



U.S. Department
Of Transportation

1200 New Jersey Ave., SE
Washington, DC 20590

**Pipeline and
Hazardous Materials
Safety Administration**

November 16, 2016

OVERNIGHT EXPRESS MAIL

Ms. Betty Ann Kane
Chairman
Public Service Commission of the District of Columbia
1325 G Street, NW, Suite 800
Washington, DC 20005

Dear Chairman Kane:

Sections 60105(e) and 60106(d) of the Pipeline Safety, Regulatory Certainty, and Job Creation Act of 2011 (Act) provide for the monitoring of State pipeline safety programs by the Pipeline and Hazardous Materials Safety Administration (PHMSA). This annual monitoring is to ensure compliance with the Act's requirements for State pipeline safety programs and provides information for determining the State's total point award for the PHMSA pipeline safety grant for next year.

On October 17 - 21, 2016, a representative of PHMSA's Office of State Programs evaluated the CY 2015 Pipeline Safety Program activities conducted by the Public Service Commission of the District of Columbia (DCPSC). The evaluation encompassed the validation of annual Progress Report documents submitted to PHMSA, a review of the pipeline program procedures and records, and the observation of an on-site inspection of a pipeline operator conducted by your staff. Thank you for the courtesies extended to Mr. Leonard Steiner, PHMSA State Programs, by your staff.

Based on the evaluation and the validation of Progress Report information, it appears the pipeline safety program is generally complying with PHMSA's requirements. If an item has not been corrected from the previous evaluation, it will result in a loss of grant funding.

As a result of this evaluation, I would like to bring the following items to your attention:

1. Each year PHMSA's State Programs Office reviews and scores the annual Progress Report submitted by each State program. Through the Progress Report review, the State Program Office verifies that minimum basic requirements established by PHMSA are met. This year, no deficiencies were discovered and the DCPSC received the maximum 50 points for its Progress Report.
2. The other part of the annual evaluation by PHMSA is the Performance Evaluation conducted in the State Pipeline Safety Program's office and during a State field inspection. During the Performance Evaluation, no deficiencies were discovered and no points were deducted. This Performance Evaluation result along with the Progress Report score, the DCPSC received the overall score of 100%

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3. PHMSA appreciates the contributions to pipeline safety by Mr. Udeozo Ogbue who currently serves on the National Association of Pipeline Safety Representatives' (NAPSR) Risk Modeling Working Group. These efforts are extremely important in accomplishing our mutual goal of pipeline safety. Please continue to support Mr. Ogbue's participation in this important working group.
4. I appreciate the time given to Mr. Steiner to meet Commissioner Willie L. Phillips. This meeting should have provided immediate communication about the status of the District of Columbia Pipeline Safety Program and answered his questions and concerns. If you or any commissioner has any questions, please contact me or any of my staff.
5. The DCPSC is encouraged to review the performance metrics in the District of Columbia portion of PHMSA's PRIMIS website, <http://primis.phmsa.dot.gov/comm/states.htm>. These metrics can be helpful to envision trends in pipeline safety in your District. PHMSA is, in fact, now requiring pipeline safety programs to review these metrics and develop strategies to improve if the metrics are trending in a direction that compromises pipeline safety. Mr. Steiner reviewed the performance metrics with Mr. Ogbue. It was noticed during this discussion that metrics are trending in a positive direction indicating an effective pipeline safety program. The number of excavation damages per 1000 locates received by the operator has decreased since CY 2012, except for CY 2015. The number of inspections days per 1000 miles of pipelines has increase greatly in CY 2015. Through the DCPSC's analysis and future enhancements, pipeline safety in the District of Columbia will improve.
6. PHMSA is again pleased to see the DCPSC pipeline safety program is monitoring and working with Washington Gas Light in the Cast Iron/High Risk Pipeline Replacement Program. Again in CY 2015 Washington Gas Light has replaced some Cast Iron pipe and some bare steel pipe. We encourage the DCPSC to continue monitoring and to encourage this operator to replace as much as possible.

Thank you for your contributions and continuing support of the pipeline safety program. A reply to this letter is not necessary; however, your comments are always welcome.

Please send any comments to my attention at: 3700 South MacArthur Blvd, Suite B, Oklahoma City, OK 73179-7612.

Sincerely,



Zach Barrett
Director for State Programs
Office of Pipeline Safety

cc: Udeozo Ogbue, Chief, Office of Engineering, DCPSC
Byron Coy, Director, Eastern Region, PHMSA, PHP-100