



U.S. Department
of Transportation
**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue SE
Washington DC 20590

A federal agency may not conduct or sponsor, and a person is not required to respond to, nor shall a person be subject to a penalty for failure to comply with a collection of information subject to the requirements of the Paperwork Reduction Act unless that collection of information displays a current valid OMB Control Number. The OMB Control Number for this information collection is 2137-0584. Public reporting for this collection of information is estimated to be approximately 58.5 hours per response, including the time for reviewing instructions, gathering the data needed, and completing and reviewing the collection of information. All responses to this collection of information are mandatory. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to: Information Collection Clearance Officer, Pipeline and Hazardous Materials Safety Administration (PHMSA), PHP-30, 1200 New Jersey Ave SE, Washington, D.C. 20590

Pipeline Safety

2024 Gas Base Grant Progress Report

for

PUBLIC UTILITIES COMMISSION NEVADA

Please follow the directions listed below :

1. Review the entire document for completeness.
2. Review and have an authorized signatory sign and date page 2.
3. Scan the signed document to your computer and email it to Carrie.Winslow@dot.gov.



FedSTAR Information

Electronic Submission Date: 2/27/2025 11:09:49 AM



Pipeline and Hazardous Materials Safety Administration
1200 New Jersey Avenue, SE
Washington DC 20590

OFFICE OF PIPELINE SAFETY
2024 Gas Base Grant Progress Report

Office: PUBLIC UTILITIES COMMISSION NEVADA

Neil Pascual

Authorized Signature

Neil Pascual

Printed Name

Inspector

Title

2/27/2025 11:09:49 AM

Date



PROGRESS REPORT ATTACHMENTS (GAS)

PHMSA Form No. PHMSA F 999-92

Attachment 1: State Jurisdiction and Agent Status over Facilities.

Attachment 2: State Field Inspection Activity

Attachment 3: Facilities Subject to State Safety Jurisdiction

Attachment 4: Pipeline Incidents

Attachment 5: State Compliance Actions

Attachment 6: State Record Maintenance and Reporting

Attachment 7: State Employees Directly Involved in the Pipeline Safety Program

Attachment 8: State Compliance with Federal Regulations

{there is no attachment 9}

Attachment 10: Performance and Damage Prevention Questions



Attachment 1 - Stats on Operators

STATE JURISDICTION AND AGENT STATUS OVER GAS FACILITIES AS OF DECEMBER 31, 2024

Operator Type	State Agency Jurisdiction/ Agent Status		No. of Operators	Operators Inspected		No. of Inspection Units	Units Inspected	
	No ¹	Yes		#	%		#	%
Distribution								
Private		X/60105	2	2	100.0%	3	3	100.0%
Municipal		X/60105	0	0	N/A	0	0	N/A
Master Meter		X/60105	1	1	100.0%	1	1	100.0%
LPG		X/60105	3	3	100.0%	8	8	100.0%
Other		X/60105	0	0	N/A	0	0	N/A
Transmission								
Intrastate		X/60105	7	7	100.0%	8	8	100.0%
Interstate	F		0	0	N/A	0	0	N/A
LNG								
Intrastate		X/60105	0	0	N/A	0	0	N/A
Interstate	F		0	0	N/A	0	0	N/A
Other								
Gathering Lines		X/60105	0	0	N/A	0	0	N/A
Offshore Facilities		X/60105	0	0	N/A	0	0	N/A
Total			13	13	100.0%	20	20	100.0%

¹Codes: A - None in state and does not have jurisdiction;

B - State does not have jurisdictional authority (Provide current status or action being taken to obtain authority in notes section below)

F - No, State is currently not an interstate agent.

X/60105P = Yes, I have Section 60105 (Certification) over some of the operator type (meaning: I have 60105 authority over some, but not all of this operator type and do not have a 60106 agreement with PHMSA to inspect them). These operators are identified in the notes below.

X/IA - Yes, I have Interstate Agent jurisdiction over this type of operator

Distribution "Other" - ie Co-ops, Public Utility Districts, etc.

States should explain any special circumstances

General Instructions - All above facilities should only include facilities as defined by federal pipeline regulations and should not include extended jurisdiction by state regulation.

Attachment 1 Notes:

Nevada's pipeline safety program ("PSP") experienced several changes regarding the number of jurisdictional operators

and inspection units being reported. As such, the number of operators and inspection units being reported in the 2024 progress report differs from those reported in the 2023 progress report. Those differences are outlined below:

Private Distribution

Nevada has 2 private LDC operators, those being Southwest Gas Corporation ("SWG") and Sierra Pacific Power Company (d/b/a NV Energy). SWG is broken up into two units, Southern Nevada Division ("SND") and Northern Nevada Division ("NND"). These comprise the three Inspection Unit figure outlined in the table above.

Municipal Distribution

Nevada does not currently have any Municipal Distribution natural gas or LPG facilities.

Master Meter

In 2012, as part of Docket No. 12-06043, the Public Utilities Commission of Nevada ("PUCN") approved a plan to have aging master meter systems located within the LDC's service territories replaced by new modern plastic pipeline systems owned and operated by the LDC. To-date approximately ten (10) of these such conversions have occurred. There is only one (1) remaining known master meter natural gas system in Nevada, that being Docs Cottages.

LPG

In 2024 Sierra Pacific Power Company (d/b/a NV Energy) converted its Rainbow Bend LPG system to natural gas. Since the conversion assimilates their Rainbow Bend housing subdivision into NV Energy's existing natural gas LDC operations, this conversion resulted in the loss of an LPG operator as well as an LPG inspection unit with no new corresponding natural gas addition. Therefore, the current three (3) jurisdictional LPG operators (which makes up the eight (8) Inspection Units) in Nevada are as follows:

- AmeriGas-3 jurisdictional units

- Wendover Gas-4 jurisdictional units (all located in the City of West Wendover, NV. These units are typically inspected together and are really only broken out for incident reporting purposes)

- Mt. Charleston Cabins-1 jurisdictional system

The number of LPG operators and inspection units could change year to year as systems are converted to a non-jurisdictional configuration or if the Nevada PSP were to discover systems that are believed to be jurisdictional.

Transmission Intrastate

One (1) new transmission operator was added in 2024. This was a result of a contested proceeding in front of the PUCN (Docket No. 23-06027) regarding a renewable natural gas ("RNG") injection site facility that was under construction. The Nevada PSP had taken the position that this storage trailer injection site facility constituted a transmission pipeline facility. Vanguard Renewables/Dominion Energy was debating that the trailer injection site and associated pipelines were Type R Gas Gathering. As of the end of 2023 the site is not yet operational. However, the site became operational in 2024 and the PUCN determined that the facility to be an intra-state transmission facility. Therefore for 2024, Nevada is listing a new transmission operator ("VR Ag Operations, LLC). It should be noted however, that the RNG facility operated by VR Ag Operations, LLC, was requested to be transferred to a new entity "Regenis" on January 15, 2025, so the name being reported on this 2024 Progress Report will have to be updated in the 2025 report.

As such, there are currently seven (7) jurisdictional Intra-State Transmission operators in Nevada and they are as follows:

- Nevada Gold Mines-2 jurisdictional units

- Empire Mining-1 jurisdictional unit

- New Rise-1 jurisdictional unit

- Prospector Pipeline Company-1 jurisdictional unit

- VR Ag Operations, LLC-1 jurisdictional unit

- Southwest Gas Corporation-1 jurisdictional unit

- Sierra Pacific Power Company d/b/a NV Energy-1 jurisdictional unit

One of the existing intrastate transmission pipelines continued to be in idle status in 2024. The idle pipeline is the 36-mile Empire Mining Pipeline OPID 39536, (formerly owned by US Gypsum) which taps off the interstate Tuscarora pipeline. The pipeline is currently physically disconnected from the Tuscarora pipeline, and it is filled with a small amount of pressurized nitrogen. Depending on economic conditions it is unclear if this pipeline will ever be placed back in service, but the operator, Empire Mining, currently plans to keep the pipeline viable just in case.

The Nevada PSP is expected to gain one additional transmission operator in 2025, that being Pinyon Pipeline Company,

LLC. Per Docket No. 23-12023, Pinyon Pipeline is proposing to construct a 16-mile 24-inch intrastate natural gas transmission pipeline in order to provide the natural service required to convert the existing Valmy coat station to natural gas operation.

Intrastate LNG

There are currently no Intrastate LNG facilities in Nevada, but Nevada has adopted 49 CFR 193, so the current assumption is that if an Intrastate LNG facility were to be constructed it would be state jurisdictional and would fall under the purview of the PUCN.

Gas Gathering Pipelines

There is currently no jurisdictional gas gathering operators in Nevada.



Attachment 2 - State Inspection Activity

TOTAL STATE FIELD INSPECTION ACTIVITY AS OF DECEMBER 31, 2024

Operator Type	Standard Comprehensive	Design, Testing and Construction	On-Site Operator Training	Integrity Management	Operator Qualification	Investigating Incidents or Accidents	Damage Prevention Activities	Compliance Follow-up	Total
Distribution									
Private	155.250	267.500	6.000	33.000	18.500	0.000	24.750	12.750	517.750
Municipal	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Master Meter	1.250	0.000	0.000	0.000	0.500	0.000	0.000	0.000	1.750
LPG	26.000	1.000	0.000	3.250	3.750	0.000	0.000	0.000	34.000
Other	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Transmission									
Intrastate	40.750	7.000	0.000	6.500	12.000	0.000	0.000	0.250	66.500
Interstate	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
LNG									
Intrastate	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Interstate	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Other									
Gathering Lines	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Offshore Facilities	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Total	223.250	275.500	6.000	42.750	34.750	0.000	24.750	13.000	620.000

Drug and Alcohol

Total Count of Drug and Alcohol Inspections

0

Attachment 2 Notes

The numbers above are based upon an inspection day being a full 8 hours. Multiple operator types are sometimes inspected in the same day therefore the time on those days are allocated between the different operator types based upon inspection hours. Additionally, multiple inspection types are often performed on the same operator during multi-day inspections therefore the time is allocated to each inspection type being performed during these multi-day inspections (example: 4 hours OQ, 4 hours DIMP, 16 hours Standard). Adjustments are made for those inspections that are performed in excess of 8 hours to a single day in order to not overstate the figures for

those limited instances in which the inspector is in the field for greater than 8 hours in a single day.

Additionally, because Nevada PSP inspectors also perform One-Call inspections of excavators in the field (via a One-Call grant provided by PHMSA and state funds for non-gas related inspections) to ensure that those excavators are complying with Nevada's One-Call Law (NRS 455) when excavating around underground natural gas and other facilities; these One-Call inspections are tracked separately from the gas field inspections that are performed pursuant to 49 CFR 192. Nevada's PSP tracks these different inspections separately, so the numbers above do not include the approximately 150 field inspections and enforcement activities relating to protecting natural gas facilities (including PHMSA jurisdictional pipelines) via Nevada's One-Call Law.

The number of inspection field days in 2024 was very comparable to the number of inspection field days reported in 2023, in fact the number was slightly higher. This is a result of Nevada's PSP being fully Staffed in 2024, and several of its newer employees becoming qualified to lead certain types of inspections. Nevada has several people participating in NAPSRS sponsored committees (NAPSRS/PHMSA Distribution Team, Plastic Pipe Committee, GPTC Committee, LPG and RNG Committees and the NARUC Pipeline Safety Staff Sub-Committee) and the resources needed to actively participate in those committees detracted a small number of field days in 2024 but it is not expected to have a material impact going forward.

Nevada PSP exceeded that minimum number of construction inspection days required by PHMSA (20 percent) and the construction inspection days in 2024 made up approximately 44 percent of all inspection days. With the significant construction and pipe replacement work occurring in Nevada this level of construction inspection work is warranted and important.

Nevada also exceeded the minimum number of inspection days required per its 2024 SICT submittal as that inspection day requirement was 418 days.

The strong overall number of inspection days were a result of performing numerous field inspections of LDC and LPG Operator standard inspection work activities including:

- Leak survey work;
- Valve maintenance work;
- Numerous leak repairs;
- Taking rectifier and pipe to soil reads;
- Regulator maintenance;
- Odorant reads;
- Emergency response and excavation damage repairs;
- Etc.

The strong construction inspection day figure is associated with the following:

- Nevada being one of the fastest growing States and the significant new construction that is occurring statewide.
- Southwest Gas replacing some 50 miles of higher risk, more leak prone PVC and Aldyl A pipelines in its Southern Nevada division.
- Southwest Gas performing large school customer owned yard line replacement projects.
- Southwest Gas expanding its service territory to Mesquite, Nevada and Spring Creek, Nevada including all the construction activities associated with bringing natural gas to a new city/region.
- NV Energy constructing facilities needed to convert its Rainbow Bend LPG systems as well as several old pre-code steel replacement projects.

Nevada's PSP did not perform any comprehensive Drug and Alcohol ("D&A") inspections in 2024 as none were due. However, Nevada PSP performed its annual in-

depth review of operator and contractor's compliance with the 50 percent random testing rate which led to a compliance action being issued. Several D&A inspections are scheduled for 2025.

Annual DIMP update meetings/reviews were performed on both large LDCs, those being Southwest Gas and NV Energy.

Annual TRIMP meetings/review were performed with both large transmission operators with HCAs, as well as HCA TRIMP inspections being performed on other operators without HCA mileage. A compliance action stemmed from the annual TRIMP meeting with Southwest Gas.

No TRIMP field In-Line-Inspection ("ILI") inspections occurred in 2024. However, TRIMP ILI runs are planned for those operators with HCA/MCA and 710 mileage in 2025, 2026 and 2027.

The continued decline in the number of master meter and small LPG operator inspection units has allowed for increased inspections of larger, higher consequence LDC and transmission operators for 2024.

In 2024, Nevada PSP held is 3-year pipeline seminar which resulted in several days of operator training.



Attachment 3 - List of Operators

GAS FACILITIES SUBJECT TO STATE SAFETY JURISDICTION AS OF DECEMBER 31, 2024

Operator Business Name Operator ID Address	Distribution (Operator type & Inspection Units)					Transmission (Operator type & Inspection Units)		LNG(Operator type & Inspection Units)		Other (Operator type & Inspection Units)	
	Private	Municipal	Master Meter	LPG	Other	Intrastate	Interstate	Intrastate	Interstate	Gathering Lines (Jurisdictional)	Offshore Facilities (State Waters)
Amerigas Consolidated Systems 32013 460 N Gulph Rd, King of Prussia, PA 89415	0	0	0	3	0	0	0	0	0	0	0
Docs Cottages 37064 P.O. Box 3626, Stateline, NV 89449	0	0	1	0	0	0	0	0	0	0	0
Empire Mining Co, LLC 39536 Nevada Highway 447 - MP 68, Empire, NV 89405	0	0	0	0	0	1	0	0	0	0	0
Mount Charleston Resort Cabins 36756 5355 Kyle Canyon Road, Las Vegas, NV 89124	0	0	0	1	0	0	0	0	0	0	0
Nevada Gold Mines 30052 1655 Mountain City Highway, Elko, NV 89822	0	0	0	0	0	2	0	0	0	0	0
New Rise Renewables Reno, LLC 39590 14830 Kivett Lane, Reno, NV 89521	0	0	0	0	0	1	0	0	0	0	0
NV Energy (dba Sierra Pacific Power Company) 18308 6100 Neil Road, P.O. Box 10100 Reno, NV 89520	1	0	0	0	0	1	0	0	0	0	0
Prospector Pipeline Company 38923 2981 Gold Canal Drive, Rancho cordova, CA 95670	0	0	0	0	0	1	0	0	0	0	0

Southwest Gas Corporation 18536 5241 Spring Mountain Road, Las Vegas, NV 89150	2	0	0	0	0	1	0	0	0	0	0
VR AG Operations, LLC 40611 133 Boston Post Road Bldg 15 - 2nd floor, Weston, MA 02493	0	0	0	0	0	1	0	0	0	0	0
Wendover Gas Company 31497 460 Mesa Street, Wendover, NV 89883	0	0	0	4	0	0	0	0	0	0	0



	Distribution (Operator type & Inspection Units)					Transmission (Operator type & Inspection Units)		LNG(Operator type & Inspection Units)		Other (Operator type & Inspection Units)	
	Private	Municipal	Master Meter	LPG	Other	Intrastate	Interstate	Intrastate	Interstate	Gathering Lines (Jurisdictional)	Offshore Facilities (State Waters)
Inspection Unit totals by type	3	0	1	8	0	8	0	0	0	0	0

Total Operators

11

Attachment 3 Notes:

The Operators listed above as well as the number of inspection units matches the number reported in Attachment 1 of this Progress Report, when considering that NV Energy operates two types of systems (Transmission and LDC/Private) and Southwest Gas operates two types of systems (Transmission and LDC/Private).

One intrastate transmission pipeline continues to be in idle status in 2023. The 36-mile Empire Mining Pipeline OPID 39536, (formerly owned US Gypsum) which taps off the interstate Tuscarora pipeline is currently physically disconnected from the Tuscarora pipeline, and it is filled with a small amount of pressurized nitrogen. Depending on economic conditions it is unclear if this pipeline will ever be placed back in service, but the operator, Empire Mining, currently plans to keep the pipeline viable just in case.

As outlined in detail in Attachment #1 in 2024 Sierra Pacific Power Company (d/b/a NV Energy) converted its Rainbow Bend LPG system to natural gas. Since the conversion assimilated the Rainbow Bend housing subdivision into NV Energy's natural gas LDC operations, this conversion resulted in the loss of an LPG operator as well as an LPG inspection unit with no new corresponding natural gas addition.

Additionally, as outlined in Attachment #1 one (1) new transmission operator was added in 2024. This was a result of a contested proceeding before the PUCN (Docket No. 23-06027) regarding a renewable natural gas ("RNG") injection site facility that was under construction. The Nevada PSP had taken the position that this storage trailer injection site facility constituted a transmission pipeline facility. Vanguard Renewables/Dominion Energy was arguing that the trailer injection site and associated pipelines was Type R Gas Gathering. As of the end of 2023 the site was not yet operational. However, the site became operational in 2024 and the PUCN determined that the facility constituted an intra-state transmission facility. Therefore for 2024, Nevada is listing a new transmission operator ("VR Ag Operations, LLC). It should be noted however, that the RNG facility operated by VR Ag Operations, LLC, was

requested to be transferred to a new entity "Regenis" on January 15, 2025, so the name being reported on this 2024 Progress Report will have to be updated in the 2025 report.



Attachment 4 - Incidents/Accidents

SIGNIFICANT⁴ GAS INCIDENTS/ACCIDENTS JANUARY 1, THROUGH DECEMBER 31, 2024

Date of Incident	Location - City/County/etc.	System Type	Injuries #	Fatalities #	Property Damage ³ \$	Operator Cause Code ¹	State Cause Code ¹
------------------	-----------------------------	-------------	------------	--------------	---------------------------------	----------------------------------	-------------------------------

Name of Operator:

Operator ID:

Report No:

Summary²

¹High Level Cause Codes: A - Corrosion failure; B - Natural Force Damage; C - Excavation Damage; D - Other Outside Force Damage; E - Pipe, Weld or Joint Failure; F - Equipment Failure; G - Incorrect Operation; H - Other Incident Cause; IP - Investigation Pending;

²Please include a summary or report of the state agency's investigation of each of the above incidents.

³Interstate agents should use the 191.3 Incident definition for listing incidents investigated on interstate facilities.

Attachment 4 Notes

Nevada had no intrastate Federal Reportable Incidents in 2024. There was one NRC report (#1396971) submitted on April 21, 2024, regarding an indoor building leak at the Costco located at 222 S Martin Luther King Blvd., Las Vegas. However, that turned out to be a house piping leak and was not a jurisdictional incident, nor did it meet any of the triggering requirements.

Staff did however investigate a PHMSA Jurisdictional Interstate Pipeline Reportable Incident (October 9, 2024, Great Basin Gas Transmission Company OPID #15033) because the cause of the incident (NRC #1413294) was excavation damage and therefore was jurisdictional to the PUCN because of the PUCN's One-Call Law oversight. As a result of that investigation and compliance with Nevada's Call Before You Dig Law (NRS 455), Nevada PSP imposed a civil penalty (\$25,000 and \$6,000) with both the Operator and the Excavator for failure to comply with NRS 455.

Attachment 5 - Stats on Compliance Actions

STATE COMPLIANCE ACTIONS -- CALENDAR YEAR (CY) 2024

Probable Violation Categories	Intrastate	Interstate
Number carried over from all previous CY's	4	0
Number Found During CY	10	0
Number submitted for DOT action [60106 Agreement agent only]	0	0
Number corrected during CY (including carry over from previous year(s))	14	0
Number to be corrected at end of CY (including carry over)	0	0

Number of Compliance Actions Taken ¹

(see definition) 31

Civil Penalties

Number assessed during CY	2
Dollars assessed during CY	\$30,000.00
Number collected during CY	2
Dollars collected during CY	\$30,000.00

¹Do not double count for a related series of actions.

Attachment 5 Notes

The \$30,000 civil penalty figure issued in 2024 is comprised of two (2) different civil penalty proceedings.

The following is a summary of those civil penalty cases:

#1

A civil penalty totaling \$25,000 was assessed against Sierra Pacific Power Company d/b/a NV Energy ("NVE"), OPID 18308. This civil penalty was associated with a state reportable excavation damage incident that occurred on September 29, 2023. NVE's line locate contractor attempted to mark a service line in an area where construction work was occurring but could not gain access to the meter. Rather than informing the contractor and make other arrangements, the service line went unmarked resulting in an excavation damage, an uncontrolled release of gas, the evacuation of two residences (six people) and the loss of gas service to approximately 152 customers. After several months of negotiations, on February 6, 2024, Staff and NVE reached a settlement agreement and filed a Stipulation outlining a \$25,000 civil penalty associated with violations of 49 CFR 192. Additionally, the Stipulation outlined some pipeline safety enhancements that NVE was required to undertake in order to better account for line locate tickets that contain pipelines for which access is limited. The agreement also included a civil penalty associated with Nevada's call before you dig law (NRS 455) and a safety enhancement contribution to the Nevada Regional Common Ground Alliance. The stipulation filing was designated as Docket No. 24-02007. On March 27, 2024, the PUCN accepted the Stipulation and issued an order. The civil penalty payment amount of \$25,000 was paid by NVE on April 20,

2023.

#2

A civil penalty totaling \$5,000 was assessed against CEA Dairy RNG Nevada LLC for operating a jurisdictional intrastate transmission pipeline without the required OPID and without procedures and plans necessary to comply with 49 CFR 192 and 199. After the discovery of this jurisdictional system, CEA Dairy RNG Nevada LLC hired a qualified entity to operate and maintain the transmission pipeline facility. The Stipulation which authorized the civil penalty was filed with the PUCN on August 8, 2024 and was designated as Docket No. 24-08022. The Stipulation was voted on and approved by the PUCN on October 28, 2024. On November 19, 2024, CEA Dairy RNG Nevada LLC filed proof of the \$5,000 civil penalty payment being made.

Nevada's PSP and the PUCN also assessed \$77,500 (27 different cases) in civil penalties in 2024 to excavators/operators for violations of Nevada's One-Call Law (NRS 455). Because these violations were not associated with 49 CFR 192, they have not been included in the civil penalty figures above. However, Nevada's PSP believes it is important to inform PHMSA of these penalties given that PHMSA is evaluating States as to whether they have an effective One-Call Law/Enforcement, and these enforcement efforts also include protecting PHMSA jurisdictional interstate pipeline facilities.



Attachment 6 - List of Records Kept

GAS STATE RECORD MAINTENANCE AND REPORTING DURING CY 2024

Records Maintained by the State Agency

Records of inspections, probable violations, follow-up actions and enforcement activities.
Records of expenditures for the Gas Pipeline Safety Program.
Letters, directives, correspondence, certification, authorizations, etc.
Requested Interpretation Requests and Waiver Request Information.
Some NTSB reports and various AID safety releases.
Guidelines for States participating in the Gas Pipeline Safety Program.
Pipeline Safety Regulations (49 CFR Parts 191, 192, 193 and 199) including amendments.
Information related to T&Q training.
Records and correspondence from PHMSA program evaluations.
NAPSR correspondence and NAPSR survey responses
Incident Reports and Investigation Documentation.
Probable Violation Log.
One-Call Enforcement Log.
Pipeline Safety Manual / Procedures
Records for Pipeline Safety personnel Activity Tracking

Reports Required from Operators

Incident reports.
Annual reports.
Annual Results of Drug and Alcohol testing for applicable operators.
Operations Manuals.
LDC quarterly/yearly damage cause data.
Notification emails on excavation damages from larger operators.
Some misc. audit related documents, such as leak trend analyses, ILI Reports, ECDA Reports, etc.
Annual odor call and leak call emergency response times

Attachment 6 Notes

Attachment 7 - Staffing and TQ Training

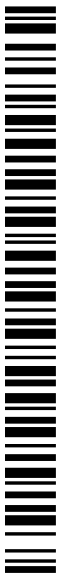
STATE EMPLOYEES DIRECTLY INVOLVED IN THE GAS PIPELINE SAFETY PROGRAM DURING CY 2024

Name/Title	% Time	# Months	Qual. Cat.
Supervisor			
Neil Pascual Senior Gas Pipeline Engineer	48.700	12	II
Paul Maguire Manager Engineering	27.500	12	I
Inspector/Investigator			
Adelere Adesina Gas Pipeline Engineer	96.300	12	I
Carson Alexander Gas Pipeline Engineer	95.100	12	II
Dennis Bott Gas Pipeline Engineer	64.800	12	III
Kelly Everson Gas Pipeline Engineer	98.900	12	II
Mike Evans Gas Pipeline Engineer	96.500	12	II
Neil Pascual Senior Gas Pipeline Engineer	48.700	12	II
Paul Maguire Manager Engineering	24.900	12	I
Clerical and Administrative Support			
Cyndi Martin Administrative Assistant, Carson City	30.890	12	IV

Summary

<u>Employee Type</u>	<u>No. of Staff</u>	<u>Person-Years</u>
Supervisor	2	0.760
Damage Prevention/Technical	0	0.000
Inspectors/Investigators	7	5.250
Clerical/Administrative	1	0.310
Total	10	6.320





Attachment 7 Notes

Pipeline Safety Supervision Time Detail

- Neil Pascual was split 50/50 between Supervisor and Inspector
- Paul Maguire spent approximately 52% of his total work time (2080 hours per year) on pipeline safety base grant activities, with 24.9% performing inspections and 27.5% as a supervisor.

2024 T&Q training classes:

- Daniel 1 (Methane Abatement Class)
- Dennis 1 (This was the 1250 Class)
- Kelly 1 (He went to the Mega Rule Class)
- Carson 3 (These were all IMP Specialty classes)
- Mike 0
- Neil 0
- Paul 0

One of Nevada's more senior inspectors passed away at the beginning of November-2023, and a replacement (Dennis Bott) was on-boarded in Jan-2024. Carson Alexander was hired in mid-May 2022, and he has completed his core T&Q classes plus several specialty T&Q classes. Carson is now qualified to perform all standard level inspections and he is expected to have all specialty classes completed by the end of 2025. Carson is in qualification category II based on his Engineering degree and compilation of TQ training. By May of 2025, Carson will have three years of experience and move to qualification category I.

The Senior Gas Pipeline Engineer position is a half-inspector/half-supervisor position that is why Neil's position is broken up as 50 percent Supervisor and 50 percent Inspector. 97.4% of his time was split between the two positions with the remaining 2.6% spent on State One-Call inspections and enforcement issues which is not allocated against the Base Grant, but instead is charged against Nevada's One Call Grant or paid for by the State itself.

Engineering Manager, Paul Maguire, has all core T&Q classes, including the OQ class, and is fully qualified to lead standard, construction, DIMP, Control Room, LPG and OQ inspections. As such, it is estimated that Paul Maguire will perform roughly 50 to 60 inspection days per year, which equates to 40 percent of the time he spends on pipeline safety activities. The other time Mr. Maguire spends is supervisory in nature, including reviewing NOPV Letters and being on the NARUC pipeline safety Staff subcommittee, the NAPSRLPG and RNG subcommittees and attending NAPSRL regional meetings.

All Nevada pipeline safety engineers/inspectors also perform One-Call inspections and enforcement of Nevada's Call Before Your Dig Law ("NRS 455") and that is why each of those Inspector's time is less than 100 percent. The time spent inspecting and enforcing NRS 455 are tracked separately, and those costs are not included in the Base Grant and are instead allocated to the PHMSA awarded One-Call Grant.

Four of the six Nevada PSP Inspectors in 2024 have completed all the IMP classes and the Root Cause class.

The goal for 2025 is to have Carson Alexander complete all of the specialty TRIMP classes. Also, the plan is to have our newest inspector ~~Dennis Bott~~ complete all of the core classes by the end of 2026.

Attachment 8 - Compliance with Federal Regulations

STATE COMPLIANCE WITH FEDERAL REQUIREMENTS AS OF DECEMBER 31, 2024

No.	Effective Date	Impact	Adoption Date	AdoptionStatus
1		<p>Maximum Penalties Substantially same as DOT (\$266,015/\$2,660,135). State must adopt minimum penalties of at least (\$100,000/\$1,000,000). Indicate actual amount in notes.</p> <p>The PUCN's regulations (NAC 704.460) automatically adopts the latest Federal Pipeline Safety Regulations contained in 49 CFR 191, 192, 193 and 199.</p> <p>The PUCN was successful in getting Senate Bill 86 passed during the 2015 Nevada Legislative Session, which increased Nevada's pipeline safety civil penalty authority amount to the then Federal civil penalty standard of \$200,000 per day per violation to a maximum of \$2 million. The PUCN plans to pursue new legislation in the 2025 Nevada legislative session to adopt the new Federal inflation adjusted civil penalty amount. It is the PUCN's understanding that PHMSA still accepts the \$200,000/\$2 million civil penalty standard as being comparable/acceptable to the PHMSA standard but the PUCN understands that the best scenario is for Nevada's pipeline safety civil penalty authority to match the PHMSA level exactly.</p> <p>The PUCN plans to submit a Bill Draft Request to update the current civil penalty amount to include the annual inflation adjustment as part of the 2025 Nevada Legislative session.</p>	05/2015	Adopted (\$200,000/\$2,000,000)
Note ¹				
2		Part 192 Amendments		
1-115	Pre 2011	[All applicable amendments prior to and including 2010]	12/31/2010	Adopted
Note ¹		Adoption of all amendments prior to 2011		
116 - 76 FR 5494	4/4/2011	Mechanical Fitting Failure Reporting Requirements	04/2011	Adopted
Note ¹				
117-76 FR 35130	8/15/2011	Control Room Management/Human Factors	08/2011	Adopted
Note ¹				
118 - 78 FR 58897	10/25/2013	Administrative Procedures, Updates, and Technical Corrections (Not applicable to States)	09/2013	Adopted
Note ¹				

119 - 80 FR 168	3/6/2015	Periodic Updates of Regulatory References to Technical Standards and Miscellaneous Edits	03/2015	Adopted
Note ¹				
120 - 80 FR 12779	10/1/2015	Miscellaneous Changes to Pipeline Safety Regulations (Part 192.305 DELAYED)	10/2015	Adopted
Note ¹				
121 - 81 FR 70989	4/14/2017	Expanding the Use of Excess Flow Valves in Gas Distribution Systems to Applications Other Than Single-Family Residences	4/2017	Adopted
Note ¹				
123 - 82 FR 7972	3/24/2017	Operator Qualification, Cost Recovery, Accident and Incident Notification, and Other Pipeline Safety Changes	3/2017	Adopted
Note ¹				
124 - 83 FR 58694	1/22/2019	Use of Plastic Piping Systems in the Transportation of Natural and Other Gas	1/22/2019	Adopted
Note ¹				
125 - 84 FR 52180	7/1/2020	Pipeline Safety: Safety of Gas Transmission Pipelines: MAOP Reconfirmation, Expansion of Assessment Requirements, and Other Related Amendments	7/1/2020	Adopted
Note ¹	Pursuant to NAC 704.460, this regulation was automatically adopted			
126 - 86 FR 2210	3/12/2021	Pipeline Safety: Gas Pipeline Regulatory Reform (Delayed to 3/21) (Delayed Compliance date 10/12/2021)	03/12/2021	Adopted
Note ¹				
127 - 86 FR 63266	5/16/2022	Safety of Gas Gathering Pipelines: Extension of Reporting Requirements, Regulation of Large, High-pressure Lines, and Other Related Amendments	05/16/2022	Adopted
Note ¹	Pursuant to NAC 704.460, this regulation was automatically adopted			
128 - 87 FR 26296	5/16/2022	Pipeline Safety: Safety of Gas Gathering Pipelines: Extension of Reporting Requirements, Regulation of Large, High-Pressure Lines, and Other Related Amendments. Response to a Petition for Reconsideration; Technical Corrections; Issuance of Limited Enforcement Discretion	5/16/2022	Adopted
Note ¹				

129 - 87 FR 20940	10/5/2022	Pipeline Safety: Amendments to Parts 192 and 195 to Require Valve Installation and Minimum Rupture Detection Standards.	10/5/2022	Adopted
Note ¹				
130 - 87 FR 52224	5/24/2023	Pipeline Safety: Safety of Gas Transmission Pipelines: Repair Criteria, Integrity Management Improvements, Cathodic Protection, Management of Change, Other Related Amendments, and Technical Corrections	5/24/2023	Adopted
Note ¹	Pursuant to NAC 704.460, this regulation was automatically adopted			
131 - 88 FR 24708	5/24/2023	Pipeline Safety: Safety of Gas Transmission Pipelines: Repair Criteria, Integrity Management Improvements, Cathodic Protection, Management of Change, and Other Related Amendments: Technical Corrections	5/24/2023	Adopted
Note ¹	Pursuant to NAC 704.460, this regulation was automatically adopted			
132 - 88 FR 50056	8/1/2023	Pipeline Safety: Requirement to Valve Installation and Minimum Rupture Detection Standards: Technical Corrections	8/1/2023	Adopted
Note ¹	Pursuant to NAC 704.460, this regulation was automatically adopted			
133 - 89 FR 33264	6/28/2024	Periodic Updates of Regulatory References to Technical Standards and Miscellaneous Amendments	6/28/2024	Adopted
Note ¹				
134 - 89 FR 53880	6/28/2024	Periodic Updates of Regulatory References to Technical Standards and Miscellaneous Amendments; Technical Correction	6/28/2024	Adopted
Note ¹				
135 - 89 FR 53880	6/28/2024	Pipeline Safety: Requirement to Valve Installation and Minimum Rupture Detection Standards:response to Petition for reconsideration; Additional Technical Corrections	6/28/2024	Adopted
Note ¹				
3	Part 193 Amendments (applicable only where state has jurisdiction over LNG)			
1-23	Pre 2011	[All applicable amendments prior to and including 2010]	12/31/2010	Adopted
Note ¹	Adoption of all amendments prior to 2011			
24 - 78 FR 58897	10/25/2013	Administrative Procedures, Updates, and Technical Corrections	09/2013	Adopted
Note ¹				

25 - 80 FR 168	3/6/2015	Periodic Updates of Regulatory References to Technical Standards and Miscellaneous Edits	03/2015	Adopted
Note ¹				
4	Part 199 - Drug Testing			
53 FR 47096	11/21/1988	Part 199 - Drug Testing	04/2000	Adopted
Note ¹				
5	Part 199 Amendments			
1-24	Pre 2011	[All applicable amendments prior to and including 2010]	12/31/2010	Adopted
Note ¹	Adoption of all amendments prior to 2011			
25 - 78 FR 58897	10/25/2013	Administrative Procedures, Updates, and Technical Corrections	09/2013	Adopted
Note ¹				
26 - 80 FR 168	3/6/2015	Periodic Updates of Regulatory References to Technical Standards and Miscellaneous Edits	03/2015	Adopted
Note ¹				
27 - 82 FR 7972	3/24/2017	Operator Qualification, Cost Recovery, Accident and Incident Notification, and Other Pipeline Safety Changes	3/2017	Adopted
Note ¹				
28 - 84 FR 16770	4/23/2019	Conforming Amendments and Technical Corrections to Department Rules Implementing the Transportation Industry Drug Testing Program	04/23/2019	Adopted
Note ¹				
6	State Adoption of Part 198 State One-Call Damage Prevention Program			
a.		Mandatory coverage of areas having pipeline facilities	07/1987	Adopted
Note ¹				
b.		Qualification for operation of one-call system	07/1987	Adopted
Note ¹				
c.		Mandatory excavator notification of one-call center	07/1987	Adopted
Note ¹				

d. Note ¹	State determination whether calls to center are toll free	07/1987	Adopted
e. Note ¹	Mandatory intrastate pipeline operator participation	07/1987	Adopted
f. Note ¹	Mandatory operator response to notification	07/1987	Adopted
g. Note ¹	Mandatory notification of excavators/public	07/1987	Adopted
h. Note ¹	Civil penalties/injunctive relief substantially same as DOT Civil penalty amounts were increased in 2015 as part of Senate Bill 86.	10/1991	Adopted

¹If Adoption Status is No, Please provide an explanation

State Attendance at 2024 NAPS Regional Meeting:

Attended full time (Lead rep or alternative pipeline staff)

Frequency of General Legislative Session: Biennially



Attachment 8 Notes

The PUCN's regulations (NAC 704.460) automatically adopts the latest Federal Pipeline Safety Regulations contained in 49 CFR 191, 192, 193 and 199.

The PUCN was successful in getting Senate Bill 86 passed during the 2015 Nevada Legislative Session, which increased Nevada's pipeline safety civil penalty authority amount to the then Federal civil penalty standard of \$200,000 per day per violation to a maximum of \$2 million. The PUCN is attempting during the 2025 legislative session to adopt the new Federal inflation adjusted civil penalty amount. It is the PUCN's understanding that PHMSA still accepts the \$200,000/\$2 million civil penalty standard as being comparable/acceptable to the PHMSA standard, but the PUCN understands that the best-case scenario is for Nevada's pipeline safety civil penalty authority to exactly match the PHMSA level.

The PUCN was successful in getting new legislation passed (during the current 2021 session) to have the blanket exemption for natural gas utilities from having to have professional engineers review and stamp interstate natural gas utility projects removed. This legislation change was a result of the NTSB recommendations that came out of the 2018 Merrimack Valley, MA, pipeline safety incident and report. The new legislation was passed via Assembly Bill 173 during the 2021 Nevada Legislative Session. A Rule Making Docket, Docket No. 21-06039, was opened by the PUCN after the passage of the bill and that Rule Making Docket outlines, via regulations, what types of natural gas utility projects require the review of a Nevada licensed professional engineer. The NTSB has officially closed out the Recommendation issued to the State of Nevada stemming from the 2018 Merrimack Valley, MA pipeline safety incident.

During the 2023 Nevada Legislative Session, the PUCN was successful in getting Senate Bill 27 passed which removed the blanket hand tool exemption from Nevada's One-Call Law, NRS 455. This change in the law should help reduce excavation damages even further than record low levels currently being achieved.

Nevada ideally sends two representatives to the NAPSRS Western Region meeting but may send one depending on availability. In 2024, both Neil Pascual and Paul Maguire attended the NAPSRS Western Region meeting. Neil attended the 2024 NAPSRS National meeting.

Nevada ideally sends two representatives to the NAPSRS Western Region meeting but may send one depending on availability. In 2024, both Neil Pascual and Paul Maguire attended the NAPSRS Western Region. Neil attended the 2024 NAPSRS National Meeting.

Attachment 10 - Performance and Damage Prevention Questions

CALENDAR YEAR (CY) 2024

Planned Performance: What are your Planned Annual and Long-term goals for your Pipeline Safety Program?

The Nevada Pipeline Safety Program will continue to audit and/or inspect every jurisdictional operator in Nevada. This includes our quarterly audits of our three LDC inspection units, which comprises approximately 90 percent of the jurisdictional pipeline in Nevada.

In addition to these quarterly audits, which focus on documentation and procedures, the Nevada Pipeline Safety Program will also conduct various field inspections. These field inspections are a core to pipeline safety as construction inspections provide one of the only opportunities to observe the pipeline as it goes into the ground. Operations and maintenance are the other component of field inspections ensuring that our operator's maintenance activities adhere to both federal code and their own operations manuals.

As the new annual leak survey regulation in Nevada enters its third year in 2025, we will continue to work with our operators to disseminate the leak data. Annual leak data that encompasses a leak survey of all natural gas pipeline provides unprecedented insight to leak trends and impacts to Operator's DIMP plans.

Nevada has six qualified inspectors and one new inspector going through PHMSA Training and Qualifications. Our goal is to have a staff that is fully trained to perform all applicable inspections.

Along with construction and O&M inspections, addressing the rapid expansion of our state includes a focus on damage prevention. As one of the leading threats to most pipelines, damages have an even greater potential in a state with the growth of Nevada. A deadline driven construction industry with new excavators appearing each week adds to the impetus to continue efforts to drive down damages.

Past Performance: What did the Pipeline Safety Program accomplish during the subject year (to this document) to contribute toward the program's annual and long-term goals?

In 2024, the Nevada Pipeline Safety Program achieved audits on 100% of our operators, including quarterly audits on our LDCs. One of those quarterly audits focused on Damage Prevention. Our operators completed their second year of annual leak surveys. The data indicates that over 200 grade 1 leaks were discovered in 2023 in areas that would not have been scheduled for a leak survey in the current year.

1. Has the state or agency reviewed the Damage Prevention Assistance Program (DPAP) document in the last twelve months?

Yes

2. Has the state or agency developed or is in the process of developing a plan to address the nine elements contained in the PIPES Act of 2006 for an effective State Damage Prevention Program?

Yes

If yes to question 2, where does the state or agency stand on implementation of the nine elements contained in the PIPES Act of 2006? Please provide a description of how the state or agency has or will meet each element. If not, please provide a brief passage explaining the reasons why the state or agency has not.

All 9 Elements have been implemented by Nevada. The majority of the Elements have been implemented through the Nevada Regional Common Ground Alliance ("NRCGA"). Implementation of Elements 6 and 7 (Enforcement) is primarily a function of the Public Utilities Commission of Nevada ("PUCN"), its pipeline safety program ("PSP") and its Staff legal department.

Element (1), Enhanced Communications between operators and excavators.

Nevada's One-Call Center, USA North ("USAN"), is a member of the NRCGA and participates in the monthly NRCGA meetings.

These meetings and USAN's participation gives all stakeholders (operators and excavators) the opportunity to discuss the operations of the One-Call Center. As of January 2025, the PUCN has implemented the use of Positive Response. Through the One-Call Center, ticket stakeholders (excavators, operator and locators) are able to determine ticket status up to completion.

Element (2), Fostering Support and partnership of all stakeholders.

This has been accomplished through the participation of operators, excavators, USAN, and the PUCN pipeline safety program Staff during the monthly NRCGA meetings. At least one member of the PUCN's pipeline safety group typically attends the monthly NRCGA meetings which are video linked to both Reno and Las Vegas.

Element (3), Operator use of performance measures for locators.

The two local distribution companies ("LDCs") Southwest Gas and NV Energy have Quality Assurance/Quality Control ("QA/QC") measures for locators and use the QA/QC measures to drive improvements. Additionally, both operators track the cause of each damage, including miss-marks and report that data on an annual basis to the CGA DIRT database. These damage numbers are reviewed at least quarterly/yearly (depending on Operator size), in order to track locating company performance.

Element (4), Stakeholder partnership in employee training.

Excavator training has been developed and implemented through the NRCGA with the assistance of the PUCN pipeline safety group and LDC operators. Training sessions are held on a regular basis, and on-site training sessions are available and are often put on at excavating company offices in order to allow for more training and easier access.

Element (5), Partnership in Public Education.

The PUCN is a paying member of the NRCGA. The NRCGA has a Public Outreach Sub-Committee, which the PUCN Staff also participates in. 811 Banners have been purchased and distributed to equipment rental yards and Home Shows are attended where 811 Call-Before-You-Dig information is handed out. The PUCN Staff, via its Public Outreach Director, regularly attends Home/Trade Shows both in Northern and Southern Nevada and to distribute literature regarding safe digging practices and the use of 811. The goal of these efforts is to increase public awareness and education of the 811 program. Additionally, the NRCGA placed numerous educational booths events local events (such as contractor and builder gold tournaments) in order to promote safe digging practices and the use of 811.

Element (6), Enforcement agencies role to help resolve issues.

The PUCN has authority to enforce Nevada's One-Call Law (NRS 455). Verbal warnings are given in the field for minor violations that are discovered. If the verbal warnings are not effective and repeat violations are observed, a formal written Warning Letter is sent from the PUCN Staff Legal Counsel to the violating operator/excavator. If further violations are found after a Warning Letter has been issued or if egregious acts are discovered, the PUCN Staff can file a Formal Complaint Petition with the PUCN requesting civil penalties be assessed against those operators/excavators who continually violate and/or egregiously violate NRS 455.

Element (7), Fair and consistent enforcement of the law.

Nevada's One-Call Statute, NRS 455 was revised during the 2007 legislative session to include Enforcement by the PUCN Staff. Since that time the PUCN Staff, with the help of its Staff Counsel Division, has developed procedures for enforcing NRS 455. Additionally, in 2015 the civil penalty amounts outlined in NRS 455 were increased from \$1000 per day per violation to \$2,500 per day per violation. Also, there is now a provision in the law that allows the civil penalty amount to be tripled if the violation involves high consequence facilities, such as pipelines operating above 90 PSI. In 2023, legislation was passed to include hand-digging as part of excavation to help foster a reduction of damages from hand-held equipment such as ground rod stakes.

Element (8), Use of Technology to improve the locating process.

USA North has worked with the NRCGA to develop an app for ticket management for contractors to provide information whether a request is valid, expired or in process. This will especially be helpful for contractors with managing multiple dig tickets. There is also a drive to promote on-line ticket processing. The PUCN is working with the NRCGA to explore new technologies such as ticket management systems for contractors and ground penetrating radar (GPR) to enhance potholing identification.

Element (9), Data analysis to continually improve program effectiveness.

The primary measure of program effectiveness is the number of dig-ins by year and the number of damages per 1000 tickets. Nevada has been tracking this data since 2000. In 2023 the 1.53 gas damages per 1,000 tickets represents the lowest amount in the program's history. Preliminary data shows that we were able to maintain this low damage rate in 2024 with 1.54 damages per 1000 tickets.

Attachment 10 Notes