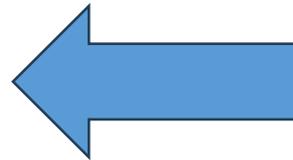




Welcome to the 2026 Wisconsin Pipeline Safety Seminar

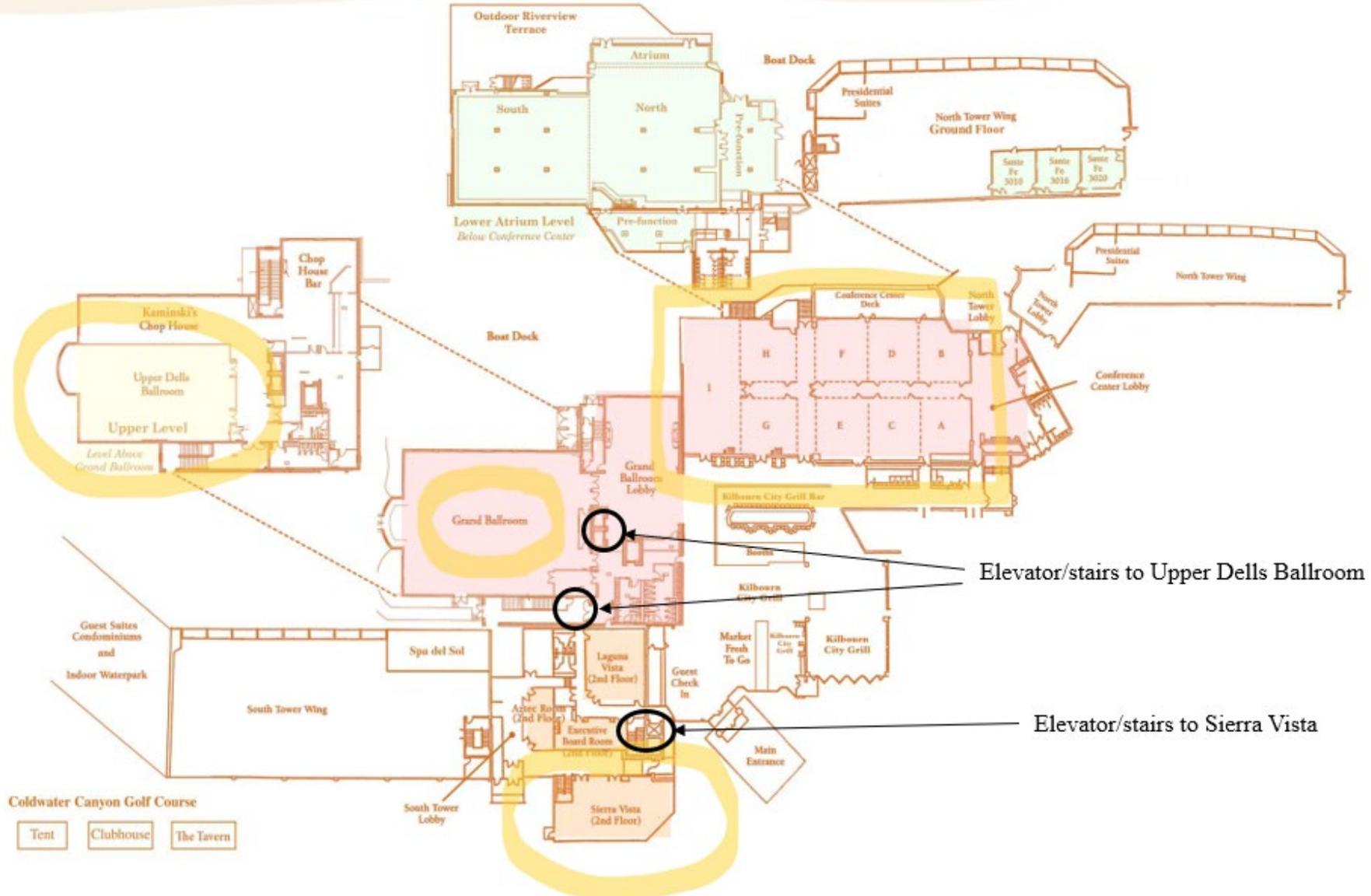
February 4-6, 2026

*REGISTRATION is down the hall past the
vendor room*



Chula Vista Facility Layout

River





Welcome to the 2026 Wisconsin Pipeline Safety Seminar

February 4-6, 2026

Chairperson Summer Strand
Public Service Commission of Wisconsin



Public Service Commission of Wisconsin Overview

Pipeline Safety Seminar

February 4, 2026

Alex Kirschling

Pipeline Safety Program Manager

Public Service Commission of Wisconsin

PSC Mission Statement

- The Public Service Commission of Wisconsin (PSC) ensures safe, reliable, affordable, and environmentally responsible utility services and equitable access to telecommunications and broadband services.

Who is the Public Service Commission?



- Since 1907, the Public Service Commission (PSC) has been responsible for the regulation of Wisconsin public utilities, including those that are municipally owned.
- Types of utilities regulated include electric, natural gas, water, and certain aspects of local telephone service. More than 1,100 utilities are under the agency's jurisdiction. Most of these must obtain PSC approval before:
 - Setting new rates
 - Issuing stocks or bonds
 - Undertaking major construction projects such as power plants, water wells, and transmission lines.
 - The PSC does not regulate cable TV, cellular phones, cellular towers, internet service providers, LP gas, or fuel oil.

The PSC is composed of three full-time Commissioners that have oversight of all PSC staff related activities. Commissioners serve staggered, six-year terms



**Chairperson
Summer Strand**



**Commissioner
Kristy Nieto**



**Commissioner
Marcus Hawkins**

- Bureau of Rates and Finance
- Bureau of Audit and Accounting
- Bureau of Electric Analysis and Engineering
- Bureau of Natural Gas Analysis and Safety

- Review gas supply plans
- Review Purchased Gas Adjustments (PGA)
- Review natural gas construction projects and territorial agreements
- Investigate one-call complaints
- Administer the Wisconsin Pipeline Safety Program

Which was in effect first?

49 CFR 192 (federal pipeline safety regulations)

OR

PSC 135 (WI state pipeline safety regulations)

Which was in effect first?

**49 CFR 192 (federal pipeline safety regulations)
1970**

OR

**PSC 135 (WI state pipeline safety regulations)
1952**

1952 Original PSC 135 highlights

- A) Leak detection program & records
- B) Checks whenever a road is paved or re-paved
- C) When a leak is found/repared, further check in vicinity
- D) When leak is fixed, record nature/cause of leak
- E) Regulator inspections
- F) Various construction requirements
 - Over-pressure protection, relief vents terminating outdoors, regulator station valves & inspections, corrosion control
- G) Service purged outside when placed into service
- H) Promote efforts towards the reduction of corrosion
- I) 20% LEL odorization & sniff tests

State Pipeline Safety Program

- Pipelines are regulated by U.S. Department of Transportation
- The specific office is the Pipeline and Hazardous Materials Safety Administration (PHMSA)
- Pipeline Safety Act of 1968 allowed for states to assume safety authority over intrastate pipelines
 - Intrastate = non-FERC regulated
 - Exists today in 49 USC 60105
- Delegation of Responsibility: US DOT (Secretary of Transportation) -> PHMSA -> States

State Pipeline Safety Program

- Certification Requirements
 - Adopt PHMSA's regulations within certain timeframes
 - Enforce regulations through inspections with qualified staff
 - Ability to enforce civil penalties substantially the same as PHMSA
 - Encourage and promote damage prevention program
 - Sufficient staffing
 - May adopt more stringent regulations (PSC 135)

State Pipeline Safety Program

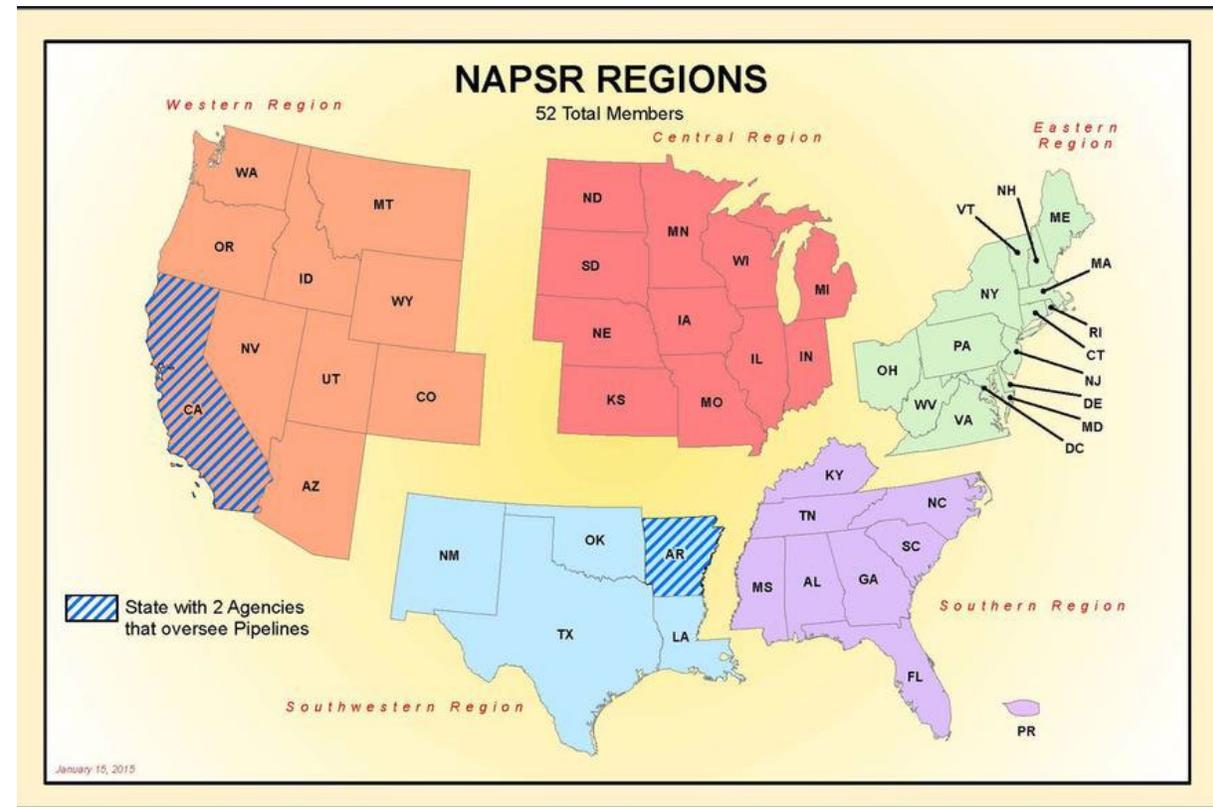
- Performance based grant
 - 50% based on field evaluation
 - 50% based on certification agreement
- Maximum of 80% funding
 - Congress usually allocates ~60%
- ~\$1million for WI in calendar year 2025

State Pipeline Safety Program

- Other Program Requirements
 - Follow PHMSA State Program Guidelines
 - 85 days in the field per inspector (~600-700 as a group)
 - Conduct comprehensive inspection of each operator every 5 years
 - Attend mandatory training classes at TQ in OKC (~15 weeks)
 - Conduct operator training and host state seminar every 3 years

What is NAPSAR?

- National Association of Pipeline Safety Representatives
- Represents all State pipeline safety personnel



What is NAPSRS?

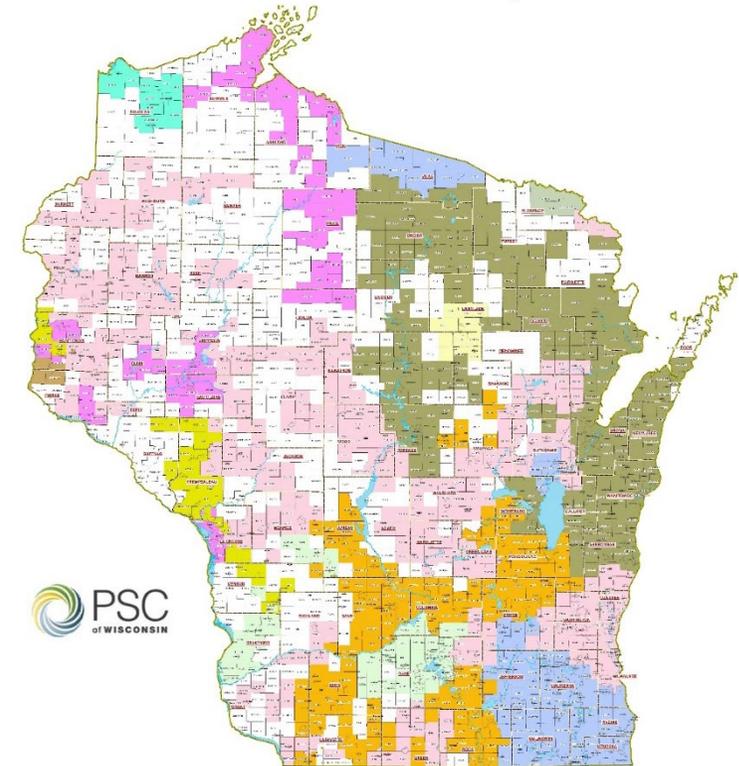
- Established in 1982
- NAPSRS members oversee:
 - 99% gas distribution
 - 35% gas transmission
 - 93% gas gathering
 - 31% hazardous liquids
 - 80% LNG facilities



Wisconsin Pipeline Safety Program

- 11 local distribution companies
- 12 other pipeline operators
 - RNG/biogas
 - Direct sale transmission
- 71,000 miles services, main, transmission
- +2 million gas customers served
- No jurisdiction over propane or hazardous liquids

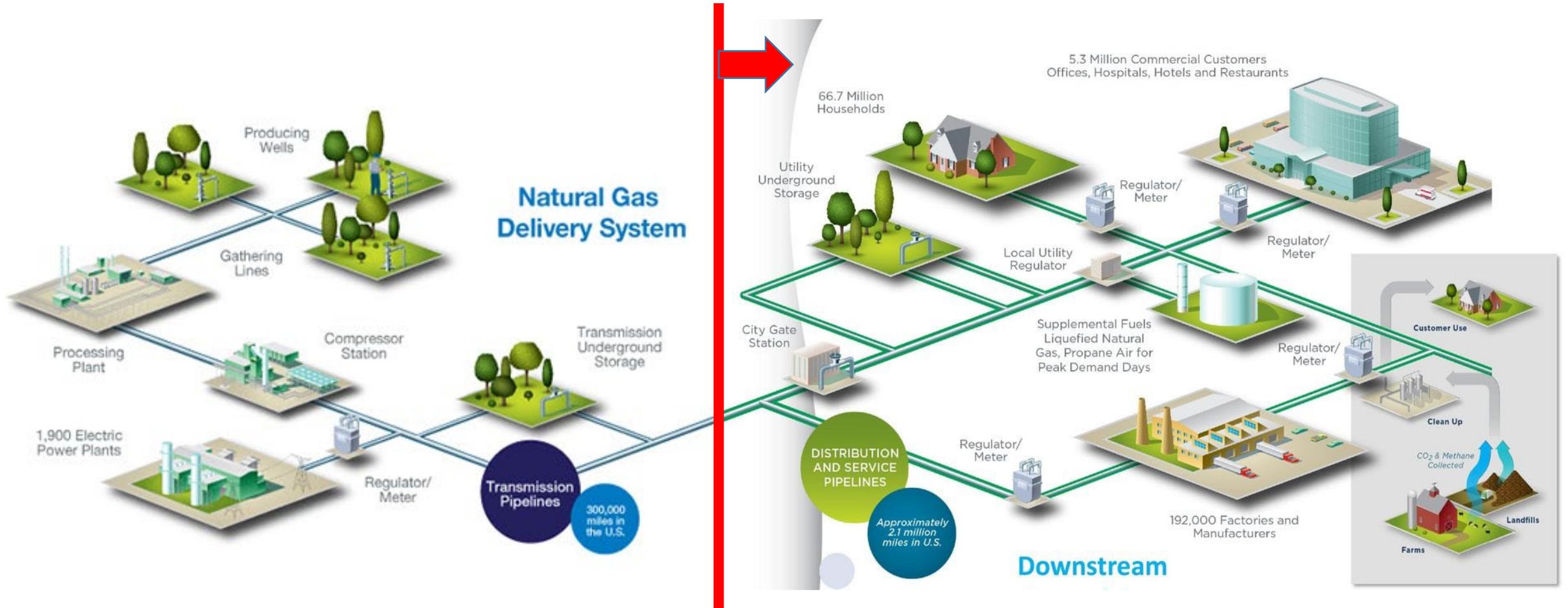
Wisconsin Natural Gas System



Wisconsin Natural Gas Utilities

- | | |
|---|--|
|  City Gas Company |  St. Croix Valley Natural Gas Company |
|  Florence Utility Commission |  Superior Water, Light, & Power Company |
|  Madison Gas and Electric Company |  Wisconsin Electric Power Company |
|  Midwest Natural Gas Incorporated |  Wisconsin Gas |
|  Northern States Power Company - Wisconsin |  Wisconsin Power and Light Company |
| |  Wisconsin Public Service Corporation |

What does the PSC inspect?



PSC Pipeline Safety Group - 2024



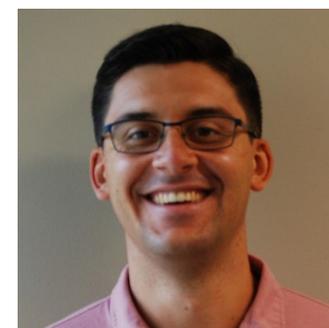
Alex Kirschling



Andrew Baader



Jake Boebel



Bryce Graveline



Andrew Lindquist



Sam Quon



Alex Rodriguez



Evan Uphoff



Dagmar Vanek

PSC Pipeline Safety Group - 2026



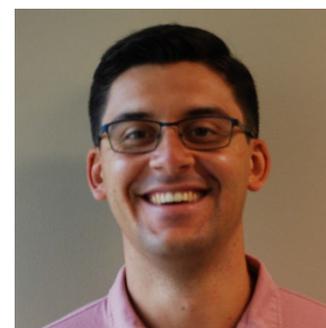
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Evan Uphoff



Dagmar Vanek

PSC Pipeline Safety Group - 2026



Alex Kirschling



Evan Uphoff
Supervisor



Andrew Baader
WEGO, Midwest



Bryce Graveline
WPS, City Gas



Joe Murphy
Xcel, SCVNG



Mason Ihrke
Florence, WG



Scott Schneider
Alliant, Superior



Ahmed Saied
MGE, WG



Noah Hanselman
WEGO



Zuzana Repka
WPS

Inspection types

• Field Inspections

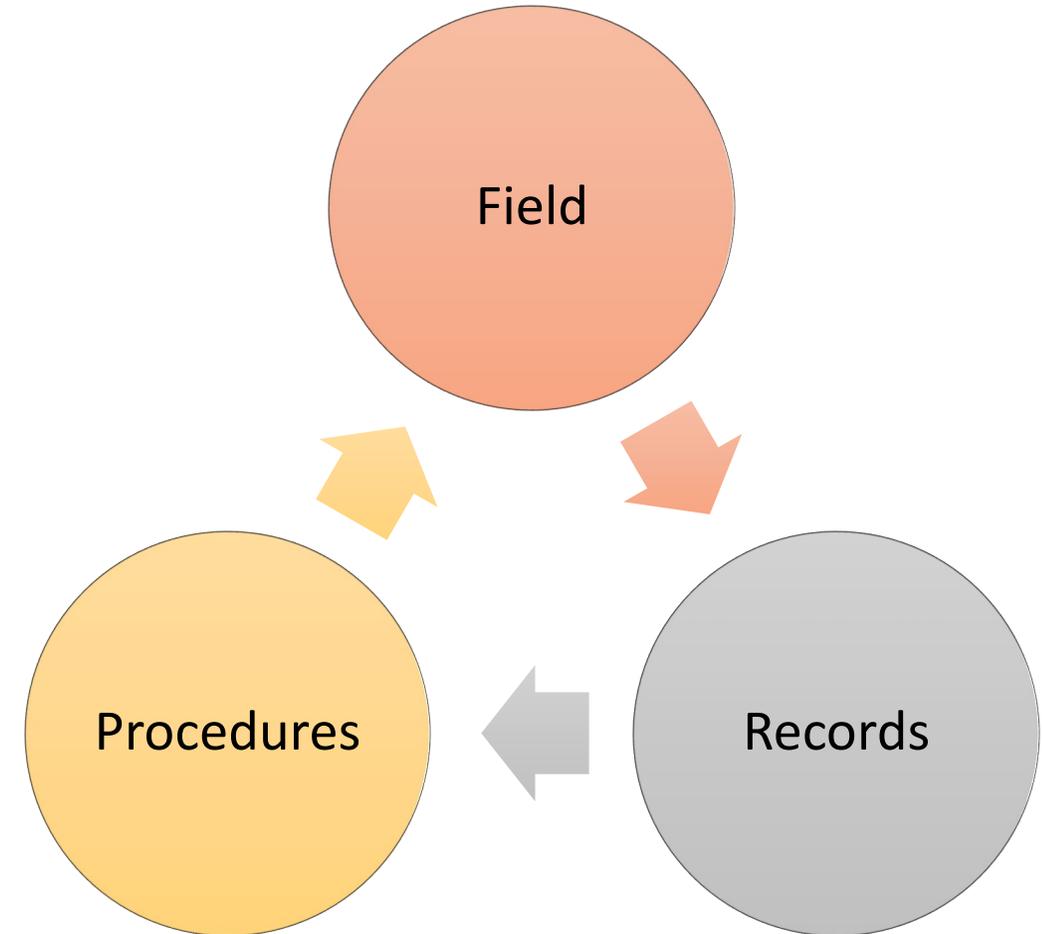
- O&M Field Reviews
 - Cathodic Protection
 - Overpressure Protection
 - Odorization
 - Valve maintenance
 - Leak surveys/patrols
- Construction, Testing, & Design
- Fusion/Welding Qualifications
- ILI & ECDA evaluations
- Incident Investigations
- Damage Prevention
- LNG Facilities

• Office Inspections

- O&M Procedures
- O&M Records
- Integrity management (TIMP & DIMP)
- Operator Qualification (OQ)
- Public Awareness Plan (PAP)
- LNG Facilities
- Control Room Management (CRM)
- Drug & Alcohol (D&A)

Inspections – What is the PSC looking at?

- Procedures
 - Does the operator have adequate procedures?
 - Do issues noted in the field/records require procedural changes?
- Field
 - Are the procedures being followed?
 - Any changes needed to procedures based on field observations, incidents, or near misses?
- Records
 - Are adequate records kept to demonstrate compliance?
 - Is there documentation when issues are resolved?
 - Are issues being followed up on in a timely manner?



After the inspections:

- We are required to give an exit interview
- My expectation is that our group is communicating any preliminary concerns prior to leaving the site
- Any findings are sent to a company officer via letter
 - Lists any probable violations or watch list items
 - Posted publicly to the PSC's electronic records filing system
 - Response required typically within 30 days
- Findings we ultimately include in a letter should not be a surprise

After a letter is sent:

- We are required to follow up on findings
 - Quarterly responses to probable violations until resolved
- Once an issue is resolved we “close” it in the next letter
- Issues that aren’t promptly resolved or particularly egregious violations may result in civil penalties
- The inspection cycle starts over

More on inspection findings and priorities on Friday

PSC/PHMSA Regulatory Updates

PSC 135 – Gas Safety

- We must adopt PHMSA's rules, typically every 2-3 years
- State will not allow us to auto-adopt the rules
- Rulemaking docket 1-AC-258
- Rule effective 8/1/25

PSC 135 updates

- Majority of changes minor
- Adopts PHMSA regulations through 6/2024 including 191
- Prohibits master meter operation absent Commission waiver
- Clarification for gathering lines
- No incidental gathering for high-pressure steel pipeline leaving operator property
- Move 135.319(cw) to a more logical place (not offshore pipe)
- Move 135.714 to 135.711 due to new transmission repair rule
- 135.375 removed, repetitive to federal code

PSC 135 updates

- One notable change regarding services unused for 10 years

Section 11. PSC 135.727 (hw) (intro.) is amended to read:

~~(hw) Special efforts shall be made to include services which have not been used for ten years in a way that will remove gas from the customers' premises.~~ Each operator shall have a plan in its operating and maintenance procedure for sealing off the supply of gas to all distribution facilities for which there is no planned use including service lines, mains, control lines, equipment, and appurtenances. The plan shall include all of the following provisions:

Section 12. PSC 135.727 (hw) (4) is created to read:

(4) A service line that has not been used for ten years and does not have a planned use shall be abandoned. In circumstances where there is a planned use for a service line which has not been used for ten years or it is not feasible to abandon a service line, take additional measures to protect the service from damage. Additional measures include all of the following:

- (a) Ensuring the service line has a means for locating.
- (b) Marking the presence of the service line by line marker or similar means if feasible.
- (c) Annually notifying the customer in writing of the service line's presence to determine if there is a planned use for the service line.

PSC 134 – Gas Service Standards

- Contains requirements for public utilities serving gas
- Billing, disconnections, applying for service, meter testing
- PSC 134 has not been updated since 1989, with some sections dating to the 1950s or 60s
- Complete re-write attempted in 2000s, but was never passed

PSC 134 – Gas Service Standards

- Commission received waiver request from 7 utilities in docket 5-GI-120
- Request asked for a waiver to modify some gas meter testing requirements in PSC 134 and some in a previously granted waiver
- Commission has issued 2 orders
 - First partially granted request and asked for additional information
 - Second denied the remaining requests and directed staff to address during the rulemaking

PSC 134 – Rulemaking next steps

- Docket 1-AC-260
- LIMITED to gas meter testing
- Next step – SoS was revised to also include PSC 135.744
 - Leak, lockup, and flow tests are tied to meter testing intervals
 - Currently awaiting approval from Governor’s office
- If SoS approved, next step is to establish advisory committee
 - Committee will meet ~3 times to discuss rule
 - Potential topics include ultrasonic meters, sample testing requirements, reporting requirements, other test intervals, etc.
 - Timeline – early 2026

PHMSA Updates & Priorities

- Standards Update I – effective 6/28/2024
 - Updates incorporated by reference standards in 192
 - Steel pipe/fittings, integrity management, propane, etc.
 - Some standards of note
 - API 5L (2018)
 - API 6D (2021)
 - API 1104 (2013)
 - ASME B31.8S (2018)
 - MSS SP-44 (2019)
 - NFPA 58 (2020)
 - NFPA 59 (2017)

PHMSA Updates & Priorities

- Entirely new leadership
 - Administrator – Paul Roberti
 - Deputy Administrator – Ben Kochman
 - Chief Counsel – Keith Coyle
 - Government/International/Public Affairs – Emily Wong
- Many other career officials (non-inspectors) took buyout

PHMSA Updates & Priorities

- Pipeline Safety Reauthorization – 2026
 - Congress extends the funding and legal authority for federal agencies to operate
 - Sets funding for PHMSA in addition to grant \$ for state programs
 - Typically every 4-5 years for PHMSA
 - Congress includes new/revised mandates which ultimately result in statute changes
 - House/Senate currently have draft bills circulating

PHMSA Updates & Priorities

- PHMSA keeps an updated chart of the status of its rulemakings
 - [PIPES Act Web Chart | PHMSA](#)

Rule Title/Subject/Docket No.	RIN	Rule Stage	Legislation	Description of Work Plan	Rulemaking Timeline (*actual date)	
OPS: Gas Pipeline Leak Detection	2137-AF51	Final Rule	PIPES Act 2020 Sec 113	Complete Final Rule	To OST To OMB FR Pub	TBD TBD TBD
OPS: Safety of Gas Distribution Pipelines	2137-AF53	NPRM	PIPES Act 2020; Leonel Rondon Act Sec 202, 203, 204, and 206	Hold GPAC meeting	To OST To OMB FR Pub	2/14/23* 4/18/23* 9/7/23*
OPS: Amendments to Liquefied Natural Gas Facilities	2137-AF45	NPRM	PIPES Act 2016 Sec 27; PIPES Act 2020 Sec 110	Complete NPRM	To OST To OMB FR Pub	1/30/26 3/16/26 6/29/26
OPS: Pipeline Operational Status	2137-AF52	NPRM	PIPES Act 2020 Sec 109	Complete NPRM	To OST To OMB FR Pub	10/5/26 11/18/26 2/26/27
OPS: Carbon Dioxide and Hazardous Liquid Pipelines	2137-AF60	NPRM	Pipeline Safety Act 2011 Sec 15	Complete NPRM	To OST To OMB FR Pub	TBD TBD TBD

PHMSA Updates & Priorities

- 1/2025 – Leak Detection and Repair rule was issued in final days of previous administration and immediately rescinded by Executive Order by new administration
 - Strengthened leakage survey and patrolling requirements
 - Performance standards for advanced leak detection programs
 - Leak grading and repair criteria with mandatory repair timelines
 - Requirements for mitigating emissions from blowdowns
 - Pressure relief device design, configuration, and maintenance requirements
 - Clarified requirements for investigating failures
- LDAR rule is required by 2020 PHMSA Reauthorization
- Future status uncertain

PHMSA Updates & Priorities

- ADB-2025-01 Pipeline Safety Management Systems
 - PHMSA strongly encourages regulated pipeline owners and operators to take the following actions to strengthen their pipeline safety programs:
 - Implement a PSMS program and ensure that the program covers all essential elements of an effective PSMS, such as those in API RP 1173.
 - Ensure the PSMS program continuously evolves and improves.
 - Maintain a positive safety culture that continually promotes diligence throughout the operator's organization and addresses issues that can erode the safety culture.
 - Addresses an NTSB recommendation and satisfies a congressional mandate from 2020 reauthorization

PHMSA Updates & Priorities

- May-June 2025 – PHMSA issued 3 Advanced Notice of Proposed Rulemakings
 - Liquefied Natural Gas (LNG)
 - Repair Criteria for Gas Transmission and Hazardous Liquids
 - Mandatory Regulatory Review
- ANPRMs gather feedback before formal proposed rules are issued
- Next step likely NPRM for each of these

PHMSA Updates & Priorities

Section 114

- Self-executing mandate from 2020 reauthorization
- O&M plans must address the replacement or remediation of pipelines that are known to leak based on the material (including cast iron, unprotected steel, wrought iron, and historic plastics with known issues)
- Pipeline operators must update their plans to minimize, among other things, fugitive emissions and vented emissions from pipeline facilities
- PHMSA and state authorities were required to inspect operators' revised O&M plans in calendar year 2022
- ADB-2021-01

PHMSA Updates & Priorities

Section 114

- 6/16/2025 – ADB-2021-01 rescinded
- PHMSA's inspection form has been rescinded
- We have been advised we do not need to complete these inspections again moving forward
- Statute still exists – your O&M plans still need to address those items

PHMSA Updates & Priorities

7/1/25 - PHMSA issued 28 separate rulemaking actions

- Combination of Direct Final Rules, and NPRMs
 - 2 Final Rule Corrections
 - Amends 192.624(a)(1) regarding traceable, verifiable, and complete records for pipelines installed prior to 1970
 - Clarifies incorporation of 2018 version of ASME B31.8S rather than combination 2004/2018
 - 6 NPRMs
 - Adds exception to 192.481(d) if pipeline is replaced
 - Deadlines for ACVG/DCVG surveys required after pipeline construction
 - Incidental gathering applicability for repaired/replaced pipelines
 - Codify in-plant piping system definition and exception
 - Class location change pressure test requirements
 - Special permit conditions

PHMSA Updates & Priorities

7/1/25 - PHMSA issued 28 separate rulemaking actions

- 20 DFRs
 - 16 are individual incorporated by reference standards
 - 1 DFR adds definition of day to address weekend filings in 190
 - 3 DFRs received adverse comments – PHMSA was required to withdraw
 - Proposed change to the annual report deadline to June
 - Proposed addition of drones/satellites to patrol methods
 - Proposed clarification to incident definition to exclude permit cost & cost to remove/replace infrastructure not damaged by the release
- Next step – some of those DFRs have gone into effect, other NPRMs will go through rulemaking process, and other DFRs that received adverse comments are TBD

PHMSA Updates & Priorities

8/21/25 – Standards Update II

- Effective 1/10/2026
- Updates an additional 19 incorporated by reference standards (13 gas)
- Plastic fittings/fusion, integrity management assessments, etc.
- Some standards of note
 - ASTM D2513 (2020)
 - ASTM F2620 (2020)
 - NACE SP0102 (2017)
 - NACE SP0502 (2010)

PHMSA Updates & Priorities

- 1/14/26 – Class Location Change Requirements
 - Effective 3/16/2026
 - Addresses transmission pipeline class location change to class 3
 - Adds integrity management approach option vs. pressure test
 - Codifies requirements PHMSA has granted in special permits into 192.611(a)(4)
 - Segments confirmed in accordance with this rule must be considered an HCA

PHMSA Updates & Priorities

- Other rules at various stages
 - LNG - NPRM
 - Safety of Gas Distribution – GPAC meeting
 - Pipeline Operational Status – NPRM
 - CO2 - NPRM

PHMSA Updates & Priorities

- Does the PSC/NASPR get to participate in PHMSA's rulemaking process differently than other stakeholders or members of the public?

PHMSA Updates & Priorities

- Does the PSC / ASPR get to participate in PHMSA's rulemaking processes differently than other stakeholders or members of the public?

NO

Questions?



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