

Distribution Integrity Management Program (DIMP)

Operator of Gas Distribution System

Liberty Energy

Operator ID: **38906**
Operator: **LIBERTY ENERGY (MID-STATES) CORP D/B/A LIBERTY UTILITIES**
5/1/2014
Address: **2370 NORTH HIGH STREET, JACKSON, MO 63755**
(573)2048148
David.Swain@LibertyUtilities.com

Inspection ID: **13**
Report Date:
Inspection Date: **4/29/2014**
States(s) included in this Inspection:
Illinois

Agency Representatives:

James Watts, Illinois Commerce Commission, 2174149609,
jwatts@icc.illinois.gov

Persons Interviewed:

Mike Beatty, Director, Engineering, 5737550108,
Mike.Beatty@libertyutilities.com

Inspector Comments:

Staff review established that the current DIM plan utilized by Liberty relies on the processes and programs owned by ATMOS. Due to the sale of the Illinois systems to Liberty they no longer have access to these programs to run the risk and threats processes. Upon Liberty adopting the new DIM plan to be utilized in Illinois, they shall submit the plan for review.

Q. No.:	Rule Name:	Question	Answer	Details	Comments
1	192.1005	Was the plan written and implemented per the requirement of 192.1005 by 08/02/2011? OR For a gas system put into service or acquired after 08/02/2011, was a plan written and implemented prior to beginning of operation?	Yes or Satisfactory	Liberty became an Operator in August of 2012. They previously operated under Atmos Energy prior to this from 1998. The plan reviewed was originally an Atmos plan and was adopted by Liberty. This plan was dated 12/7/2011. There was an initial plan in effect as of 8/2/2011 under Atmos.	Liberty Energy became an operator in August of 2012 and utilized the Atmos plan upon prior to becoming a jurisdictional operator in Illinois.
2	Information Only				

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Were commercially available product(s)/templates used in the development of the operator's written integrity management plan?	Yes or Satisfactory	The plan currently in place was written in house at Atmos.	The plan currently in place was written in house at Atmos. Liberty will need to initiate a new plan due to the lack of access to the Atmos matrix for system evaluation and threat determination.
		Commercial product(s)/templates name if used:	Not at all	No commercial products were utilized by Atmos which was later adopted by Liberty.	
3	Information Only	Does the operator's plan assign responsibility, including titles and positions, of those accountable for developing and implementing required actions?	Yes or Satisfactory	The positions are defined in 2.3 of the plan on page 4 of 5. The IM Team under the direction of the Utility Operations Council's Compliance Committee will be responsible for the Oversight of the DIMP. This includes periodic evaluation, review and modification of the Liberty Utilities IM plan.	The plan states the Division Compliance Managers and Operations Managers will have responsibility over the IM region plans.
4	192.1007(a)(1)	Do the written procedures identify or reference the appropriate sources used to determine the following characteristics necessary to assess the threats and risks to the integrity of the pipeline: Defined in Section 3 inserted pipe, rehabilitated pipe method, materials, sizes, dates of installation, mains and services, etc.)? Operating Conditions (e.g. pressure, gas quality, etc.)?	Design (e.g. type of construction, The above are defined Yes or Satisfactory	pages 1-6. Defined in 3.3 IM Region Data on page 3 of 6.	Yes or Satisfactory in Section 3 of the plan.

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Operating Environmental Factors (e.g. corrosive soil conditions, frost heave, land subsidence, landslides, washouts, snow damage, external heat sources, business districts, wall-to-wall paving, population density, difficult to evacuate facilities, valve placement, etc.)?	Yes or Satisfactory	Environmental Factors are defined in 3.4 of Section 3 on page 4 of 6.	
5	192.1007(a)(2)	Do the written procedures require the consideration of information gained from past design, operations, and maintenance (e.g. O&M activities, field surveys, One-Call system information, excavation damage, etc.)?	Yes or Satisfactory	This is defined in 3.3 through 3.7 of the plan on pages 3-6.	This is defined in 3.3 through 3.7 of the plan on pages 3-6.
6	Information Only	Do the written procedures indicate if the information was obtained from electronic records, paper records, or subject matter expert knowledge (select all which apply)? Electronic, Paper, SME	Electronic - Paper - SME	This is defined in 2.6 of the plan on page 5 of 5.	SME's are local personnel with knowledge of the system. Paper records were retained from the past owners such as United Cities and Atmos and were utilized to establish the materials and installation practices.
7	192.1007(a)(3)	Does the plan contain written procedures to identify additional information that is needed to fill gaps due to missing, inaccurate, or incomplete records?	Yes or Satisfactory	This is defined in 2.4 under Historical Data on page 4 of 5.	At this time there have been no gaps defined during the establishment of the plan.
8	192.1007(a)(3)	Does the plan list the additional information needed to fill gaps due to missing, inaccurate, or incomplete records?	Yes or Satisfactory	Historical Data is defined in 2.4 on page 4 of the plan.	At this time there have been no gaps in information or missing or incomplete records determined by the operator. If gaps are identified, 2.4 defines how these will be established.
9	192.1007(a)(3)				

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Do the written procedures specify the means to collect the additional information needed to fill gaps due to missing, inaccurate, or incomplete records (e.g., O&M activities, field surveys, One-Call System, etc.)?	Yes or Satisfactory	This is defined in Historical Data in 2.4 of the plan located on page 4.	This is defined in Historical Data in 2.4 of the plan located on page 4.
10	192.1007(a)(5)	Do the written procedures require the capture and retention of data on any new pipeline installed?	Yes or Satisfactory	Data collected on piping systems installed after August 2011 is defined in 3.8 on page 6 of 6 of the plan.	Single Source Documents ("SSD's") are utilized to record the required information regarding new piping or facilities installed at Liberty after August of 2011. This is defined in 3.8 on page 6 of the plan.
11	192.1007(a)(5)	Does the data required for capture and retention include, at a minimum, the location where the new pipeline is installed and the material from which it is constructed?	Yes or Satisfactory	Review of the SSD form utilized by Liberty indicates the document utilized for information collection does include the location, material that it is constructed of and the date installed.	Review of completed SSD's indicate Liberty is recording the required information for piping and materials.
12	192.1007(a)	Does the documentation provided by the operator demonstrate implementation of the element "Knowledge of the System"?	Yes or Satisfactory	System Knowledge is defined in 3.1 through 3.8 of Section 3.0.	Staff reviewed the record keeping process for establishing piping materials and issues identified by field personnel using the reporting system in Wennsoft.
13	192.1007(a)	Has the operator demonstrated an understanding of its system?	Yes or Satisfactory	This is defined in System Knowledge in Section 3 of the plan.	The operator has established knowledge and understanding of their system.
14	192.1007(b)	In identifying threats, do the written procedures include consideration of the following categories of threats to each gas distribution pipeline?			

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Corrosion	Yes or Satisfactory	Corrosion threat is considered and is defined in 5.3 of the plan on pages 4-5. At this time they do not consider sub threats separately but are adequately defined under corrosion.	Liberty has considered the above threats and were defined in the DIM plan in Section 5.
		Natural Forces	Yes or Satisfactory	Natural Forces is considered and is defined in 5.5 of the plan on pages 8-9.	
		Excavation Damage	Yes or Satisfactory	Excavation damage is considered and is defined in 5.4 of the plan on pages 5-7.	
		Other Outside Force Damage	Yes or Satisfactory	Other Outside Forces are considered and is defined in 5.6 on pages 9-10.	
		Material or Welds	Yes or Satisfactory	Material or Welds is considered and is defined in 5.7 on pages 10-12.	
		Equipment Failure	Yes or Satisfactory	Equipment Failure is considered and is defined in 5.8 on pages 12-13.	
		Incorrect Operation	Yes or Satisfactory	Incorrect Operations is considered and is defined in 5.9 on pages 14-15.	
		Other Concerns	Yes or Satisfactory	Other Concerns is considered and is defined in 5.10 on pages 15-16.	
15	192.1007(b)	Did the operator consider the information that was reasonably available to identify existing and potential threats?	Yes or Satisfactory	Threats are defined in Section 5 of the DIM plan on pages 1-16.	Liberty utilized the available information by using data sets provided by Atmos on existing facilities and data collected by Liberty on new installations and current information.

Q. No.:	Rule Name:	Question	Answer	Details	Comments
16	Information Only	Does the plan subdivide the primary threats into subcategories to identify existing and potential threats?	Yes or Satisfactory	Subcategories are not currently utilized by Liberty but the data is being collected for the potential threats that would be included for the areas that could be defined as subcategories.	The areas defined in guidance for subcategories and defined in GPTC Guidance in G-192-8 Identify Threats are being reviewed under the applicable threat categories.
17	192.1007(b)	Incident and leak history	Yes or Satisfactory	Incident and leak history is included in the Threats to be assessed on pages 3-4.	
		Corrosion control records	Yes or Satisfactory	Corrosion Control records are collected from SSD documents completed by personnel when performing corrosion tasks and surveys. This is defined in 5.2 of the plan on pages 3.	
		Continuing surveillance records	Yes or Satisfactory	Continuing surveillance records are defined in 6.8 of the plan on page 9 of 14. Staff reviewed the records utilized to gather information for continuing surveillance.	
		Patrolling records	Yes or Satisfactory	Patrolling is defined in 6.9 on page 10 of the plan.	
		Maintenance history	Yes or Satisfactory	This would be defined under Materials in 5.2 on page 3 and in O&M data in Section 3.5 on page 4.	

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Excavation damage experience	Yes or Satisfactory	Excavation is defined in 6.3 under Damage Prevention Program on page 4 and in 3.7 for Excavation Data on page 5.	
		Other – Describe	Yes or Satisfactory	Other is considered in 5.10 under threats on pages 15-16 and throughout Section 6 on pages 1-14.	
		In identifying threats did the information considered include any of the following?	Yes or Satisfactory	The following were reviewed by Liberty when identifying threats.	Liberty has gathered the available information defined above and utilized it to consider the possible threats to their systems.
18	Information Only	Does the plan categorize primary threats as either “system-wide” or “localized”?	All Localized	Each threat is applied by Cost Center which would be by areas in Illinois such as Harrisburg, Metropolis, Virden and Vandalia. These were reviewed separately using the DIMplate to establish and rank the applicable threats. This is defined in 2.6 on page 5.	Each threat is reviewed by Cost Center which would be by Area such as Harrisburg, Metropolis, Virden and Vandalia. These were reviewed separately using the DIMplate to establish and rank the applicable threats. This was defined in 2.6 on page 5.
19	Information Only	Do the written procedures consider, in addition to the operator’s own information, data from external sources (e.g. trade associations, government agencies, or other system operators, etc.) to assist in identifying potential threats?	Yes or Satisfactory	DIMP overview in 2.1 on page 2 includes these data sources.	This is utilized by Liberty to aid in establishing threats.
20	192.1007(b)				

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Does the documentation provided by the operator demonstrate implementation of the element "Identify Threats"?	Yes or Satisfactory	Liberty utilized previous data and DIMplate to establish the applicable threats. Staff reviewed the sources of documentation utilized to address where threats are applicable. This is also in 3.1 on page 2 of the plan.	Staff reviewed the DIMplate for each Cost Center for Illinois and determined the applicable threats were established.
21	Information Only	Was the risk evaluation developed fully or in part using a commercially available tool? Commercial tool name if used:	Not at all	The risk evaluation tool was developed internally by Atmos and was adopted by Liberty. This is defined in 2.1 IMP Overview on pages 2-3.	The risk evaluation tool was developed internally by Atmos. This is defined in 2.1 IMP Overview on pages 2-3.
22	192.1007(c)	Do the written procedures contain the method used to determine the relative importance of each threat and estimate and rank the risks posed? Briefly describe the method.	Yes or Satisfactory	Risk Methodology is defined in 4.2 and Risk Determination in 4.3 of the plan.	Risk Methodology is defined in 4.2 and Risk Determination in 4.3 of the plan.
23	192.1007(c)	Do the written procedures to evaluate and rank risk consider: Each applicable current and potential threat?			
		Corrosion	Yes or Satisfactory	Defined in Section 5.3 on pages 4-5.	Liberty's DIMP does consider the above threats and ranks the risks applicable to their systems.
		Natural Forces	Yes or Satisfactory	Defined in 5.5 on pages 8-9.	
		Excavation Damage	Yes or Satisfactory	Defined in 5.4 on pages 5-7.	
		Other Outside Force Damage	Yes or Satisfactory	Defined in 5.6 on pages 9-10.	
		Material or Welds	Yes or Satisfactory	Defined in 5.7 on pages 10-12.	
		Equipment Failure	Yes or Satisfactory	Defined in 5.8 on pages 12-13.	

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Incorrect Operation	Yes or Satisfactory	Defined in 5.9 on pages 14-15.	
		Other Concerns	Yes or Satisfactory	Defined in 5.10 on pages 15-16.	
24	192.1007(c)	Do the written procedures to evaluate and rank risk consider: The likelihood of failure associated with each threat?			
		Corrosion	Yes or Satisfactory	Likelihood of failure is defined in 4.4 on page 4. The threat is defined in 5.2 on pages 3.	Likelihood of failure is defined in 4.4 on page 4. The threats are defined in 5.2 on pages 3-4.
		Natural Forces	Yes or Satisfactory	Likelihood of failure is defined in 4.4 on page 4. The threat is defined in 5.2 on pages 3.	
		Excavation Damage	Yes or Satisfactory	Likelihood of failure is defined in 4.4 on page 4. The threat is defined in 5.2 on pages 3.	
		Other Outside Force Damage	Yes or Satisfactory	Likelihood of failure is defined in 4.4 on page 4. The threat is defined in 5.2 on pages 3.	
		Material or Welds	Yes or Satisfactory	Likelihood of failure is defined in 4.4 on page 4. The threat is defined in 5.2 on pages 4.	
		Equipment Failure	Yes or Satisfactory	Likelihood of failure is defined in 4.4 on page 4. The threat is defined in 5.2 on pages 4.	
		Incorrect Operation	Yes or Satisfactory	Likelihood of failure is defined in 4.4 on page 4. The threat is defined in 5.2 on pages 4.	
		Other Concerns	Yes or Satisfactory	Likelihood of failure is defined in 4.4 on page 4. The threat is defined in 5.2 on pages 4.	

Q. No.:	Rule Name:	Question	Answer	Details	Comments
25	192.1007(c)	Do the written procedures to evaluate and rank risk consider: The potential consequence of such a failure?			
		Corrosion	Yes or Satisfactory	Consequence of Failure is defined in 4.5 on pages 5-6. The calculation utilized in DIMplate is defined in 4.6 on pages 6-8.	Consequence of Failure is defined in 4.5 on pages 5-6. The calculation utilized in DIMplate is defined in 4.6 on pages 6-8.
		Natural Forces	Yes or Satisfactory	Consequence of Failure is defined in 4.5 on pages 5-6. The calculation utilized in DIMplate is defined in 4.6 on pages 6-8.	
		Excavation Damage	Yes or Satisfactory	Consequence of Failure is defined in 4.5 on pages 5-6. The calculation utilized in DIMplate is defined in 4.6 on pages 6-8.	
		Other Outside Force Damage	Yes or Satisfactory	Consequence of Failure is defined in 4.5 on pages 5-6. The calculation utilized in DIMplate is defined in 4.6 on pages 6-8.	
		Material or Welds	Yes or Satisfactory	Consequence of Failure is defined in 4.5 on pages 5-6. The calculation utilized in DIMplate is defined in 4.6 on pages 6-8.	
		Equipment Failure	Yes or Satisfactory	Consequence of Failure is defined in 4.5 on pages 5-6. The calculation utilized in DIMplate is defined in 4.6 on pages 6-8.	

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Incorrect Operation	Yes or Satisfactory	Consequence of Failure is defined in 4.5 on pages 5-6. The calculation utilized in DIMplate is defined in 4.6 on pages 6-8.	
		Other Concerns	Yes or Satisfactory	Consequence of Failure is defined in 4.5 on pages 5-6. The calculation utilized in DIMplate is defined in 4.6 on pages 6-8.	
26	192.1007(c)	If subdivision of system occurs, does the plan subdivide the system into regions with similar characteristics and for which similar actions are likely to be effective in reducing risk? Briefly describe the approach.	Not Applicable	Subdivision is not utilized by Liberty.	Subdivision is not utilized by Liberty.
27	Information Only	Is the method used to evaluate and rank risks reasonable?	Yes or Satisfactory	Risk determination is defined in 4.3 of the plan on pages 3-4.	The process is defined in 4.3 and utilizes a numerical score from 4 to 60. The results are recorded in DIMplate for each Cost Center.
28	192.1007(c)	Are the results of the risk ranking supported by the risk evaluation model/method?	Yes or Satisfactory	Review of the completed risk ranking recorded on the DIMplate reports indicates the risk evaluation model/method is adequate.	Review of the completed risk ranking recorded on the DIMplate reports indicates the risk evaluation model/method is adequate.
29	192.1007(c)	Did the operator validate the results generated by the risk evaluation model/method? Briefly describe.	Yes or Satisfactory	The procedure is defined in 4.7 of the plan on page 8. Reviews were documented by SME's on the DIMplate forms for each Cost Center.	The procedure is defined in 4.7 of the plan on page 8. Reviews were documented by SME's on the DIMplate forms for each Cost Center.
30	192.1007(c)				

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Does the documentation provided by the operator demonstrate implementation of the element "Evaluate and Rank Risk"?	Yes or Satisfactory	This is defined in 1.2 of the plan on page 2. The findings were recorded on the DIMplate forms to establish the applicable threats to the system and ranked accordingly.	This is defined in 1.2 of the plan on page 2. The findings were recorded on the DIMplate forms to establish the applicable threats to the system and ranked accordingly.
31	192.1007 (d)	Does the plan include procedures to identify when measures, beyond minimum code requirements specified outside of Part 192 Subpart P, are required to reduce risk?	Yes or Satisfactory	In 6.2 Leak Management Program leak surveys on bare steel were increased to a shorter interval than required by code. They went from 3 years to 1 year for bare steel. In 6.3 Damage Prevention the plan states that Liberty currently has procedures that exceed the requirements of Part 192 under Damage Prevention due to the application of Common Ground Alliance Procedures.	In 6.2 Leak Management Program leak surveys on bare steel were increased to a shorter interval than required by code. They went from 3 years to 1 year for bare steel. In 6.3 Damage Prevention the plan states that Liberty currently has procedures that exceed the requirements of Part 192 under Damage Prevention due to the application of Common Ground Alliance Procedures.
32	192.1007 (d)				

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		When measures, beyond minimum code requirements specified outside of Part 192 Subpart P, are required to reduce risk, does the plan identify the measures selected, how they will be implemented, and the risks they are addressing?	Yes or Satisfactory	In 6.2 Leak Management Program leak surveys on bare steel were increased to a shorter interval than required by code. They went from 3 years to 1 year for bare steel. In 6.3 Damage Prevention the plan states that Liberty currently has procedures that exceed the requirements of Part 192 under Damage Prevention due to the application of Common Ground Alliance Procedures.	In 6.2 Leak Management Program leak surveys on bare steel were increased to a shorter interval than required by code. They went from 3 years to 1 year for bare steel. In 6.3 Damage Prevention the plan states that Liberty currently has procedures that exceed the requirements of Part 192 under Damage Prevention due to the application of Common Ground Alliance Procedures.
34	192.1007 (d)	Locate the leaks in the distribution system;	Yes or Satisfactory	O&M Procedures for Leak Surveys are defined in Section 9 of the O&M and are referenced in Appendix I.2 of the DIM plan.	
		Evaluate the actual or potential hazards associated with these leaks;	Yes or Satisfactory	This is defined in their leak classification guidelines that are referenced in Appendix I.2 on page 3. Leak Classification Guidelines are defined in 9.4 of the O&M.	
		Act appropriately to mitigate these hazards;	Yes or Satisfactory	Review of the current outstanding leaks indicates the operator is following their standards for repairing leaks. These are defined in 9.4 of the O&M.	

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Keep records;	Yes or Satisfactory	Leak data is maintained in Wennsoft scheduling software that monitors outstanding leaks for corrective actions to ensure that they are completed as required.	
		Self-assess to determine if additional actions are necessary to keep people and property safe.	Yes or Satisfactory	Their procedures in the Emergency Procedures 27.2 are the HELP steps which stand for Hazard, Extent, Life Property (HELP). The technician can at any time uprate a leak to initiate precautionary measures.	
		Does the plan include an effective leak management program (unless all leaks are repaired when found)	Yes or Satisfactory	Leak Management is defined in 6.2 of the plan on page 3. This is also defined in Appendix I.2 which lists the Program Elements and where these are located in the O&M plan on page 3.	Liberty has established adequate leak detection and repair procedures and carry minimal numbers of outstanding leaks.
35	192.1007 (d)	Does the documentation provided by the operator demonstrate implementation of the measures, required by Part 192 Subpart P, to reduce risk?	Yes or Satisfactory	Review of leak survey compliance records indicates they are completing the leakage surveys as required by their procedures. Leaks are repaired within the guidelines as defined in their procedures. Liberty has increased the leak survey interval for unprotected and protected bare steel to annually.	Review of leak survey compliance records indicates they are completing the leakage surveys as required by their procedures. Leaks are repaired within the guidelines as defined in their procedures. Liberty has increased the leak survey interval for unprotected and protected bare steel to annually.

Q. No.:	Rule Name:	Question	Answer	Details	Comments
36	192.1007 (e)	Does the plan contain written procedures for how the operator established a baseline for each performance measure?			
		i) Number of hazardous leaks either eliminated or repaired, categorized by cause?	Yes or Satisfactory	Open and repaired leaks are tracked using Wennsoft software (eAM process) and is defined in 4.4 of the DIM plan on page 5. The leak information required by this section is pulled from Wennsoft database for the DOT report. Review of the annual report indicates the information reported is accurate.	Liberty currently maintains sufficient documentation to address the above requirements of this section.
		ii) Number of excavation damages?	Yes or Satisfactory	Wennsoft database and supervisor reports are utilized to determine the number of excavation damages. Each service area is required to submit monthly reports that include the number of excavation damages and leak totals which are sent to corporate headquarters for review.	
		iii) Number of excavation tickets received by gas department?	Yes or Satisfactory	Korterra ticket management system is utilized to establish the number of excavation tickets received is used to ensure that all received tickets are completed. Staff reviewed the systems ability to track and report locate activity.	

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		iv) Total number of leaks either eliminated or repaired categorized by cause?	Yes or Satisfactory	Wennsoft is utilized to record and track leak repairs. The (LL3) Leak found, repair and to report third party damage form is utilized to report the information required to be collected during a leak repair and includes cause.	
		v) Number of hazardous leaks either eliminated or repaired, categorized by material?	Yes or Satisfactory	Wennsoft is utilized to document, report and retain information on leaks repaired and includes material that is reported using the LL3 form.	
		vi) Any additional measures the operator determines are needed to evaluate the effectiveness of the IM program in controlling each identified threat?	Yes or Satisfactory	This is defined in 7.3 of the DIM plan on page 3. It currently indicates that there are currently no additional measures needed at this time, but will evaluate and add additional measures as necessary, in the future.	
37	192.1007 (e)	Does the plan establish a baseline for each performance measure?			
		i) Number of hazardous leaks either eliminated or repaired, categorized by cause?	Yes or Satisfactory	This is defined in 7.2 of the DIM plan on page 3. This is the information reported to PHMSA on the annual report.	Liberty is retaining the required information to allow for establishing the baseline for leakage.
		ii) Number of excavation damages?	Yes or Satisfactory	This is defined in 7.2 of the DIM plan on page 3. This is the information reported to PHMSA on the annual report.	

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		iii) Number of excavation tickets received by gas department?	Yes or Satisfactory	This is defined in 7.2 of the DIM plan on page 3. This is the information reported to PHMSA on the annual report.	
		iv) Total number of leaks either eliminated or repaired categorized by cause?	Yes or Satisfactory	This is defined in 7.2 of the DIM plan on page 3. This is the information reported to PHMSA on the annual report.	
		v) Number of hazardous leaks either eliminated or repaired, categorized by material?	Yes or Satisfactory	This is defined in 7.2 of the DIM plan on page 3. This is the information reported to PHMSA on the annual report.	
		vi) Any additional measures the operator determines are needed to evaluate the effectiveness of the IM program in controlling each identified threat?	Yes or Satisfactory	Additional measures are defined in 7.3 of the DIM plan.	
38	192.1007 (e)	Does the operator have written procedures to collect the data for each performance measure?			
		i) Number of hazardous leaks either eliminated or repaired, categorized by cause?	Yes or Satisfactory	This is defined in 7.2 of the DIM plan on page 3. This is the information reported to PHMSA on the annual report.	Performance measures are defined in the plan and this review established that Liberty is maintaining the required documentation to establish the above performance measures.
		ii) Number of excavation damages?	Yes or Satisfactory	This is defined in 7.2 of the DIM plan on page 3. This is the information reported to PHMSA on the annual report.	

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		iii) Number of excavation tickets received by gas department?	Yes or Satisfactory	This is defined in 7.2 of the DIM plan on page 3. This is the information reported to PHMSA on the annual report.	
		iv) Total number of leaks either eliminated or repaired categorized by cause?	Yes or Satisfactory	This is defined in 7.2 of the DIM plan on page 3. This is the information reported to PHMSA on the annual report.	
		v) Number of hazardous leaks either eliminated or repaired, categorized by material?	Yes or Satisfactory	This is defined in 7.2 of the DIM plan on page 3. This is the information reported to PHMSA on the annual report.	
		vi) Any additional measures the operator determines are needed to evaluate the effectiveness of the IM program in controlling each identified threat?	Yes or Satisfactory	Additional measures are defined in 7.3 of the DIM plan.	
39	192.1007 (e)	Do the written procedures require the operator to monitor each performance measure?			
		i) Number of hazardous leaks either eliminated or repaired, categorized by cause?	Yes or Satisfactory	This is defined in 8.2 on page 2 of the DIM plan. This information is gathered and reviewed on an annual basis. This allows for reporting information to PHMSA on an annual basis. This is used to review deviations from the initial baseline.	Review of the information and documentation reviewed indicates Liberty is monitoring each performance measure as required.

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		ii) Number of excavation damages?		This is defined in 8.2 on page 2 of the DIM plan. This information is gathered and reviewed on an annual basis. This allows for reporting information to PHMSA on an annual basis. This is used to review deviations from the initial baseline.	
		iii) Number of excavation tickets received by gas department?		This is defined in 8.2 on page 2 of the DIM plan. This information is gathered and reviewed on an annual basis. This allows for reporting information to PHMSA on an annual basis. This is used to review deviations from the initial baseline.	
		iv) Total number of leaks either eliminated or repaired categorized by cause?		This is defined in 8.2 on page 2 of the DIM plan. This information is gathered and reviewed on an annual basis. This allows for reporting information to PHMSA on an annual basis. This is used to review deviations from the initial baseline.	

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		v) Number of hazardous leaks either eliminated or repaired, categorized by material?		This is defined in 8.2 on page 2 of the DIM plan. This information is gathered and reviewed on an annual basis. This allows for reporting information to PHMSA on an annual basis. This is used to review deviations from the initial baseline.	
		vi) Any additional measures the operator determines are needed to evaluate the effectiveness of the IM program in controlling each identified threat?	Yes or Satisfactory	Additional measures are defined in 7.3 of the DIM plan.	
40	192.1007 (e)	When measures are required to reduce risk, do the written procedures provide how their effectiveness will be measured?	Yes or Satisfactory	This is defined in 7.5 of the DIM plan.	Liberty has conducted reviews to determine the effectiveness of the AA that have been implemented. No further implementation of actions have been required to further remediate threats.
41	Information Only				

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Can the performance measures identified by the operator in the plan be counted, monitored, and supported?	Yes or Satisfactory	The measures implemented by Liberty can be counted, monitored and are supported. They are also realistic to achieve. These would be increased leak surveys to detect leakage sooner on bare steel and measures implemented in March of 2014 to reduce third party damages. Liberty has submitted for a rate case of which pat is to recover costs for implementing a replacement program of bare steel and pvc piping in Illinois.	The measures implemented by Liberty can be counted, monitored and are supported. They are also realistic to achieve. These would be increased leak surveys to detect leakage sooner on bare steel and measures implemented in March of 2014 to reduce third party damages. Liberty has submitted for a rate case of which pat is to recover costs for implementing a replacement program of bare steel and pvc piping in Illinois.

42 192.1007 (e)

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Does the documentation provided by the operator demonstrate implementation of the element "Measure Performance, Monitor Results, and Evaluate Effectiveness"?	Yes or Satisfactory	The operator had provided documentation to indicate implementation of the plan, measure performance and evaluate effectiveness. Staff reviewed leak surveys to determine that they were completed as required and reviewed the outstanding leaks to ensure they were repaired as required. For third party damage it will take a couple of months to see if the action taken reduce third party damages. Staff also reviewed the performance measure reports through 2013 for each cost center.	The operator had provided documentation to indicate implementation of the plan, measure performance and evaluate effectiveness.
43	192.1007 (f)	Do the written procedures for periodic review include:			
		a. This is defined in 7.5 complexity of the system and changes in factors affecting the risk of failure, not to exceed 5 years?	Frequency of review based on the Liberty currently has	of the plan on pages 4-5. This is a five year interval.	Yes or Satisfactory the required procedures for the above requirements defined in their plan.
		b. Verification of general information (e.g. contact information, form names, action schedules, etc.)?	Yes or Satisfactory	Defined in 8.2 of the plan on page 2.	
		c. Incorporate new system information?	Yes or Satisfactory	New information is defined in 8.2 on page 2 of the plan.	
		d. Re-evaluation of threats and risk?	Yes or Satisfactory	Defined in 8.2 of the plan on page 2.	
		e. Review the frequency of the measures to reduce risk?	Yes or Satisfactory	Defined in 8.2 of the plan on page 2.	
		f. Review the effectiveness of the measures to reduce risk?	Yes or Satisfactory	Defined in 8.3 of the plan on page 3.	

Q. No.:	Rule Name:	Question	Answer	Details	Comments
in 8.3 of the		g. risk and refine/improve as needed (i.e. add new, modify existing, or eliminate if no longer needed)?	Modify the measures to reduce	Yes or Satisfactory	Defined
in 7.5 of the		h. their effectiveness, and if they are not appropriate, refine/improve them?	Review performance measures,	Yes or Satisfactory	Defined
44	Information Only	Does the plan contain a process for informing the appropriate operating personnel of an update to the plan?	Yes or Satisfactory	This is defined 8.4 Communication of Change on page 3.	There have been no changes to the plan that have required communication of changes to be submitted. The change log is located in Appendix J.2 of the plan.
45	Information Only	Does the plan contain a process for informing the appropriate regulatory agency of a significant update to the plan?	Yes or Satisfactory	This is defined in 8.4 of the plan on page 3.	This is defined in 8.4 of the plan on page 3. No changes have been made that required notification to the state.
46	192.1007 (f)	Does the documentation provided by the operator demonstrate implementation of the element "Periodic Evaluation and Improvement"?	Yes or Satisfactory	This is defined in 8.2 on page 2 of the plan. Liberty has conducted the first review after leaving Atmos and will be required to implement a new program to evaluate and rank risk due to losing access to the Atmos processes.	
47	192.1007 (g)	Does the plan contain or reference procedures for reporting, on an annual basis, the four measures listed in 192.1007(e)(1)(i) through (e)(1)(iv) to PHMSA as part of the annual report required by § 191.11 and the State regulatory authority?	Yes or Satisfactory	Defined in 7.2 of the plan on page 3.	Liberty has provided the required information to PHMSA through their annual reports.
48	Information Only				

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		When required by the State, does the plan identify the specific report form, date, and location where it is to be submitted?	Yes or Satisfactory	Defined in 8.4 of the plan on page 3.	Defined in 8.4 of the plan on page 3.
49	192.1007 (g)	Has the operator submitted the required reports?	Yes or Satisfactory	Liberty has provided the plan as required to the state agency.	Liberty has provided the plan as required to the state agency.
50	192.1009	Does the operator have written procedures to collect the information necessary to comply with the reporting requirements of 192.1009?	Yes or Satisfactory	Defined in 7.4 on page 4. There have been no reports submitted for Illinois in 2012 or 2013.	Defined in 7.4 on page 4. There have been no reports submitted for Illinois in 2012 or 2013.
51	192.1011	Does the operator have written procedures specifying which records demonstrating compliance with Subpart P will be maintained for at least 10 years?	Yes or Satisfactory	This is defined in 8.2 of the plan on page 2. Also defined in 7.5 the plan on page 4. The change log is located in Appendix J pages 2-4.	Liberty is maintaining the required documentation for 10 years.
52	192.1011	Does the operator have written procedures specifying that copies of superseded integrity management plans will be maintained for at least 10 years?	Yes or Satisfactory	This is defined in 8.2 of the plan on page 2.	Liberty has maintained copies of the plan as required.
53	192.1011	Has the operator maintained the required records?	Yes or Satisfactory	Defined in 8.2 of the plan on page 2. The documentation reviews conducted as part of this audit indicates Liberty is maintaining the required documentation to implement the plan.	The documentation reviews conducted as part of this audit indicates Liberty is maintaining the required documentation to implement the plan.
54-1	192.1007 (d)	1. For the top five highest ranked risks from the operator's risk ranking list the following:			

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Primary threat category (corrosion, natural forces, excavation damage, other outside force damage, material or weld, equipment failure, incorrect operation, and other concerns);	Corrosion		Liberty is currently leak surveying bare steel in Illinois on an annual basis. Liberty is repairing all leaks detected within their established guidelines (GPTC parameters) and includes repairing above ground class three leaks.
		Threat subcategory (GPTC threat subcategories are acceptable. Try to be specific. Example, failing bonnet bolts of gate valve, manufacturer name, model #);		Bare Steel piping located in the Illinois systems.	
		Measure to reduce the risk (list the one measure the operator feels is most important to reducing the risk);		Conducting Leakage Surveys on an annual basis.	
		Associated performance measure.		Reduction in the number of hazardous leaks due to early detection before they become hazardous. Liberty is repairing all leaks detected within their established guidelines (GPTC parameters) and includes above ground class three leaks.	
54-2	192.1007 (d)	2. For the top five highest ranked risks from the operator's risk ranking list the following:			
		Primary threat category (corrosion, natural forces, excavation damage, other outside force damage, material or weld, equipment failure, incorrect operation, and other concerns);	Excavation damage		Due to an increase in third party damages Liberty had initiated an improved damage prevention program that was started in March of 2014.
		Threat subcategory (GPTC threat subcategories are acceptable. Try to be specific. Example, failing bonnet bolts of gate valve, manufacturer name, model #);	Third party	Third Party Damages to all materials.	

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Measure to reduce the risk (list the one measure the operator feels is most important to reducing the risk);		Initiate Third Party Damage Prevention procedure that enhances awareness, education including emphasis on repeat offenders.	
		Associated performance measure.		Reduction of Third Party Damages	
54-3	192.1007 (d)	3. For the top five highest ranked risks from the operator's risk ranking list the following:			
		Primary threat category (corrosion, natural forces, excavation damage, other outside force damage, material or weld, equipment failure, incorrect operation, and other concerns);	Excavation damage		Liberty has initiated a plan to utilize new technology to allow for locating of PVC systems that currently do not have tracer wire. If the piping cannot be located the piping is to be excavated to determine the location of the piping. Trending indicates the number of third party damages are reducing
		Threat subcategory (GPTC threat subcategories are acceptable. Try to be specific. Example, failing bonnet bolts of gate valve, manufacturer name, model #);	Locator error	Excavation damage to PVC systems installed without tracer wire.	
		Measure to reduce the risk (list the one measure the operator feels is most important to reducing the risk);		Enhanced locating of non-tracer wire pvc piping using Jameson Gas Line Tracer for non-metallic gas lines.	
		Associated performance measure.		Reduction of third party damages to pvc systems due to the lack of ability to locate.	
54-4	192.1007 (d)	4. For the top five highest ranked risks from the operator's risk ranking list the following:			

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Primary threat category (corrosion, natural forces, excavation damage, other outside force damage, material or weld, equipment failure, incorrect operation, and other concerns);	Equipment failure		
		Threat subcategory (GPTC threat subcategories are acceptable. Try to be specific. Example, failing bonnet bolts of gate valve, manufacturer name, model #);	Other	Completion Caps and Compression Couplings.	
		Measure to reduce the risk (list the one measure the operator feels is most important to reducing the risk);		Leak surveys	
		Associated performance measure.		Reduction of hazardous leaks.	
54-5	192.1007 (d)	5. For the top five highest ranked risks from the operator's risk ranking list the following:			
		Primary threat category (corrosion, natural forces, excavation damage, other outside force damage, material or weld, equipment failure, incorrect operation, and other concerns);	Equipment failure		Liberty is replacing all of the pilot loaded 1805 reliefs located in the Illinois systems. They have encountered sticking seats in the pilot assembly. Liberty has initiated a plan to replace the remaining reliefs in 2014.
		Threat subcategory (GPTC threat subcategories are acceptable. Try to be specific. Example, failing bonnet bolts of gate valve, manufacturer name, model #);	Regulators	Liberty has encountered issues with sticking pilots on pilot loaded 1805 reliefs.	
		Measure to reduce the risk (list the one measure the operator feels is most important to reducing the risk);		Liberty has developed a plan to replace the 1805 relief valves.	
		Associated performance measure.		Replacement of 1805 Pilot loaded relief valves that have the AR pilot assembly to reduce the possibility of over pressuring a distribution system.	