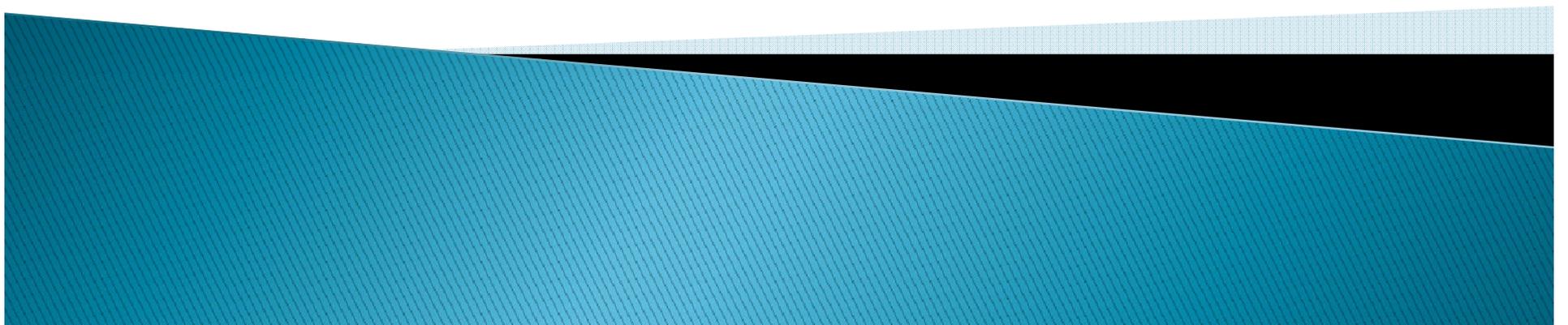
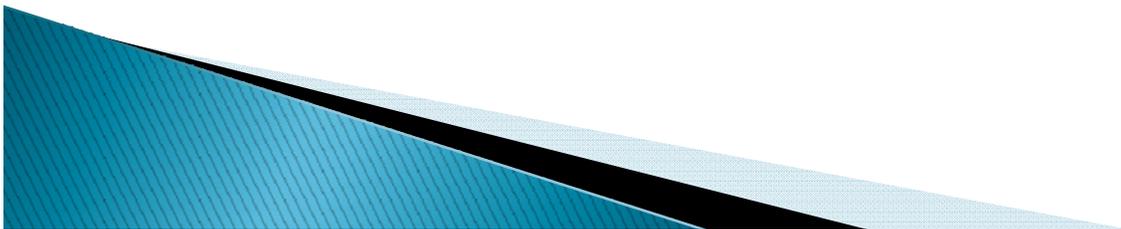


IURC Damage Investigation Process



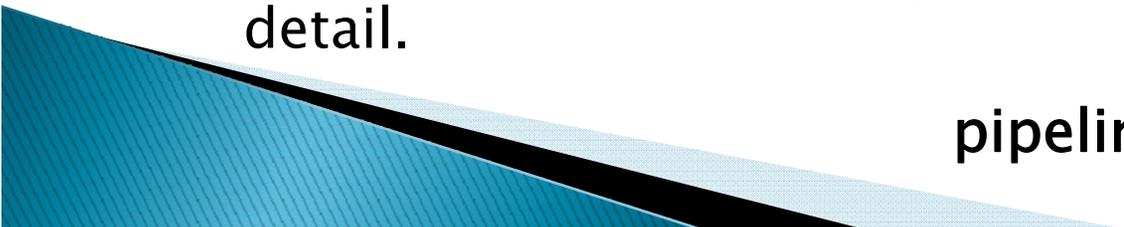
Overview

- ▶ When do we complete the investigation?
- ▶ What we are seeing
- ▶ Areas of Concern



The IURC Investigation Process

- ▶ After receiving responses from both sides, the investigation will begin.
- ▶ It is important to understand that both sides are equally considered.
 - Provide as much supporting documentation as possible, especially pictures.
- ▶ We have several excavators and operators providing pictures to support their case. A few things to keep in mind when you take/submit pictures:
 - 1) Does the picture support your submitted report?
 - 2) Does the picture provide the necessary details. (A close-up picture of a damaged line only shows us a damaged line.)
 - 3) When submitting the picture(s) to us make sure to use color. A black and white photo will not show the necessary detail.



pipelinedamagecase@urc.in.gov









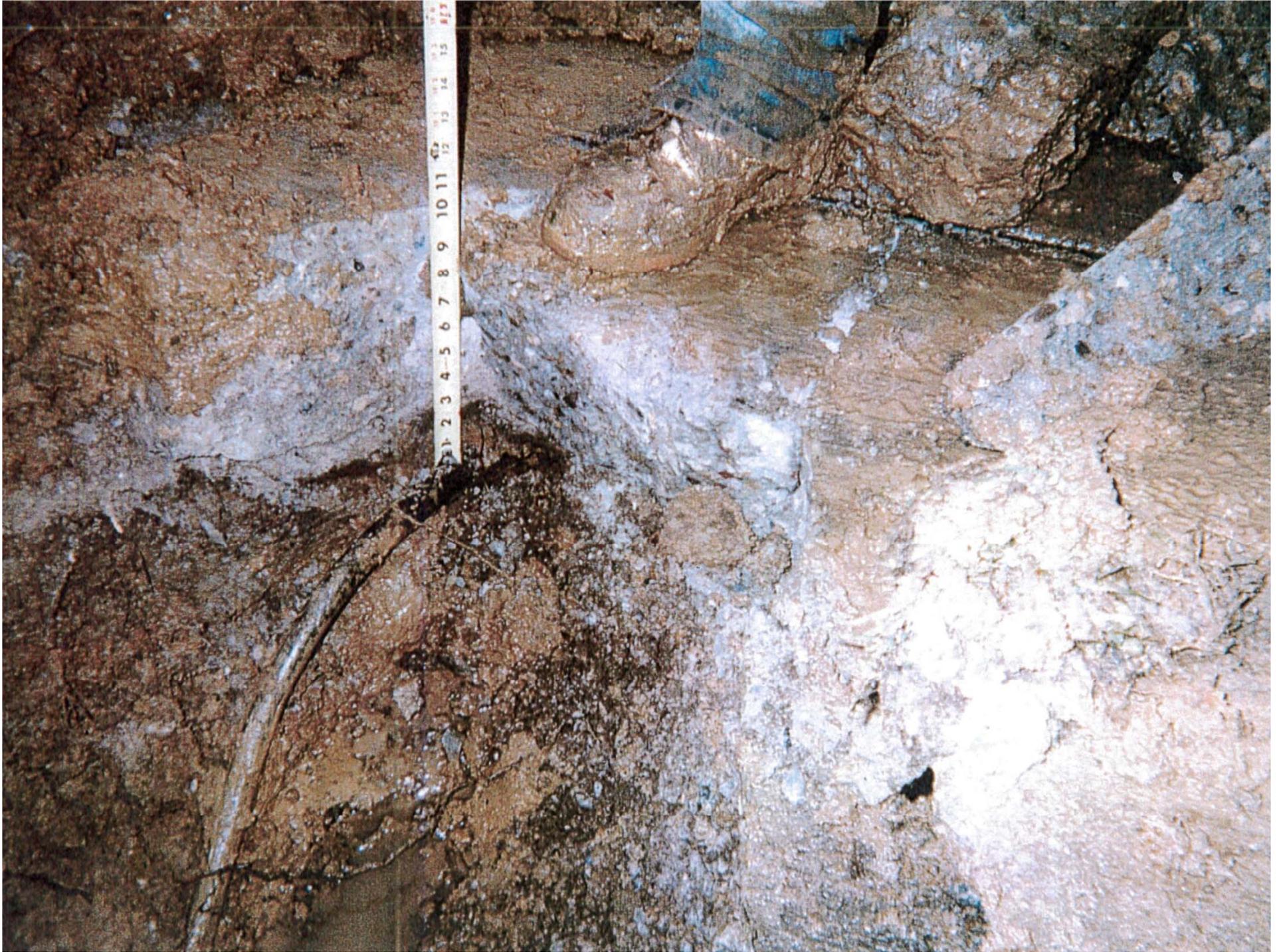


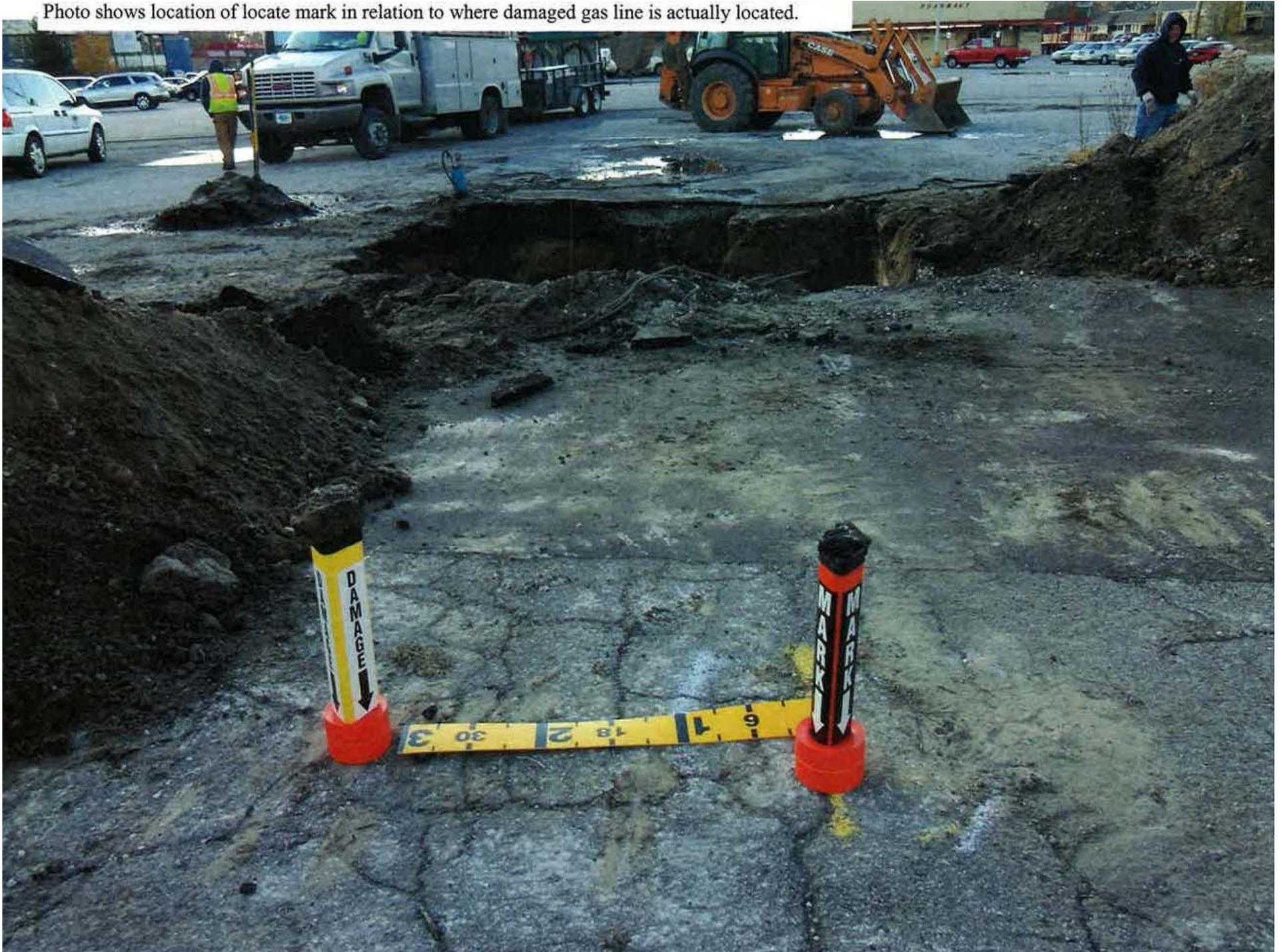








Photo shows location of locate mark in relation to where damaged gas line is actually located.





The black marker above indicates where the pipeline was located (yellow paint); the yellow marker indicates the center of the hole where the pipeline was struck. The ruler indicates 3 feet.







Other yellow lines are from our printer



TIRE
STOP
LLANTAS
USADAS

USED TIRES
13 '15-'20 14 '25-'30
15 '25-'30 16 '30-'35
17 '40-'45
WE FIX RIMS
Quality Product - Great Service

4707

Fix
FLATS



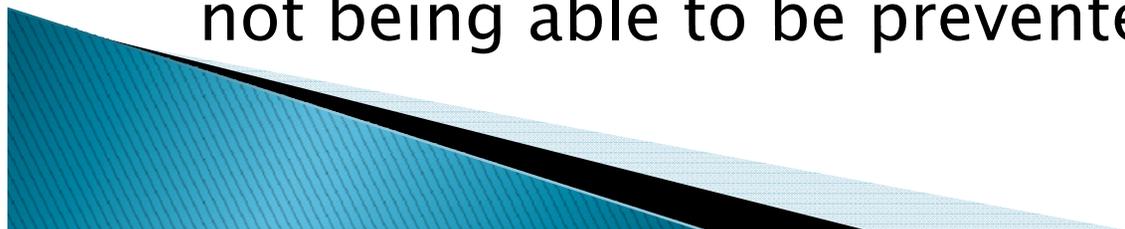
Be Careful what you Say...

- ▶ Excavators will report everything they can to support their case.
 - They will quote your employees who were on site and be able to provide a name.
 - For example, “that locator is the worst locator in the business”. “Don’t worry about it, the line should have been deeper.” “We have told our supervisor for years that the maps are wrong.”
 - Remember, the things your employees say and do may be held against you and hurt your case.
- ▶ Some documentation from operator’s field employees has been excellent.
 - For example, the excavator reported hitting the line with a shovel, the operator reported the line was hit with a backhoe. The notes from the operator’s crew leader indicated “the backhoe operator said “I figured the line was deeper than that. I should have used a shovel.”



How we Address Depth

- ▶ Several excavators along with their legal representation like to quote CFR 49, 192.327 and expect us to hold operators accountable due to the fact that line was not at the proper depth.
 - 192.327 is the depth requirement at the time of installation.
- ▶ The only instance depth is covered in IC 8-1-26 is a homeowner digging on their own property less than 12" deep with hand tools.
- ▶ Depth is only addressed in our investigation if the damaged facility was directly under a hard surface. If the excavator is properly removing the hard surface cover and the facility is directly under the hard surface, they will not be found in violation if they had a valid locate request due to the damage not being able to be prevented.



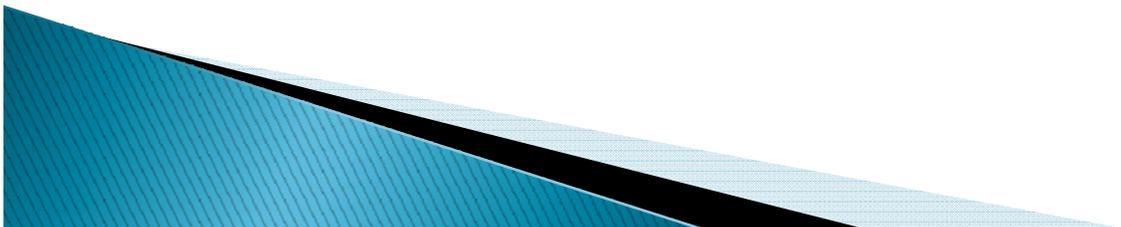
Areas of Concern

- ▶ The excavator reports “the gas guy spliced the pipe together and left. He was there for five minutes at the most.”
 - This raises a red flag. An inspector may come to your office requesting the test records. Document the test!
- ▶ The office report and the field report are conflicting.
 - The office report indicates the locate marks to be accurate. The field report indicates the locate marks inaccurate by five feet. We cannot make a decision supporting your side with conflicting information.



Areas of Concern

- ▶ An unmarked line due to the facility being “unknown or undocumented” because of inaccurate maps and/or records.
 - NOT Acceptable!
- ▶ Newly installed facilities not being marked.
 - If there is a possibility additional construction will take place around a newly installed facility, consider flagging the lines before leaving the site. We have had a number of damages to newly installed facilities that had not been marked.



Areas of Concern

- ▶ Gas facilities inaccessible to locators
 - If you have secured sites such as prisons, military bases or any other fenced in areas, you need to make contact with these locations.
 - Set expectations with the locators and make arrangements to gain access to the site.
 - This could also be a part of your Public Awareness Program.
 - You may want to strengthen marker post placement on the site.
 - A damage case there was a cut line on a secured military base.
 - The excavator was hired by the military and was told not to request underground locates because they take care of locates themselves, which resulted in a damage.



Areas of Concern

- ▶ Are you tracking the collection rate of your damages?
 - The cost of damages has come to the attention of the rates division of the IURC.
 - Make sure that you recover the actual costs of damages from excavator incidents.
 - It is the operator's responsibility to recover such costs and the Commission is monitoring the recovery of costs for such damages.

