

MACFARLANE FERGUSON & McMULLEN

ATTORNEYS AND COUNSELORS AT LAW

ONE TAMPA CITY CENTER, SUITE 2000
201 NORTH FRANKLIN STREET
P.O. BOX 1531 (ZIP 33601)
TAMPA, FLORIDA 33602
(813) 273-4200 FAX (813) 273-4396

www.mfmlegal.com
EMAIL: info@mfmlegal.com

625 COURT STREET
P.O. BOX 1669 (ZIP 33757)
CLEARWATER, FLORIDA 33756
(727) 441-8966 FAX (727) 442-8470

IN REPLY REFER TO:

Ansley Watson, Jr.
P.O. Box 1531
Tampa, Florida 33601
e-mail: aw@macfarlane.com

April 18, 2016

VIA E-PORTAL FILING

Carlotta S. Stauffer, Director
Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Docket No. 150259-GU -- Initiation of show cause proceedings against Peoples Gas System for apparent violations of Sections 368.01 - 05, F.S., and Chapter 25-12, F.A.C.

Dear Ms. Stauffer:

Attached for filing with the Commission in the above docket on behalf of Peoples Gas System ("Peoples"), please find a Settlement Agreement entered into by and among Peoples, the Commission's Prosecutorial Staff, and the Office of Public Counsel.

If approved by the Commission, this Settlement Agreement will avoid the time, expense and uncertainty associated with adversarial litigation. In keeping with the Commission's long-standing policy and practice of encouraging parties in contested proceedings to settle issues whenever possible.

Thank you for your usual assistance.

Sincerely,



Ansley Watson, Jr.

AWjr/a
Enclosure

Carlotta S. Stauffer, Director
April 18, 2016
Page 2

cc: J. R. Kelly, Esquire
Charles Rehwinkel, Esquire
Danielle M. Roth, Esquire
Kelley F. Corbari, Esquire
Bianca Lherisson, Esquire
Charles Murphy, Esquire
Kathryn Cowdery, Esquire
Samantha Cibula, Esquire
Ms. Kandi M. Floyd
(all above via e-mail attachment)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Initiation of show cause proceedings against)	
Peoples Gas System for apparent violations of Sections)	Docket No. 150259-GU
368.01 - 05, F.S., and Chapter 25-12, F.A.C.)	
<hr/>		Filed: 4-18-16

SETTLEMENT AGREEMENT

Pursuant to Section 120.57(4), *Florida Statutes*, Peoples Gas System ("PGS" or the "Company"), the Office of Public Counsel ("OPC"), and the Prosecutorial Staff ("Staff") of the Florida Public Service Commission ("Commission") (collectively, the "Parties") have entered into this Settlement Agreement to reach an informal disposition and complete a binding resolution of any and all matters and issues that were or might have been addressed by the Commission in Docket No. 150259-GU. More specifically, this Settlement Agreement completely resolves the issues raised in (i) OPC's Petition Requesting the Florida Public Service Commission to Issue an Order to Show Cause Against Peoples Gas System For Violations of Chapter 25-12 F.A.C., Request for Imposition of Fines, and Request for Rate Relief, filed on December 7, 2015; (ii) Staff's Notice of Violation and Initiation of Show Cause Proceeding filed February 25, 2016; (iii) the Commission's September 2013 "Review of Peoples Gas Distribution Facility Inspections" Audit; and (iv) the Commission's November 2015 "Peoples Gas Distribution Facility Inspections Follow-up Audit." This Settlement Agreement avoids the time, expense and uncertainty associated with adversarial litigation, in keeping with the Commission's longstanding policy and practice of encouraging parties in contested proceedings to settle issues whenever possible. The terms of this Settlement Agreement are as follows:

1. Definitions. As used in this Settlement Agreement, the following capitalized terms, unless otherwise defined herein, shall have the following meanings:

"AS" means TECO Energy Audit Services, including any successor department of TECO Energy designated to perform the same or similar services during the term of this Settlement Agreement.

"Employee" means an employee (including a management employee) who has responsibilities for pipeline safety compliance.

"KPMG" means KPMG LLP, a Delaware registered limited liability partnership and the United States member firm of the KPMG network of independent firms, its successors and assigns.

"PGS" or "Company" means Peoples Gas System, its successors and assigns.

"PGS Gas Delivery" means the functional area (regardless of Company organizational titles) within PGS with responsibility for the engineering, construction, maintenance and operational support of the Company's gas transmission and distribution system, including operational divisions, engineering, team member safety, pipeline safety compliance, training and technical support.

"PGS Gas Operations" means the functional area (regardless of Company organizational titles) within PGS Gas Delivery comprised of the Company's operational divisions with responsibility for inspection, construction, maintenance and related compliance activities of the Company's gas transmission and distribution system.

"TECO Energy" means TECO Energy, Inc., a Florida corporation, its successors and assigns.

2. A list of the violations in this docket is attached to this Settlement Agreement as Appendix A, all of which violations are admitted by PGS for purposes of this Settlement Agreement.

3. PGS will submit a penalty in the amount of \$1,000,000, as provided by Section 368.061, *Florida Statutes*, to the Commission within thirty (30) days after the Commission's approval of this Settlement Agreement. Upon receipt of the payment, the Commission will forward the payment to the Department of Financial Services for deposit into the General Revenue Fund.

4. Following the Commission's approval of this Settlement Agreement, PGS will issue a one-time, non-recurring credit in the amount of \$2,000,000, representing a refund to make PGS customers subject to the Company's Cast Iron/Bare Steel Replacement Rider (Rider CI/BSR) whole for any contentions of any deficiency in O&M spending levels that could have mitigated the compliance issues. Such credit will be made to reflect O&M savings within Rider CI/BSR in the month following the Commission's approval of this Settlement Agreement. It is understood by the Parties that PGS customers will experience the benefit of the one-time, non-

recurring, credit through a reduction of the 2017 monthly surcharges contemplated by Rider CI/BSR. It is the intent of the parties that the full amount of \$2,000,000 be returned to PGS customers in 2017 (subject to a true-up) and PGS will clearly identify the inclusion of the \$2,000,000 credit in its 2016 Rider CI/BSR petition for approval of the Company's 2017 Rider CI/BSR monthly surcharge. PGS will also include, and clearly identify, schedules concurrently with the Company's 2017 petition for approval of its 2018 Rider CI/BSR surcharges to verify that the Company issued the one-time, non-recurring credit referenced above.

5. As an integral part of this Settlement Agreement, the Parties agree that, and PGS agrees that it will comply with the following:

a. PGS Compliance – Employees

i. PGS will, within six (6) months following the date of the Commission's order approving this Settlement Agreement, conduct training for all PGS Gas Delivery Employees, clearly communicating the high priority placed by the Company upon safety and facilities inspection compliance, and a zero tolerance policy toward falsification of records. PGS will also put provisions in place to ensure the adequacy of any contractor training, clearly communicating the high priority placed by the Company upon safety and facilities inspection compliance, and a zero tolerance policy toward falsification of records.

ii. PGS will, within six (6) months following the date of the Commission's order approving this Settlement Agreement, require PGS Gas Delivery management Employees to acknowledge in writing a commitment to vigilant oversight of safety and inspection compliance and awareness of consequences for failure to execute this duty.

iii. PGS will, within six (6) months following the date of the Commission's order approving this Settlement Agreement, assess the performance of each PGS Gas Delivery management Employee and, if and when necessary, take appropriate actions (including, but not limited to, reassignment) to help ensure effective safety and regulatory compliance.

b. KPMG/AS Investigation. PGS Gas Delivery will review KPMG/AS's February 2016 investigation report and develop a plan and timetable for implementing internal controls improvements and audits PGS and/or TECO Energy determines are needed. This plan and timetable will be presented to Commission Staff for review no later than December 31, 2016. The OPC will be provided a copy at the same time. The Parties agree that such a plan might be subject in whole or in part to the confidentiality protections listed in Section 366.093, *Florida Statutes*.

c. AS Involvement

i. AS will conduct or oversee all needed audit activity, and review implementation of the corrective action plan developed as a result of the KPMG/AS investigation and the requirements of this Settlement Agreement.

ii. AS Management will continue making regular reports to the Board of Directors Audit Committee (or a successor thereto) regarding improvements in the overall effectiveness of the PGS compliance program, including implementation of both the KPMG/AS investigation recommendations and the requirements of this Settlement Agreement.

d. Compliance Reviews

i. PGS Gas Delivery will reinstitute the broader scope, thorough testing, and detailed format of the annual pipeline safety compliance reviews conducted by the Company between 2009 and 2013.

ii. AS (or a qualified person or department independent of PGS Gas Delivery) will conduct and document regular reviews of the above referenced compliance review results. For 2016 and 2017, AS (or a qualified person or department independent of PGS Gas Delivery) will coordinate with PGS Gas Delivery compliance review staff in assessing a required letter of response by PGS Gas Operations management to each compliance review, and in reviewing and verifying completion of agreed upon corrective actions reported by PGS Gas Operations management.

iii. All PGS Gas Operations managers will regularly conduct and document reviews of status reports produced by GL Essentials, and the work of contractors performing gas pipeline safety work for the Company.

e. GL Essentials

i. PGS will implement the use of GL Essentials by all contractors conducting facilities inspections by December 31, 2016.

ii. Operations management will develop standardized written procedures for GL Essentials, and closely monitor its use by employees and contractors to identify and address any training needs by December 31, 2016.

iii. PGS will institute a mechanism to gather Employee input regarding problems/potential improvements for all facilities inspection activities and GL Essentials by December 31, 2016.

f. **Agreement Term.** The obligations of PGS (including the responsibilities of PGS Gas Delivery, PGS Gas Operations, and AS) under this paragraph 5 shall terminate, and be of no further force or effect, on and after the date which is four (4) years after the date of the Commission's order approving this Settlement Agreement. PGS acknowledges that it will continue to be responsible for complying with any and all FPSC and Pipeline and Hazardous Materials Safety Administration ("PHMSA") gas safety rules during the term of, and following the expiration of the term of, this Settlement Agreement.

6. The incremental costs incurred by PGS as a result of implementing certain corrective measures identified in this Settlement Agreement will not be recovered from PGS customers, including but not limited to the costs associated with the KPMG/AS investigation.

7. In accordance with Section 120.57(4), *Florida Statutes*, approval of this Settlement Agreement in its entirety will resolve all matters in Docket No. 150259-GU, including any alleged violations of reasonably related rules or standards outlined in Appendix A that may have occurred up to the date this Settlement Agreement takes effect and all claims set forth in the petition filed by OPC in this docket on December 7, 2015.

8. This Settlement Agreement will take effect the day after it is approved by the Commission.

9. The provisions of this Settlement Agreement are contingent on approval of this Settlement Agreement in its entirety by the Commission without modification.

10. It is the desire of the Parties that this Settlement Agreement be considered at an appropriate proceeding that does not involve live testimony and cross examination on the merits of the Petition and Notice that initiated this proceeding. The Parties agree that: (a) consideration of this Settlement Agreement as an agenda item at a regularly scheduled Commission

conference at which all interested persons are provided an opportunity to speak shall satisfy any requirement for the conduct of a hearing on the approval of this Settlement Agreement; (b) the following documents on file in this proceeding shall be available for the Commission during its consideration of this Settlement Agreement: the Petition Requesting the Florida Public Service Commission to Issue an Order to Show Cause Against Peoples Gas System for Violations of Chapter 25-12, *Florida Administrative Code*, Request for Imposition of Fines, and Request for Rate Relief, filed by the Office of Public Counsel, the Notice of Violation and Initiation of Show Cause Proceeding filed by Staff, the Commission 2013 and 2015 audits, and this Settlement Agreement; (c) upon approval of this Settlement Agreement by the Commission, such documents shall become part of the record of this proceeding as if admitted into evidence at a final hearing; and (d) a Commission decision approving this Settlement Agreement may be issued as a final order.

11. With respect to this Settlement Agreement, the Parties agree to waive: (a) all notice requirements for a hearing as set forth in Section 120.569(2)(b), *Florida Statutes*, or other applicable provisions of law; (b) their right to require a hearing on the merits; (c) their respective rights to seek reconsideration pursuant to Rule 25-22.060, *Florida Administrative Code*, of any final order that approves this Settlement Agreement in its entirety and without change; and (d) their respective right to judicial review of any such final agency action approving this Settlement Agreement afforded by Section 120.68, *Florida Statutes*, except proceedings to enforce this Settlement Agreement.

12. The Parties further agree that they will support this Settlement Agreement and affirmatively assert that this Settlement Agreement is in the public interest and should be approved. In this regard, the Parties acknowledge that this Settlement Agreement has been agreed to by each and every Party and resolves each and every issue in this docket. The Parties agree that they will not request or support any order, relief, outcome, or result in conflict

with the terms of this Settlement Agreement in any administrative or judicial proceeding relating to, reviewing, or challenging the establishment, approval, adoption, or implementation of this Settlement Agreement or the subject matter hereof.

13. The Parties' agreement to the terms in this Settlement Agreement shall be without prejudice to any Party's ability to advocate a different position in future proceedings not involving this Settlement Agreement. The Parties further expressly agree that no individual provision, by itself, necessarily represents a position of any Party in a future proceeding, and the Parties further agree that no Party shall assert or represent in any future proceeding in any forum that another Party endorses any specific provision of this Settlement Agreement because of that Party's signature hereto. It is the intent of the Parties to this Settlement Agreement that the Commission's approval of all the terms and provisions of this Settlement Agreement is an express recognition that (a) no individual term or provision, by itself, necessarily represents a position, in isolation, of any Party and (b) that no Party to this Settlement Agreement endorses a specific provision, in isolation, of this Settlement Agreement because of that Party's signature hereto.

14. If the Commission does not accept this Settlement Agreement in its entirety pursuant to its terms set out herein, then (i) the Settlement Agreement shall be considered rejected and shall be and become null and void and of no further force or effect as if this document had never been developed and written; (ii) this document will not constitute an admission of liability by PGS and shall not be admissible in any hearing on the matters at issue in Docket No. 150259-GU, or in any other docket or forum; and (iii) no Party to this Settlement Agreement waives any position on any issue that it could have otherwise asserted in any docket in which it is a Party.

15. This Settlement Agreement may be executed in counterpart originals and a facsimile or scan of an original signature shall be deemed an original.


16. This Settlement Agreement constitutes a single, integrated written contract expressing the entire agreement among the Parties and superseding all other agreements, representations and understandings on the subject matter hereof. There is no other agreement, oral or written, expressed or implied, among the Parties with respect to the subject matter hereof, except this Settlement Agreement.

17. Docket 150259-GU will be closed administratively, upon (i) the Commission's receipt of the \$1,000,000 penalty payment provided in paragraph 3 of this Settlement Agreement and (ii) PGS filing of its 2016 Rider CI/BSR petition for approval of the Company's 2017 Rider CI/BSR monthly surcharge clearly identifying the inclusion of the \$2,000,000 credit, as outlined in paragraph 4 of this Settlement Agreement., and no Party shall seek appellate review of any order issued in this docket.

[signature page follows]

The Parties evidence their acceptance of and agreement with the provisions of this Settlement Agreement by their signatures:

FLORIDA PUBLIC SERVICE COMMISSION PROSECUTORIAL STAFF

By: 

Braulio L. Baez
Executive Director

FLORIDA OFFICE OF PUBLIC COUNSEL

By: _____
J. R. Kelly, Esquire
Public Counsel

PEOPLES GAS SYSTEM

By: _____
Ansley Watson, Jr., Esquire
Macfarlane Ferguson & McMullen
Attorneys for Peoples Gas System

The Parties evidence their acceptance of and agreement with the provisions of this Settlement Agreement by their signatures:

FLORIDA PUBLIC SERVICE COMMISSION PROSECUTORIAL STAFF

By: _____
Braulio L. Baez
Executive Director

FLORIDA OFFICE OF PUBLIC COUNSEL

By: _____
J. R. Kelly, Esquire
Public Counsel

PEOPLES GAS SYSTEM

By: _____
Ansley Watson, Jr., Esquire
Macfarlane Ferguson & McMullen
Attorneys for Peoples Gas System

The Parties evidence their acceptance of and agreement with the provisions of this Settlement Agreement by their signatures:


FLORIDA PUBLIC SERVICE COMMISSION PROSECUTORIAL STAFF

By: _____
Braulio L. Baez
Executive Director

FLORIDA OFFICE OF PUBLIC COUNSEL

By: _____
J. R. Kelly, Esquire
Public Counsel

PEOPLES GAS SYSTEM

By:  _____
Ansley Watson, Jr., Esquire
Macfarlane Ferguson & McMullen
Attorneys for Peoples Gas System

PHMSA RULES

191.11 Distribution System Annual Report

PGS Division	Violation	Evaluation Date	Notice Issued	PGS Response	Progress Report	Closed
PGSTA	GS-1192	6/19/2013	7/9/2013	8/6/2013	5/15/2014	5/27/2014

192.199 Requirements for Design of Pressure Relief & Limiting Devices

PGS Division	Violation	Evaluation Date	Notice Issued	PGS Response	Progress Report	Closed
PGSSP	GS-1191	6/21/2013	6/26/2013	7/19/2013	12/4/2013	12/12/2013

192.201 Required Capacity of Pressure Relieving & Limiting Stations

PGS Division	Violation	Evaluation Date	Notice Issued	PGS Response	Progress Report	Closed
PGSSP	GS-1191	6/21/2013	6/26/2013	7/19/2013	12/4/2013	12/12/2013

192.203 Instrument Control & Sampling Pipe & Components

PGS Division	Violation	Evaluation Date	Notice Issued	PGS Response	Progress Report	Closed
PGSSP	GS-1191	6/21/2013	6/26/2013	7/19/2013	12/4/2013	12/12/2013

192.383 Excess Flow Valve Installation

PGS Division	Violation	Evaluation Date	Notice Issued	PGS Response	Progress Report	Closed
PGSSP	GS-1191	6/21/2013	6/26/2013	7/19/2013	12/4/2013	12/12/2013
PGSTA	GS-1254	6/3/2014	6/26/2014	7/23/2014	12/23/2014	12/29/2014

192.458 External Corrosion Control: Examination of Buried Pipeline When Exposed

PGS Division	Violation	Evaluation Date	Notice Issued	PGS Response	Progress Report	Closed
PGSOD	GS-1326	4/24/2015	5/8/2015	6/5/2015	NONE	NO
PGSTA	GS-1326	7/8/2015	7/21/2015	9/18/2015	12/21/2015	12/28/2015

192.463 External Corrosion Control: Cathodic Protection

PGS Division	Violation	Evaluation Date	Notice Issued	PGS Response	Progress Report	Closed
PGSSA	GS-1223	12/6/2013	12/16/2013	1/10/2014	10/28/2014	10/29/2014

192.465 External Corrosion Control: Monitoring

PGS Division	Violation	Evaluation Date	Notice Issued	PGS Response	Progress Report	Closed
PGSAP	GS-1289	10/17/2014	10/21/2014	11/20/2014	12/24/2014	12/29/2014
PGSLD	GS-1287	10/31/2014	11/12/2014	12/10/2014	12/24/2014	12/29/2014
PGSOC	GS-1250	5/14/2014	6/3/2014	6/30/2014	12/9/2014	12/16/2014
PGSSP	GS-1256	6/23/2014	7/1/2014	7/31/2014	3/20/2015	3/24/2015
PGSTA	GS-1326	6/19/2013	7/9/2013	8/6/2013	5/15/2014	5/27/2014
PGSTA	GS-1326	7/8/2015	7/21/2015	9/18/2015	12/21/2015	12/28/2015

192.467 External Corrosion Control: Electrical Isolation

PGS Division	Violation	Evaluation Date	Notice Issued	PGS Response	Progress Report	Closed
PGSTA	GS-1192	6/19/2013	7/9/2013	8/6/2013	5/15/2014	5/27/2014

192.479 Atmospheric Corrosion Control: General

PGS Division	Violation	Evaluation Date	Notice Issued	PGS Response	Progress Report	Closed
PGSAP	GS-1283	10/17/2014	10/21/2014	11/20/2014	12/24/2014	12/29/2014
PGSBS	GS-1331	1/30/2014	2/6/2014	3/3/2014	3/27/2014	4/9/2014
PGSLD	GS-1324	11/4/2013	12/30/2013	1/10/2014	2/7/2014	2/7/2014
PGSOD	GS-1205	7/1/2013	9/25/2013	10/22/2013	1/16/2014	1/24/2014
PGSSP	GS-1256	6/23/2014	7/1/2014	7/31/2014	3/20/2015	3/24/2015
PGSTA	GS-1322	6/19/2013	7/9/2013	8/6/2013	5/15/2014	5/27/2014
PGSTA	GS-1254	6/3/2014	6/26/2014	7/23/2014	12/23/2014	12/29/2014
PGSTA	GS-1326	7/8/2015	7/21/2015	9/18/2015	12/21/2015	12/28/2015
TEBPL	GS-1330	1/30/2014	2/6/2014	3/3/2014	3/27/2014	4/9/2014

192.481 Atmospheric Corrosion Control: Monitoring

PGS Division	Violation	Evaluation Date	Notice Issued	PGS Response	Progress Report	Closed
PGPPL	GS-1279	10/10/2014	10/13/2014	11/20/2014	12/23/2014	12/29/2014
PGSAP	GS-1239	10/17/2014	10/21/2014	11/20/2014	12/24/2014	12/29/2014
PGSFM	GS-1234	10/14/2014	10/29/2014	11/11/2014	2/9/2015	2/9/2015
PGSFM	GS-1235	8/4/2015	7/27/2015	8/21/2015	10/14/2015	10/15/2015
PGSLD	GS-1287	10/31/2014	11/12/2014	12/10/2014	12/24/2014	12/29/2014
PGSSA	GS-1346	11/16/2015	10/23/2015	12/14/2015	NONE	NO
PGSSP	GS-1256	6/23/2014	7/1/2014	7/31/2014	3/20/2015	3/24/2015
PGVPL	GS-1273	9/10/2014	9/22/2014	10/17/2014	12/24/2014	12/29/2014

192.487 Remedial Measures: Distribution Lines Other than Cast Iron or Ductile Iron Lines

PGS Division	Violation	Evaluation Date	Notice Issued	PGS Response	Progress Report	Closed
PGSEU	GS-1324	6/17/2015	6/29/2015	NONE	NONE	NO

192.491 Corrosion Control Records

PGS Division	Violation	Evaluation Date	Notice Issued	PGS Response	Progress Report	Closed
PGSEU	GS-1324	6/17/2015	6/29/2015	NONE	NONE	NO

192.5 Class Locations

PGS Division	Violation	Evaluation Date	Notice Issued	PGS Response	Progress Report	Closed
PGSBV	GS-1198	8/15/2013	9/5/2013	10/3/2013	12/10/2013	12/13/2013

192.605 Procedural Manual for Operations, Maintenance & Emergencies

PGS Division	Violation	Evaluation Date	Notice Issued	PGS Response	Progress Report	Closed
PGSSP	GS-1191	6/23/2013	6/26/2013	7/19/2013	12/4/2013	12/12/2013
PGSTA	GS-1192	6/13/2013	7/3/2013	8/6/2013	5/15/2014	5/27/2014
PGSTA	GS-1326	7/8/2015	7/21/2015	9/18/2015	12/21/2015	12/28/2015
PGVPL	GS-1275	9/10/2014	9/22/2014	10/17/2014	12/24/2014	12/29/2014
TEBPL	GS-1330	1/30/2014	2/6/2014	3/3/2014	3/27/2014	4/9/2014

192.614 Damage Prevention

PGS Division	Violation	Evaluation Date	Notice Issued	PGS Response	Progress Report	Closed
PGSFM	GS-1216	10/24/2013	11/8/2013	12/6/2013	10/13/2014	10/14/2014
PGSIU	GS-1317	5/20/2015	5/26/2015	6/24/2015	NONE	NO
PGSSA	GS-1223	12/6/2013	12/16/2013	1/10/2014	10/28/2014	10/29/2014
PGSSA	GS-1252	11/26/2014	12/1/2014	2/3/2015	3/3/2015	3/3/2015
PGSSP	GS-1191	6/21/2013	6/26/2013	7/19/2013	12/4/2013	12/12/2013
PGSSP	GS-1256	6/23/2014	7/1/2014	7/31/2014	3/20/2015	3/24/2015
PGSSP	GS-1350	12/3/2015	12/15/2015	12/13/2015	NONE	NO

192.615 Emergency Plans

PGS Division	Violation	Evaluation Date	Notice Issued	PGS Response	Progress Report	Closed
PGSAP	GS-1283	10/17/2014	10/21/2014	11/20/2014	12/24/2014	12/29/2014
PGSTA	GS-1326	7/8/2015	7/21/2015	9/18/2015	12/21/2015	12/28/2015

192.616 Public Awareness

PGS Division	Violation	Evaluation Date	Notice Issued	PGS Response	Progress Report	Closed
PGPPL	GS-1200	9/5/2013	9/20/2013	10/21/2013	NONE	1/10/2014
PGSFM	GS-1216	10/24/2013	11/8/2013	12/6/2013	10/13/2014	10/14/2014
PGVPL	GS-1201	9/5/2013	9/23/2013	10/21/2013	NONE	1/10/2014

192.625 Odorization of Gas

PGS Division	Violation	Evaluation Date	Notice Issued	PGS Response	Progress Report	Closed
PGSFM	GS-1216	10/24/2013	11/8/2013	12/6/2013	10/13/2014	10/14/2014
PGSSP	GS-1191	6/21/2013	6/26/2013	7/19/2013	12/4/2013	12/12/2013

192.707 Line Markers for Mains & Transmission Lines

PGS Division	Violation	Evaluation Date	Notice Issued	PGS Response	Progress Report	Closed
PGSAP	GS-1283	10/17/2014	10/21/2014	11/20/2014	12/24/2014	12/29/2014
PGSLD	GS-1287	10/31/2014	11/12/2014	12/30/2014	12/24/2014	12/29/2014
PGSOC	GS-1314	5/4/2015	5/11/2015	NONE	NONE	NO
PGSOD	GS-1313	4/24/2015	5/8/2015	6/5/2015	NONE	NO
PGSTA	GS-1326	7/8/2015	7/21/2015	9/18/2015	12/21/2015	12/28/2015

192.723 Distribution Systems: Leakage Surveys

PGS Division	Violation	Evaluation Date	Notice Issued	PGS Response	Progress Report	Closed
PGSDD	GS-1213	9/19/2013	10/24/2013	11/21/2013	1/14/2014	1/24/2014
PGSDD	GS-1282	9/26/2014	10/17/2014	11/19/2014	NONE	9/22/2015
PGSMI	GS-1274	9/18/2014	10/1/2014	11/18/2014	2/4/2015	2/5/2015
PGSOD	GS-1264	7/14/2014	8/13/2014	9/8/2014	11/10/2014	11/13/2014

192.739 Pressure Limiting & Regulating Stations: Inspections & Testing

PGS Division	Violation	Evaluation Date	Notice Issued	PGS Response	Progress Report	Closed
PGSOD	GS-1264	7/14/2014	8/13/2014	9/8/2014	11/10/2014	11/13/2014

192.741 Pressure Limiting & Regulating Stations: Telemetering or Recording Gauges

PGS Division	Violation	Evaluation Date	Notice Issued	PGS Response	Progress Report	Closed
PGSSP	GS-1191	6/21/2013	6/26/2013	7/19/2013	12/4/2013	12/12/2013

192.743 Pressure Limiting & Regulating Stations: Capacity of Relief Devices

PGS Division	Violation	Evaluation Date	Notice Issued	PGS Response	Progress Report	Closed
PGSOD	GS-1264	7/14/2014	8/13/2014	9/8/2014	11/10/2014	11/13/2014
SCGPL	GS-1266	7/1/2014	8/14/2014	9/26/2014	11/18/2014	11/19/2014
TEBPL	GS-1330	1/30/2014	2/6/2014	3/3/2014	3/27/2014	4/9/2014

192.745 Valve Maintenance: Transmission Lines

PGS Division	Violation	Evaluation Date	Notice Issued	PGS Response	Progress Report	Closed
PGJPL	GS-1265	6/18/2014	8/13/2014	8/27/2014	11/18/2014	11/19/2014

192.747 Valve Maintenance: Distribution Systems

PGS Division	Violation	Evaluation Date	Notice Issued	PGS Response	Progress Report	Closed
PGSDD	GS-1262	9/26/2014	10/17/2014	11/19/2014	NONE	NO
PGSOD	GS-1264	7/14/2014	8/13/2014	9/8/2014	11/10/2014	11/13/2014
PGSTA	GS-1192	6/19/2013	7/9/2013	8/6/2013	5/15/2014	5/27/2014
PGSTA	GS-1254	6/3/2014	6/26/2014	7/23/2014	12/23/2014	12/29/2014

192.805 Qualification Program

PGS Division	Violation	Evaluation Date	Notice Issued	PGS Response	Progress Report	Closed
PGSSP	GS-1191	6/21/2013	6/26/2013	7/19/2013	12/4/2013	12/12/2013
PGSTA	GS-1192	6/19/2013	7/9/2013	8/6/2013	5/15/2014	5/27/2014

192.807 Record Keeping - Qualification Records

PGS Division	Violation	Evaluation Date	Notice Issued	PGS Response	Progress Report	Closed
PGSOD	GS-1313	4/24/2015	5/8/2015	6/5/2015	NONE	NO
PGSTA	GS-1192	5/19/2013	7/9/2013	8/6/2013	5/15/2014	5/27/2014

192.809 Qualification - General

PGS Division	Violation	Evaluation Date	Notice Issued	PGS Response	Progress Report	Closed
PGSSP	GS-1191	6/21/2013	6/26/2013	7/19/2013	12/4/2013	12/12/2013

192.905 How Does an Operator Identify a High Consequence Area

PGS Division	Violation	Evaluation Date	Notice Issued	PGS Response	Progress Report	Closed
PGSBS	GS-1241	4/11/2014	4/14/2014	5/12/2014	5/13/2014	5/14/2014

192.1011 What Records Must an Operator Keep

PGS Division	Violation	Evaluation Date	Notice Issued	PGS Response	Progress Report	Closed
PGSFM	GS-1216	10/24/2013	11/8/2013	12/6/2013	10/13/2014	10/14/2014
PGSSA	GS-1223	12/6/2013	12/16/2013	1/10/2014	10/28/2014	10/29/2014

192 Appendix D: Criteria for Cathodic Protection & Determination of Measurements

PGS Division	Violation	Evaluation Date	Notice Issued	PGS Response	Progress Report	Closed
PGSAP	GS-1283	10/27/2014	10/21/2014	11/20/2014	12/24/2014	12/29/2014
PGSLD	GS-1257	10/31/2014	11/12/2014	12/10/2014	12/24/2014	12/29/2014
PGSSP	GS-1256	6/23/2014	7/1/2014	7/31/2014	3/20/2015	3/24/2015
PGSTA	GS-1328	7/8/2015	7/21/2015	9/18/2015	12/21/2015	12/28/2015
PGSTA	GS-1192	6/19/2013	7/9/2013	8/6/2013	5/15/2014	5/27/2014

FPSC RULES

25-12.022 Requirements for Distribution System Valves

PGS Division	Violation	Evaluation Date	Notice Issued	PGS Response	Progress Report	Closed
PGSSA	GS-1346	11/16/2015	10/23/2015	12/14/2015	NONE	NO

25-12.040 Leak Surveys, Procedures and Classification

PGS Division	Violation	Evaluation Date	Notice Issued	PGS Response	Progress Report	Closed
PGSAP	GS-1288	10/17/2014	10/21/2014	11/20/2014	12/24/2014	12/29/2014
PGSDD	GS-1287	9/26/2014	10/17/2014	11/19/2014	NONE	NO
PGSEU	GS-1242	3/17/2014	4/15/2014	5/3/2014	8/20/2014	8/28/2014
PGSLD	GS-1224	11/4/2013	12/30/2013	1/10/2014	2/7/2014	2/18/2014
PGSMI	GS-1274	8/18/2014	10/1/2014	11/18/2014	2/4/2015	2/5/2015
PGSMI	GS-1812	4/13/2015	4/20/2015	5/18/2015	10/14/2015	10/15/2015
PGSOD	GS-1205	7/1/2013	9/25/2013	10/22/2013	1/16/2014	1/24/2014
PGSOD	GS-1264	7/14/2014	8/13/2014	9/3/2014	11/10/2014	11/13/2014
PGSOD	GS-1353	4/24/2015	5/8/2015	6/5/2015	NONE	NO
PGSPC	GS-1836	9/23/2015	9/14/2015	9/30/2015	10/22/2015	10/26/2015
PGSSA	GS-1123	12/6/2013	12/16/2013	1/10/2014	10/28/2014	10/29/2014
PGSSP	GS-1131	6/21/2013	6/26/2013	7/19/2013	12/4/2013	12/12/2013
PGSSP	GS-1256	6/23/2014	7/1/2014	7/31/2014	3/20/2015	3/24/2015
PGSSP	GS-1890	12/3/2015	10/15/2015	12/18/2015	NONE	NO
PGSTA	GS-1192	6/19/2013	7/9/2013	8/6/2013	5/15/2014	5/27/2014
PGSTA	GS-1254	6/3/2014	6/26/2014	7/23/2014	12/23/2014	12/29/2014
PGSTA	GS-1326	7/20/2015	7/8/2015	9/18/2015	12/21/2015	12/28/2015

25-12.045 Inactive Gas Service Lines

PGS Division	Violation	Evaluation Date	Notice Issued	PGS Response	Progress Report	Closed
PGSAP	GS-1283	10/17/2014	10/21/2014	11/20/2014	12/24/2014	12/29/2014
PGSMI	GS-1812	4/13/2015	4/20/2015	5/18/2015	10/14/2015	10/15/2015
PGSOD	GS-1264	7/14/2014	8/13/2014	9/3/2014	11/10/2014	11/13/2014
PGSOD	GS-1813	4/24/2015	5/8/2015	6/5/2015	NONE	NO
PGSSP	GS-1256	6/23/2014	7/1/2014	7/31/2014	3/20/2015	3/24/2015
PGSTA	GS-1826	7/8/2015	7/20/2015	9/18/2015	12/21/2015	12/28/2015

25-12.050 Facility Identification

PGS Division	Violation	Evaluation Date	Notice Issued	PGS Response	Progress Report	Closed
PGPPL	GS-1278	10/10/2014	10/13/2014	11/20/2014	12/28/2014	12/29/2014
PGSFM	GS-1216	10/24/2013	11/8/2013	12/5/2013	10/14/2014	10/14/2014
PGSTA	GS-1254	6/3/2014	6/26/2014	7/23/2014	12/23/2014	12/29/2014
PGSTA	GS-1326	7/20/2015	7/8/2015	9/18/2015	12/21/2015	12/28/2015

25-12.052 Cathodic Protection

PGS Division	Violation	Evaluation Date	Notice Issued	PGS Response	Progress Report	Closed
PGSAP	GS-1285	10/17/2014	10/21/2014	11/20/2014	12/24/2014	12/29/2014
PGSPC	GS-1208	6/3/2013	10/4/2013	10/20/2013	NONE	1/8/2014
PGSSP	GS-1131	6/21/2013	6/26/2013	7/19/2013	12/4/2013	12/12/2013
PGSSP	GS-1256	6/23/2014	7/1/2014	7/31/2014	3/20/2015	3/24/2015
PGSTA	GS-1192	6/19/2013	7/9/2013	8/6/2013	5/15/2014	5/27/2014
PGSTA	GS-1254	6/3/2014	6/26/2014	7/23/2014	12/23/2014	12/29/2014

25-12.055 Odorization of Gas

PGS Division	Violation	Evaluation Date	Notice Issued	PGS Response	Progress Report	Closed
PGPPL	GS-1279	10/10/2014	10/13/2014	11/20/2014	12/23/2014	12/29/2014
PGSAP	GS-1283	10/17/2014	10/21/2014	11/20/2014	12/24/2014	12/29/2014
PGSLD	GS-1267	10/31/2014	11/12/2014	12/10/2014	12/24/2014	12/29/2014
PGSMI	GS-1274	9/18/2014	10/1/2014	11/18/2014	2/4/2015	2/5/2015
PGSOD	GS-1264	7/14/2014	8/13/2014	9/8/2014	11/10/2014	11/13/2014
PGSTA	GS-1254	6/3/2014	6/26/2014	7/23/2014	12/23/2014	12/29/2014
PGSTA	GS-1326	7/20/2015	7/8/2015	9/18/2015	12/21/2015	12/28/2015

25-12.060 General Records

PGS Division	Violation	Evaluation Date	Notice Issued	PGS Response	Progress Report	Closed
PGSBS	GS-1351	1/30/2014	2/6/2014	3/3/2014	3/27/2014	4/9/2014
PGSEU	GS-1324	6/17/2015	6/26/2015	7/28/2015	12/17/2015	12/18/2015
PGSOD	GS-1313	4/24/2015	5/8/2015	6/5/2015	NONE	NO
PGSTA	GS-1192	6/19/2013	7/3/2013	8/6/2013	5/15/2014	5/27/2014

PGS Division	Violation	Evaluation Date	Notice Issued	PGS Response	Progress Report	Closed
PGSBS	GS-1351	1/30/2014	2/6/2014	3/3/2014	3/27/2014	4/9/2014
PGSIU	GS-1307	5/20/2015	5/26/2015	6/24/2015	10/14/2015	10/15/2015
PGSSA	GS-1290	11/26/2014	12/1/2014	2/9/2015	3/3/2015	3/3/2015
PGSSP	GS-1351	6/21/2013	6/26/2013	7/19/2013	12/4/2013	12/12/2013
TEBPL	GS-1330	1/30/2014	2/6/2014	3/3/2014	3/27/2014	4/9/2014

25-12.062 Leak Reports

PGS Division	Violation	Evaluation Date	Notice Issued	PGS Response	Progress Report	Closed
PGSTA	GS-1254	6/3/2014	6/26/2014	7/23/2014	12/23/2014	12/29/2014

25-12.082 Construction Notice

PGS Division	Violation	Evaluation Date	Notice Issued	PGS Response	Progress Report	Closed
PGSFM	GS-1216	10/24/2013	11/8/2013	12/6/2013	10/13/2014	10/14/2014
PGSFM	GS-1329	8/4/2015	7/27/2015	8/21/2015	10/14/2015	10/15/2015