

**PUBLIC AWARENESS PROGRAM EFFECTIVENESS INSPECTION  
SPECIFIC INFORMATION**

**Control Information**

<b>Inspection Start Date*:</b>	11-8-2011	
<b>Inspection End Date*:</b>	11-8-2011	
<b>OpID:</b>	13840	
<b>Parent Operator Name:</b>	NW Natural	
<b>Unit ID (s):</b>	13840	
<b>State/Other ID:</b>	NA	
<b>Activity Record ID No.</b>	NA	
<b>Address of Company Official*:</b> Kerry Shampine Manager, Code Compliance 503-226-4211 x4340 Fax: 503-273-4822 Cell: 360-910-3998 Kerry.shampine@nwnatural.com	<b>Company Official*:</b>	Grant Yoshihara 220 NW Second Ave Portland, OR 97209
	<b>Title*:</b>	Vice President, Utility Operations
	<b>Phone Number*:</b>	503-226-4211 x2374 Cell: 503-887-4947
	<b>Fax Number:</b>	Fax: 503-273-4822
	<b>Email Address*:</b>	Grant.yoshihara@nwnatural.com
<b>Web Site:</b>	<a href="http://www.nwnatural.com">www.nwnatural.com</a>	
<b>Total Mileage (from page 3)*:</b>	1689 in WA / 11,569 in OR (miles of main)	
<b>Total Mileage in HCA:</b>	.2 in WA / 196 in OR	
<b>Number of Services (For Distribution):</b>	65,821 in WA / 592,036 in OR	
<b>Alternate MAOP (80% Rule):</b>	None	
<b>No. of Special Permits:</b>	NA	

<b>Initial Date of Public Awareness Program*:</b>	December 2005 – for program incorporating RP 1162
<b>Title of Current PAP*:</b>	NW Natural 2010 Pipeline Public Awareness Plan
<b>Current PAP Version*:</b>	December 2005 – for main plan, supplemental activities are added each year – current version 2010
<b>Current PAP Date*:</b>	See above

**Post Inspection Information**

*PHMSA Form 21 Public Awareness Program Effectiveness Inspection, July 21, 2011, Rev 0*

<b>Date Submitted for Approval:</b>	
<b>Director Approval:</b>	
<b>Approval Date:</b>	

*\* Required field*

<b>Persons Interviewed*</b>	<b>Title/Organization*</b>	<b>Phone Number</b>	<b>Email Address</b>
Dakota Duncan	Compliance Specialist	(503) 226 4211	Dakota.duncan@nwnatural.com
Cory Beck	Manager Consumer Information and internet services	(503) 220 2576	
Kim Heiting	Chief Communication Office	(503) 226 4211	Kah@nwnatrual.com
Kerry Shampine	Manager of Code Compliance	(503) 226 4211	
Samantha Burt	Compliance Specialist	(503) 226 4211	
Andrea Scott	Compliance Specialist	(503) 226 4211	
Melissa Moore	Public Information Officer	(503) 226 4211	

*To add rows, press TAB with cursor in last cell.*

<b>External Support Entity Name*</b>	<b>Part of Plan and/or Evaluation*</b>	<b>Phone Number</b>	<b>Email Address</b>

*To add rows, press TAB with cursor in last cell.*

<b>Inspector Representative(s)*</b>	<b>PHMSA/State*</b>	<b>Region/State*</b>	<b>Email Address</b>	<b>Lead*</b>
John Ivey	Oregon	Western	John.ivey@state.or.us	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N
Patti Johnson	Washington	Western	Pjohnson@utc.wa.gov	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N
				<input type="checkbox"/> Y <input type="checkbox"/> N
				<input type="checkbox"/> Y <input type="checkbox"/> N
				<input type="checkbox"/> Y <input type="checkbox"/> N

*To add rows, press TAB with cursor in last cell.*

*\* Required field*

**Mileage Covered by Public Awareness Program (by Company and State)**

Based on the **most recently submitted annual report**, list each company and subsidiary separately, broken down by state (using 2-letter designation). Also list any new lines in operation that are not included on the most recent annual report. If a company has intrastate and/or interstate mileage in several states, use one row per state. If there are both gas and liquid lines, use the appropriate table for intrastate and/or interstate.

**Jurisdictional to Part 192 (Gas) Mileage (Interstate)**

Company Name (Gas Operator)	Operator ID	Product Type*	State*	Interstate Gathering Mileage*	Interstate Transmission Mileage	Interstate Distribution Mileage**	Remarks (new or in HCA)
NA							

(To add rows, press TAB with cursor in last cell.)

**Jurisdictional to Part 192 (Gas) Mileage (Intrastate)**

Company Name (Gas Operator)	Operator ID	Product Type*	State*	Intrastate Gathering Mileage*	Intrastate Transmission Mileage*	Intrastate Distribution Mileage**	Remarks (new or in HCA)
NW Natural	13840	Natural gas	WA		3.4	1689	
NW Natural	13840	Natural gas	OR		614.4	11569	

(To add rows, press TAB with cursor in last cell.)

**Jurisdictional to Part 195 (Hazardous Liquid) Mileage (Interstate)**

Company Name (Liquid Operator)	Operator ID	Product Type*	State*	Interstate Transmission Mileage*	Remarks (new or in HCA~)
NA					

(To add rows, press TAB with cursor in last cell.)

**Jurisdictional to Part 195 (Hazardous Liquid) Mileage (Intrastate)**

Company Name (Liquid Operator)	Operator ID	Product Type*	State*	Intrastate Transmission Mileage*	Remarks (new or in HCA~)
NA					

(To add rows, press TAB with cursor in last cell.)

<b>Total Mileage:</b>	<b>Total Mileage 13,875.8</b>
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- Supply company name and Operator ID, if not the master operator from the first page (i.e., for subsidiary companies).
  - Use OPS-assigned Operator ID. Where not applicable, leave blank or enter N/A
  - Use only 2-letter State codes, e.g., TX for Texas.
  - Enter number of applicable miles in applicable columns. (Only positive values. No need to enter 0 or N/A.)
- ^ Please do not include Service Line footage. This should only be MAINS.  
 \* Required Field  
 ~ Use Total HCA as reported on annual reports.

Please provide a comment or explanation for each inspection question.

## 1. Administration and Development of Public Awareness Program

### 1.01 Written Public Education Program

Does the operator have a written continuing public education program or public awareness program (PAP) in accordance with the general program recommendations in the American Petroleum Institute's (API) Recommended Practice (RP) 1162 (incorporated by reference), by the required date, except for master meter or petroleum gas system operators?

**(Reference: § 192.616 (h); § 195.440 (h))**

- Verify the operator has a written public awareness program (PAP).
- Review any Clearinghouse deficiencies and verify the operator addressed previous Clearinghouse deficiencies, if any, addressed in the operator's PAP.
- Identify the location where the operator's PAP is administered and which company personnel is designated to administer and manage the written program.
- Verify the date the public awareness program was initially developed and published.

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	Comments: <ul style="list-style-type: none"> <li>• <b>Operator has a written PAP</b></li> <li>• <b>Reviewed NW Clearinghouse deficiencies.</b></li> <li>• <b>PAP is administered in Headquarters in Portland Ore</b></li> <li>• <b>2003 developed plan using API 1162 as guideline. Kim Heiting is Chief Communication officer and Cory Beck is manager of program.</b></li> </ul>
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

### 1.02 Management Support

Does the operator's program include a statement of management support (i.e., is there evidence of a commitment of participation, resources, and allocation of funding)?

**(Reference: § 192.616 (a); § 195.440 (a); API RP 1162 Section 2.5 and 7.1)**

- Verify the PAP includes a written statement of management support.
- Determine how management participates in the PAP.
- Verify that an individual is named and identified to administer the program with roles and responsibilities.
- Verify resources provided to implement public awareness are in the PAP. Determine how many employees involved with the PAP and what their roles are.
- Determine if the operator uses external support resources for any implementation or evaluation efforts.

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	Comments: <ul style="list-style-type: none"> <li>• <b>PAP Section 1.5, 1.5.1 and 1.5.2 and 1.6 provide written management support</b></li> <li>• <b>Management support</b> <ol style="list-style-type: none"> <li>1. <b>PAP part of Kim Heiting and Cory Beck performance evaluation.</b></li> <li>2. <b>At least once a year meet with VP</b></li> </ol> </li> </ul>
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	

	<p>and recommended improvements.</p> <p>3. Annual presentation to officer team.</p> <ul style="list-style-type: none"> <li>• Section 1.6 is an up to date chart with all employees' names and titles involved with PAP and their roles.</li> <li>• There are 14 dedicated employees to PA and many others with partial responsibility ie training and drills.</li> <li>• Various TV and radio, mail house, printer, phone survey, list provide.</li> </ul>
Check exactly one box above. * Required field	

**1.03 Unique Attributes and Characteristics**

Does the operator's program clearly define the specific pipeline assets or systems covered in the program and assess the unique attributes and characteristics of the pipeline and facilities?

**(Reference: § 192.616 (b); § 195.440 (b); API RP 1162 Section 2.7 and Section 4)**

- Verify the PAP includes all of the operator's system types/assets covered by PAP (gas, liquid, HVL, storage fields, gathering lines etc).
- Identify where in the PAP the unique attributes and characteristics of the pipeline and facilities are included (i.e. gas, liquids, compressor station, valves, breakout tanks, odorizer).

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	Comments: <ul style="list-style-type: none"> <li>• All assets identified in 2.1 of PAP. WA only has distribution, 3.1 miles transmission and .2 HCA</li> </ul>
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

**1.04 Stakeholder Audience Identification**

Does the operator's program establish methods to identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents?

**(Reference: § 192.616 (d), (e), (f); § 195.440 (d), (e), (f); API RP 1162 Section 2.2 and Section 3)**

- Identify how the operator determines stakeholder notification areas and distance on either side of the pipeline.
- Determine the process and/or data source used to identify each stakeholder audience.
- Select a location along the operator's system and verify the operator has a documented list of stakeholders consistent with the requirements and references noted above.

- Affected public
- Emergency officials
- Public officials
- Excavators

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	Comments: <ul style="list-style-type: none"> <li>• 220 yards (660 feet) from center of pipeline from all facilities.</li> </ul>
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	

<input type="checkbox"/> N/C – Not Checked (explain)*	<ul style="list-style-type: none"> <li>• <b>Data sources found in section 3</b>            *HCA and Affected Public: company mailing and mass communication advertising. Same with folks along transmission line.            *Emergency Official: uses own research with Ore fire Marshall and WA state patrol. Numerous volunteer fire departments. NW’s provides an e leaning web site for all firemen. NW Nat’l can track who used e learning.            *For Public officials: Purchases a list from Dunn and Bradstreet and North American industries classification codes and is coordinated with NW Nat’l key opinion leader list (list includes mayors to heads of volunteer organizations.)            *Excavators: Purchased from Dept. of Labor and Industry labor registry in Olympia and OR Construction Contractors Board.</li>   <li>• Reviewed map with residents along transmission line – area near Camas. Has list of all stakeholders. Total number of OR 77,668 and WA 192 customer, .2 mile HCA included in 3.2 transmission miles on route.</li> </ul>
Check exactly one box above. * Required field	

**1.05 Message Frequency and Message Delivery**

Does the operator’s program define the combination of messages, delivery methods, and delivery frequencies to comprehensively reach all affected stakeholder audiences in all areas in which the operator transports gas, hazardous liquid, or carbon dioxide?

**(Reference: § 192.616 (c); § 195.440 (c); API RP 1162 Sections 3-5)**

- Identify where in the operator’s PAP the combination of messages, delivery methods, and delivery frequencies are included for the following stakeholders:

- Affected public
- Emergency officials
- Public officials
- Excavators

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	Comments: Reviewed. Section 5.1 in plan and in Annual Plan book section 1.2. 2010 Safety Implementation and 2010 Safety Awareness Program Evaluation.
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

**1.06 Written Evaluation Plan**

Does the operator's program include a written evaluation process that specifies how the operator will periodically evaluate program implementation and effectiveness? If not, did the operator provide justification in its program or procedural manual?

**(Reference: § 192.616 (c), (i); § 195.440 (c), (i))**

- Verify the operator has a written evaluation plan that specifies how the operator will conduct and evaluate self-assessments (annual audits) and effectiveness evaluations.
- Verify the operator's evaluation process specifies the correct frequency for annual audits (1 year) and effectiveness evaluations (no more than 4 years apart).
- Identify how the operator determined a statistical sample size and margin-of-error for stakeholder audiences' surveys and feedback.

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	Comments: <b>Reviewed pg 29 of PAP and supplemental, JD Power and Key audience survey. Doc in Annual Plan book for Overview survey section 1.3.</b>  <b>It has correct frequency for annual audits and does effectiveness evaluations every year as part of annual. Documented in Annual Plan Book. Review effectiveness annually instead of once every 4 years. Reviewed effectiveness for year and Charts for historical trending.</b>  <b>For clarity, OR and WA inspectors recommend that NW Nat'l plainly state in the PAP that even though they do an effectiveness evaluation annually, they only will provide effectiveness evaluations as required by code. NW should consider titling the required effectiveness evaluations as such.</b>
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

**4. Program Implementation**

**2.01 English and other Languages**

- Did the operator develop and deliver materials and messages in English and in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?

**(Reference: § 192.616 (g); § 195.440 (g); API RP 1162 Section 2.3.1)**

- Determine if the operator delivers material in languages other than English and if so, what languages.
- Identify the process the operator used to determine the need for additional languages for each stakeholder audience.
- Identify the source of information the operator used to determine the need for additional languages and the date the information was collected.

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	Comments: <b>1. TV in Spanish and English, Print in Spanish</b>
<input type="checkbox"/> U - Unsatisfactory (explain)*	

<input type="checkbox"/> N/A - Not Applicable (explain)*	and English, Safety Brochure in English, Spanish, Korean, Russian, Chinese, and Vietnamese
<input type="checkbox"/> N/C – Not Checked (explain)*	<p><b>Annual Plan Book Section 3.2</b></p> <p><b>2. 2010 census data showed double increase in Spanish, as result, NW will print excavator in English and Spanish and all safety is stand-alone English or Spanish brochure</b></p> <p><b>3. Sources used to determine the need for additional languages was 2010 census. Prior to 2010 used 2000 census (most current data)</b></p>
Check exactly one box above. * Required field	



**2.02 Message Type and Content**

Did the messages the operator delivered specifically include provisions to educate the public, emergency officials, local public officials, and excavators on the:

- Use of a one-call notification system prior to excavation and other damage prevention activities;
- Possible hazards associated with unintended releases from a gas, hazardous liquid, or carbon dioxide pipeline facility;
- Physical indications of a possible release;
- Steps to be taken for public safety in the event of a gas, hazardous liquid, or carbon dioxide pipeline release; and
- Procedures to report such an event (to the operator)?

**(Reference: § 192.616 (d); (f); § 195.440 (d), (f))**

- Verify all required information was delivered to **each** of the primary stakeholder audiences.
- Verify the phone number listed on message content is functional and clearly identifies the operator to the caller.

- Affected public
- Emergency officials
- Public officials
- Excavators

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	<p>Comments:</p> <p><b>Affected Public – Section 2 of the Annual Plan book, TV section 2.1, radio section 2.2, newspaper section 2.3, on line section 2.4, media and PR is section 2.5 and week as spreadsheet called 2010 Safety Implementation schedule.</b></p> <p><b>Called the emergency phone number. Recording answered and asked caller to hold. We were on hold for 5 -10 seconds before a person answered. OR and WA Inspectors would like to note that it is ok if the phone system transferring calls between lines, however to be put an emergency call on hold for more than a few seconds is not acceptable.</b></p>
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

**2.03 Messages on Pipeline Facility Locations**

Did the operator develop and deliver messages to advise affected municipalities, school districts, businesses, and residents of pipeline facility location?

**(Reference: § 192.616 (e), (f); § 195.440 (e), (f))**

- Verify that the operator developed and delivered messages advising municipalities, school districts, businesses, residents of pipeline facility locations.

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	<p>Comments:</p> <p><b>Reviewed PAP section 5: In Annual Plan Book section 3.6 and direct delivery is Section 1.3 of Annual Book.</b></p> <p><b>*School section 3.1 identify schools as</b></p>
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	

	Stakeholder effected Public and * section 1.8 for city and county managers, police and fire under emergency and section 1.1 in Annual Plan Book For clarity, OR and WA inspectors recommend that NW Nat'l include municipalities and schools under section 5 also.
Check exactly one box above. * Required field	

**2.04 Baseline Message Delivery Frequency**

Did the operator's delivery for materials and messages meet or exceed the baseline frequencies specified in API RP 1162, Table 2-1 through Table 2.3? If not, did the operator provide justification in its program or procedural manual?

**(Reference: § 192.616 (c); § 195.440 (c))**

- Identify message delivery (using the operator's last five years of records) for the following stakeholder audiences:

- Affected public
- Emergency officials
- Public officials
- Excavators

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	Comments: Reviewed Annual Plan book for 2004 thru 2010 for each group.
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

**2.05 Considerations for Supplemental Program Enhancements**

Did the operator consider, along all of its pipeline systems, relevant factors to determine the need for supplemental program enhancements as described in API RP 1162 for each stakeholder audience?

**(Reference: § 192.616 (c); § 195.440 (c); API RP 1162 Section 6.2)**

- Determine if the operator has considered and/or included other relevant factors for supplemental enhancements.

- Affected public
- Emergency officials
- Public officials
- Excavators

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	Comments: <b>Yes, Examples of supplemental enhancements are 1. Verizon was installing line and causing damage, NW provided messages for call before you dig heavily with Verizon and general public, After Japan's earthquake NW did earthquake awareness, After San Bruno NW sent mailings</b>
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	

	<p><b>for safety and every winter NW provides flood and slide area special messages. NW trademarked Smell, Go, Let us Know. It has been very effective and ties all communications together.</b></p>
<p>Check exactly one box above. * Required field</p>	

**2.06 Maintaining Liaison with Emergency Response Officials**

Did the operator establish and maintain liaison with appropriate fire, police, and other public officials to: learn the responsibility and resources of each government organization that may respond, acquaint the officials with the operator’s ability in responding to a pipeline emergency, identify the types of pipeline emergencies of which the operator notifies the officials, and plan how the operator and other officials can engage in mutual assistance to minimize hazards to life or property?

**(Reference: § 192.616 (c); § 195.440 (c); API RP 1162 Section 4.4)**

- Examine the documentation to determine how the operator maintains a relationship with appropriate emergency officials.
- Verify the operator has made its emergency response plan available, as appropriate and necessary, to emergency response officials.
- Identify the operator’s expectations for emergency responders and identify whether the expectations are the same for all locations or does it vary depending on locations.
- Identify how the operator determined the affected emergency response organizations have adequate and proper resources to respond.
- Identify how the operator ensures that information was communicated to emergency responders that did not attend training/information sessions by the operator.

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	<p>Comments:</p> <ol style="list-style-type: none"> <li>1. <b>Maintain relationship with appropriate emergency officials by e leaning, 21 fire department training, doc of meeting with damage prevention, emergency folks meetings. Reviewed 3 random samples 2009 Vancouver Fire Department Emergency Response Training 22 present ; Nov , 2011 is Keizer OR Fire Dept training 20 present; 2010 Boring City Fire Dept training- 91 present</b></li> <li>2. <b>Emergency response plan is made available if requested; NW ensures it is available to all. Section 3.1 of annual review book.</b></li> <li>3. <b>Reviewed Brochure titled Prepared “Fire Personnel”, this has a section titled “What should fire personnel do in case of natural gas emergency” and reviewed brochure for police titled “Prepared Police Personnel” it lists “ What should Police Personnel do in case of a natural gas emergency”</b></li> </ol>
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	

	<p>4. NW has determined the affected emergency response organizations have adequate and proper resources to respond, determined by communication and attending emergency response meeting. Examples follow: NW Natural attends Fire Dept Training; Officer and Fire Chief meetings; Western WA Training Assoc.; Marion County Fire Chiefs; NW has started partnering with the OR Fire Instructor Assoc. In Oregon when LNG etc have enhanced training for those fire departments. In OR Tualatin Valley Dept and Rescue is largest fire dept training facility in OR, NW built a natural gas training field for them. As a result of this mutual training the fire departments found they were not properly calibrating their natural gas. Now they are.</p> <p>5. NW is currently building a training site for its internal use and will use this facility for all fire and police departments training also.</p> <p>6. For emergency responders that did not attend training, information sessions provided by NW,</p> <p>7. NW offers training, eLearning with incentives to complete the classes, NW is partnering with Dept of Public Safety Training to develop "Chief Training Box". NW goes to individual fire departments in person and offer training if it cannot make by letter or phone.</p> <p>Side note: In NW training group of employees, 3 are Chiefs of volunteer fire departments.</p>
<p>Check exactly one box above. * Required field</p>	

## 5. Program Evaluation & Continuous Improvement (Annual Audits)

### 3.01 Measuring Program Implementation

Has the operator performed an audit or review of its program implementation annually since it was developed? If not, did the operator provide justification in its program or procedural manual?

(Reference: § 192.616 (c), (i); § 195.440 (c), (i); API RP 1162 Section 8.3)

- Verify the operator performed an annual audit or review of the PAP for each implementation year.

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	Comments: In PAP section 8, the Annual Review book section 1.1 provides information. PA folks meet with subject matter experts of NW. Practice is all folks come together and deal with all items in 8.2 of PAP plan. Outcome of meeting is the supplemental list. Recommendation OR and WA inspectors recommend that for clarity the details of the 4 year effectiveness evaluation be included in the PAP and titled Effectiveness evaluation.
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

**3.02 Acceptable Methods for Program Implementation Audits**

Did the operator use one or more of the three acceptable methods (i.e., internal assessment, 3rd-party contractor review, or regulatory inspections) to complete the annual audit or review of its program implementation? If not, did the operator provide valid justification for not using one of these methods?

**(Reference: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.3)**

- Determine how the operator conducts annual audits/reviews of its PAP.

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	Comments: <b>NW uses internal assessment 9.2 in PAP (this will be elaborated for 3.01. Phone surveys conducted by vendor. Also do focus groups of TV spots with actual customers company used was Consumer Opinion Services and JD Power</b>  Reviewed USPS Postal receipts for Excavator Safety, Public Official Officials, multi family, and fire safety.  OR and WA inspectors recommend that NW include postage reports in the Annual Plan Book.
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

**3.03 Program Changes and Improvements**

Did the operator make changes to improve the program and/or the implementation process based on the results and findings of the annual audit? If not, did the operator provide justification in its program or procedural manual?

**(Reference: § 192.616 (c); § 195.440 (c); API RP 1162 Section 8.3)**

- Determine if the operator assessed the results of its annual PAP audit/review then developed and implemented changes in its program, as a result.
- If not, determine if the operator documented the results of its assessment and provided justification as to why no changes were needed.

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	Comments: <b>Document with program summary in Annual Book section 1.1 is overview summary. 1.4 are the tools used, how evaluations done. Specific results for specific section 3.1 thur 3.6.</b>
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	

Check exactly one box above. \* Required field

## 6. Program Evaluation & Continuous Improvement (Effectiveness)

### 4.01 Evaluating Program Effectiveness

Did the operator perform an effectiveness evaluation of its program (or no more than 4 years following the effective date of program implementation) to assess its program effectiveness in all areas along all systems covered by its program? If not, did the operator provide justification in its program or procedural manual?

**(Reference: § 192.616 (c); § 195.440 (c); API RP 1162 Section 8.4)**

- Verify the operator conducted an effectiveness evaluation of its program (or no more than 4 years following the effective date of program implementation).
- Document when the effectiveness evaluation was completed.
- Determine what method was used to perform the effectiveness evaluation (in-house, by 3<sup>rd</sup> party contractor, participation in and use the results of an industry group or trade association).
- Identify how the operator determined the sample sizes for audiences in performing its effectiveness evaluation.

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	Comments: Section 1.3 of Annual Book is awareness survey. Section 1.3 of Annual Book is trend of dig ins per K Section 1.3 of Annual Book and JD Power is public perception NW Nat'l does an effectiveness evaluation every year. OR and WA inspectors recommend that the details of the effectiveness evaluation be included in the PAP and titled Effectiveness evaluation.
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

### 4.02 Measure Program Outreach

In evaluating effectiveness, did the operator track actual program outreach for each stakeholder audience within all areas along all assets and systems covered by its program? If not, did the operator provide justification in its program or procedural manual?

**(Reference: § 192.616 (c); § 195.440 (c); API RP 1162 Section 8.4.1)**

- Examine the process the operator used to track the number of individuals or entities reached within each intended stakeholder audience group.
- Determine the outreach method the operator used to perform the effectiveness evaluation (e.g., questionnaires, telephone surveys, etc).
- Determine how the operator determined the statistical sample size and margin-of-error for each of the four intended stakeholder audiences.

- Affected public
- Emergency officials
- Public officials
- Excavators

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	Comments:
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<input type="checkbox"/> U - Unsatisfactory (explain)*	<b>Annual Plan book Section 1.3, includes process the operator used to track the number of individuals or entities reached, method used to determine the outreach method and statically analysis. All found in 2010 Public Safety Awareness Program Evaluation Summary Reviewed questionnaire used by consumer opinion services' called Natural Gas Safety-Tracking Survey</b>
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

**4.03 Measure Percentage Stakeholders Reached**

Did the operator determine the percentage of the individual or entities actually reached within the target audience within all areas along all systems covered by its program? If not, did the operator provide justification in its program or procedural manual?

**(Reference: § 192.616) (c); § 195.440 (c); API RP 1162 Section 8.4.1)**

- Document how the operator determined the statistical sample size and margin-of-error for each of the four intended stakeholder audiences.
- Document how the operator estimated the percentage of individuals or entities actually reached within each intended stakeholder audience group.

- Affected public
- Emergency officials
- Public officials
- Excavators

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	<b>Comments:</b> <b>NW estimated the percentage of individuals or entities actually reached within each intended stakeholder audience group. This is found in Section 2.1 of Annual Plan Book, is media analysis.</b> Reviewed 2010 Audience summary.  *reviewed Newspapers add, there are 5 newspapers and includes the circulation numbers, also reviewed # people who look at adds on line while visiting newspaper site - there are 11 on line newspapers.
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

**4.04 Measure Understandability of Message Content**

In evaluating effectiveness, did the operator assess the percentage of the intended stakeholder audiences that understood and retained the key information in the messages received, within all areas along all assets and systems covered by its program? If not, did the operator provide justification in its program or procedural manual?

**(Reference: § 192.616) (c); § 195.440 (c); API RP 1162 Section 8.4.2)**

- Examine the operator’s evaluation results and data to assess the percentage of the intended stakeholder audience that understood and retained the key information in each PAP message.

- Verify the operator assessed the percentage of the intended stakeholder audience that (1) understood and (2) retained the key information in each PAP message.
- Determine if the operator pre-tests materials.

- Affected public
- Emergency officials
- Public officials
- Excavators

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	Comments: <b>2004 did benchmark survey on awareness. And in 2006 focus group tested TV audience (customers and non-customers).</b>
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

**4.05 Measure Desired Stakeholder Behavior**

In evaluating its public awareness program effectiveness, did the operator attempt to determine whether appropriate preventive behaviors have been understood and are taking place when needed, and whether appropriate response and mitigative behaviors would occur and/or have occurred? If not, did the operator provide justification in its program or procedural manual?

**(Reference: § 192.616 (c); § 195.440 (c); API RP 1162 Section 8.4.3)**

- Examine the operator’s evaluation results and data to determine if the stakeholders have demonstrated the intended learned behaviors.
- Verify the operator determined whether appropriate prevention behaviors have been understood by the stakeholder audiences and if those behaviors are taking place or will take place when needed.

- Affected public
- Emergency officials
- Public officials
- Excavators

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	Comments: <b>With excavator the number of locates is going up, the number of dig ins is down but it appeared from the PA review the message was not understood. Section 1.3 of Annual Plan Book. Reviewed Chart</b>  <b>Message understanding is historical charts stats, information came from all results of surveys. Found in Annual Plan Book 1.3. This chart shows improvements every year except in 2008. NW believes this is due to several reasons, 1. It was an election year and it is harder to get TV and radio</b>
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	



	<b>spots (these spots can also just be bumped for campaign spots). 2. Contractor had understanding of what needed to do but appeared confused on some issues in survey results.</b>
Check exactly one box above. * Required field	

**4.06 Measure Bottom-Line Results**

In evaluating its public awareness program effectiveness, did the operator attempt to measure bottom-line results of its program by tracking third-party incidents and consequences including: (1) near misses, (2) excavation damages resulting in pipeline failures, (3) excavation damages that do not result in pipeline failures? Did the operator consider other bottom-line measures, such as the affected public's perception of the safety of the operator's pipelines? If not, did the operator provide justification in its program or procedural manual?

**(Reference: § 192.616 (c); § 195.440 (c); API RP 1162 Section 8.4.4)**

- Examine the operator's process for measuring bottom-line results of its program.
- Verify the operator measured bottom-line results by tracking third-party incidents and consequences.
- Determine if the operator considered and attempted to measure other bottom-line measures, such as the affected public's perception of the safety of the operator's pipelines. If not, determine if the operator has provided justification in its program or procedural manual for not doing so.

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	<b>Comments:</b> <b>With excavator the number of locates is going up, the number of dig ins is down but it appeared the message was not understood. Section 1.3 of Annual Plan Book. Reviewed Chart</b>  <b>NW Nat'l considered and attempted to measure other bottom-line measures with JD Powers, Annual survey questions</b>  <b>Reviewed Section 6 or Annual Plan Book has all stats on second page of 2010 plan evaluation</b>
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

**4.07 Program Changes**

Did the operator identify and document needed changes and/or modifications to its public awareness program(s) based on the results and findings of its program effectiveness evaluation? If not, did the operator provide justification in its program or procedural manual?

**(Reference: § 192.616 (c); § 195.440 (c); API RP 1162 Section 2.7 Step 12 and 8.5)**

- Examine the operator's program effectiveness evaluation findings.
- Identify if the operator has a plan or procedure that outlines what changes were made.
- Verify the operator identified and/or implemented improvements based on assessments and findings.

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	<b>Comments:</b>
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<input type="checkbox"/> U - Unsatisfactory (explain)*	2010 Public Awareness Plan Summary is consider the annual but contains the 4 year effectiveness requirements
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

## 7. Inspection Summary & Findings

### 5.01 Summary

NWN PAP compliment in letter OR and WA inspectors made 6 recommendations.

### 5.02 Findings