

Significant Incident – 3914

- Violations:
  - 192.614 – Failure to carry out a written program to prevent damage to pipelines from excavation activities.
- Warning:
  - MCL 460.725(9) - Failure to provide additional notice and failure to stop excavation when there is visible evidence of a facility with no marks visible.

Damage Complaints

- 158 complaints filed since PA 174 became effective on April 1, 2014.

Year	Complaints Received	Issued NOPV with Penalty	Issued NOPV	Resolved
2016	24	3	3	18
2017	23	10	2	11
2018	30	7	3	20
2019	54	3	5	10
Total	131	23	13	59

Damage Investigation Cases

- In 2019, 31 pipeline safety cases involving excavation damage were reported.
  - A total of $81,500 in penalties were assessed.

Type of Letter	Excavator	Facility Operator	Total
NOPV with Penalty	17	13	30
NOPV	8	1	9
Total	25	14	39

Damage Complaints

- January 1, 2020, MPSC adopted Common Ground Alliance's 2018 changes to the Damage Information Reporting Tool (DIRT) field form.
  - Updated Damage Reporting Manual and CSV File available on MPSC website or upon request.

- On April 18, 2019 the MPSC updated the Damage Prevention Complaint Form.
  - Available on the MPSC website
  - **Users must use a browser other than Internet Explorer**

Dennis D’Antonio

- Area of Responsibility:
  - Damage Prevention

Significant Incident – 3765

- Type:
  - Third-Party Damage
- Characteristics:
  - 5/8” plastic stub
- Description:
  - Contractor damaged a gas service the previous day
  - City Sewer Inspector indicated that the excavator cut the line and taped it back up with black electrical tape.

Significant Incident – 3765

Location of cut by contractor

End of damaged service

Significant Incident – 3765

- Excavator Violations:
  - MCL 460.725(10) – Failure to provide immediate notice to the facility owner or facility operator, if a damage occurs.
  - MCL 460.725(11) – Failure to call 9-1-1 and provide immediate notice to the facility owner or facility operator, if a damage results in the escape of any flammable, toxic, or corrosive gas or liquid, or endangering life, health, or property.

Significant Incident – 4071

- Type:
  - PA 174 Inspection
- Characteristics:
  - Plastic Main
- Description:
  - On two occasions within a two-week span, excavator was digging before their MISS DIG ticket digstart with no markings from multiple facilities, including a gas operators.

Significant Incident – 4071

1st Encounter

Significant Incident – 4071

2nd Encounter

Significant Incident – 4071

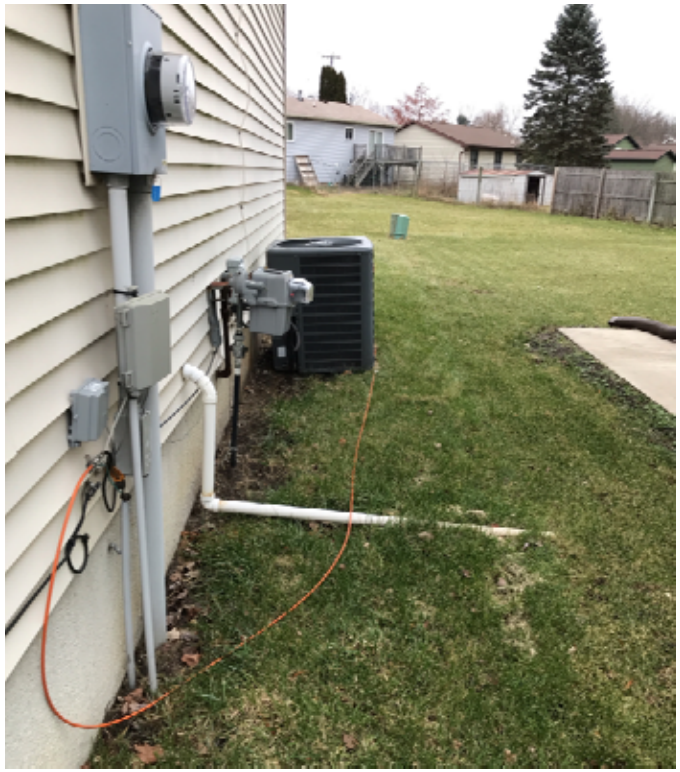
- Excavator Violations:
  - MCL 460.725(1) – Failure to provide a dig notice to the notification system at least 72 hours, but not more than 14 calendar days, before the start of any blasting or excavation.

Significant Incident – 4081

- Type:
  - PA 174 Inspection
- Characteristics:
  - Gas Service line
- Description:
  - Gas operator marking 001 (no conflict) when facilities are near an excavation area
- Violations:
  - Ongoing investigation

Significant Incident – 4081

- Photos taken before digstart



Significant Incident – 4081

- Related issues
  - Excavator boring telecom cables without positive response on a consistent basis
  - Operator responding with 001 (no conflict), but including pictures of bored cables near their facilities

Significant Incident – 4081

- Operator Violations:
  - MCL 460.727(1) – Failure to respond to a ticket by the start date and time for the excavation or blasting by marking facilities in the area of the proposed excavation or blasting in a manner that permits the excavator to employ soft excavation to establish the precise location of the facilities.