STATE OF MICHIGAN
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS
PUBLIC SERVICE COMMISSION

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TO: Michigan Intrastate Pipeline Operators

FROM: David J. Chislea, Director
Gas Safety and Operations Division

DATE: March 14, 2025

SUBJECT: 2025 Gas Safety Pipeline Inspections and Program Updates

2025 Planned Inspections[1]

1. **Standard –**
    a. **First and Second Half –** Inspection forms have been updated to include individual questions for Procedure, Record, and Observation elements for the inspected rules. The Compression Station questions are in a separate inspection form.
    b. **Field Observation of Overpressure Protection and Pressure Regulating Equipment –** Inspections may also include an evaluation of corrosion control, leakage surveys, odorization levels and equipment, repaired and/or active leaks, emergency valves, and emergency response.
2. **Risk-Based[2] –** Staff will be conducting Risk-Based Inspections, whereupon each inspection unit within the State will have its own risk profile, which will be used to develop a supplemental risk-based inspection. In a future correspondence, operators will be individually notified of any Risk-Based Inspection that will occur in 2025 and the inspection form(s) will be provided at that time.
3. **Specialized –** These inspections include Drug and Alcohol, Operator Qualification, Control Room Management, and Integrity Management. Specialized Inspections are being conducted in a four-year cycle where one quarter of the pipeline operators in the State will be inspected each year. In a future correspondence, operators will be individually notified of any Specialized Inspections that will occur in 2025, and the inspection form will be provided at that time.

[1] The rules/questions included are the minimum to be inspected in 2025. Additional inspections may be necessary as findings or concerns arise.
[2] The federal "Guidelines for States Participating in the Pipeline Safety Program" requires risk-based inspections of units using "information available from the operator's annual reports."

4. **Gathering Line Rules**[3] **–** These inspections will include an initial review of operators' annual reports and determination of regulated facilities. In a future correspondence, operators will be individually notified if onsite inspections will occur in 2025, and if inspection form(s) are developed, they will be provided at that time.
5. **Construction**[4] **–** These inspections will include main, service, and transmission replacement projects; repairs; maintenance; inspection and remediation; and new facilities. In a future correspondence, operators will be individually notified if these inspections will occur in 2025, and the inspection form(s) will be provided at that time.
6. **Damage Prevention –** Staff will be conducting Damage Prevention Inspections throughout the year upon notification of incidents, following review of damage data submissions, from complaints, or as Staff determines.

Inspection forms will also be added to the MPSC Pipeline Safety[5] website.

In 2025, there have been some changes with regards to which Staff has inspection responsibility for a specific operator/unit. Staff will be individually contacting operators to notify of those specific changes. If there is uncertainty with regards to which Staff has inspection responsibility for your company/unit, please inquire.

Data/Report Submittals

Submission Addresses

The Michigan Gas Safety Standards (MGSS) require that any report filed with the Pipeline and Hazardous Materials Safety Administration (PHMSA) must be concurrently filed with the Michigan Public Service Commission (MPSC). The Gas Safety and Operations Division encourages paperless submission of any and all correspondence directly to our email address: LARA-MPSC-Operations@michigan.gov. If responding to an existing case, please use the same email address (LARA-MPSC-Operations@michigan.gov) and include the case reference number (ref:_xxxxxxx:ref) in the email so that your response will be directed to the appropriate case.

Alternatively, correspondence can still be mailed to the following address:

Michigan Public Service Commission
PO Box 30221
Lansing, MI 48909

[3] 86 FR 63295, Nov. 15, 2021, and 87 FR 26299, May 4, 2022.
[4] The federal "Guidelines for States Participating in the Pipeline Safety Program" requires "At least 20% of Inspection Person-Days each year must be spent on Design, Testing and Construction Inspections."
[5] https://www.michigan.gov/mpsc/regulatory/natural-gas/pipeline-safety

The MPSC offices are located at the following address:

Michigan Public Service Commission
7109 West Saginaw Hwy
Lansing, MI 48917

Annual Reports

The annual report forms and instructions for distribution, transmission/gathering, and Underground Natural Gas Storage operators can be found on PHMSA's website at: https://www.phmsa.dot.gov/forms/operator-reports-submitted-phmsa-forms-and-instructions. The 2024 annual reports for all regulated operators are due by March 15, 2025. These forms should be electronically submitted to PHMSA at: http://portal.phmsa.dot.gov/.

When initially submitting your annual reports, please provide them electronically to LARA-MPSC-Operations@michigan.gov or the mailing address above. The Staff would like a new case created for each operators' 2024 reports, so for the initial submission, please send a new email using LARA-MPSC-Operations@michigan.gov without any reference numbers or responding to any previous emails. Supplemental or corrected filings should be submitted using the reference number generated from the initial submittal, so the information is directed into the appropriate case.

National Pipeline Mapping System Updates

49 CFR 191.29 requires each transmission pipeline facility operator to provide information each year, on or before March 15, representing assets as of December 31 of the previous year to support the National Pipeline Mapping System (NPMS). The updates do not apply to distribution or gathering pipelines. The acceptable formats and additional information are specified in the NPMS Operator Standards Manual available at www.npms.phmsa.dot.gov or by contacting the PHMSA Geographic Information Systems Manager at (202) 366–4595. **Additionally, if no changes have occurred since the previous year's submission, the operator must comply with the guidance provided in the NPMS Operator Standards manual available at www.npms.phmsa.dot.gov or by contacting the PHMSA Geographic Information Systems Manager at (202) 366–4595.** Operators must also notify the Gas Safety and Operations Division of any NPMS submittal by sending an email to LARA-MPSC-Operations@michigan.gov.

National Response Center Updates

Notice of incidents per 49 CFR 191.5 requires an operator to revise or confirm its initial telephonic notice within 48 hours. Please provide a copy of the National Response Center (NRC) update report to the Staff person that the incident was initially reported to and the Staff person responsible for inspections of that operator/unit.

Damage Prevention Data

Public Act 174 of 2013, MISS DIG Underground Damage Prevention and Safety Act, and R 460.40 requires that the MPSC establish requirements for reporting damage to underground facilities. All underground facility owners and operators are required to submit quarterly reports by the 15th day of the second month following each quarter, such that first quarter data is due May 15th, second quarter data is due August 15th, third quarter data is due November 15th, and fourth quarter data is due February 15th of the following year. MPSC Staff has developed and launched a Pipeline Safety Community portal for facility owners and operators to upload excavation damage data directly into the database; the data will run through an automated verification process to ensure it meets submission requirements; the data will be available immediately once submitted. This effort is expected to improve data quality and availability of data. **All pipeline owners and operators should submit damage data, including notice of no damages, through the Community portal**. Information and forms are posted on the MPSC Safe Digging[6] website.

- If your company has not already done so, please submit the contact form available on the MPSC Safe Digging website. Staff will review this form and reach out if there are any issues or questions. Please submit the contact form no later than April 15, 2025, to ensure you have access by the May 15 submission deadline.
- After submitting the contact form, individuals identified as community users on the form should submit community access requests. Please note this is not an automated process and may take several days to complete processing by Staff. Staff will review the contact form to determine whether to accept or deny access requests.
- Once users have access to the community, the *Pipeline Safety Community Users Instructions* guide can be found on the community *Help* tab. The guide is the first resource on topics such as how to submit, edit, search, sort, and export excavation data. Staff will create additional aids as requested.
- Please review the updated CSV template and the *Manual for Reporting Incidents Involving Damage to Underground Facilities* for changes made to the CSV file headers and to the reporting requirements. These documents are located on the *Help* tab and on the MSPC Safe Digging website.

If you have any questions concerning Community access or if you would like to schedule Community portal training, please contact Ms. Cindy Creisher at creisherc@michigan.gov or 517-275-2823. If you have any questions concerning submitting quarterly damage data through the Community portal, please contact Nathan Kitler at kitlern1@michigan.gov or 517-643-3528.

In order to have more accurate damage data, operators are requested to reconcile damage data reported in Gas Distribution Annual Report, Part D – Excavation Damage from 2015 through the current reporting year to reduce inaccurate reporting of the "Other" category. **Prior to submission of the Annual Report for calendar year 2024, ensure excavation damage data is reviewed for accuracy and completeness.**

[6] https://www.michigan.gov/mpsc/regulatory/damage-prevention

Contact List

Please provide the Staff with an updated contact list for your company. You can provide this electronically to LARA-MPSC-Operations@michigan.gov or mail it to the attention of the Gas Safety and Operations Division at the Lansing office address listed above.

Updated Pipeline Safety Regulations

On November 30, 2023, the 26th Edition of the MGSS became effective adopting PHMSA standards 49 CFR Part 40, 49 CFR Part 191, 49 CFR Part 192, and 49 CFR Part 199 as published on October 1, 2023. The Guide for the 26th Edition of the MGSS is under development and will be published soon. The final rules contained in the 26th Edition of the MGSS can be found on the MPSC website, and the federal rules can be found on the eCFR.gov website.[7]

Attachments

1. 2025 First Half Inspection Form.
2. 2025 Second Half Inspection Form.
3. Compressor Station Inspection Form.
4. Field Observation checklists for the following:
    a. Leak Survey,
    b. Pipe to Soil,
    c. Valves.
5. Act 174 Reporting CSV.
6. Act 174 Reporting Memo.
7. An updated MPSC Gas Safety Staff Contact List dated January 6, 2025. Please exclusively use the incident notification phone number (517-284-8230) for reporting incidents.

Intrastate Underground Natural Gas Storage operators, please be advised that individual letters have been sent to each operator with notification of 2025 inspections.

This information has been provided to facilitate inspections. If you have questions regarding the attached information, please contact Mr. Jason Mailloux at maillouxj@michigan.gov or 517-388-7420.

Enclosures

cc: Gas Safety Engineers

[7] https://www.michigan.gov/mpsc/regulatory/natural-gas/michigan-gas-safety-standards and https://www.ecfr.gov/current/title-49.