



Damage Reporting Expectations

INDIANA UTILITY REGULATORY COMMISSION

Miranda Chandler – Director of Pipeline Safety

Aaron Holeman – Senior Pipeline Safety Engineer

July 9, 2026



Initial Report of Damage by the Operator

After the Operator becomes **aware** of the damage, they shall submit an initial notice to the PSD within 30 days.

Request for Information

- The PSD will send out a request for information (1st letter) to the excavator named by the operator as the damaging party.
 - The excavator has 30 days from receipt of the letter to send in the response
 - If the excavator does not respond, the statute requires PSD to investigate the damage with the information supplied by the operator

Operator Submission Contents

- Operators fill out State Form 57051
- Answer standard investigation questions
- Pictures of the locate marks on site before excavation began
- Pictures of the damage with its relationship to the marks preferably
- Written narrative of the damage and any pertinent information that will be helpful in the investigation

Possible Findings of Violations by PSD

There are 6 possible findings from PSD investigations

1. Operator Violation 8-1-26(18)(j) – Failure to Locate/Miss Locate
2. Excavator Violation (Numerous Possibilities under IC 8-1-26)
3. No Violation
4. Failure to join 811 8-1-26-15(d) – this can be for any operator, including non-gas utilities
5. Knowingly removing or destroying locate marks 8-1-26-15-8(l). This can be for anyone, such as a property owner who removes locate flags because they do not want work done in the ROW
6. False Emergency 8-1-26-19(c)

After the Finding of Violation by PSD

The party found in violation by PSD will receive a letter called an Investigation Summary Report (2nd Letter) with the details of the violation at least two weeks before the UPPAC meeting. It also notifies them of the location, date and time of the meeting.

Contents of Operator Submissions

There is no such thing as too much information.

Pictures!

Pictures!

Pictures!

Helpful Pictures



Helpful Pictures



Helpful Pictures



Rescheduled Locates

170 IAC 5-5-2.1 Notice of inability to provide locate information

- Sec. 2.1.
- (a) The notice under [IC 8-1-26-18\(m\)](#) shall be an oral, written, or electronic contact with the person responsible for the excavation or demolition. The operator shall make a written record, contemporaneously at the time of the contact, containing at a minimum:
 - (1) the date, time, and manner of the communication;
 - (2) the name of all individuals that participated in the communication; and
 - (3) the new date by which the operator will provide the location information as required by [IC 8-1-26-18](#).
- (b) An operator of a pipeline facility that does not provide notice as specified in this section:
 - (1) fails to notify the person responsible for the excavation under [IC 8-1-26-18\(m\)](#); and
 - (2) if [IC 8-1-26-18\(j\)](#) otherwise applies, the operator is subject to the penalty specified in [IC 8-1-26-18\(j\)](#).

Positive Response to IN 811

170 IAC 5-5-2.3 Positive response to excavators of supplied location information

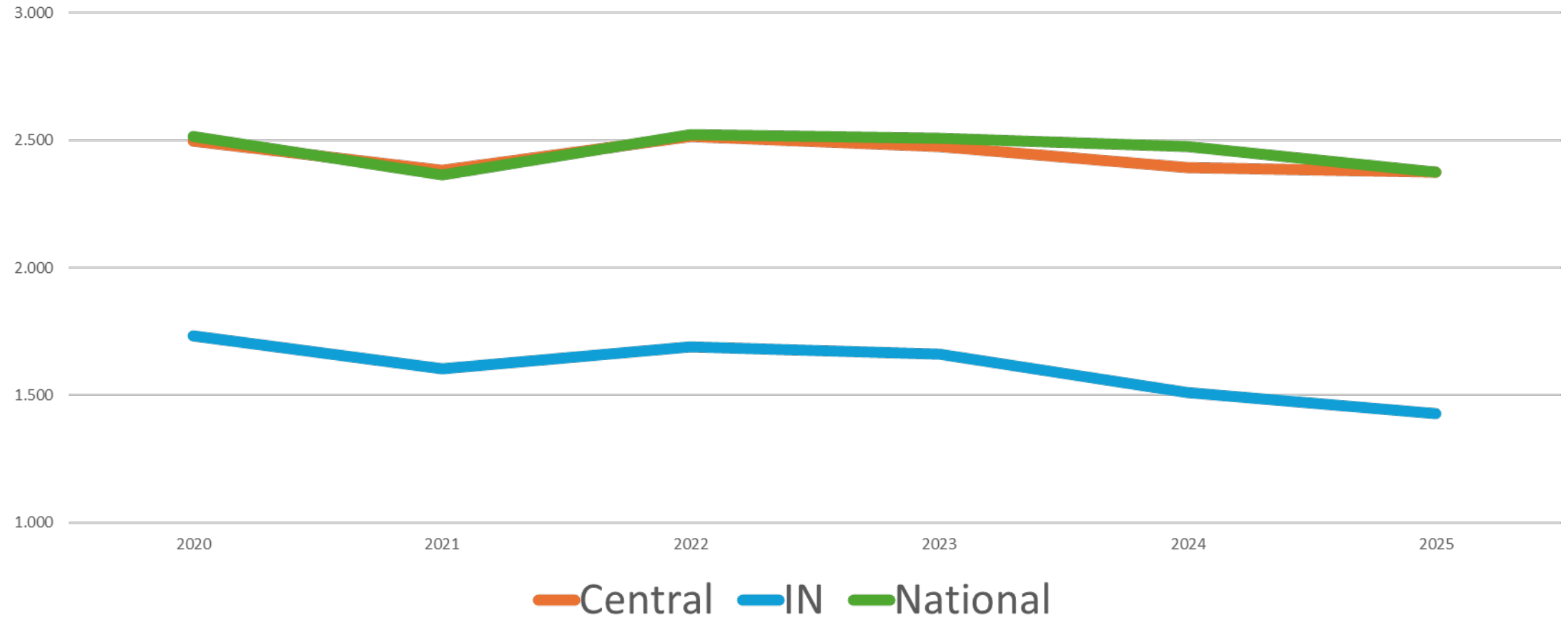
- Sec. 2.3.
- (a) An operator of a pipeline facility shall provide an affirmative electronic response to the association in the manner directed by the association when the operator has provided the marking information in response to an 811 ticket.
- (b) The association shall make available the operator's response under subsection (a) to the person responsible for the excavation or demolition.
- (c) An operator of a pipeline facility that does not provide the affirmative response required under subsection (a) violates [IC 8-1-26-18\(j\)\(1\)](#). If [IC 8-1-26-18\(j\)](#) otherwise applies, the operator is subject to the penalty specified in [IC 8-1-26-18\(j\)](#).



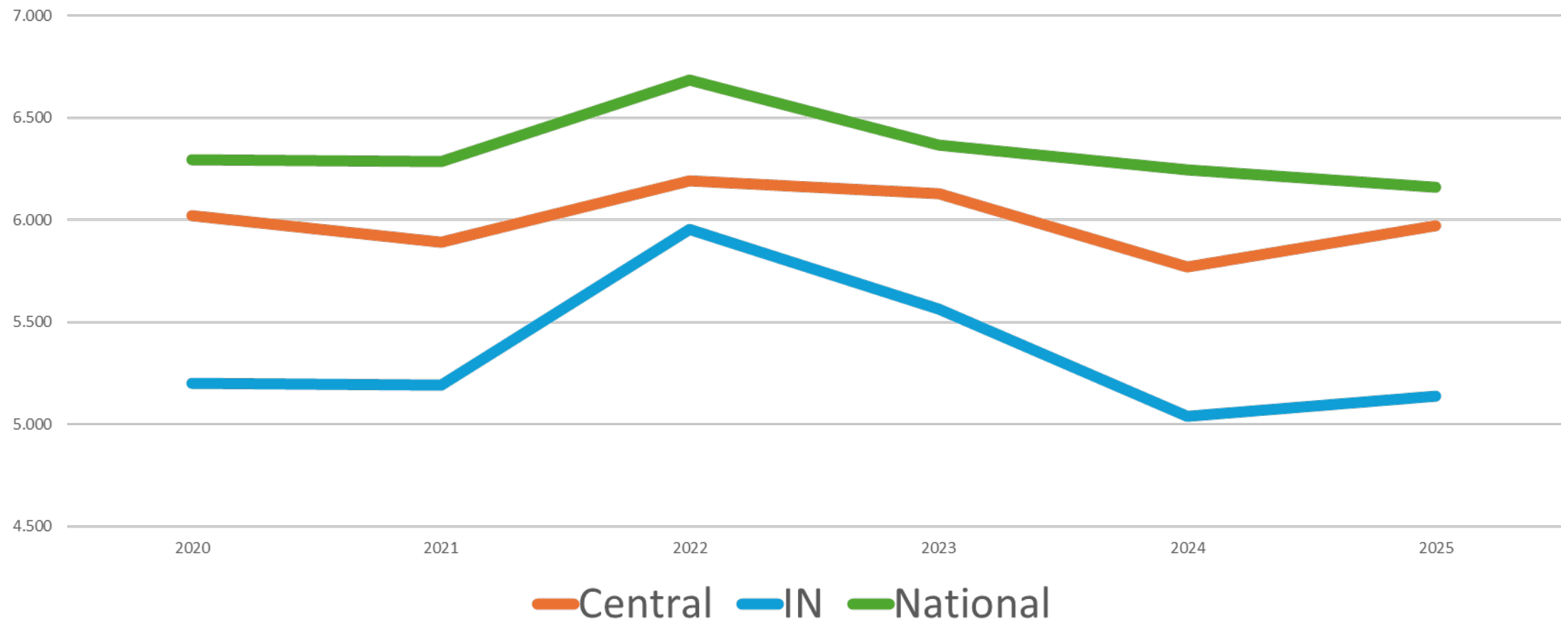
DATA AND TRENDS



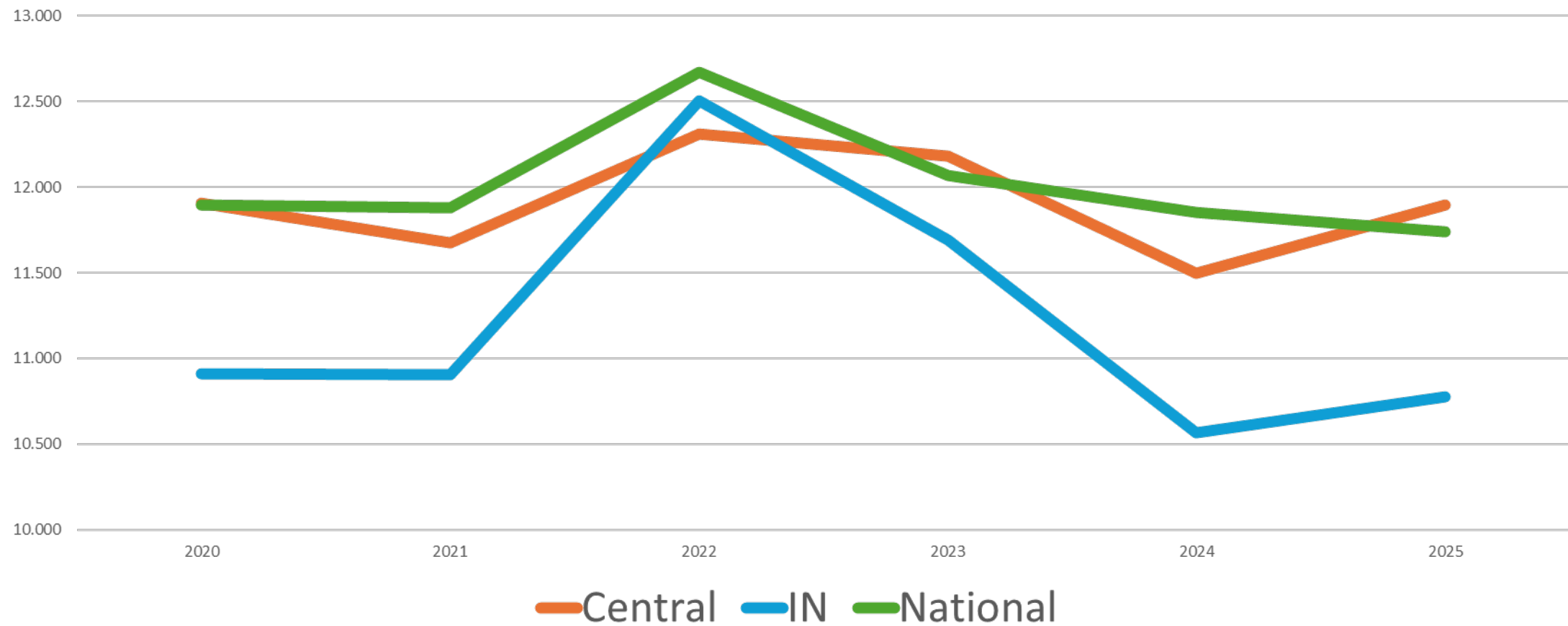
Damages Per Thousand Tickets



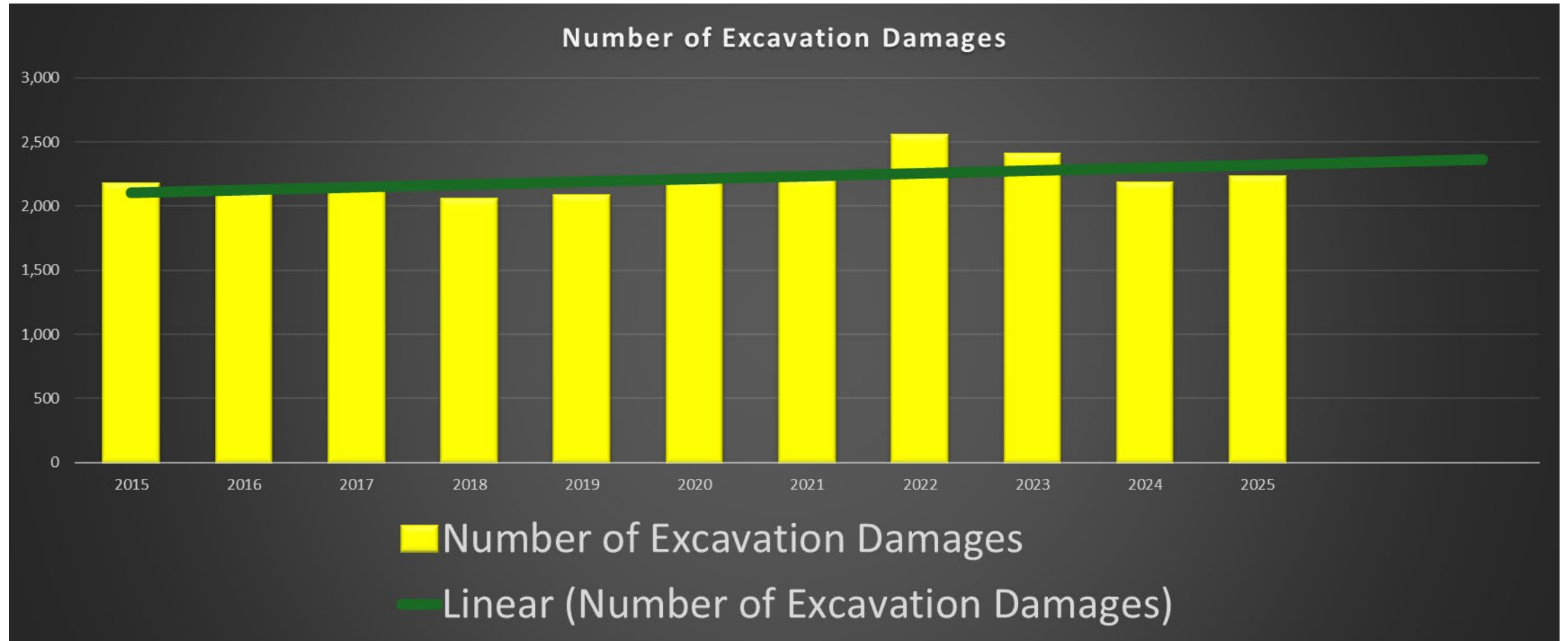
Damages Per Hundred Miles of Main



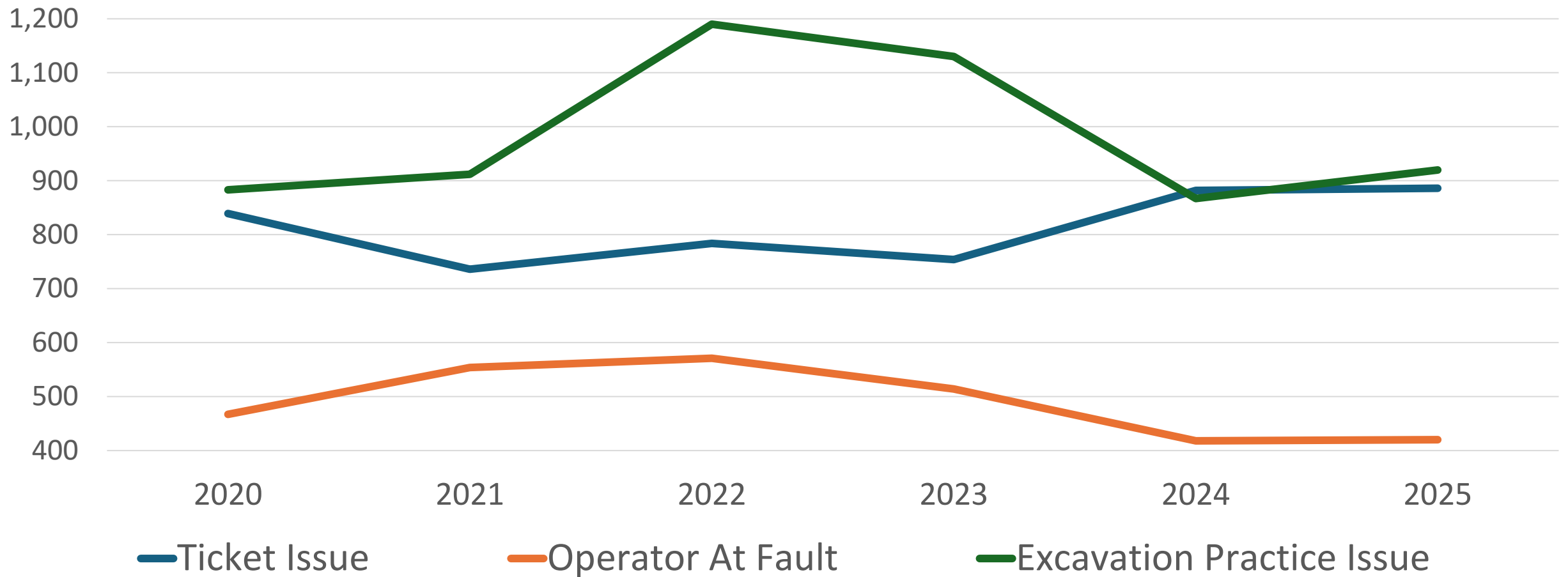
Damages Per 10,000 Services



Number of Damages

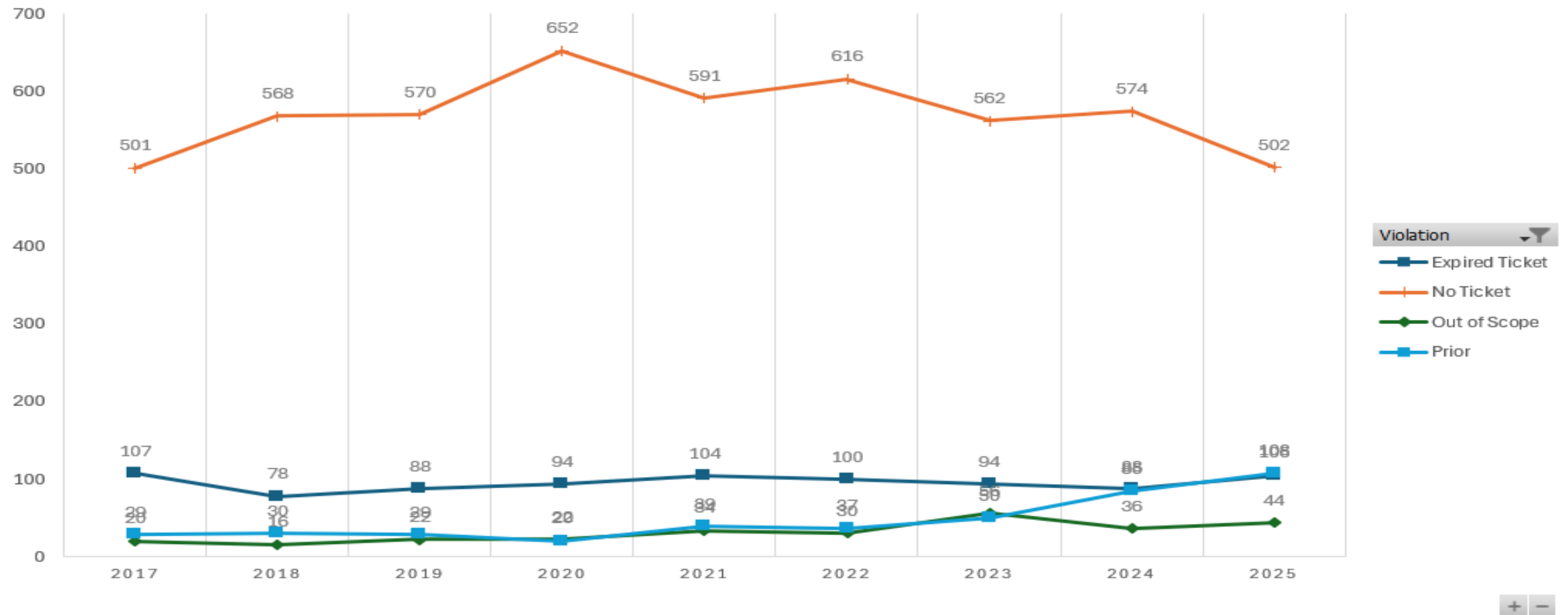


At Faults for Indiana



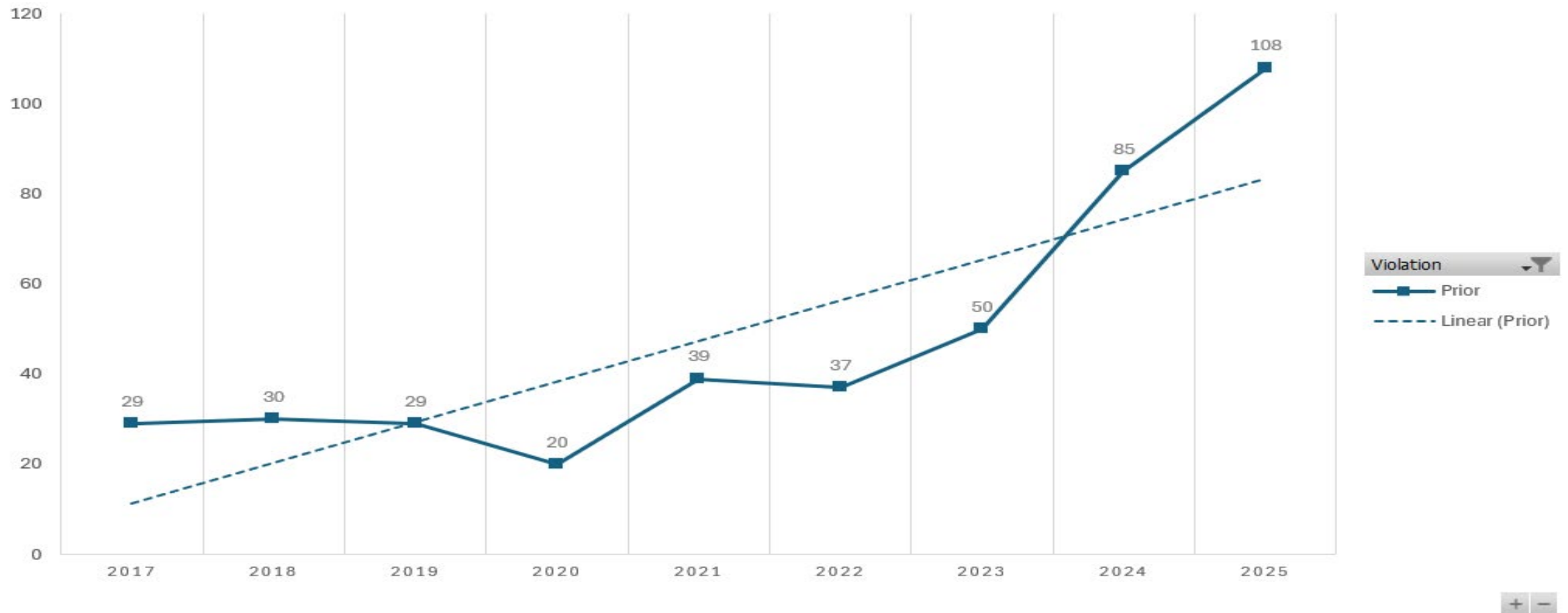
Ticket Issue

VIOLATIONS OVER TIME

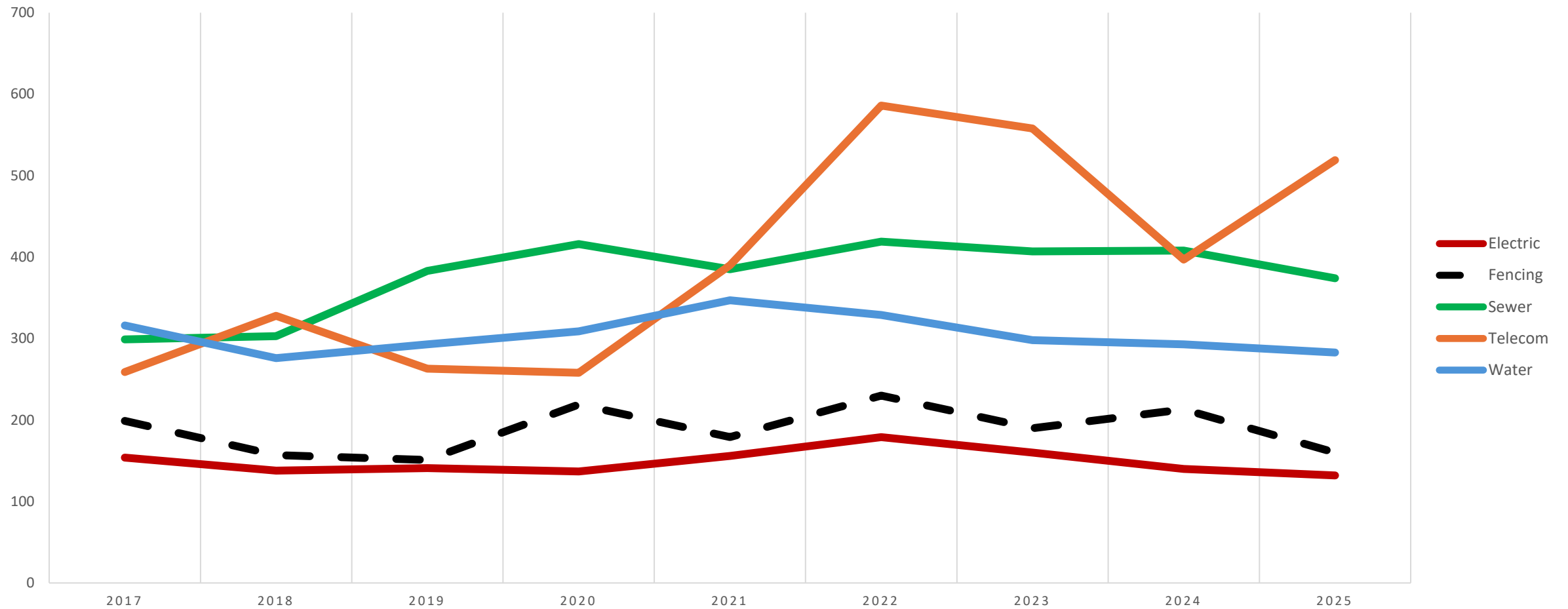


Ticket Issue

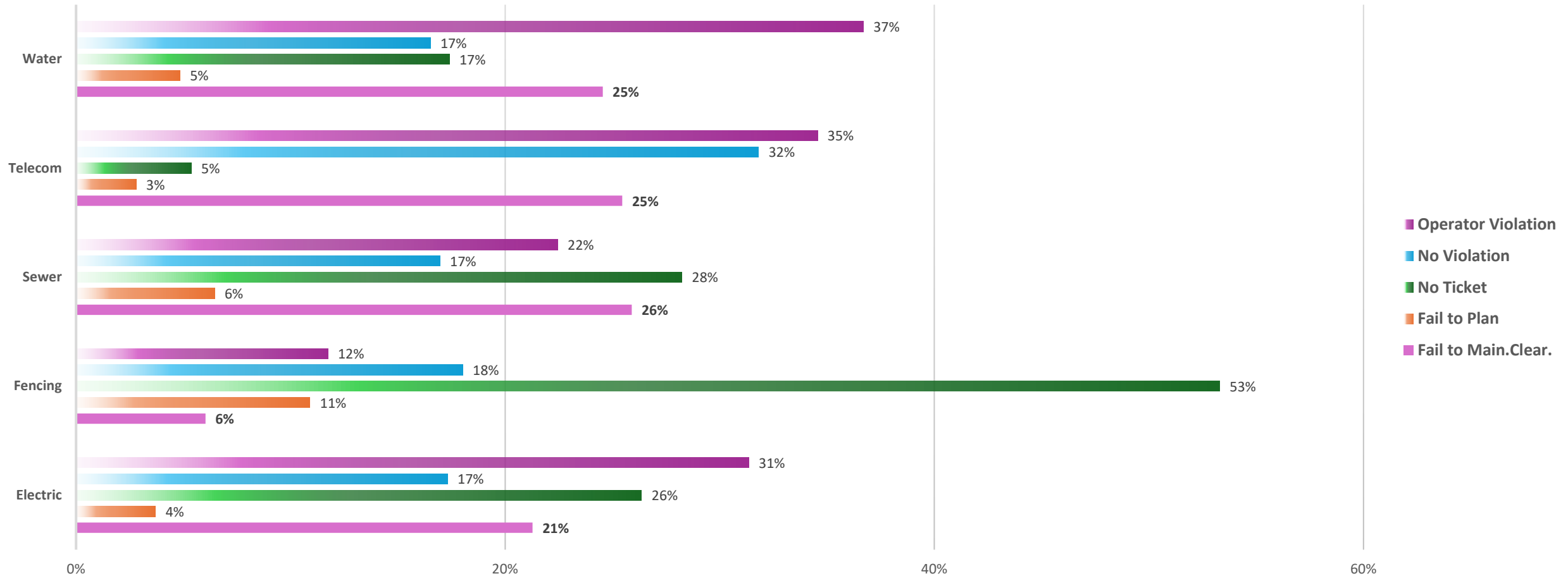
PRIOR VIOLATIONS OVER TIME



PROJECTS BEHIND EXCAVATION DAMAGES

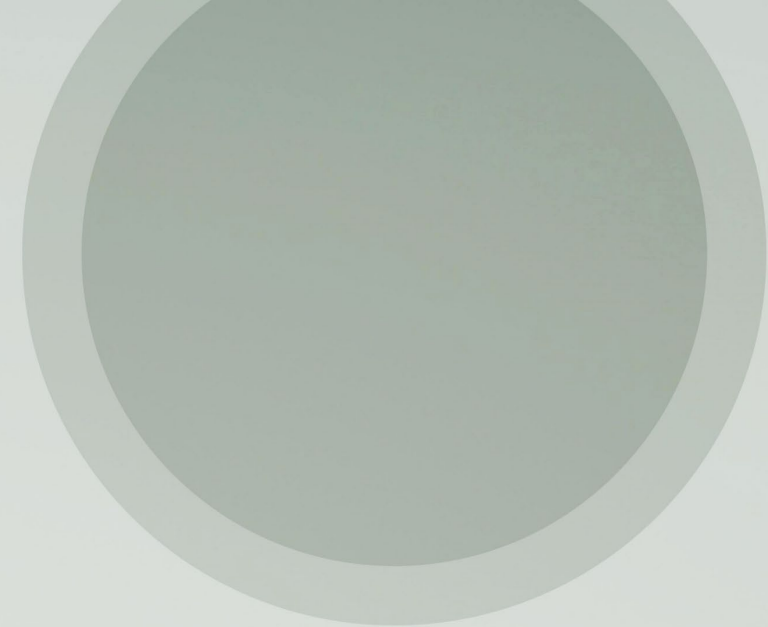


PROJECTS & THE VIOLATIONS COMMONLY FOUND



Reason this Matters





QUESTIONS





THANK YOU



INDIANA UTILITY REGULATORY COMMISSION

Miranda Chandler – Director of Pipeline Safety

MiChandler@urc.in.gov

Aaron Holeman – Senior Pipeline Safety Engineer

aholeman@urc.in.gov

Indiana Utility Regulatory Commission

101 W. Washington Street, Suite 1500 East, Indianapolis, IN 46204

www.in.gov/iurc