

# PST – State Website Transparency Assessment

## 2022 METHODOLOGY

Instructions for scoring – Spring 2022

Following the successful transparency assessments over the last six years, PST has used nearly the same methodology for state pipeline safety agencies. In 2017, we made a minor adjustment to methodology to reflect circumstances that are often beyond the agency's control. This adjustment is **underlined and bold** in the criteria below.

### State Pipeline Safety Agency Review Criteria

All questions have three possible points; a total of 33 points is possible. Where a score depends on a description of something as “easy to find,” that means it can be found within four mouse clicks of the general agency home page.

1. Finding the Agency Website (additive points)
  - 2 points: If you Google (state name) plus “pipeline safety” or “pipeline regulation” you will get the right page within the top five search results
  - 1 point: If you go to general state government web page and look for, or search for “pipeline safety” or “pipeline regulation” you will get taken to the right page from a menu or a link to the page will be in the top five hits
  - 0 points: Unable to find the agency page in the top five hits through the steps above
2. Contact Information for Agency Staff
  - 3 points: Easy to find, includes complete staff list and titles, email addresses and phone numbers
  - 2 points: Easy to find, some (more than one) individual staff contact email addresses or phone numbers
  - 1 Point: Any shortcoming from two points: either hard to find, or missing some aspect of contact info from two points
  - 0 points: Anything less, including blind email box for information request
3. Access to State Statutes, Rules; Federal Statutes, Rules (additive points)
  - 1 point: Easy to find link to state rules and statutes
  - 1 point: Easy to find link to federal rules and statutes that link to PHMSA website, PHMSA standards and rulemakings page, or other link to federal regulations specific to pipeline safety
  - 1 point: Links to state pipeline safety statutes/rules that go directly to automatically updated portion(s) of the state regulations and rules having to do with pipeline safety **or links to PDFs of the most current versions of state regulations and rules that are clearly identified as “current” rules/regulations with an adoption date.**
4. Description of State authority (what the state does and does not regulate) (additive points)
  - 2 points: Clearly and accurately describe what types of pipelines the state regulates, enforces, and/or inspects under certifications or agreements with PHMSA (1 point if partial – e.g. description for gas and not hazardous liquids if state regulates both)
  - 1 point: Clearly and accurately describe what pipelines the state does NOT regulate/enforce/inspect, and refer reader to PHMSA by appropriate link for pipelines not regulated by state (If interstate agents for both, no link necessary)
  - 0 Points: Neither of the above descriptions
5. Transmission Pipeline Maps
  - 3 points: Easy to find; can be either link to interactive state mapping system, or link to National Pipeline Mapping System (NPMS) public viewer
  - 2 points: Not immediately apparent – need to use search function or fish around (more than 4 clicks) to find maps, either state system or link to NPMS
  - 1 point: Some map(s) – operator system maps, fixed state map of systems, etc.

- 0 points: No maps available
6. Pipeline Company Contact Information
- 3 Points: List of pipeline operators in the agency's jurisdiction, including operator company name, address, contact information, type(s) of pipelines operated and PHMSA operator identification number
  - 2 Points: Everything but PHMSA operator identification number; or link to NPMS operator finder page
  - 1 Point: List of companies with contact info, but less than what's required for two points, or only gas operator contacts if state has authority for both gas and hazardous liquid pipelines
  - 0 Points: No information available
7. Inspection Records
- 3 points: Description and list of inspections with links to records related to inspection, any correspondence, follow up, etc.
  - 2 points: Description and list and type of inspections performed by date and company, but no access to documents
  - 1 point: General description of different types of inspections performed or link to PHMSA description page - <http://primis.phmsa.dot.gov/comm/Inspection.htm>
  - 0 points: No information available
8. Incident Data
- 3 points: Links or searchable docket to easily access pipeline incident investigation reports
  - 2 points: Link to PHMSA state incident page, or presence of equivalent state page identifying incidents by commodity, location, and identifying operator, nature and cause of incident
  - 1 point: Some sort of information about incidents (map, list), or part of larger docket without search function limiting to pipeline incident information
  - 0 points: No information available
9. Enforcement Data
- 3 points: Enforcement information with description and summaries, with totals by year, and by company: notices of probable violations, fines proposed, fines collected, links to administrative orders, consent orders or settlements or other correspondence closing out enforcement
  - 2 points: Description and summary with totals by year, by company, but no links to underlying documents; or link to PHMSA state enforcement page; or clear links to reports without overall summary info
  - 1 point: Some information about enforcement: by operator, or annual totals, or located within the overall docket
  - 0 points: Anything less than above or no information
10. Excavation Damage Data
- 3 points: Excavation damage data includes operator, date, cause, whether a reportable incident occurred, or link to PHMSA state damage prevention page
  - 2 points: Summary of annual excavation data including description of how data was obtained.
  - 1 point: Overall excavation damage data for the state by year; or some info in docket
  - 0 points: Anything less than above or no information
11. Siting and Routing Information (additive points)
- 1 point: Explanation of process different types of pipelines in the state must follow for permission to construct new or expand existing lines
  - 1 point: Links to appropriate federal and/or state agencies with routing/siting authority
  - 1 point: Information about whether agency has involvement in permitting or routing new transmission or gathering pipelines