

OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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If an item is marked Unsatisfactory, Not Applicable, or Not Checked, an explanation must be included in this report.

Operator: DYNEGY KENDALL ENERGY, LLC	Operator ID#: 32210
Inspection Date(s): 12/11/2013, 12/12/2013	Man Days: 2
Inspection Unit: Dynegy Kendall Energy	
Location of Audit: Minooka	
Exit Meeting Contact: Todd Benninghoff	
Inspection Type: Standard Inspection Plan Review- O and M	
Pipeline Safety Representative(s): Jim Watts,	
Company Representative to Receive Report: Tod Benninghoff	
Company Representative's Email Address: todd.benninghoff@dynegy.com	

Headquarters Address Information:	Emergency Phone#: Fax#:
Official or Mayor's Name:	Mike McConnell Phone#: (815) 521-1000 Ext: 50 Email: jbm93@dynegy.com
Inspection Contact(s)	Title
	Phone No.

REPORTING PROCEDURES		Status
[192.605(b) (4)][191.5]	Does the operator's procedure require Telephonic Notices of Incidents reported to the NRC (800-424-8802)?	Satisfactory
General Comment: <i>Reporting procedures are defined in the reporting section on pages 7-9.</i>		
[192.605(b) (4)][191.9(a)]	Does the operator's procedure require a DOT Incident Report Form 7100.1 submitted within 30 days after detection of an incident?	Not Applicable
General Comment: <i>Dynegy has no distribution facilities only transmission pipelines.</i>		
[192.605(b) (4)][191.9(b)]	Does the operator's procedure require a supplemental incident report when deemed necessary? (Form F7100.1)	Not Applicable

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<u>General Comment:</u>		
<i>Dynegy has no distribution facilities only transmission pipelines.</i>		
[192.605(b) (4)][191.15(a)]	Does the operator's procedure require a DOT Incident Report Form 7100-2 submitted within 30 days after detection of an incident?	Satisfactory
<u>General Comment:</u>		
<i>The requirements for submitting transmission incident reports is defined in the reporting section located on page 7-9 of the plan.</i>		
[192.605(b) (4)][191.15(b)]	Does the operator's procedure require a supplemental incident report when deemed necessary? (Form F7100-2)	Satisfactory
<u>General Comment:</u>		
<i>Supplemental incident reports are defined on pages 8-9.</i>		
[192.605(a)][191.25]	Does the operator's procedure require filing the SRCR within 5 days of determination, but not later than 10 days after discovery?	Satisfactory
<u>General Comment:</u>		
<i>The requirements for reporting a safety related condition are defined on pages 123-127.</i>		
[192.605(d)][191.23]	Does the operator's procedure contain instructions to enable operation and maintenance personnel to recognize potential Safety Related Conditions?	Satisfactory
<u>General Comment:</u>		
<i>The definitions of a safety related condition are defined on page 123-124 of the plan.</i>		
[595.120.(a)]	Reports of Accidents: Does the operator have provisions for reporting accidents or damage to the ICC? (217-782-5050)	Satisfactory
<u>General Comment:</u>		
<i>Reporting of incidents to the Illinois Commerce Commission is defined on page 9 of the plan.</i>		
CUSTOMER NOTIFICATION AND EFV INSTALLATION PROCEDURES		Status
<u>Category Comment:</u>		
<i>Customer notification is not applicable as the transmission pipeline operated by Dynegy does not supply any customers. They are the sole user of the gas transported by the transmission pipeline.</i>		
[192.13(c)][192.16]	Does the operator have procedures for notifying new customers, within 90 days, of their responsibility for those sections of service not maintained by the operator?	Not Applicable
[192.13(c)][192.381]	Does the operator's procedure require that when EFVs are installed on single family residents that shall at a minimum meet the performance requirements of §192.381?	Not Applicable

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INSTALLATION OF TRANSMISSION & DISTRIBUTION MAIN PIPE		Status
[192.13(c)][192.319]	Does the operator's procedure contain specifications for installation of transmission line or main in a ditch?	Satisfactory
General Comment: <i>Defined in Construction Standard #22 Trenching.</i>		
[192.13(c)][192.321]	Does the operator's procedure contain specifications for installation of plastic pipe in the ditch including a means of locating pipe?	Not Applicable
General Comment: <i>There is no plastic piping located in the transmission system operated by Dynegy.</i>		
[192.13(c)][192.323]	Does the operator's procedure contain casing requirements?	Not Applicable
General Comment: <i>There are no casings on the transmission pipeline owned by Dynegy.</i>		
[192.13(c)][192.325]	Does the operator's procedure contain underground clearance specifications?	Satisfactory
General Comment: <i>Clearance is defined in Construction Standard #22 Trenching.</i>		
[192.13(c)][192.327]	Does the operator's procedure specify the amount of cover required for various types of installations?	Satisfactory
General Comment: <i>Defined in Construction Standard #22 Trenching.</i>		
[192.13(c)][192.321(g)]	Does the operator's procedure specify the time limitations for exposure to UV rays for PE pipe?	Not Applicable
General Comment: <i>There is no pe piping in the Dynegy transmission system.</i>		
SERVICE LINE INSTALLATION		Status
Category Comment: <i>There are no service lines on the transmission pipeline operated by Dynegy.</i>		
[192.13(c)][192.361]	Does the operator's procedure include service line installation standards such as depth?	Not Applicable
[192.13(c)][192.361]	Does the operator's procedure include service line installation standards such as support and backfill?	Not Applicable
[192.13(c)][192.361]	Does the operator's procedure include service line installation standards such as protection against strain and loading?	Not Applicable
[192.13(c)][192.361]	Does the operator's procedure include service line	Not Applicable

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	installation standards such as installation of service line into a building	
[192.13(c)][192.361]	Does the operator's procedure include service line installation standards such as installation of service line under a building	Not Applicable
[192.13(c)][192.365]	Does the operator's procedure address service line valve location?	Not Applicable
[192.13(c)][192.367]	Does the operator's procedure include specifications for service line connection to the main?	Not Applicable
CUSTOMER METERS AND REGULATORS		Status
<u>Category Comment:</u>		
<i>There are no customer meters or regulators on the pipeline system as Dynegy is the sole user of gas from the transmission system.</i>		
[192.13(c)][192.353]	Does the operator's procedure contain requirements for the location of meters and regulators?	Not Applicable
[192.13(c)][192.355]	Does the operator's procedure contain provisions to protect customer's meters and regulators from damage?	Not Applicable
[192.13(c)][192.357(a)]	Does the operator's procedure require each regulator and meter to be installed so as to minimize anticipated stresses upon the connecting piping and the meter?	Not Applicable
[192.13(c)][192.357(d)]	Does the operator's procedure require each regulator that might release gas in its operation to be vented to the outside atmosphere?	Not Applicable
NORMAL OPERATING AND MAINTENANCE PROCEDURES		Status
[192.605(a)]	Does the operator's procedure require the O&M Plan to be reviewed and updated at a minimum of 1 per year/15 months?	Satisfactory
<u>General Comment:</u>		
<i>The annual review of the O&M is defined on page 2 in the General Procedures.</i>		
Does the operator's procedure require the OQ Plan to be reviewed and updated in connection with the O&M Plan review at a minimum of 1 per year/15 months?		No
<u>General Comment:</u>		
<i>The OQ program is a separate program and has a requirement for an annual evaluation to be conducted. This is defined on page 15 of the OQ plan.</i>		
Do procedures clearly include the name of the reviewer and dates of reviews?		Yes
<u>General Comment:</u>		
<i>The record for the annual review is located in the front of the plan.</i>		
[192.605(a)][192.605(b)(3)]	Does the operator's procedure require making construction records, maps, and operating history available to appropriate operating personnel?	Satisfactory

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General Comment:		
<i>The procedures for making maps and records available to operating records is defined on page 4-6.</i>		
[192.605(a)][192.605(b)(5)]	Does the operator's procedure contain provisions for start up and shut down of a pipeline to assure operation within MAOP plus allowable buildup?	Satisfactory
General Comment:		
<i>Start up and shutdown procedures are defined on pages 13-14 of the plan.</i>		
[192.605(a)][192.605(b)(8)]	Does the operator's procedure contain provisions for periodically reviewing the work done by operator's personnel to determine the effectiveness and adequacy of the procedures used in normal operation and maintenance and modifying the procedures when deficiencies are found?	Satisfactory
General Comment:		
<i>Defined in the OQ Plan under Evaluations.</i>		
[192.605(a)][192.605(b)(9)]	Does the operator's procedure contain provisions taking for adequate precautions in excavated trenches to protect personnel from the hazards of unsafe accumulations of vapors or gas, and making available when needed at the excavation, emergency rescue equipment, including a breathing apparatus and a rescue harness and line? If not, then does the plan include prohibiting personnel from entering excavated trenches that may be hazardous?	Satisfactory
General Comment:		
<i>Excavation Safety is defined on pages 101-102.</i>		
ABNORMAL OPERATING PROCEDURES FOR TRANSMISSION		Status
[192.605(a)][192.605(c)(1)(i)]	Does the operator's procedure contain provisions for responding to, investigating, and correcting the cause of unintended closure of valves or shut downs?	Satisfactory
General Comment:		
<i>Procedures for unintended closure of valves is defined in 5 A on page 121.</i>		
[192.605(a)][192.605(c)(1)(ii)]	Does the operator's procedure contain provisions for responding to, investigating, and correcting the cause of increase or decrease in pressure or flow rate outside of normal operating limits?	Satisfactory
General Comment:		
<i>Procedures for increase or decrease in pressure outside normal operating limits is defined in 5 B on page 121.</i>		

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[192.605(a)][192.605(c)(1)(iii)]	Does the operator's procedure contain provisions for responding to, investigating, and correcting the cause of loss of communications?	Satisfactory
<u>General Comment:</u> <i>Procedures for loss of communications is defined in 5 C on page 122.</i>		
[192.605(a)][192.605(c)(1)(iv)]	Does the operator's procedure contain provisions for responding to, investigating, and correcting the cause of the operation of any safety device?	Satisfactory
<u>General Comment:</u> <i>Procedures are defined in 5 D on page 122.</i>		
[192.605(a)][192.605(c)(1)(v)]	Does the operator's procedure contain provisions for responding to, investigating, and correcting the cause of any other foreseeable malfunction of a component, deviation from normal operations or personnel error?	Satisfactory
<u>General Comment:</u> <i>Defined in 5 D on page 122.</i>		
[192.605(a)][192.605(c)(2)]	Does the operator's procedure contain provisions for checking variations from normal operation after abnormal operations ended at sufficient critical locations?	Satisfactory
<u>General Comment:</u> <i>Defined in #2 of procedures section for Abnormal Operations on page 120.</i>		
[192.605(a)][192.605(c)(3)]	Does the operator's procedure contain provisions for notifying the responsible operating personnel when notice of an abnormal operation is received?	Satisfactory
<u>General Comment:</u> <i>Defined in #3 of procedures for Abnormal Operations on page 121.</i>		
[192.605(a)][192.605(c)(4)]	Does the operator's procedure contain provisions for periodically reviewing the response of operating personnel to determine the effectiveness of the procedures and taking corrective action where deficiencies are found?	Satisfactory
<u>General Comment:</u> <i>Defined in #3 of procedures for Abnormal Operations on page 121.</i>		
CHANGE IN CLASS LOCATION PROCEDURES		Status
[192.605(a)][192.609]	Does the operator's procedure contain provisions for conducting a class location survey whenever an increase in populations density indicates a change in class location or a segment of an existing steel pipeline operating at a hoop stress that is more than	Satisfactory

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	40 percent of SMYS, or indicates that the hoop stress corresponding to the established MAOP for a segment of existing pipeline is not commensurate with the present class location?	
[192.605(a)][192.611]	In the event a change in class location becomes necessary does the manual contain procedures for confirmation or revision of the MAOP?	Satisfactory
<u>General Comment:</u>		
<i>Procedures for changes in class location are defined in #2 of procedures on page 28.</i>		
CONTINUING SURVEILLANCE PROCEDURES		Status
[192.613(a)]	Does the operator's procedure include requirements for continuing surveillance of facilities to determine and take appropriate action concerning class location changes, failures, leak history, corrosion, cathodic protection requirements, and other unusual operating conditions?	Satisfactory
<u>General Comment:</u>		
<i>Procedures for Continuing Surveillance are defined on pages 97-98.</i>		
[192.613(a)][192.613(b)]	Does the operator's procedure include requirements for reducing the MAOP, or other actions to be taken, if a segment of pipeline is in unsatisfactory condition?	Satisfactory
<u>General Comment:</u>		
<i>Defined in #3 of surveillance procedures located on page 98.</i>		
[192.613(a)][192.459]	Does operator have procedures for determining if exposed cast iron was examined for evidence of graphitization and, if necessary, were remedial actions taken?	Not Applicable
<u>General Comment:</u>		
<i>There is no cast iron piping in the transmission system.</i>		
[192.613(a)][192.489]	Does the operator's procedure include requirements for surveillance of cast iron pipelines, including appropriate action resulting from tracking circumferential cracking failures, study of leak history, or any other unusual operating maintenance conditions?	Not Applicable
<u>General Comment:</u>		
<i>There is no cast iron piping located in the transmission system.</i>		
DAMAGE PREVENTION PROGRAM PROCEDURES		Status
[192.605(a)][192.614(c)(1)]	Does the operator's procedure require participation in a qualified one-call program, or if available, a company program that complies with the following- identifies	Satisfactory

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	persons who engage in excavating?	
<u>General Comment:</u>		
<i>Defined in #1 of Damage Prevention Procedures on page 106 of the plan.</i>		
[192.605(a)][192.614(c)(2)]	Does the operator's procedure require participation in a qualified one-call program, or if available, a company program that complies with the following- provides notification to the public in the One Call area?	Satisfactory
<u>General Comment:</u>		
<i>Defined in #1 of Damage Prevention Procedures on page 106 of the plan.</i>		
[192.605(a)][192.614(c)(3)]	Does the operator's procedure require participation in a qualified one-call program, or if available, a company program that complies with the following- provides means for receiving and recording notifications of pending excavations?	Satisfactory
<u>General Comment:</u>		
<i>Defined in #4 of the Damage Prevention Procedures located on pages 107-109.</i>		
[192.605(a)][192.614(c)(4)]	Does the operator's procedure require participation in a qualified one-call program, or if available, a company program that complies with the following- provides notification of pending excavations to the members?	Satisfactory
<u>General Comment:</u>		
<i>Locating of pipelines is defined in #4 of the Damage Prevention Procedures on pages 107-109.</i>		
[192.605(a)][192.614(c)(5)]	Does the operator's procedure require participation in a qualified one-call program, or if available, a company program that complies with the following- provides means of temporary marking for the pipeline in the vicinity of the excavations?	Satisfactory
<u>General Comment:</u>		
<i>Marking the location of pipelines is defined in #5 of the Damage Prevention Procedures located on page 109-110.</i>		
[192.605(a)][192.614(c)(6)(i)]	Does the operator's procedure provide for follow-up inspection of the pipeline where there is reason to believe the pipeline could be damaged- Inspection must be done to verify integrity of the pipeline?	Satisfactory
<u>General Comment:</u>		
<i>Follow up inspections are defined in # 7 of the Damage Prevention Procedures on page 112.</i>		
[192.605(a)][192.614(c)(6)(ii)]	Does the operator's procedure provide for follow-up inspection of the pipeline where there is reason to believe the pipeline could be damaged- After blasting, a leak survey must be conducted as part of the inspection by the operator?	Satisfactory

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<u>General Comment:</u>		
<i>Defined in #18 of Leak Surveys located on page 43.</i>		
Has the Operator adopted the applicable Common Ground Alliance Best Practices?		Yes
<u>General Comment:</u>		
<i>The operator has adopted what CGA procedures they believe to be applicable to their operation.</i>		
Does the operator have adequate directional drilling/boring procedures to determine effective actions to protect their underground facilities from the dangers posed by directional drilling and other trenchless technology? A pipeline operator's damage prevention program shall include actions to protect their facilities when directional drilling operations are conducted in proximity to the pipeline. These procedures should include, but are not limited to, accurately locating underground piping and reviewing personnel qualifications?		Yes
<u>General Comment:</u>		
<i>Defined in #6 b of the Damage Prevention Procedures on page 110.</i>		
[IL ADM. CO.265.100(b)]	Does the operator have procedures to report third party damage to mains, when a release of gas occurs, reported to ICC JULIE Enforcement?	Satisfactory
<u>General Comment:</u>		
<i>Defined in the Damage Prevention Section #7 Damage.</i>		
EMERGENCY PROCEDURES		Status
[192.615(a)(9)]	Does the operator have procedures for restoring service outages after the emergency has been rendered safe?	Satisfactory
<u>General Comment:</u>		
<i>Defined in #22 of the Emergency Procedures and is on page 118-119.</i>		
[192.615(a)(1)]	Does the operator have procedures for receiving, identifying, and classifying notices of events which require immediate response by the operator?	Satisfactory
<u>General Comment:</u>		
<i>Defined in #4-#5 of the Emergency Procedures located on page 115.</i>		
[192.615(a)(2)]	Does the operator have procedures for establishing and maintaining communication with appropriate public officials regarding possible emergency?	Satisfactory
<u>General Comment:</u>		
<i>Defined in #16 of the Emergency Procedures located on page 117.</i>		
[192.615(a)(3)(i)]	Does the operator have procedures for prompt response to gas detected inside or near a building?	Satisfactory

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<u>General Comment:</u>		
<i>Defined in #6 of the Emergency Procedures on page 115 and in #20 on 118.</i>		
[192.615(a)(3)(ii)]	Does the operator have procedures for prompt response to a fire located near a pipeline?	Satisfactory
<u>General Comment:</u>		
<i>Defined in D of #6 of the Emergency Procedures on page 115-116.</i>		
[192.615(a)(3)(iii)]	Does the operator have procedures for prompt response to an explosion near a pipeline?	Satisfactory
<u>General Comment:</u>		
<i>Defined in #18 of the Emergency Procedures on pages 117-118.</i>		
[192.615(a)(3)(iv)]	Does the operator have procedures for prompt response to natural disasters?	Satisfactory
<u>General Comment:</u>		
<i>Defined in #4 of the Emergency Procedures on page 115.</i>		
[192.615(a)(4)]	Does the operator have procedures for the availability of personnel, equipment, instruments, tools, and material required at the scene of an emergency?	Satisfactory
<u>General Comment:</u>		
<i>Defined in #16 of the Emergency Procedures on page 117.</i>		
[192.615(a)(5)]	Does the operator have procedures for actions directed towards protecting people first, then property?	Satisfactory
<u>General Comment:</u>		
<i>Defined in #2 of the Emergency Procedures on page 114.</i>		
[192.615(a)(6)]	Does the operator have procedures for emergency shutdown or pressure reduction to minimize hazards to life or property?	Satisfactory
<u>General Comment:</u>		
<i>Defined in B of #6 of the Emergency Procedures and in Shutdown Procedures on page 13.</i>		
[192.615(a)(7)]	Does the operator have procedures to require making safe any actual or potential hazard to life or property?	Satisfactory
<u>General Comment:</u>		
<i>Defined in C of #6 of the Emergency Procedures on pages 115-116.</i>		
[192.615(a)(8)]	Does the operator have procedures requiring the notification of appropriate public officials required at the emergency scene and coordinating planned and actual responses with these officials?	Satisfactory
<u>General Comment:</u>		

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Defined in #5 and #6 of the Emergency Procedures on pages 115 -116.

[192.615(a)(10)]	Does the operator have procedures for investigating accidents and failures as soon as possible after the emergency?	Satisfactory
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General Comment:

Defined in #18-#20 of the Emergency Procedures on pages 117-118.

[192.615(b)(1)]	Does the operator have procedures for furnishing applicable portions of the emergency plan to supervisory personnel who are responsible for emergency action?	Satisfactory
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General Comment:

Defined in #16 of the Emergency Procedures on page 117.

[192.615(b)(2)]	Does the operator have procedures for training appropriate employees as to the requirements of the emergency plan and verifying effectiveness of training?	Satisfactory
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General Comment:

Defined in #14 of the Emergency Procedures on page 117.

[192.615(b)(3)]	Does the operator have procedures for reviewing employee activities to determine whether the procedures were effectively followed in each emergency?	Satisfactory
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General Comment:

Defined in #15 of the Emergency Procedures on page 117.

[192.615(c)]	Does the operator have procedures to establish and maintain liaison with appropriate public officials, such that both the operator and public officials are aware of each other's resources and capabilities in dealing with gas emergencies?	Satisfactory
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General Comment:

Defined in #16 of the Emergency Procedures on page 117.

Does the operator have procedures for leaks caused by excavation damage near buildings and determine whether the procedures adequately address the possibility of multiple leaks and underground migration of gas into nearby buildings?	Yes
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General Comment:

Defined in Emergency Plan in #4 on page 115.

FAILURE INVESTIGATION PROCEDURES		Status
[192.617]	Does the operator have procedures for analyzing accidents and failures, including laboratory analysis	Satisfactory

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	where appropriate, to determine cause and prevention of recurrence?	
General Comment:		
<i>Defined in #18 of the Emergency Plan Procedures located on page 117-118.</i>		
MAOP PROCEDURES		Status
[192.605(a)][192.621]	Does the operator have procedures for establishing the MAOP for High Pressure Distribution Systems?	Not Applicable
General Comment:		
<i>There is no high pressure distribution piping in the Dynegy system, only transmission piping.</i>		
[192.605(a)][192.623]	Does the operator have procedures for establishing the Minimum and Maximum Allowable Operating Pressure Low Pressure Distribution Systems?	Not Applicable
General Comment:		
<i>There is no low pressure distribution piping in the Dynegy system, only transmission piping.</i>		
[192.605(a)][192.619(a)(1)]	Is MAOP determined by design and test? or	Satisfactory
General Comment:		
<i>Defined in A or B of #1, MAOP Procedures on page 24.</i>		
[192.605(a)][192.619(a)(2)]	Does the operator have procedures requiring the MAOP to be determined by test pressure divided by applicable factor?	Satisfactory
General Comment:		
<i>Defined in B of #1 in MAOP Procedures on page 24.</i>		
[192.605(a)][192.619(a)(3)]	Does the operator have procedures requiring the MAOP to be determined by highest operating pressure to which the segment of line was subjected between July 1, 1965 and July 1, 1970?	Not Applicable
General Comment:		
<i>This is not applicable due to the pipeline being installed between 2000 and 2001.</i>		
[192.605(a)][192.619(a)(4)]	Does the operator have procedures requiring the MAOP to be determined by the maximum safe pressure determined by operator?	Satisfactory
General Comment:		
<i>Defined in D of #1 in the MAOP Procedures on page 24.</i>		
[192.605(a)][192.619(b)]	Does the operator have procedures requiring overpressure devices be installed if .619 (a) (4) is applicable?	Satisfactory
General Comment:		

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Defined in #2 of the MAOP Procedures on page 24.

PRESSURE TEST PROCEDURES		Status
[192.13(c)]	Does the plan allow for the use of pre-tested pipe for repairs?	Satisfactory
<u>General Comment:</u>		
<i>Defined in #1 of the Pressure and Leak Test Procedures on page 94.</i>		
[192.13(c)][192.503(a)(1)]	Does the operator's procedure prohibit operating a new segment of pipeline, or return to service a segment of pipeline that has been relocated or replaced, until it is pressure tested in accordance with this subpart and §192.619 to substantiate the maximum allowable operating pressure; and	Satisfactory
<u>General Comment:</u>		
<i>Defined in #1 of Pressure and Leak Testing Procedures on page 94.</i>		
[192.13(c)][192.503(a)(2)]	Does the operator's procedure prohibit operating a new segment of pipeline, or return to service a segment of pipeline that has been relocated or replaced, until all potentially hazardous leaks have been located and eliminated?	Satisfactory
<u>General Comment:</u>		
<i>Defined in the Scope of Pressure and Leak Testing on page 94.</i>		
[192.13(c)][192.503(b)(1),192.503(b)(2),192.503(b)(3)]	Does the operator's procedure indicate that, for a new segment of pipeline, or a segment of pipeline that has been relocated or replaced, the pressure test medium must be liquid, air, natural gas, or inert gas that is compatible with the material of which the pipeline is constructed, relatively free of sedimentary materials, and except for natural gas, nonflammable?	Satisfactory
<u>General Comment:</u>		
<i>Defined in #2 A-E of Pressure and Leak Testing on page 94.</i>		
[192.13(c)][192.503(d)]	Does the operator's procedure indicate that each joint used to tie in a test segment of pipeline is excepted from the specific test requirements of this subpart, but each non-welded joint must be leak tested at not less than its operating pressure?	Satisfactory
<u>General Comment:</u>		
<i>Defined in Construction Standard # 47 and utilize NDT testing of welds.</i>		
[192.13(c)][192.505(b)]	Except for service lines, Does the operator's procedure include requirements for strength testing of pipe to operate at a hoop stress of 30% of SMYS or more which are based on class location?	Satisfactory

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<u>General Comment:</u>		
<i>Defined in B of #1 in the MAOP Procedures on page 24.</i>		
[192.13(c)][192.505(c)]	Except for service lines, Does the operator's procedure include requirements for strength testing of pipe to operate at a hoop stress of 30% of SMYS or more to be tested at or above the required test pressure for at least 8 hour?	Satisfactory
<u>General Comment:</u>		
<i>Defined in Construction Standard #9 Station Pressure Testing. D 2 (b) - Main Gas Piping.</i>		
[192.13(c)][192.505(d)]	Except for service lines, Does the operator's procedure include requirements for strength testing of pipe to operate at a hoop stress of 30% of SMYSs or more for replacement components if not certified by manufacturer?	Satisfactory
<u>General Comment:</u>		
<i>Defined in Construction Standard #9 Station Pressure Testing.</i>		
[192.13(c)][192.505(e)]	Except for service lines, Does the operator's procedure include requirements for fabricated units and short sections of pipe which operates at a hoop stress of 30% or more of SMYS and for which a post installation test is impractical, that a pre-installation strength test must be conducted by maintaining the pressure for at least 4 hours?	Satisfactory
<u>General Comment:</u>		
<i>Defined in Construction Standard #47 Pressure Testing.</i>		
[192.13(c)][192.507]	Does the operator's procedure include requirements for testing pipelines, which operate at a hoop stress less than 30% of SMYS and at or above 100 psig?	Not Applicable
<u>General Comment:</u>		
<i>This is not applicable as the pipeline has an MAOP above 40% SMYS.</i>		
[192.13(c)][192.509(b)]	Does the operator's procedure include requirements for testing steel main which operate below 100 psig at a minimum of 10 psig for main that operates below 1 psig and for each steel main to operate below 100 psig test to a minimum of 90 psig for main that operates over 1 psig?	Not Applicable
<u>General Comment:</u>		
<i>This is not applicable as the pipeline has an MAOP above 40% SMYS.</i>		
[192.13(c)][192.511(b)]	Does the operator's procedure include test requirements for service lines other than plastic which	Not Applicable

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	specify minimum test pressure as follows: 50 psig if the line operates over 40 psig?	
General Comment:		
<i>The transmission pipeline has no service lines present.</i>		
[192.13(c)][192.511(c)]	Does the operator's procedure include test requirements for service lines other than plastic which specify minimum test pressure of 90 psig if the line operates over 40 psig, unless the service line is stressed to 20% or more SMYS then testing must be conducted in accordance with 192.507?	Not Applicable
General Comment:		
<i>The transmission pipeline has no service lines.</i>		
[192.13(c)][192.513(c)]	Does the operator's procedure include test requirements for plastic pipelines of 150% of MOP or 50 psig whichever is greater?	Not Applicable
General Comment:		
<i>There is no plastic pipe in the transmission system.</i>		
[192.13(c)][192.517(a)(1)]	Does the plan require test records for pipelines that operate over 100 psig that include: Operators name, responsible employee's name, name of testing company?	Satisfactory
General Comment:		
<i>Defined in #2 of Pressure and Leak Testing on page 94.</i>		
[192.13(c)][192.517(a)(2)]	Does the plan require test records for pipelines that operate over 100 psig that include test medium?	Satisfactory
General Comment:		
<i>Defined in #2 of the Pressure and Leak Testing Procedures on page 94.</i>		
[192.13(c)][192.517(a)(3)]	Does the plan require test records for pipelines that operate over 100 psig that include test pressure?	Satisfactory
General Comment:		
<i>Defined in #2 of the Pressure and Leak Testing Procedures on page 94.</i>		
[192.13(c)][192.517(a)(4)]	Does the plan require test records for pipelines that operate over 100 psig that include test duration?	Satisfactory
General Comment:		
<i>Defined in #2 of the Pressure and Leak Testing Procedures on page 94.</i>		
[192.13(c)][192.517(a)(5)]	Does the plan require test records for pipelines that operate over 100 psig that include pressure recording charts of readings?	Satisfactory

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<u>General Comment:</u>		
<i>Defined in #1 of the Pressure and Leak Testing Procedures on page 94</i>		
[192.13(c)][192.517(a)(7)]	Does the plan require test records for pipelines that operate over 100 psig that include leaks and failures noted?	Satisfactory
<u>General Comment:</u>		
<i>Defined in Pressure and Leak Testing #7 on page 95.</i>		
ODORIZATION of GAS PROCEDURES		Status
<u>Category Comment:</u>		
<i>The transmission pipeline transports unodorized gas and is defined in the scope of the Odorization Section on page 50.</i>		
[192.605(a)][192.625(a)]	Does the operator's procedure include a requirement that distribution lines must contain odorized gas?	Not Applicable
[192.605(a)][192.625(b)]	Does the operator's procedure require odorized gas in Class 3 or 4 locations (if applicable)?	Not Applicable
[192.605(a)][192.625(f)]	Does the operator's procedure require periodic gas sampling, using an instrument capable of determining the percentage of gas in air at which the odor becomes readily detectable?	Not Applicable
TAPPING PIPELINES UNDER PRESSURE PROCEDURES		Status
[192.605(a)][192.627]	Does the operator's procedure require that hot taps be made by a qualified crew?	Satisfactory
<u>General Comment:</u>		
<i>Defined in #5 of the Tapping Procedures located in the Tapping Section on page 92.</i>		
PIPELINE PURGING PROCEDURES		Status
[192.605(a)][192.629(a)]	Do the operator's procedures require that purging of pipelines must be done to prevent entrapment of an explosive mixture in the pipeline lines containing air must be properly purged?	Satisfactory
<u>General Comment:</u>		
<i>Defined in #3 of the Procedures in the Purging Section located on pages 18-19.</i>		
[192.605(a)][192.629(b)]	Do the operator's procedures require that purging of pipelines must be done to prevent entrapment of an explosive mixture in the pipeline lines containing gas must be properly purged?	Satisfactory
<u>General Comment:</u>		
<i>Defined in #2 of the procedures in the Purging Section located on page 18.</i>		
MAINTENANCE PROCEDURES		Status

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[192.605(a)][192.703(b)]	Does the operator's procedure require that each segment of pipeline that becomes unsafe must be replaced, repaired, or removed from service?	Satisfactory
<u>General Comment:</u>		
<i>Defined in #1 and #2 of Pipeline Repair Procedures on page 80.</i>		
[192.605(a)][192.703(c)]	Does the operator's procedure require that hazardous leaks must be repaired promptly?	Satisfactory
<u>General Comment:</u>		
<i>Defined in #1 and #2 of Pipeline Repair Procedures on page 80.</i>		
TRANSMISSION LINES - PATROLLING & LEAKAGE SURVEY PROCEDURES		Status
[192.605(b)][192.705(a)]	Does the operator's procedure require patrolling of surface conditions on and adjacent to transmission line right of way for indications of leak, construction activities, and other factors affecting safety and operations?	Satisfactory
<u>General Comment:</u>		
<i>Defined in #2 of the procedures located in the Patrolling and Leak Survey Section on page 41 of the plan.</i>		
[192.605(b)][192.705(b)]	Does the operator's procedure require that the frequency of patrols is to be determined by the size of the line, the operating pressures, the class location, terrain, weather, and other relevant factors, but intervals between patrols may not be longer than prescribed in .705(b)?	Satisfactory
<u>General Comment:</u>		
<i>Defined in #4 of the procedures of the Patrolling and Leak Survey Section on page 41 of the plan.</i>		
[192.605(b)][192.706]	Does the operator's procedure require leakage surveys at a minimum of 1 year/15 months	Satisfactory
<u>General Comment:</u>		
<i>Defined in #14 of Leak Surveys on page 42-43 of the Patrolling and Leak Survey Section of the plan.</i>		
[192.605(b)][192.706(a)]	Does the operator's procedure include leak detector equipment survey requirements for transmission lines transporting un-odorized gas in Class 3 locations 7½ months but at least twice each calendar year?	Not Applicable
<u>General Comment:</u>		
<i>This is not applicable due to the pipeline currently being located in a Class 1-2 Location. The procedures do define the requirements for unodorized gas in Class 3 locations on page 43 in #16 a.</i>		
[192.605(b)][192.706(b)]	Does the operator's procedure include leak detector equipment survey requirements for lines transporting un-odorized gas in Class 4 locations - 4½ months but at least 4 times each calendar year?	Not Applicable

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<u>General Comment:</u>		
<i>This is not applicable due to the pipeline currently being located in a Class 1-2 Location. The procedures do define the requirements for unodorized gas in Class 4 locations on page 43 in #16 b.</i>		
DISTRIBUTION SYSTEM PATROLLING & LEAKAGE SURVEY PROCEDURES		Status
<u>Category Comment:</u>		
<i>Dynegy has no distribution facilities only a transmission pipeline.</i>		
[192.605(b)][192.721(a)]	Does the operator's procedure require the frequency of patrolling mains to be determined by the severity of the conditions which could cause failure or leakage?	Not Applicable
[192.605(b)][192.721(b)(1)]	Does the operator's procedure require that mains in places or on structures where anticipated physical movement or external loading could cause failure or leakage must be patrolled in business districts at intervals not exceeding 4½ months, but at least four times each calendar year? and	Not Applicable
[192.605(b)][192.721(b)(2)]	Does the operator's procedure require that mains in places or on structures where anticipated physical movement or external loading could cause failure or leakage must be patrolled outside business districts at intervals not exceeding 7½ months, but at least twice each calendar year?	Not Applicable
[192.605(b)][192.723(b)(1)]	Does the operator's procedure require periodic leak surveys determined by the nature of the operations and conditions, and be performed with leak detector equipment in business districts as specified, 1/yr (15 months)?	Not Applicable
[192.605(b)][192.723(b)(2)]	Does the operator's procedure require periodic leak surveys determined by the nature of the operations and conditions, and be performed with leak detector equipment outside of business districts as specified, once every 5 calendar years/63 mos.; for unprotected lines subject to .465(e) where electrical surveys are impractical, once every 3 years/39 mos.	Not Applicable
LINE MARKER PROCEDURES		Status
[192.605(b)][192.707]	Does the operator's procedure require that line markers be installed and labeled as required?	Satisfactory
<u>General Comment:</u>		
<i>Defined in Pipeline Markers on pages 52-53.</i>		
TRANSMISSION RECORD KEEPING PROCEDURES		Status
[192.605(b)][192.709(a)]	Does the operator's procedure require that records must be maintained on repairs to the pipe for the life of the system?	Satisfactory

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<u>General Comment:</u>		
<i>Defined in the Record Section of Pipeline Repair on page 85.</i>		
[192.605(b)][192.709(b)]	Does the operator's procedure require that records must be maintained on repairs to "other than pipe" for 5 years?	Satisfactory
<u>General Comment:</u>		
<i>The plan states that all repair records shall be retained for the life of the pipeline and is stated on page 85.</i>		
[192.605(b)][192.709(c)]	Does the operator's procedure require that records must be maintained for Operation (Sub L) and Maintenance (Sub M) patrols, surveys, tests for 5 years or until next completion of the next inspection cycle?	Satisfactory
<u>General Comment:</u>		
<i>This is defined in the record section of the Patrolling and Leak Survey section on page 45.</i>		
TRANSMISSION FIELD REPAIR PROCEDURES		Status
[192.605(b)][192.713(a)(1)]	Does the operator's procedure require that each imperfection or damage that impairs the serviceability of pipe in a steel transmission line operating at or above 40 percent of SMYS must be removed by cutting out and replacing a cylindrical piece of pipe; OR must be repaired by a method that reliable engineering tests and analyses show can permanently restore the serviceability of the pipe?	Satisfactory
<u>General Comment:</u>		
<i>Defined in #16 of the Pipeline Repair Section on page 82.</i>		
[192.605(b)][192.713(b)]	Does the operator's procedure require that the operating pressure must be at a safe level during repair operations?	Satisfactory
<u>General Comment:</u>		
<i>Defined in #17 of Pipeline Repair Procedures on page 83.</i>		
[192.605(b)][192.715(a)]	Does the operator's procedure require that each weld that is unacceptable under §192.241(c) must be repaired in accordance with the applicable requirements of §192.245 if the segment of transmission line is taken out of service?	Satisfactory
<u>General Comment:</u>		
<i>Defined in #19, #20 and #21 of the weld Section of the Pipeline Repair Procedures on pages 83 and 84.</i>		
[192.605(b)][192.715(b)(1)]	Does the operator's procedure require that each weld	Satisfactory

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	that is unacceptable under §192.241(c) must be repaired in accordance with the applicable requirements of §192.245 while the segment of transmission line is in service if the weld is not leaking?	
<p><u>General Comment:</u> Defined in #19 of the Weld Section of Pipeline Repair Procedures on page 83.</p>		
[192.605(b)][192.715(b)(2)]	Does the operator's procedure require that each weld that is unacceptable under §192.241(c) must be repaired in accordance with the applicable requirements of §192.245 while the segment of transmission line is in service if the pressure is reduced to produce a stress that is 20% of SMYS?	Satisfactory
<p><u>General Comment:</u> Defined in C of #19 under Welds in Repair Procedures on page 83.</p>		
[192.605(b)][192.715(b)(3)]	Does the operator's procedure require that each weld that is unacceptable under §192.241(c) must be repaired in accordance with the applicable requirements of §192.245 while the segment of transmission line is in service if the grinding is limited so that 1/8 inch thickness of pipe weld remains?	Satisfactory
<p><u>General Comment:</u> Defined in E of #19 under Welds in Repair Procedures on page 83.</p>		
[192.605(b)][192.715(c)]	Does the operator's procedure require that each weld that is unacceptable under §192.241(c) and cannot be repaired in accordance with .715(a) or .715(b) then a full encirclement welded split sleeve of appropriate design must be installed?	Satisfactory
<p><u>General Comment:</u> Defined in i of #21 under Welds in Pipeline Repair Procedures on page 84.</p>		
[192.605(b)][192.717(a)]	Do the operator's procedures require that each permanent field repair of a leak on a transmission line must be made by removing the leak by cutting out and replacing a cylindrical piece of pipe? OR	Satisfactory
<p><u>General Comment:</u> Defined in i of #22 under Leaks in Pipeline Repair Procedures on page 84.</p>		
[192.605(b)][192.717(b)(1)]	Do the operator's procedures require that each permanent field repair of a leak on a transmission line	Satisfactory

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	must be made by installing a full encirclement welded split sleeve of appropriate design, unless the transmission line is joined by mechanical couplings and operates at less than 40 percent of SMYS? OR	
General Comment:		
<i>Defined in #22 b i of the Leaks Section in Pipeline Repairs on page 84.</i>		
[192.605(b)][192.717(b)(2)]	Do the operator's procedures require that each permanent field repair of a leak on a transmission line must be made by installing a properly designed bolt-on-leak clamp if the leak is due to a corrosion pit? OR	Satisfactory
General Comment:		
<i>Defined in #22 b ii of Leaks in the Pipeline Repair Procedures on page 84.</i>		
[192.605(b)][192.717(b)(3)]	Do the operator's procedures require that each permanent field repair of a leak on a transmission line must be made if the leak is due to a corrosion pit and on pipe of not more than 40,000 psi (267 Mpa) SMYS, fillet weld over the pitted area a steel plate patch with rounded corners, of the same or greater thickness than the pipe, and not more than one-half of the diameter of the pipe in size? OR	Not Applicable
General Comment:		
<i>This is N/A due to the piping in the Dynegy system being above 40,000 SMYS piping.</i>		
[192.605(b)][192.717(b)(4)]	Do the operator's procedures require that each permanent field repair of a leak on a transmission line must be made if the leak is on a submerged pipeline in inland navigable waters, mechanically apply a full encirclement split sleeve of appropriate design? OR	Not Applicable
General Comment:		
<i>This is not applicable due to the Dynegy transmission pipeline not crossing any navigable waterways.</i>		
[192.605(b)][192.717(b)(5)]	Does the operator's procedure require that each permanent field repair of a leak on a transmission line must be made by applying a method that reliable engineering tests and analyses show can permanently restore the serviceability of the pipe?	Satisfactory
General Comment:		
<i>Defined in #22 (b) (iv) in Leaks in Pipeline Repair Procedures on page 84.</i>		
[192.605(b)][192.719(a)]	Does the operator's procedure require that	Satisfactory

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	replacement pipe must be pressure tested to meet the requirements of a new pipeline?	
General Comment:		
<i>Defined in #1 of Pressure and Leak Testing Procedures on page 94.</i>		
[192.605(b)][192.719(b)]	Does the operator's procedure require that for lines of 6-inch diameter or larger and that operate at 20% of more of SMYS, the repair must be nondestructively tested in accordance with §192.241(c)?	Satisfactory
General Comment:		
<i>Defined in #6 D of the Welding of Steel Pipeline Procedures on page 88.</i>		
TEST REQUIREMENTS FOR REINSTATING SERVICE LINES		Status
Category Comment:		
<i>There are no service lines on the transmission pipeline operated by Dynegey.</i>		
[192.605(b)][192.725(a)]	Does the operator's procedure require that disconnected service lines must be tested the same as a new service line?	Not Applicable
[192.605(b)][192.725(b)]	Does the operator's procedure require that service lines that are temporarily disconnected must be tested from the point of disconnection, the same as a new service line, before reconnect?	Not Applicable
ABANDONMENT or DEACTIVATION of FACILITIES PROCEDURES		Status
[192.605(b)][192.727(b)]	Does the operator's procedure require disconnecting both ends, purge, and seal each end before abandonment or a period of deactivation where the pipeline is not being maintained?	Satisfactory
General Comment:		
<i>Defined in #4 of Abandonment or Deactivation of Facilities Procedures on page 21.</i>		
[192.605(b)][192.727(c)]	Does the operator's procedure require that, except for service lines, each inactive pipeline that is not being maintained under Part 192 must be disconnected from all gas sources/supplies, purged, and sealed at each end?	Satisfactory
General Comment:		
<i>Defined in #4 of Abandonment or Deactivation of Facilities Procedures on page 21.</i>		
[192.605(b)][192.727(d)(1)]	Does the operator's procedure require that whenever service to a customer is discontinued the valve that is closed to prevent the flow of gas to the customer must be provided with a locking device or other means designed to prevent the opening of the valve by	Not Applicable

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	persons other than those authorized by the operator? OR	
General Comment:		
<i>Dynegy has no service lines or customers.</i>		
[192.605(b)][192.727(d)(2)]	Does the operator's procedure require that whenever service to a customer is discontinued a mechanical device or fitting that will prevent the flow of gas must be installed in the service line or in the meter assembly? OR	Not Applicable
General Comment:		
<i>Dynegy has no service lines or customers.</i>		
[192.605(b)][192.727(d)(3)]	Does the operator's procedure require that whenever service to a customer is discontinued the customer's piping must be physically disconnected from the gas supply and the open pipe ends sealed?	Not Applicable
General Comment:		
<i>Dynegy has no service lines or customers.</i>		
[192.605(b)][192.727(e)]	Does the operator's procedure require that if air is used for purging, the operator shall ensure that a combustible mixture is not present after purging?	Satisfactory
General Comment:		
<i>Defined in #3 of the Abandonment or Deactivation of Facilities Procedures on page 21.</i>		
[192.605(b)][192.727(g)]	Does the operator's procedure require that the operator must file reports upon abandoning underwater facilities crossing commercially navigable waterways, including offshore facilities?	Not Applicable
General Comment:		
<i>This not applicable due to Dynegy not having any pipelines that cross a navigable waterway but is defined in #4 of Responsibilities in Abandonment or Deactivation of Facilities on page 22.</i>		
COMPRESSOR STATION PROCEDURES		Status
Category Comment:		
<i>There are no compressor stations on the Dynegy transmission system.</i>		
[192.605(b)(7)][192.605(b)(6)]	Does the operator's procedure include provisions for isolating units or sections of pipe and for purging before returning to service?	Not Applicable
[192.605(b)(7)][192.605(b)(7)]	Does the operator's procedure require starting, operating, and shutdown procedures for gas compressor units?	Not Applicable
[192.605(b)(7)][192.731]	Does the operator's procedure require inspection and testing for remote control shutdowns and pressure	Not Applicable

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	relieving devices at a minimum of 1 per yr/15 months), prompt repair or replacement?	
[192.605(b)(7)][192.735(a)]	Does the operator's procedure require storage of excess flammable or combustible materials at a safe distance from the compressor buildings?	Not Applicable
[192.605(b)(7)][192.735(b)]	Does the operator's procedure require above ground storage tanks to be protected according to NFPA #30; Amdt 192-103 pub. 06/09/06 eff. 07/10/06?	Not Applicable
[192.605(b)(7)][192.736(a)(1)]	Does the operator's procedure require that compressor buildings in a compressor station must have fixed gas detection and alarm systems (must be performance tested), unless: 50% of the upright side areas are permanently open? OR	Not Applicable
[192.605(b)(7)][192.736(a)(2)]	Does the operator's procedure require compressor buildings in a compressor station must have fixed gas detection and alarm systems (must be performance tested), unless: It is an unattended field compressor station of 1000 hp or less?	Not Applicable
PRESSURE LIMITING and REGULATING STATION PROCEDURES		Status
[192.605(b)][192.739(a)(1)]	Does the operator's procedure require inspection and testing for pressure limiting stations, relief devices, pressure regulating stations and equipment at a minimum of 1 per yr/15 months to determine if the equipment is in good mechanical condition?	Satisfactory
<u>General Comment:</u>		
<i>Defined in #1 (a) of the Procedures for Overpressure Protection and Pressure Limiting Devices on page 46.</i>		
[192.605(b)][192.739(a)(2)]	Does the operator's procedure require inspection and testing for pressure limiting stations, relief devices, pressure regulating stations and equipment at a minimum of 1 per yr/15 months to determine if the equipment is adequate from the standpoint of capacity and reliability of operation for the service in which it is employed	Satisfactory
<u>General Comment:</u>		
<i>Defined in #1 (a) (ii) of the Procedures for Overpressure Protection and Pressure Limiting Devices on page 46.</i>		
[192.605(b)][192.739(a)(3)]	Does the operator's procedure require inspection and testing for pressure limiting stations, relief devices, pressure regulating stations and equipment at a minimum of 1 per yr/15 months to determine if the equipment is set to control or relieve at correct pressures consistent with .201(a), except for .739(b).	Satisfactory
<u>General Comment:</u>		

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Defined in #1 (a) (iv) of the Procedures for Overpressure Protection and Pressure Limiting Devices on page 46.

[192.605(b)][192.739(a)(4)]	Does the operator's procedure require inspection and testing for pressure limiting stations, relief devices, pressure regulating stations and equipment at a minimum of 1 per yr/15 months to determine if the equipment is properly installed and protected from dirt, liquids, and other conditions that may prevent proper operation.	Satisfactory
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General Comment:

Defined in #1 (a) (iii) of the Procedures for Overpressure Protection and Pressure Limiting Devices on page 46.

[192.605(b)][192.739(b)]	Does the operator's procedure require steel pipelines whose MAOP is determined under §192.619(c), if the MAOP is 60 psi (414 kPa) gauge or more, the control or relief pressure limit is as required by .739 (b).	Not Applicable
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General Comment:

This does not apply due to the Dynegy pipeline being constructed in 2000-2001.

[192.605(b)][192.741(a)]	Does the operator's procedure require telemetering or recording pressure gauges to be in place to indicate gas pressure in the district that is supplied by more than one regulating station?	Not Applicable
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General Comment:

This is not applicable to the Dynegy system as this only applicable to distribution piping not transmission.

[192.605(b)][192.741(b)]	Does the operator's procedure require the operator to determine the need in a distribution system supplied by only one district station?	Not Applicable
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General Comment:

This is not applicable to the Dynegy system as this only applicable to distribution piping not transmission.

[192.605(b)][192.741(c)]	Does the operator's procedure require the operator to inspect equipment and take corrective measures when there are indications of abnormally high or low pressure?	Satisfactory
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General Comment:

Defined in #5 (b) of Abnormal Operations on page 121.

[192.605(b)][192.743(a)]	Does the operator's procedure require that capacity must be consistent with .201(a) except for .739(b), and be determined at a minimum of 1 per yr/15 months?	Satisfactory
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General Comment:

Defined #1 (c) of Overpressure Protection and Pressure Limiting Devices on page 46.

[192.605(b)][192.743(b)]	If the capacities are calculated, Does the operator's procedure require them to be compared with the rated	Satisfactory
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	or experimentally determined relieving capacity of the device for the conditions under which it operates?	
<u>General Comment:</u>		
<i>Defined in #1 (d) of Pressure Limiting and Overpressure Protection Devices Procedures on page 47.</i>		
[192.605(b)][192.743(c)]	Does the operator's procedure require new or additional devices be installed to provide required capacity if insufficient capacity exists?	Satisfactory
<u>General Comment:</u>		
<i>Defined in #1 (e) of Pressure Limiting and Overpressure Protection Devices Procedures on page 47</i>		
VALVE AND VAULT MAINTENANCE PROCEDURES		Status
[192.605(b)][192.745(a)]	Does the operator's procedure require that each transmission valve that might be required during an emergency is inspected and partially operated at a minimum of 1 per year/15 months?	Satisfactory
<u>General Comment:</u>		
<i>Defined in #1 of Procedures in the Valve Section on page 54.</i>		
[192.605(b)][192.745(b)]	Does the operator's procedure require that prompt remedial action will be taken to correct any transmission valve found inoperable, unless the operator designates an alternative valve?	Satisfactory
<u>General Comment:</u>		
<i>Defined in #8 of the Valve Maintenance Procedures on page 55.</i>		
[192.605(b)][192.747(a)]	Does the operator's procedure require that each distribution valve that might be required during an emergency is checked and serviced at a minimum of 1 per year/15 months?	Not Applicable
<u>General Comment:</u>		
<i>There are no distribution valves located in the transmission system operated by Dynegy.</i>		
[192.605(b)][192.747(b)]	Does the operator's procedure require that prompt remedial action will be taken to correct any valve found inoperable, unless the operator designates an alternative valve?	Not Applicable
<u>General Comment:</u>		
<i>There are no distribution facilities only transmission.</i>		
[192.605(b)][192.749]	Does the operator's procedure require that vaults greater than 200 cubic feet must be inspected at a minimum of 1 per year/15 months?	Not Applicable
<u>General Comment:</u>		
<i>There are no vaults located on the transmission pipeline operated by Dynegy.</i>		

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PREVENTION of ACCIDENTAL IGNITION PROCEDURES		Status
[192.605(b)][192.751(a)]	Does the operator's procedure require that when a hazardous amount of gas is being vented into open air, each potential source of ignition must be removed from the area and a fire extinguisher must be provided?	Satisfactory
General Comment:		
<i>Defined in #6 of the Prevention of Accidental Ignition and Minimizing Hazards Procedures on page 103.</i>		
[192.605(b)][192.751(b)]	Does the operator's procedure prohibit gas or electric welding or cutting on pipe or on pipe components that contain a combustible mixture of gas and air in the area of work?	Satisfactory
General Comment:		
<i>Defined in #4 of the Prevention of Accidental Ignition and Minimizing Hazards Procedures on page 103.</i>		
[192.605(b)][192.751(c)]	Does the operator's procedure require that warning signs will be posted, where appropriate?	Satisfactory
General Comment:		
<i>Defined in #15 of the Prevention of Accidental Ignition and Minimizing Hazards Procedures on page 105.</i>		
CAULKED BELL AND SPIGOT JOINTS PROCEDURES		Status
Category Comment:		
<i>There are no caulked bell and spigot joints in the transmission system operated by Dynegy.</i>		
[192.605(b)][192.753(a)]	Does the operator's procedure require that each cast iron caulked bell and spigot joint that is subject to pressures of more than 25 psi gage must be sealed with mechanical clamp, or sealed with material/device which does not reduce flexibility, permanently bonds, and seals and bonds as prescribed in §192.753(a)(2)(iii)?	Not Applicable
[192.605(b)][192.753(b)]	Does the operator's procedure require that when cast iron bell and spigot subject to 25 psig or less, joints, when exposed for any reason, must be sealed by means other than caulking?	Not Applicable
PROTECTING CAST-IRON PIPELINE PROCEDURES		Status
Category Comment:		
<i>There is no cast iron piping located in the Transmission System operated by Dynegy.</i>		
[192.605(b)][192.755(a)(1)]	Does the operator's procedure require that when the operator has knowledge that the support for a segment of a buried cast-iron pipeline is disturbed must provide protection from vibrations from heavy	Not Applicable

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	construction equipment, trains, trucks, buses or blasting?	
[192.605(b)][192.755(a)(2)]	Does the operator's procedure require that when the operator has knowledge that the support for a segment of a buried cast-iron pipeline is disturbed must provide protection from impact forces by vehicles?	Not Applicable
[192.605(b)][192.755(a)(3)]	Does the operator's procedure require that when the operator has knowledge that the support for a segment of a buried cast-iron pipeline is disturbed must provide protection from earth movement?	Not Applicable
[192.605(b)][192.755(a)(4)]	Does the operator's procedure require that when the operator has knowledge that the support for a segment of a buried cast-iron pipeline is disturbed must provide protection from apparent future excavations near the pipeline?	Not Applicable
[192.605(b)][192.755(a)(5)]	Does the operator's procedure require that when the operator has knowledge that the support for a segment of a buried cast-iron pipeline is disturbed must provide protection from other foreseeable outside forces which might subject the segment of pipeline to a bending stress?	Not Applicable
[192.605(b)][192.755(b)]	Does the operator's procedure require the operator to as soon as feasible; provide permanent protection for the disturbed segment from external loads?	Not Applicable
WELDING AND WELD DEFECT REPAIR/REMOVAL PROCEDURES		Status
[192.13(c)][192.225(a)]	Does the operator's procedure require their welding procedures to be qualified under Section 5 of API 1104 or Section IX of ASME Boiler and Pressure Code by destructive test?	Satisfactory
<u>General Comment:</u>		
<i>Defined in #1 of the procedure for Welding of Steel in Pipelines on page 86.</i>		
[192.13(c)][192.225(b)]	Does the operator's procedure require each welding procedure to be recorded in detail, including the results of the qualifying tests?	Satisfactory
<u>General Comment:</u>		
<i>Defined in #2 of the procedure for Welding of Steel in Pipelines on page 86.</i>		
[192.13(c)][192.227(a)]	Does the operator's procedure require their welders be qualified Section 6 of API 1104 or Section IX of ASME Boiler and Pressure Code?	Satisfactory
<u>General Comment:</u>		

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<i>Defined in #4 of the procedure for Welding of Steel in Pipelines on page 86.</i>		
[192.13(c)][192.227(b)]	Does the operator's procedure require their welders be qualified under Section I of Appendix C to weld on lines that operate at <20% SMYS?	Not Applicable
<u>General Comment:</u> <i>This is not applicable due to the Dynegy pipeline operating above 40 percent SMYS.</i>		
[192.13(c)][192.229(a)]	Does the operator's procedure require a welder to successfully complete a destructive test to weld on compressor station piping and components?	Not Applicable
<u>General Comment:</u> <i>Dynegy has no compressor station piping.</i>		
[192.13(c)][192.229(b)]	Does the operator's procedure require no welder may weld with a particular welding process unless, within the preceding 6 months, he has engaged in welding with that process?	Satisfactory
<u>General Comment:</u> <i>Defined in f of #4 in the Welding of Steel on Pipelines Procedures on page 87.</i>		
[192.13(c)][192.229(c)(1)]	Does the operator's procedure require a welder qualified under .227(a) may not weld on pipe that operates at > 20% SMYS unless within the preceding 6 calendar months the welder has had one weld tested and found acceptable under the sections 6 or 9 of API Standard 1104?	Satisfactory
<u>General Comment:</u> <i>Defined in f of #4 in the Welding of Steel on Pipelines Procedures on page 87.</i>		
[192.13(c)][192.229(c)(2)]	Does the operator's procedure require a welder qualified under .227(a) may not weld on pipe that operates at < 20% SMYS unless the welder is tested in accordance with .229(c) (1) or requalifies under .229(d) (1) or (d) (2)?	Not Applicable
<u>General Comment:</u> <i>This is not applicable due to the Transmission line being above 40% SMYS but is defined in #4 of the plan on page 86-87.</i>		
[192.13(c)][192.229(d)(1)]	Does the operator's procedure require that an Appendix C welder be re-qualified within 1 year/15 months? OR	Not Applicable
<u>General Comment:</u> <i>This is not applicable due to the Transmission line being above 40% SMYS but is defined in #4 of the plan on page 86-87.</i>		
[192.13(c)][192.229(d)(2)]	Does the operator's procedure require that an Appendix C welder be re-qualified within 7 1/2 months but at least twice per calendar year and has met the	Not Applicable

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	requirements of .229(d)(i)(ii)?	
General Comment:		
<i>This is not applicable due to the Transmission line being above 40% SMYS but is defined in #4 of the plan on page 86-87.</i>		
[192.13(c)][192.231]	Does the operator's procedure require that welding operations must be protected from weather conditions that would impair the quality of the completed weld?	Satisfactory
General Comment:		
<i>Defined in A of #5 in Welding of Steel in Pipelines on page 87.</i>		
[192.13(c)][192.233]	Does the operator's procedure require that miter joints be made in accordance with this section?	Satisfactory
General Comment:		
<i>Defined in C of #5 in Welding of Steel in Pipelines on page 87.</i>		
[192.13(c)][192.235]	Does the operator's procedure require proper welding surface preparation and joint alignment?	Satisfactory
General Comment:		
<i>Defined in b of #5 in Welding of Steel in Pipelines on page 87.</i>		
[192.13(c)][192.241(a)(1)]	Does the operator's procedure require that visual inspection must be conducted by an individual qualified by appropriate training and experience to ensure compliance with the welding procedure?	Satisfactory
General Comment:		
<i>Defined in A of #6 in Welding of Steel in Pipelines on page 88.</i>		
[192.13(c)][192.241(a)(2)]	Does the operator's procedure require that visual inspection must be conducted by an individual qualified by appropriate training and experience to ensure that the weld is acceptable in accordance with Section 9 of API 1104?	Satisfactory
General Comment:		
<i>Defined in C of #6 in Welding of Steel in Pipelines on page 88.</i>		
[192.13(c)][192.241(b)(1)]	Does the operator's procedure require that welds on pipelines to be operated at 20% or more of SMYS must be nondestructively tested in accordance with 192.243, except welds that are visually inspected and approved by a qualified welding inspector if the nominal pipe diameter is less than 6 inches? OR	Satisfactory
General Comment:		
<i>Defined in #6 in Welding of Steel in Pipelines on pages 88-89.</i>		
[192.13(c)][192.241(b)(2)]	Does the operator's procedure require that welds on	Satisfactory

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	pipelines to be operated at 20% or more of SMYS must be nondestructively tested in accordance with 192.243, except a pipeline that is to operate at a pressure that produces a hoop stress of less than 40% of SMYS and the welds are so limited in number that nondestructive testing is impractical?	
General Comment:		
<i>Defined in d and g of #6 in Welding of Steel in Pipelines on pages 88.</i>		
[192.13(c)][192.241(c)]	Does the operator's procedure require that the acceptability of a weld, which is based on nondestructively tested or visually inspected, is determined according to the standards in Section 9 of API Standard 1104?	Satisfactory
General Comment:		
<i>Defined in C of #6 in Welding of Steel in Pipelines on pages 88.</i>		
[192.13(c)][192.245(a)]	Does the operator's procedure require that each weld that is unacceptable must be removed or repaired?	Satisfactory
General Comment:		
<i>Defined in #8 in Welding of Steel in Pipelines on page 89.</i>		
[192.13(c)][192.245(b)]	Does the operator's procedure require that each weld that is repaired must have the defect removed down to sound metal, and the segment to be repaired must be preheated if conditions exist which would adversely affect the quality of the weld repair?	Satisfactory
General Comment:		
<i>Defined in #8 in Welding of Steel in Pipelines on pages 89-90.</i>		
[192.13(c)][192.245(c)]	Does the operator's procedure require that repair of a crack or any other defect in a previously repaired area must be in accordance with a written weld repair procedure qualified under §192.225?	Satisfactory
General Comment:		
<i>Defined in C of #8 in Welding of Steel in Pipelines on page 90.</i>		
Discuss with the operator regarding the use of a low hydrogen process when welding a sleeve for repair.		Yes
General Comment:		
<i>Use of low hydrogen welding rods is defined in #5 of Pipeline Repair Procedures on page 80.</i>		
TRANSMISSION NONDESTRUCTIVE TESTING PROCEDURES		Status
[192.13(c)][192.243(a)]	Does the operator's procedure require that nondestructive testing of welds must be performed by any process, other than trepanning, that clearly indicates defects that may affect the integrity of the	Satisfactory

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	weld?	
<u>General Comment:</u>		
<i>Defined in A of #7 Nondestructive Examination on page 88.</i>		
[192.13(c)][192.243(b)(1)]	Does the operator's procedure require that nondestructive testing of welds must be performed in accordance with written procedures?	Satisfactory
<u>General Comment:</u>		
<i>Defined in b of #7 Nondestructive Examination on page 88.</i>		
[192.13(c)][192.243(b)(2)]	Does the operator's procedure require that nondestructive testing of welds must be performed by persons who have been trained and qualified in the established procedures and with the equipment employed in testing?	Satisfactory
<u>General Comment:</u>		
<i>Defined in G of #7 Nondestructive Examination on page 89.</i>		
[192.13(c)][192.243(c)]	Does the operator's procedure require that procedures must be established for the proper interpretation of each nondestructive test of a weld to ensure the acceptability of the weld under §192.241(c)?	Satisfactory
<u>General Comment:</u>		
<i>Defined in E-G of #7 Nondestructive Examination on page 89.</i>		
[192.13(c)][192.243(d)(1)]	When nondestructive testing is required under §192.241(b), does the operator's procedure require that the following percentages of each day's field butt welds, selected at random by the operator, must be nondestructively tested over their entire circumference In Class 1 locations at least 10 percent?	Satisfactory
<u>General Comment:</u>		
<i>Defined in #7 (i) of Nondestructive Examination on page 89.</i>		
[192.13(c)][192.243(d)(2)]	When nondestructive testing is required under §192.241(b), does the operator's procedure require that the following percentages of each day's field butt welds, selected at random by the operator, must be nondestructively tested over their entire circumference in Class 2 locations at least 15 percent?	Satisfactory
<u>General Comment:</u>		
<i>Defined in #7 (i) of Nondestructive Examination on page 89.</i>		
[192.13(c)][192.243(d)(3)]	When nondestructive testing is required under §192.241(b), does the operator's procedure require that the following percentages of each day's field butt	Satisfactory

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	welds, selected at random by the operator, must be nondestructively tested over their entire circumference in Class 3 and Class 4 locations, at crossings of major or navigable rivers, offshore, and within railroad or public highway rights-of-way, including tunnels, bridges, and overhead road crossings, 100% unless impracticable, then 90%?	
<u>General Comment:</u>		
<i>Defined #7 (i) of Nondestructive Examination on page 89.</i>		
[192.13(c)][192.243(d)(4)]	When nondestructive testing is required under §192.241(b), does the operator's procedure require that the following percentages of each day's field butt welds, selected at random by the operator, must be nondestructively tested over their entire circumference at pipeline tie-ins, 100 %?	Satisfactory
<u>General Comment:</u>		
<i>Defined in #7 (i) of Nondestructive Examination on page 89.</i>		
[192.13(c)][192.243(e)]	Does the operator's procedure require that a sample of each welder's work for each day must be nondestructively tested, when nondestructive testing is required under §192.241(b), except for a welder whose work is isolated from the principal welding activity?	Satisfactory
<u>General Comment:</u>		
<i>Defined in #7 (i) of Nondestructive Examination on page 89.</i>		
[192.13(c)][192.243(f)]	Does the operator's procedure require that the operator must retain, for the life of the pipeline, a record showing by mile post, engineering station, or by geographic feature, the number of welds nondestructively tested, the number of welds rejected, and the disposition of the rejected welds?	Satisfactory
<u>General Comment:</u>		
<i>Defined in #3 of the Records Section of Nondestructive Examination on page 91.</i>		
JOINING of PIPELINE MATERIALS OTHER THAN BY WELDING PROCEDURES		Status
<u>Category Comment:</u>		
<i>There is no plastic piping located in the transmission system operated by Dynegy.</i>		
[192.273(b)][192.283(b)]	Does the operator have qualified joining procedures for mechanical joints?	Not Applicable
[192.281(a)][192.281(a)]	Does the operator's procedure prohibit joining plastic pipe by threaded or miter joint?	Not Applicable
[192.273(b)][192.283(a)]	Does the operator have qualified joining procedures	Not Applicable

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	for heat fusion, solvent cement, and adhesive joints?	
[192.273(b)][192.283(c)]	Does the operator's procedure require that persons making and inspecting joints must have available a copy of the qualified joining procedure?	Not Applicable
[192.273(b)][192.285(a)]	Does the operator's procedure require that person making joints with plastic pipe must be qualified?	Not Applicable
[192.273(b)][192.285(b)(1)]	Does the operator's procedure require the specimen joint to be visually examined during and after assembly or joining?	Not Applicable
[192.273(b)][192.285(b)(2)]	Does the operator have procedures requiring when a specimen joint used for personnel qualification in the case of a heat fusion, solvent cement, or adhesive joint be tested under any one of the qualified test methods?	Not Applicable
[192.273(b)][192.285(c)]	Does the operator have procedures that require a person to be requalified if during any 12 month period that person does not make any joints or has 3 joints or 3% of joints, whichever is greater, found to be unacceptable?	Not Applicable
[192.273(b)][192.285(d)]	Does the operator have a method to determine that each person making joints on plastic pipelines is qualified?	Not Applicable
[192.273(b)][192.287]	Does the operator's procedure require that person inspecting plastic pipe joints must be qualified by appropriate training or experience to evaluate plastic pipe joints?	Not Applicable
CORROSION CONTROL PROCEDURES		Status
[192.605(b)][192.453]	Does the operator's procedure require that corrosion control procedures required by .605(b)(2), including those for the design, installation, operation, and maintenance of cathodic protection systems, must be carried out by, or under the direction of, a person qualified in pipeline corrosion control methods?	Satisfactory
General Comment:		
<i>Defined in #1 and #2 of Corrosion, General and Records Procedures on page 58.</i>		
[192.605(b)][192.455(a)]	Does the operator's procedure require that pipelines installed after July 31, 1971, buried segments must be externally coated and cathodically protected within one year after completion of construction? (see exceptions in code)	Satisfactory
General Comment:		
<i>Defined in #1 of External Corrosion Control Procedures on page 60.</i>		
[192.605(b)][192.455(e)]		Not Applicable

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	Does the operator's procedure require that aluminum may not be installed in a buried or submerged pipeline if that aluminum is exposed to an environment with a natural pH in excess of 8, unless tests or experience indicate its suitability in the particular environment involved?	
<p><u>General Comment:</u> N/A no buried aluminum piping is present in the system.</p>		
[192.605(b)][192.457(a)]	Does the operator's procedure require that all effectively coated steel transmission pipelines installed prior to August 1, 1971, must be cathodically protected?	Satisfactory
<p><u>General Comment:</u> Defined in #3 of External Corrosion Control Procedures on page 60.</p>		
[192.605(b)][192.457(b)]	Does the operator's procedure require that cathodic protection must be provided in areas of active corrosion for bare or ineffectively coated transmission lines, and bare or coated compressor station piping, regulator station, meter station piping, and (except for cast iron or ductile iron) bare or coated distribution lines installed before August 1, 1971?	Satisfactory
<p><u>General Comment:</u> Defined in #3 of External Corrosion Control Procedures on page 60.</p>		
[192.605(b)][192.479(b)]	Does the operator's procedure require coating material to be suitable for the prevention of atmospheric corrosion?	Satisfactory
<p><u>General Comment:</u> Defined in 1 and 2 of #6 in External Corrosion Control Procedures on page 61.</p>		
[192.605(b)][192.459]	Does the operator's procedure require that whenever an operator has knowledge that any portion of a buried pipeline is exposed, the exposed portion must be examined for evidence of external corrosion if the pipe is bare, or if the coating is deteriorated and remedial actions taken when required?	Satisfactory
<p><u>General Comment:</u> Defined in #5 A of External Corrosion Control Procedures on page 61.</p>		
[192.605(b)][192.461(a),192.461(b)]	Does the operator's procedure address the external protective coating requirements of the regulations?	Satisfactory
<p><u>General Comment:</u> Defined in A and B of #6 in External Corrosion Control Procedures on page 61.</p>		

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[192.605(b)][192.463]	Does the operator's procedure require cathodic protection levels that comply with one or more applicable criteria contained in Appendix D?	Satisfactory
<u>General Comment:</u>		
<i>Defined in #7 (a-c) of Corrosion Control Procedures on pages 61-62.</i>		
[192.605(b)][192.465(a)]	Does the operator's procedure require pipe-to-soil monitoring at a minimum of 1 per year/15 months and for separately protected short sections of main and transmission main or separately protected service lines require monitoring of 10% of the system to be surveyed annually?	Satisfactory
<u>General Comment:</u>		
<i>Defined in #8 A Monitoring of Corrosion Control Procedures on page 63.</i>		
[192.605(b)][192.465(b)]	Does the operator's procedure require rectifier monitoring be conducted at a minimum of 6 per year/2 1/2 months?	Satisfactory
<u>General Comment:</u>		
<i>Defined in #8 C Monitoring - Corrosion Control Procedures on page 63.</i>		
[192.605(b)][192.465(c)]	Does the operator's procedure require critical interference bond monitoring be conducted at a minimum of 6 per year/2 1/2 months and non-critical bond monitoring be conducted at a minimum of 1 per year/15 months?	Satisfactory
<u>General Comment:</u>		
<i>Defined in #8 C Monitoring - Corrosion Control Procedures on page 63.</i>		
[192.605(b)][192.465(d)]	Does the operator's procedure require that prompt remedial action to correct any deficiencies indicated by the monitoring?	Satisfactory
<u>General Comment:</u>		
<i>Defined in #8 E Monitoring - Corrosion Control Procedures on page 63.</i>		
[192.605(b)][192.465(e)]	Does the operator's procedure require electrical surveys on bare and unprotected lines at a minimum of once per 3 years/39 months and must cathodically protect active corrosion areas, if found?	Not Applicable
<u>General Comment:</u>		
<i>There is no buried bare or unprotected piping in the Dynegy Transmission system.</i>		
[192.605(b)][192.467(a)]	Does the operator's procedure require that each buried or submerged pipeline be electrically isolated from other underground metallic structures, unless interconnected?	Satisfactory

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<u>General Comment:</u>		
<i>Defined in #8 for Electrical Operations Procedures in External Corrosion Control on page 64.</i>		
[192.605(b)][192.467(b)]	Does the operator's procedure require that one or more insulating devices must be installed where electrical isolation of a portion of a pipeline is necessary to facilitate the application of corrosion control?	Satisfactory
<u>General Comment:</u>		
<i>Defined in #8 A for Electrical Operations Procedures in External Corrosion Control on page 64.</i>		
[192.605(b)][192.467(c)]	Does the operator's procedure require that each pipeline must be electrically isolated from metallic casings that are a part of the underground system?	Satisfactory
<u>General Comment:</u>		
<i>Defined in #8 D, H, I and J for Electrical Operations Procedures in External Corrosion Control on pages 64-66.</i>		
[192.605(b)][192.467(d)]	Does the operator's procedure require that inspection and electrical tests must be made to assure that electrical isolation is adequate?	Satisfactory
<u>General Comment:</u>		
<i>Defined in #8 B for Electrical Operations Procedures in External Corrosion Control on page 64.</i>		
[192.605(b)][192.469]	Does the operator's procedure define how a sufficient number of test stations or contact points for electrical measurement are established to determine the adequacy of cathodic protection?	Satisfactory
<u>General Comment:</u>		
<i>Defined in #9 Test Station Procedures in External Corrosion Control on page 66.</i>		
[192.605(b)][192.471]	Does the operator's procedure define how test leads will be installed and maintained?	Satisfactory
<u>General Comment:</u>		
<i>Defined in #10 of External Corrosion Control Procedures on pages 66-67.</i>		
[192.605(b)][192.473(a)]	Does the operator's procedure require the determination of how interference currents are affecting the cathodic protection system?	Satisfactory
<u>General Comment:</u>		
<i>Defined in #11 of External Corrosion Control Procedures on page 67.</i>		

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[192.605(b)][192.473(b)]	Does the operator's procedure require the determination that impressed current type cathodic protection system or galvanic anode system are designed and installed to minimize any adverse effects on existing adjacent underground metallic structures?	Satisfactory
<u>General Comment:</u> <i>Defined in #11 of External Corrosion Control Procedures on page 67.</i>		
[192.605(b)][192.475(a)]	Does the operator's procedure require that if corrosive gas is transported by pipeline, the corrosive effect of the gas on the pipeline must be investigated and steps taken to minimize internal corrosion?	Satisfactory
<u>General Comment:</u> <i>This is stated in the scope that a corrosive gas is not transported in the transmission pipeline operated by Dynegy. There are procedures to be followed if internal corrosion is identified. They are located on pages 68-70.</i>		
[192.605(b)][192.475(b)]	Does the operator's procedure require that whenever any pipe is removed from a pipeline for any reason, the internal surface must be inspected for evidence of corrosion?	Satisfactory
<u>General Comment:</u> <i>Defined in #1 B and C of Internal Corrosion Control Procedures on pages 68-69</i>		
[192.605(b)][192.475(b)(1)]	Does the operator's procedure require that when internal corrosion is observed that the adjacent pipe will be inspected for internal corrosion?	Satisfactory
<u>General Comment:</u> <i>Defined in B of #1 of Internal Corrosion Control Procedures on pages 68-69.</i>		
[192.605(b)][192.475(b)(2)]	Does the operator's procedure require replacement of pipe when internal corrosion is observed to the extent required by the applicable paragraphs of §§192.485, 192.487, or 192,489?	Satisfactory
<u>General Comment:</u> <i>Defined in C of #2 Corrosion Control Remedial Measures Procedures on page 74.</i>		
[192.605(b)][192.475(b)(3)]	Does the operator's procedure require the steps that must be taken when internal corrosion is discovered?	Satisfactory
<u>General Comment:</u> <i>Defined in C of #2 Corrosion Control Remedial Measures Procedures on page 74.</i>		
[192.605(b)][192.476(a)]	Does the operator's procedure require features incorporated into its design and construction of transmission lines installed after May 23, 2007, to reduce internal corrosion?	Satisfactory

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If an item is marked Unsatisfactory, Not Applicable, or Not Checked, an explanation must be included in this report.

<u>General Comment:</u>		
<i>Defined in #2 Design and Construction of Transmission Line - Internal Corrosion Control Procedures on page 69.</i>		
[192.605(b)][192.477]	Does the operator's procedure require, if corrosive gas is being transported, the use of internal corrosion control coupons, or other suitable means of monitoring at a minimum of 2 per year/7 1/2 months?	Not Applicable
<u>General Comment:</u>		
<i>Coupons are not utilized due to no corrosion being observed but is defined in #3 of Internal Corrosion Control Procedures on page 69.</i>		
[192.605(b)][192.479(a)]	Does the operator's procedure require each exposed pipe, including soil-to-air interface, to be cleaned and coated?	Satisfactory
<u>General Comment:</u>		
<i>Defined in A and B of #1 Monitoring - Atmospheric Corrosion Control Procedures on page 71.</i>		
[192.605(b)][192.481(a)]	Does the operator's procedure require atmospheric corrosion control monitoring at a minimum of 1 per 3 years/39 months?	Satisfactory
<u>General Comment:</u>		
<i>Defined in A of #2 Monitoring - Atmospheric Corrosion Control Procedures on page 71.</i>		
[192.605(b)][192.481(b)]	Does the operator's procedure require particular attention to atmospheric corrosion on exposed pipe at soil-to-air interfaces, under thermal insulation, under disbonded coatings, at pipe supports, in splash zones, at deck penetrations, and in spans over water?	Satisfactory
<u>General Comment:</u>		
<i>Defined in #2 Monitoring for Atmospheric Corrosion Control Procedures on page 71.</i>		
[192.605(b)][192.481(c)]	Does the operator's procedure require protection be provided if atmospheric corrosion is discovered?	Satisfactory
<u>General Comment:</u>		
<i>Defined in C of #2 on page 71 and in Remedial Actions for external Corrosion on pages 73-75.</i>		
[192.605(b)][192.483]	Does the operator's procedure require that replacement pipe be coated and cathodically protected?	Satisfactory
<u>General Comment:</u>		
<i>Defined in B of #1 in Corrosion Control Remedial Measures Procedures on page 73.</i>		
[192.605(b)][192.485(a)]	Does the operator have procedures to replace or repair transmission pipe, or reduce the operating pressure if general corrosion has reduced the wall thickness?	Satisfactory

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<u>General Comment:</u>		
<i>Defined in #2 Transmission Lines in Corrosion Control Remedial Measures on pages 73-74.</i>		
[192.605(b)][192.485(b)]	Does the operator have procedures to replace or repair transmission pipe, or reduce the operating pressure if localized corrosion has reduced the wall thickness?	Satisfactory
<u>General Comment:</u>		
<i>Defined in E of #2 in Corrosion Control Remedial Measures on pages 75-76.</i>		
[192.605(b)][192.485(c)]	Does the operator's procedure require the use of Rstreng or B-31G to determine the remaining wall strength?	Satisfactory
<u>General Comment:</u>		
<i>Defined in V of E of #2 in Corrosion Control Remedial Measures on page 76.</i>		
[192.605(b)][192.487(a)]	Does the operator have procedures to replace or repair distribution pipe if general corrosion has reduced the wall thickness?	Not Applicable
<u>General Comment:</u>		
<i>There is no distribution piping in the Dynegy Transmission system.</i>		
[192.605(b)][192.487(b)]	Does the operator have procedures to replace or repair distribution pipe if localized corrosion has reduced the wall thickness?	Not Applicable
<u>General Comment:</u>		
<i>There is no distribution piping in the Transmission system.</i>		
[192.605(b)][192.489(a)]	Does the operator have procedures to replace pipe if general graphitization is discovered on cast or ductile iron pipe?	Not Applicable
<u>General Comment:</u>		
<i>There is no cast iron piping in the Dynegy system.</i>		
[192.605(b)][192.489(b)]	Does the operator have procedures to repair or replace pipe or seal by internal sealing methods when localized graphitization is discovered on cast or ductile iron pipe?	Not Applicable
<u>General Comment:</u>		
<i>There is no cast iron piping in the Dynegy system.</i>		
[192.605(b)][192.491(a)]	Does the operator have procedures requiring the retention of records and maps to show the location of cathodically protected pipe, facilities, anodes, and bonded structures?	Satisfactory
<u>General Comment:</u>		

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Defined in the Records section of Corrosion, General and Records on page 59.

[192.605(b)][192.491(b)]	Does the operator have procedures requiring the retention of records under .491(a) for the life of the pipeline?	Satisfactory
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General Comment:

Defined in #1 A of the Records Section of Corrosion, General and Records on page 59.

[192.605(b)][192.491(c)]	Does the operator have procedures that require the retention of testing, surveys, or inspections records which detail the adequacy of the corrosion control measures for a minimum of 5 years?	Satisfactory
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General Comment:

Defined in 1 and 2 of the record section of Corrosion, General and Records on page 59.

UPRATING PROCEDURES	Status
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[192.13(c)][192.553(a)(1)]	Does the operator's procedure include uprating requirements which meet Subpart K and include pressure raised in increments?	Satisfactory
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General Comment:

No uprating has been performed since the installation of the transmission pipeline but there are procedures located in the Uprating Section located on pages 37-39.

[192.13(c)][192.553(a)(1)]	Does the operator's procedure include uprating requirements which meet Subpart K and include section checked before further pressure increase?	Satisfactory
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General Comment:

Defined in F of #7 in the uprating procedures on pages 38-39.

[192.13(c)][192.553(a)(2)]	Does the operator's procedure include uprating requirements which meet Subpart K and include hazardous leaks repaired between increments?	Satisfactory
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General Comment:

Defined in g of #7 in the uprating procedures on page 38.

[192.13(c)][192.553(b)]	Does the operator's procedure include uprating requirements which meet Subpart K and include records kept for life of system?	Satisfactory
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General Comment:

Defined in #2 of the records section in the Uprating Procedures on page 40.

TRAINING	Status
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[520.10(a)(1)]	Does the operator's procedure contain adequate descriptions of types of training each job classification requires, including those of field foreman, field crew	Satisfactory
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OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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	leaders, leak inspectors, new construction inspectors, servicemen and corrosion technicians and/or equivalent classifications?	
<p><u>General Comment:</u> <i>Defined in Section 7 of the OQ Program on page 13.</i></p>		
[520.10(a)(2)]	Does the operator's procedure include scheduling of verbal instruction and/or on-the-job training for each job classification?	Satisfactory
[520.10(a)(3)]	Does the operator's procedure include provisions for evaluating the performance of personnel to assure their competency in performing the work assigned to them?	Satisfactory
<p><u>General Comment:</u> <i>Established during the initial or subsequent evaluations conducted on covered tasks and during the evaluation process. Defined in Part IV of the OQ Program on pages 19-21.</i></p>		
[520.10(a)(4)]	Does the operator's procedure include subject matter relating to recognition of potential hazards, and actions to be taken toward prevention of accidents?	Satisfactory
<p><u>General Comment:</u> <i>Defined in AOC's established for each covered task and after conducting an incident review.</i></p>		
[520.10(a)(5)]	Are the operator's procedures periodically updated to include new materials, new methods of operation and installation, and changes in general procedures?	Satisfactory
<p><u>General Comment:</u> <i>Review of the O&M indicates that revisions are being made due to regulatory audit findings and new or revised procedure changes.</i></p>		
[520.10(a)(6)]	Are the operator's procedures made a part of the gas system's operation, inspection and maintenance plan, and filed with the Commission?	Satisfactory
[520.10(b)]	Does the operator's procedure require that the operator/personnel (municipal/master meter) attend regularly scheduled instructional courses held by utility companies or participate in courses such as the IGT Gas Distribution Home Study Course, or programs developed and presented by community colleges, vocational schools, universities, consultants or other recognized gas distribution oriented agencies?	Not Applicable
<p><u>General Comment:</u> <i>This is not a master meter or municipal operator.</i></p>		
[520.10(a)]	Does the operator's procedure specify methods to be used for training, including frequency and subject matter of training?	Satisfactory

OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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General Comment:

Defined in Part V of the OQ Program on page 22-23.

OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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