PSC Inspection Priorities and Findings

Alex Kirschling, Pipeline Safety Program Manager
Public Service Commission of Wisconsin

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PHMSA Reportable Incident

191.3 “incident” means:

(1) An event that involves a release of gas from a pipeline, gas from an underground natural gas storage facility (UNGSF), liquefied natural gas, liquefied petroleum gas, refrigerant gas, or gas from an LNG facility, and that results in one or more of the following consequences:

(i) A death, or personal injury necessitating in-patient hospitalization;

(ii) Estimated property damage of $139,700 or more (adjusted annually for inflation)

(iii) Unintentional estimated gas loss of three million cubic feet or more.

(2) An event that results in an emergency shutdown of an LNG facility or a UNGSF. Activation of an emergency shutdown system for reasons other than an actual emergency within the facility does not constitute an incident.

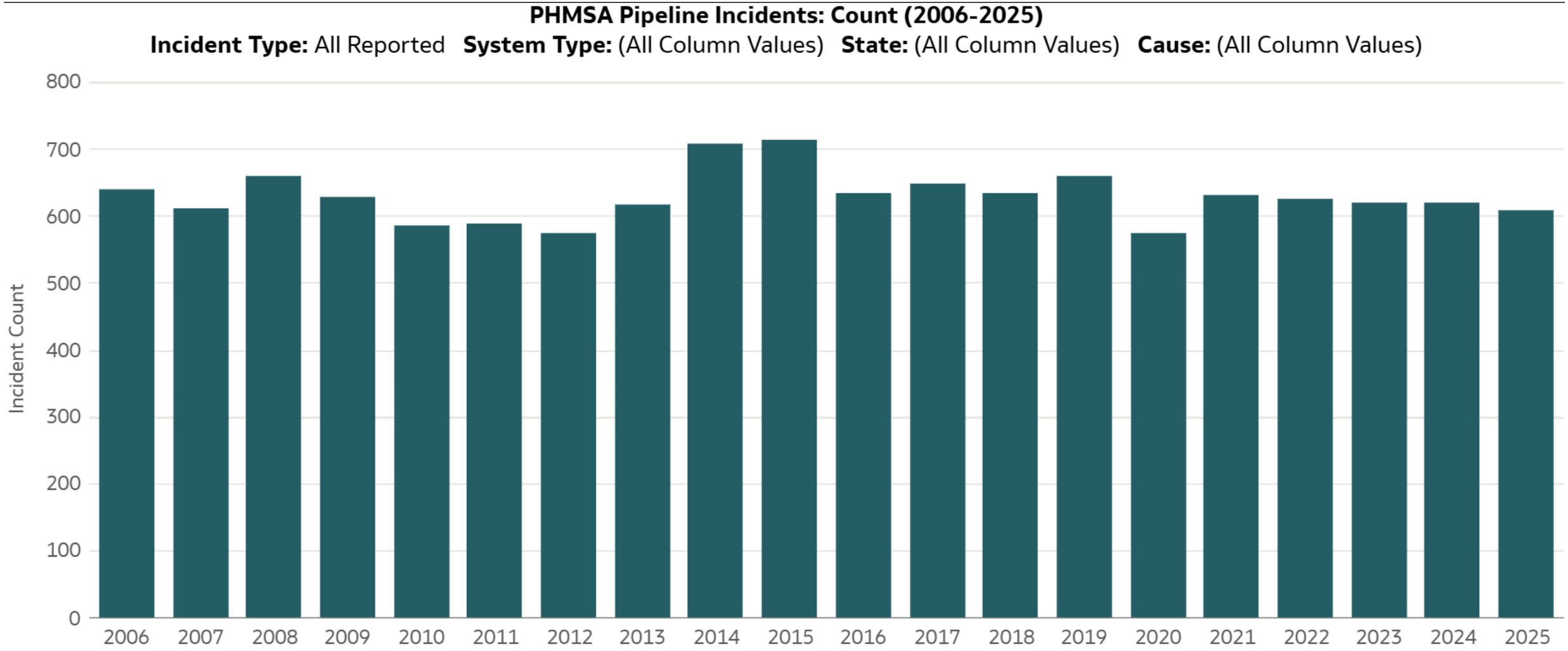
(3) An event that is significant in the judgment of the operator, even though it did not meet the criteria of paragraph (1) or (2) of this definition.

How many federally reportable incidents in Wisconsin from 2024-2025?

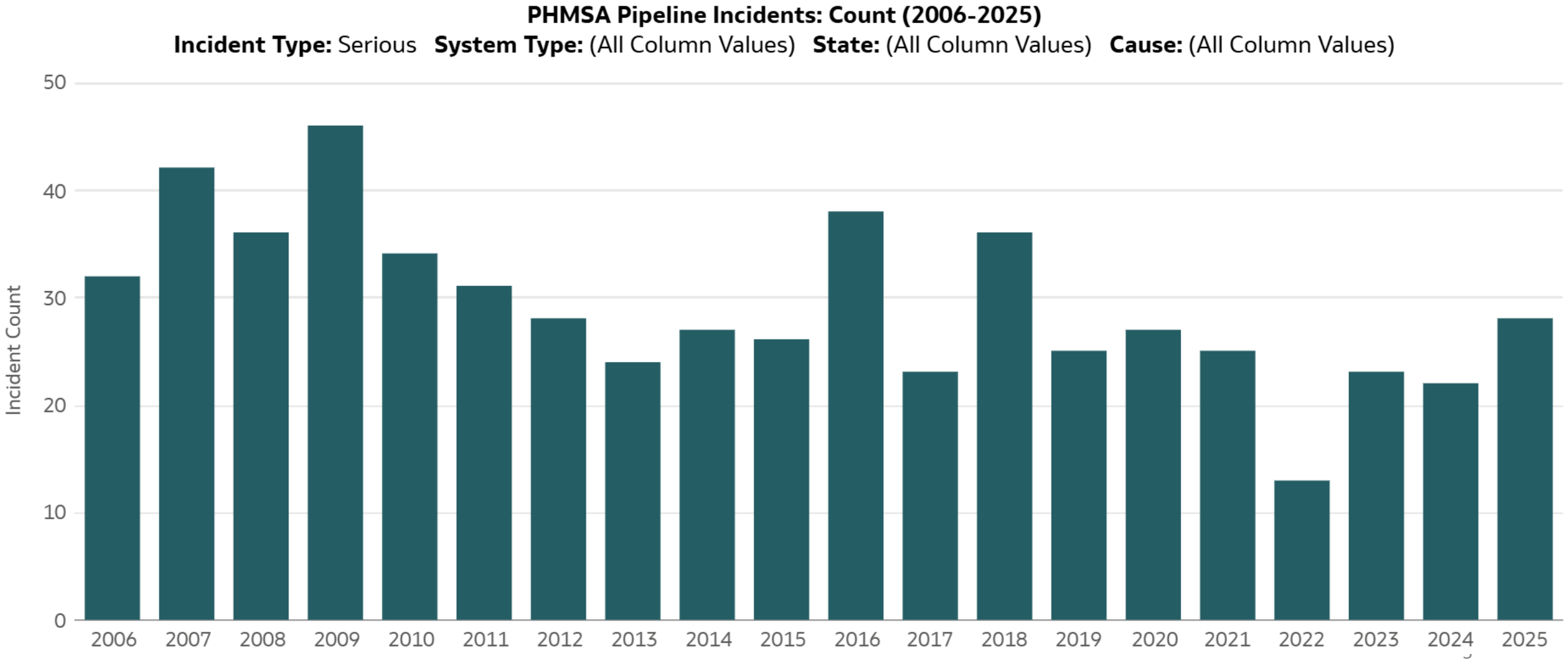
2*

*Both LNG emergency shutdowns due to gas release

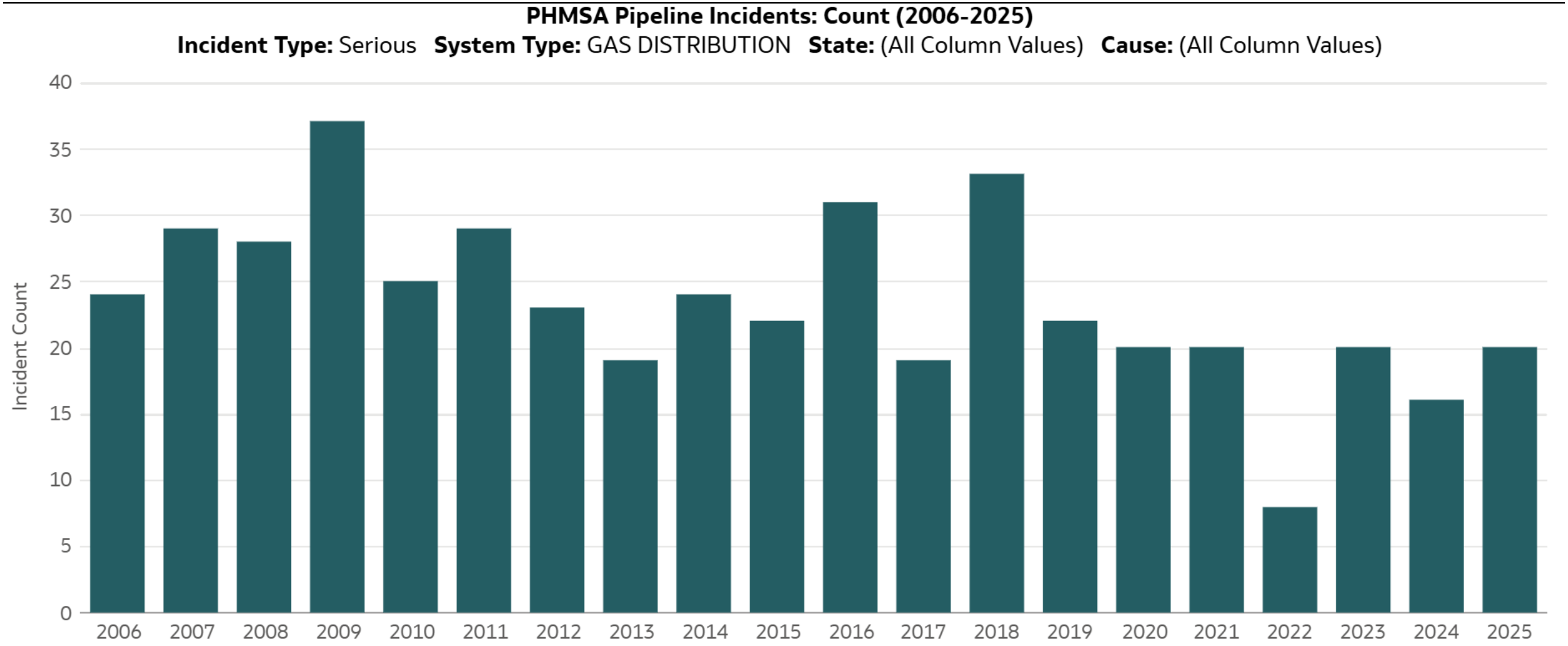
PHMSA Reportable Incidents – Last 20 years



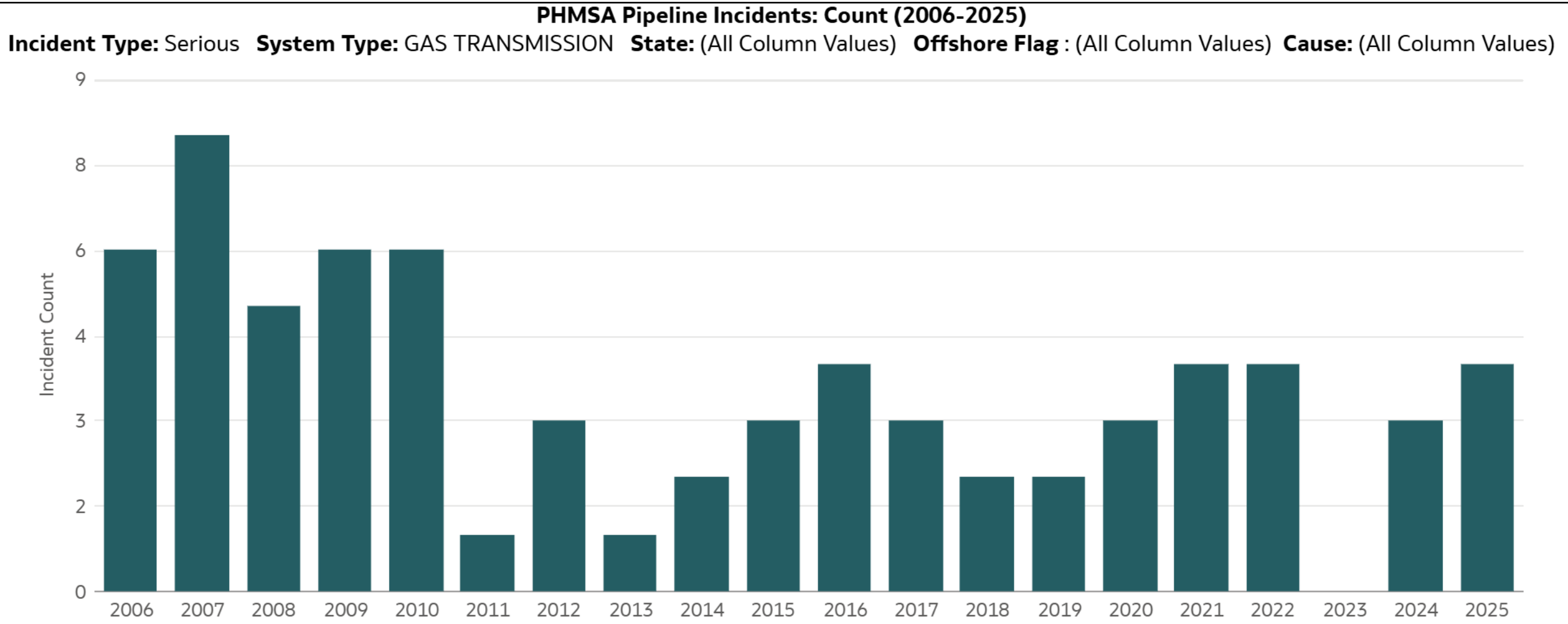
PHMSA Serious Incidents – Last 20 years



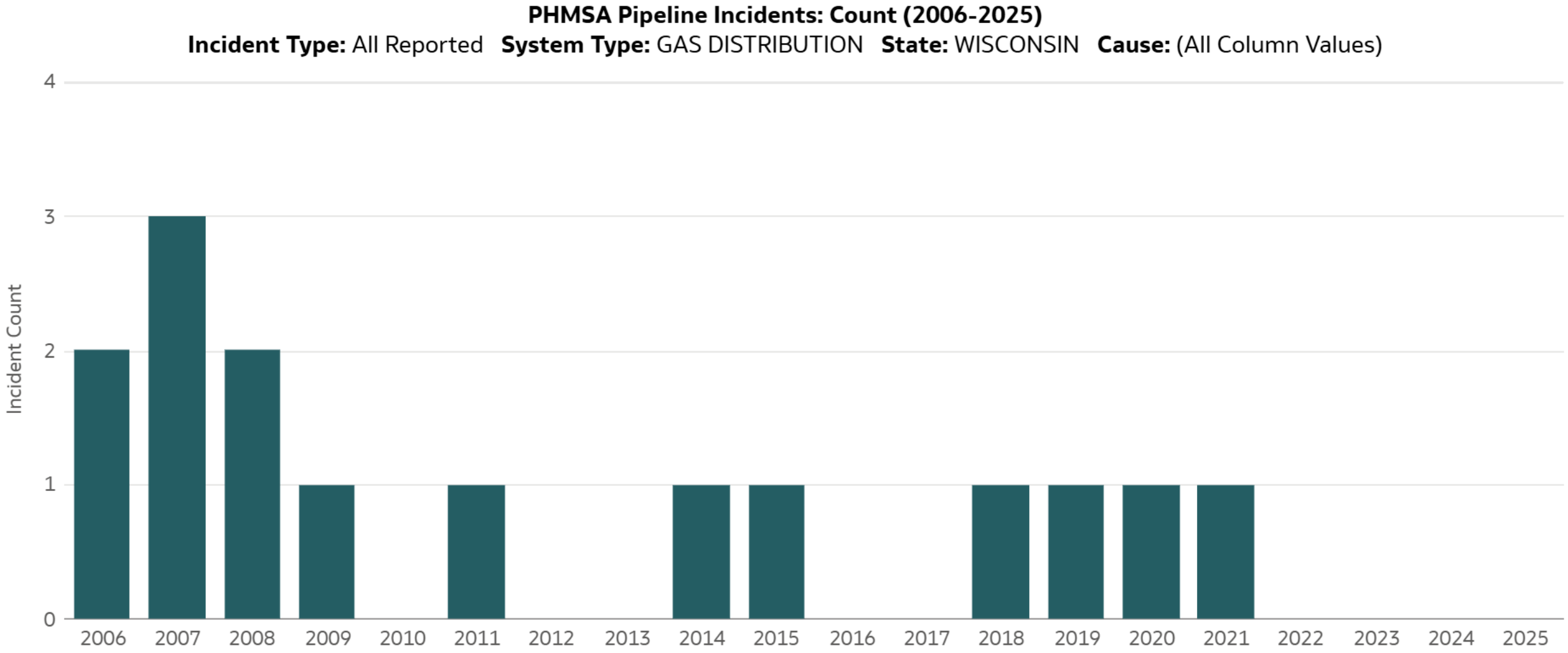
PHMSA Serious Incidents – Last 20 years - GD



PHMSA Serious Incidents – Last 20 years - GT



WI Reportable Incidents – Last 20 years - GD



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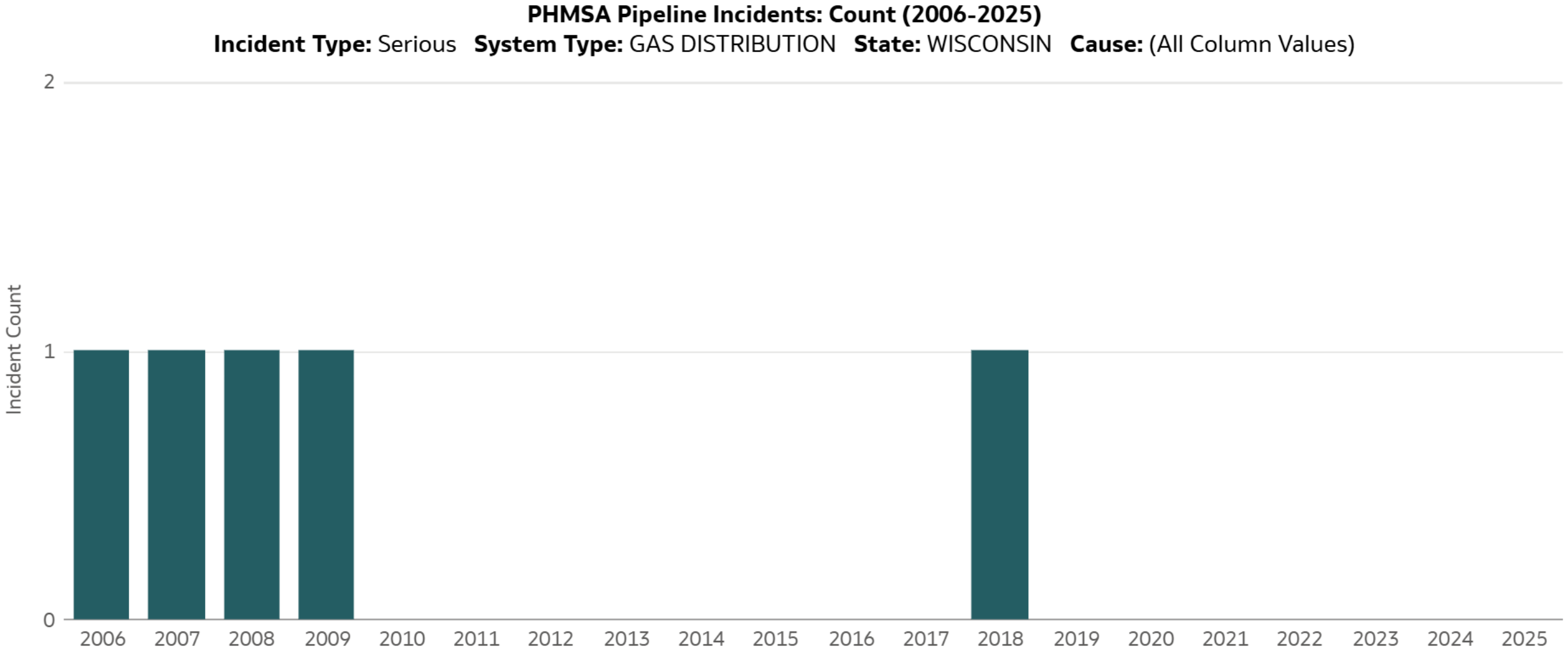

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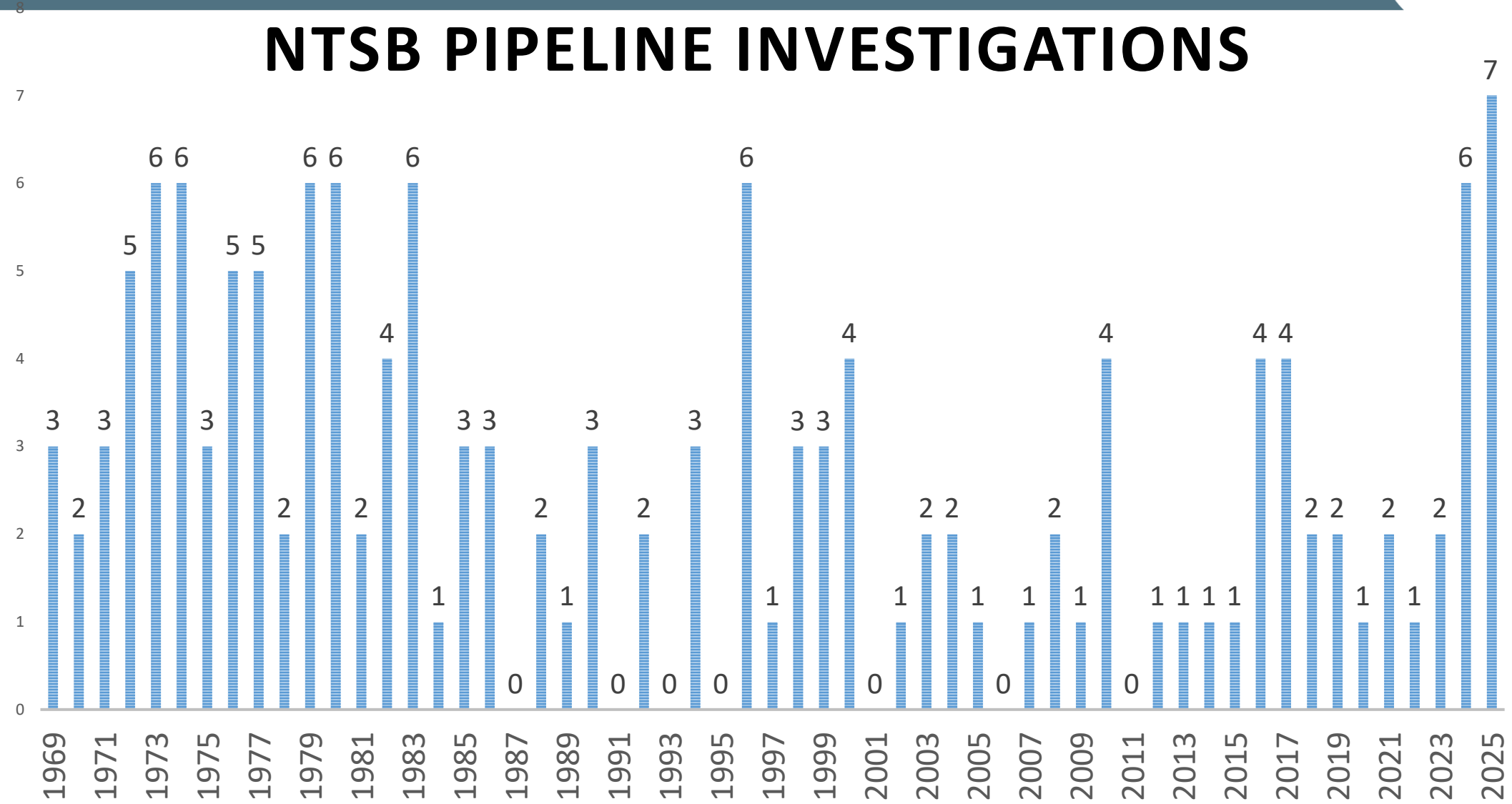
  4. Damage Prevention; and
  5. Transactions and Due Diligence

PHMSA Priorities

- State impacts
  - *"State authorities with PHMSA certifications are encouraged to adopt similar inspection and enforcement priorities in implementing their pipeline safety programs."*
  - These are already areas we prioritize (although PHMSA's list is transmission focused)
  - PHMSA and the NTSB have significantly increased their presence and deployment on incidents including on intrastate facilities

NTSB PIPELINE INVESTIGATIONS



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  1. Incidents and Accidents;
  2. High and Moderate Consequence Areas;
  3. Control Room Management and Leak Detection;
  4. Damage Prevention; and
  5. Transactions and Due Diligence
  6. Addressing leak prone pipe & riskiest DIMP threats
  7. Prompt and effective emergency response
  8. Construction

Damage Prevention

- Is your company devoting sufficient resources to damage prevention?
- Field presence is key - KNOW the excavators in your area
- 20% of excavation damages in WI are “locating” related issues
- Consider utilizing the state one-call enforcement when warranted

Excavation damage = failure

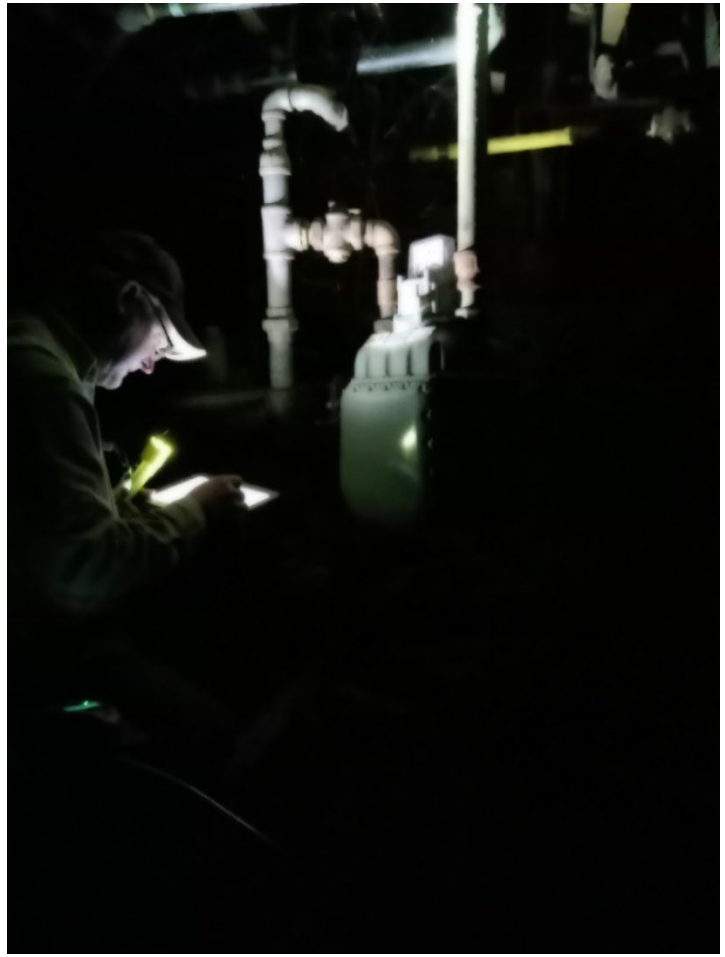
- 192.617 – Investigate incidents AND failures for the purpose of determining the causes and contributing factor(s) and minimizing the possibility of reoccurrence
- How is your company investigating excavation damages?
- Who is investigating? Conflict of interest?
- Are you assigning the actual root cause?
- What is being done to minimize the possibility of reoccurrence?

Damage Prevention - DIMP

- Excavation damage is a “threat” to gas distribution pipelines that needs to be addressed in DIMP
- Measures to address the risk of locating issues will be different than excavator issues or one-call notification issues
- One singular threat of “damage prevention” in DIMP is likely not enough

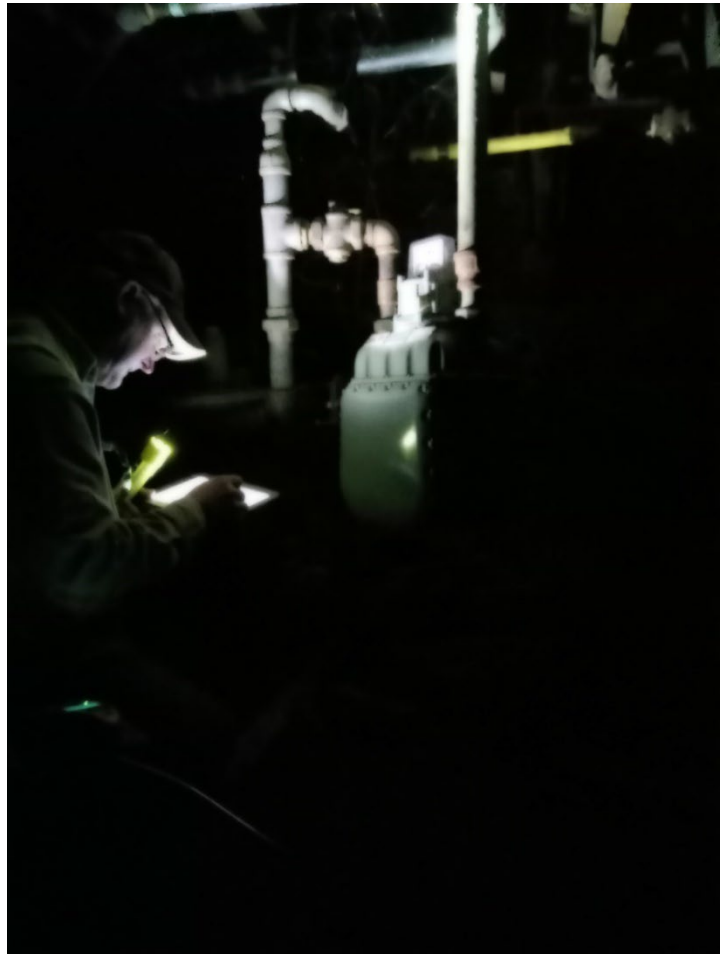
Inside meter/regulator access

- Leak surveys - 192.723/135.723
- Atmospheric corrosion - 192.481
- Difficulty gaining access
- Follow company procedures for notification
- Best practice to move outside whenever possible



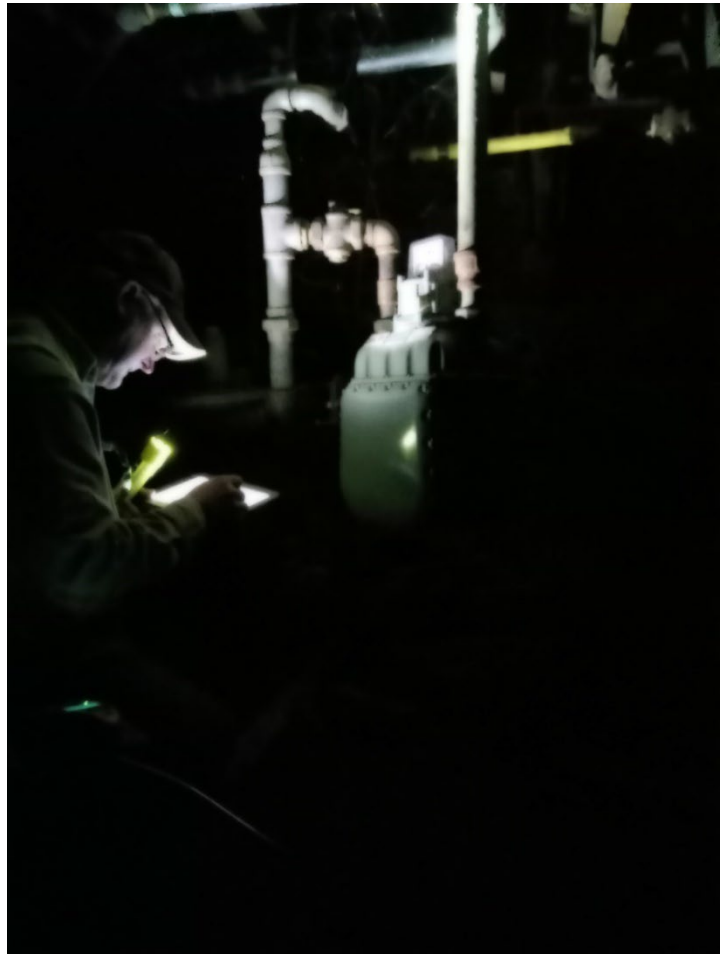
Inside meter/regulator access

- 192.355(b)(2) - Service regulator vents and relief vents must terminate outdoors, and the outdoor terminal must be located at a place where gas from the vent can escape freely into the atmosphere and away from any opening into the building



Inside meter/regulator access

- PSC 134.062(3) - A public utility may disconnect residential utility service, without notice, where a dangerous condition exists for as long as the condition exists.
- Failure to allow access may constitute a “dangerous condition”
- This includes during the moratorium



Inside Meter/Regulators

- ADB-2020-01
- *"…based on the requirements in § 192.1007(a) for operators to know their systems, PHMSA would expect operators to know the location (inside or outside) of all meters and regulators installed on their distribution system."*
- Do you know where your inside meters are? Inside regulators? Buried vent lines?

Silver Spring, MD

- August 10, 2016
- 7 killed, 65 injured
- Service regulator failure with unconnected vent line

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NTSB Recommendations:

- PHMSA - Require that all new service regulators be installed outside occupied structures.
- PHMSA - Require existing interior service regulators be relocated outside occupied structureswhenever the gas service line, meter, or regulator is replaced. In addition, multifamily structures should be prioritized over single-family dwellings.
- NFPA - In coordination with the Gas Technology Institute and the International Code Council, revise the National Fuel Gas Code, National Fire Protection Association 54 to require methane detection systems for all types of residential occupancies with gas service. At a minimum, the provisions should cover the installation, maintenance, placement of the detectors, and testing requirements.

Plastic Pipe Materials

- PHMSA has issued 5 advisory bulletins regarding plastic pipe susceptibility to brittle-like cracking
- Most recently ADB-2026-01: Distribution Integrity Management Program Considerations for Plastic Piping and Components

West Reading, PA

- March 24, 2023
- 7 killed, 10 injuries
- Degradation of Aldyl A service tee with Delrin insert
- Nearby corroded steam pipe elevated soil temperatures

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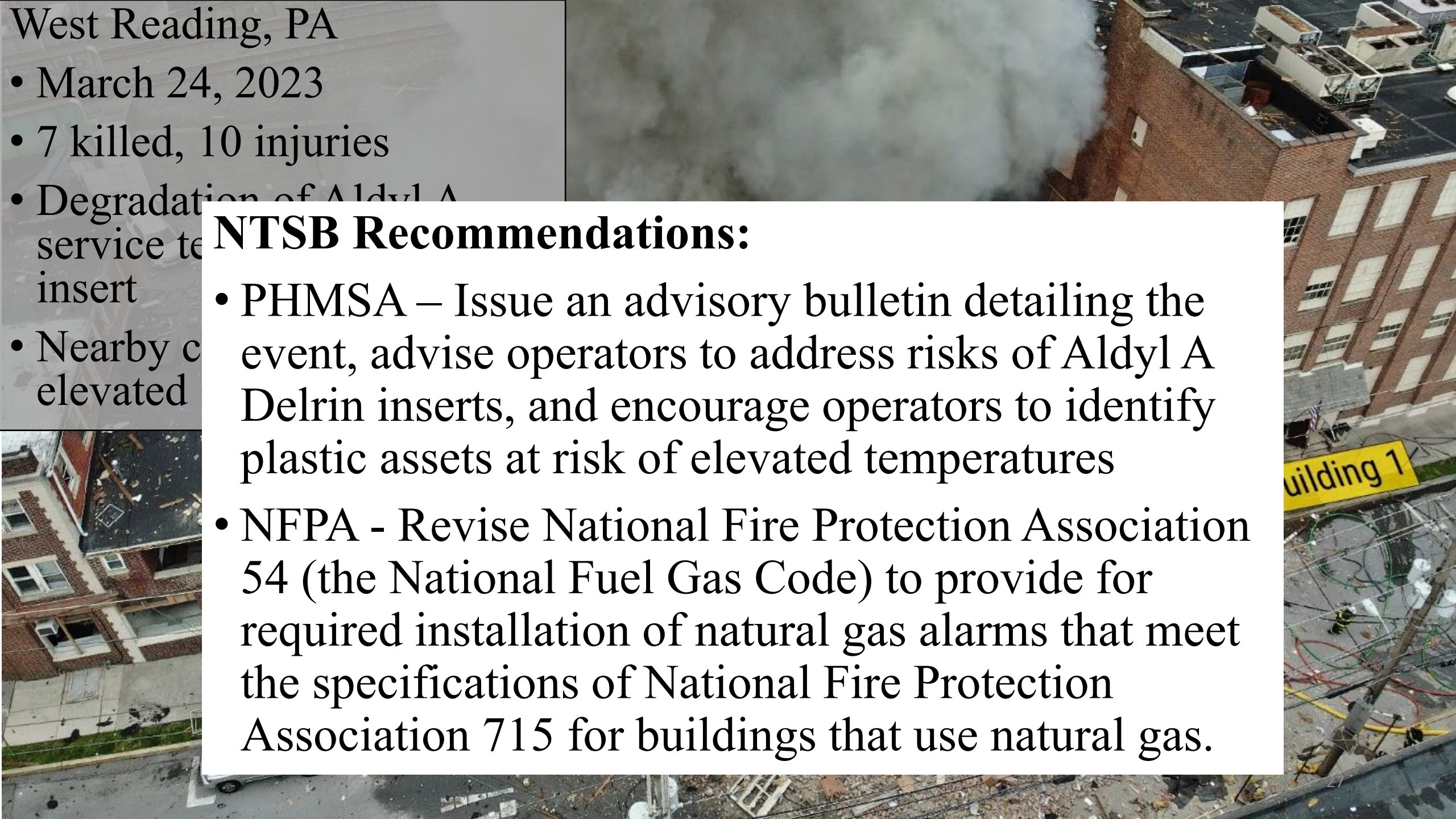

NTSB Recommendations:

- PHMSA – Issue an advisory bulletin detailing the event, advise operators to address risks of Aldyl A Delrin inserts, and encourage operators to identify plastic assets at risk of elevated temperatures
- NFPA - Revise National Fire Protection Association 54 (the National Fuel Gas Code) to provide for required installation of natural gas alarms that meet the specifications of National Fire Protection Association 715 for buildings that use natural gas.

ADB-2026-01

- 1. Review NTSB's Pipeline Investigation Report PIR-25-01 on the details of the March 24, 2023 incident in West Reading and the risks associated with Aldyl A piping and Aldyl A tees with Delrin polyacetal inserts.

- 2. Review advisory bulletins ADB-99-02, ADB-02-07, ADB-07-01, ADB-2012-03, and ADB-2020-02; DIMP Frequently Asked Questions; DIMP Enforcement Guidance; and the Gas Migration Report.

- 3. Develop and implement an integrity management plan, based on reasonably available information, to identify the characteristics of the pipeline's design and operations, as well as environmental factors such as sources of elevated temperatures (e.g., underground steam lines or electric lines), that are necessary to assess applicable threats and risks to its gas distribution pipelines (§§ 192.1005 and 192.1007(a)(1)).

ADB-2026-01

- 4. Consider these environmental factors (e.g., sources of elevated temperatures) to identify existing and potential threats. Consideration may include completing an inventory of all plastic pipe and components potentially susceptible to premature failure due to slow crack growth or brittle-like cracking, and those that may be susceptible to accelerated degradation in environments that experience or may experience elevated temperatures ("plastic assets") (§ 192.1007(b)). Operators must consider, as categories of threat, materials, welds, and any other issues that could threaten the integrity of its pipeline (§ 192.1007(b)). Susceptible materials of plastic assets may include:
  - Plastic pipe installed between 1960 and early 1980s.
  - Low-ductile inner wall Aldyl A piping manufactured by DuPont Company before 1973.
  - Polyethylene gas pipe designated PE 3306.
  - Aldyl A tees with Delrin polyacetal insert.
  - Plexco service tee Celcon (Polyacetal) caps.
  - Driscopipe 7000 and 8000 High Density Polyethylene Pipe.

ADB-2026-01

- 5. Where elevated temperatures may pose a threat to plastic assets, identify additional information needed to assess the threat and develop a plan to gather information over time through activities conducted on the pipeline, such as design, operations, maintenance, and construction (§ 192.1007(a)(3)).

- 6. Evaluate and rank the risks associated with identified plastic assets that are exposed to, or may be exposed to, elevated temperatures (§ 192.1007(c)). Operators should consider the effects of various surface conditions on the potential extent and migration rate of natural gas from an underground leak when evaluating and ranking risks. PHMSA reiterates guidance provided in advisory bulletin ADB-2020-02: a potential incident of relatively low likelihood, but one that would produce significant consequences, may entail a higher risk than an incident with somewhat greater likelihood, but that is not expected to produce major consequences.

- 7. Determine and implement measures to reduce the risks associated with the failure of plastic distribution pipeline assets (§ 192.1007(d)). These measures must include an effective leak management program. Such measures may also include replacement or remediation efforts designed to reduce the risk to plastic assets; opportunistic material type verification during routine operation and maintenance; additional leak surveys; or integration of leak survey results to support prioritizing segments for replacement.

ADB-2026-01

- 8. Maintain records, for a period of at least 10 years, demonstrating compliance with requirements of part 192, subpart P (§ 192.1011). Such records may include location and material type of operators' pipe and components; documents supporting threat identification and risk analysis; and records documenting measures implemented by the operator to reduce the risk to its pipeline.

- 9. When constructing new or replacement plastic mains, provide sufficient clearance or insulation from (printed page 2998) any sources of heat to prevent the heat from impairing the serviceability of the pipe, in accordance with requirements in § 192.325(c).

South Jordan, UT

- November 6, 2024
- 1 killed
- Leak on Aldyl A main
- Investigation ongoing

Materials Data Request

- Data request to all distribution operators will be sent in the coming weeks
- Update to data request sent by Commission staff in 2009 collecting information on plastic materials
- Will include requested information on number of inside meters and regulators

Emergency Response

- Communication between operator first responders, operator management, & emergency officials is critical
    1) Prior to an incident – maintaining liaison
    2) During an incident – making the situation safe
    3) After an incident – coordinating an incident investigation
- Fire departments cannot be solely relied on to close valves or make a determination on gas involvement
- 192.615(a)(6) – "[Emergency] procedures must provide for the following: Taking necessary actions, including but not limited to, emergency shutdown, valve shut-off, or pressure reduction, in any section of the operator's pipeline system, to minimize hazards of released gas to life, property, or the environment."


Lexington, MO
• April 9, 2025
• 1 killed, 2 injured
• Excavation damage to unmarked capped main
• Area not evacuated
• Investigation ongoing
Destroyed residence
Capped gas main sections
Leak location
Buried gas main
N

NATIONAL

21-year-old utility worker dies after responding to gas leak, Georgia deputies say

By **Tanasia Kenney**

Updated April 19, 2024 4:46 PM | Gift Article

Meter protection from damage

- 192.353(a) – Meters and service regulators must be protected from damage

Falling ice may have caused natural gas explosion at Nashua, New Hampshire building

Nashua, New Hampshire Explosion Investigators Issue Warning About Ice On Roofs

A mayday call was placed, but all firefighters were able to get out of the building. Three were hurt in the blast.

CBS Boston, News Partner

Posted Wed, Feb 4, 2026 at 9:41 am ET

WCVB | Updated: 5:28 PM EST Feb 3, 2026 | Editorial Standards ⓘ

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Working around live gas

- 192.627 – Hot tap qualified crew
- 192.629 - Purging

Contractor Oversight

- Construction inspectors need to be familiar with company procedures
- Contractor procedures and records of OQ and D&A requirements must be reviewed prior to performing work, and periodically afterwards as needed to ensure they are compliant with the operator's plan and pipeline safety code
- See OQ FAQs 2-5 and 49 CFR 199.115/199.245 Q&As
- Ultimately, the operator is responsible for ensuring that their contractors are in compliance with applicable regulations

Annual Reports

- PSC will review for accuracy
- Emphasis on excavation damages and leaks
- “Other” excavation damages or “Other” leaks
- Do the numbers make sense?

Summary

- Everyone's primary goal should be the same - safety
- Inspectors expected to be open and honest
- We strive for transparency – it is a two-way street
- A majority of our inspections do not have findings

Thank you for your attention to Pipeline Safety!

Questions?

PSC of WISCONSIN