

POST INSPECTION MEMORANDUM

Inspector: Patti Johnson/UTC (lead)
Reviewed: Joe Subsits /UTC
Peer Reviewed: RR ✓
Follow-Up Enforcement: No Violation ✓
~~PCP*~~ ~~PCO*~~ ~~NOA~~ ~~WL~~ ~~LOC~~
Director Approval* 074

12/15/12

Date: 12/14/2011

Operator Inspected:
 Puget Sound Energy
 PO Box 90868 M/S PSE-12N
 Bellevue, WA 98009-0868

OPID: 22189**Region:** Western

Unit Address:
 PO Box 90868 M/S PSE-12N
 Bellevue, WA 98009-0868

RECEIVED

JAN 14 2013

State of Washington
 UTC
 Pipeline Safety Program

Unit Inspected: Puget Sound Energy, Sumas and Jackson Prairie

Company Unit ID:
Jackson Prairie - Unit ID: 33875
Sumas - Unit ID: 33875

Unit Type: Interstate Gas Transmission**Inspection Type:** Public Awareness Inspection 0-12**Record Location:** 355 110th Ave. NE, Bellevue, WA 98004**Inspection Dates:** 11/28, 11/29 and 12/1/2011**AFOD:** 3**SMART Activity Number:** ~~NA~~ 141589

Operator Contact: Darryl Hong
Phone: (425) 462-3911 **Fax:** NA **Emergency:** (425) 766-3388

Unit Description:

Puget Sound Energy has both interstate and intrastate. PSE interstate facilities are Jackson Prairie, located in Lewis County, with 14 miles of transmission lines and Sumas Co Gen. located in Whatcom County with 3.5 miles of transmission.

Facilities Inspected: Sumas and Jackson Prairie

Persons Interviewed:

Darryl Hong, Cheryl McGrath, Dorothy C Bracken and Abigail j Elliott.

Follow up on the history of prior offenses that are still open:

Prior Offenses (for the past 5 years)		
CPF #	What type of open enforcement action(s)?	Status of the regulations(s) violated (Reoccurrence Offenses, Implement a NOA Revision, Completion of PCO or CO, and etc...)

Recommendations:

None.

Comments:

Patti Johnson, UTC WA (Lead).

Attachments:

PHMSA Form 21 Public Awareness Program Effectiveness Inspection

**PUBLIC AWARENESS PROGRAM EFFECTIVENESS INSPECTION
SPECIFIC INFORMATION**

Control Information

Inspection Start Date*:	11-28-2011	
Inspection End Date*:	12-1-2011	
OpID:	22189	
Parent Operator Name:	Puget Sound Energy	
Unit ID (s):	33875 74999	
State/Other ID:	WA	
Activity Record ID No.	NA	
Address of Company Official*: Sue McLain Senior VP Operations PO Box 90868 M/S PSE-12N Bellevue, WA 98009-0868	Company Official*:	Sue McLain
	Title*:	Senior VP Operations
	Phone Number*:	(425) 462-3696
	Fax Number:	(425) 462-3770
	Email Address*:	sue.mclain@pse.com
Web Site:	http://pse.com	
Total Mileage (from page 3)*:	12035	
Total Mileage in HCA:	4.4	
Number of Services (For Distribution):	Approximately 814,416	
Alternate MAOP (80% Rule):	NA	
No. of Special Permits:	NA	

Initial Date of Public Awareness Program*:	October 2006
Title of Current PAP*:	Public Awareness Program
Current PAP Version*:	April 2009
Current PAP Date*:	April 2009

Post Inspection Information	
Date Submitted for Approval:	1/5/2012
Director Approval:	
Approval Date:	

** Required field*

Persons Interviewed*	Title/Organization*	Phone Number	Email Address
Darryl Hong	Compliance Program Coordinator	Off: (425) 462-3911 Cell: (425) 766-3388	darryl.hong@pse.com

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

Cheryl McGrath	Manager Gas Compliance and Regulatory Audits	Off: (425) 462-3207 Cell: (206) 604-3221	cheryl.mcgrath@pse.com
Dorothy C Bracken	Customer Communications Manager	425 462 3206	Dorothy.bracken@pse.com
Abigail j Elliott	Public relations Analyst	425 462 3795	Abigail.elliott@pse.com

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

External Support Entity Name*	Part of Plan and/or Evaluation*	Phone Number	Email Address
HDR Pharos for mailings list			

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

Inspector Representative(s)*	PHMSA/State*	Region/State*	Email Address	Lead*
Patti Johnson	WA	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
				<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)
PSE-Jackson Prairie and Sumas	22184	Gas	WA	0	18.825	0	

(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)
PSE	22184	Gas	WA	0	8.56	12,008	4.4

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

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

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

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

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

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

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

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

Total Mileage:	12,035
-----------------------	--------

1. Supply company name and Operator ID, if not the master operator from the first page (i.e., for subsidiary companies).
 2. Use OPS-assigned Operator ID. Where not applicable, leave blank or enter N/A
 3. Use only 2-letter State codes, e.g., TX for Texas.
 4. 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)*	<p>Reviewed Clearinghouse letter</p> <p>Distribution: submitted 6/2006, Published after clearing house correction made in Oct, 2006.</p> <p>Sumas: Purchased in 2008. Have been doing notifications and included in PAP. It is an interstate facility.</p> <p>Jackson Prairie: submitted 6/2006, Published after clearing house correction made in Oct, 2006. It is an interstate facility</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	

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)*	<p>Clean up after exit</p> <p>Distribution:</p> <ul style="list-style-type: none"> • PSE PA Plan cover letter is signed by Sue McLain Senior VP-operations and makes commitment to PA. • Reviewed: Documentation power point
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	

	<p>presentation “update to Executive Systems Integrity Committee” meeting held Oct 16, 2006</p> <ul style="list-style-type: none"> • Documentation from 2-25-2008 Minutes of The Executive Systems Integrity Committee where PAP presentation made. This includes a list of attendees. In this meeting it was stated Oleska Associates formatting recommendations would be adopted. This should have been in 2008 plan. reviewed 10-16-2011 meetings minutes • Evaluations done by Tibbitts Co and Gilmore research out of Seattle. HDR for proximity addresses. • submitted 6/2006, • 4-2009 latest version of PAP • Page 2 of Plan, does not include the number of employees, does not include titles of all employees involved. • RECOMMEND: that all PSE employees who have or who do PA duties have their job titles, and estimated number of employees included in the PAP. Take credit for what you are doing <p>Sumas and Jackson Prairie: same as distribution</p>
<p>Check exactly one box above. * Required field</p>	

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)*	<p>Distribution : Distribution: Yes, page 2, item 4 of 2009 plan includes all of the operator’s system assets/types.</p> <p>Sumas: currently, in the PAP Sumas is included in the distribution system, Just last week Sumas became interstate and the PSE will be update PAP accordingly.</p> <p>Jackson Prairie: Reviewed Jackson Prairie team map with all hand delivered material. Reviewed</p>
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	

	PSE Jackson Prairie map of Jackson Prairie system and buffer. Reviewed list of address on Jackson system. There are 33. Most of these get hand delivered by Jackson Prairie employee. Reviewed letter given to residents. This list is prepared by PSE and verified by HDR
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)

- 1. Identify how the operator determines stakeholder notification areas and distance on either side of the pipeline.
- 2. Determine the process and/or data source used to identify each stakeholder audience.
- 3. 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)*	<p>Comments:</p> <p>*PSE uses a flat 1000 feet distance from all its facilities</p> <p>*General public who are on PSE gas main but not PSE electric are notified by newspaper adds, etc. Recommend PSE includes more notification not just newspaper adds.</p> <p>Establish methods to identify the individual stakeholders in the four affected stakeholder audience groups.</p> <p>*PSE creates list from WA State fire chief.</p> <p>* PSE Notify and invites all fire dept personnel to emergency responder training offered 8 times a year.</p> <p>*PSE makes presentation when requested. Reviewed 8 in house training as well as list of 16 presentations made to various other groups.</p> <p>RECOMMEND: on page 1 of 6 under IV Public Awareness Communications Summary Table State 1000 feet instead of 660 since 1000 feet is practice.</p> <p>*List of Distribution and Transmission affected</p>
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	

	<p>public developed by HDR, they used property records. After list was created schools, apartments, single residents, etc. were mapped. Transmission maps not in binder for intrastate.</p> <p>After HDR provided information, for apt owner, PSE made phone called to get individual apt addresses. If could not get individual apt address just talked to apt manager. Hoping they would post notice. Did not cross reference with service addresses. Owners along transmission line got letter, tenant address go to occupant/tenant. Have map but very small scale. Reviewed, recap stated 15 apartments with 1342 units, 4 condominiums with 368 units, 281 commercial properties, 1488 residential properties, 4 mobile home parks and unknowns 291</p> <p>REVIEWED. N Midway and S Seattle segments of distribution transmission.</p> <p>RECOMMEND: that PSE uses the same names in PAP as in compliance mapping.</p> <p>For customers do bill stuffers and people on route newspaper adds and safety fairs, community meetings,</p> <p>Emergency Officials are emergency responders per PSE PAP definition.</p> <p>PSE uses master list they composed from the WA Fire Chief Assoc, WA state patrol, police depts., facility managers for hotels: emergency management, Boeing, cities, hospitals. PSE invites them to 8 different annual trainings at PSE. Same program for all groups. About 80 different groups attend. No maps associated with emergency officials. Have sign in sheets for those who attended. For volunteer fire depts. go to site and do volunteer fire dept. training. Also have web training</p> <p>Public officials are defined as elected and Public Works folks. PSE has employees who are always out there: Community relations Manager six employees, Municipal Land Planner at least 12, Municipal Liaison Manager at least 10 or 12. Facilities included assoc of city, assoc of public works, majors,</p>
--	---

	<p>city managers, etc, many way, this includes many excavations. RECOMMEND: putting above detail in the written PAP as it shows additional PSE resources. Special meetings regarding near misses: example; PSE met with port of Seattle Manager and Seattle mayor because of Marginal Way on Alaska Way. Only occasional mailing done, usually one letter and web site postings. At the end of each field employee meeting with a customer they fill out form that asks if PA discussion took place. RECOMMEND: listing number of contact in the PAP.</p> <p>Reviewed service tech field report, has section that asks if safety awareness discussed.</p> <p>After conferences, training etc provide link to PSE web site for survey of effectiveness of training, etc.</p> <p>EXCAVATORS *Match and compare lists from Damage Prevents AGC, L&I, with One call center. Then face to face meeting, conferences, meets with city halls for pre-construction meeting, tail gate meetings. Do mailings and put brochure at permitting, city hall and rental companies. 811 reminders. Letter mailings when they have caused damage, PSE concentrates on excavation companies not individual excavators. Often covered under other public. Call before you dig brochure used at conferences.</p> <p>Called emergency number 1-888-225-5773. Phone system can distinguish between electric and gas emergency calls. Same emergency for intra and interstate facilities</p> <p>Intrastate and interstate use HDR.</p>
<p>Check exactly one box above. * Required field</p>	

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: For all 4 groups found in PAP Part III of Public Awareness Communication Summary Table. Postage is internal, PSE cannot prove how many mailed, PSE can prove mailing occurred because in each mailing list one letter is sent back to the PA department, and PSE receives returned mail from the list. PSE does not have process or procedure to track delivery methods. Reviewed all returned mail. Reviewed construction notification for pipeline extension by 3 rd party -- PSE committed to get US postal service verification in the future for all mailings.
<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: E has a written Public Awareness Program Plan; however, the PAP lacks detail and clarity. API 1162 section 7.1 "Each operator of a hazardous liquid pipeline, natural gas transmission pipeline system, or gas distribution pipeline system should establish (and periodically update) a written Public Awareness Program designed to include all required components of the program described in this RP". WAC 480-93-180 Plan and Procedures, includes plans and procedures for meeting all applicable requirements of 49 CFR §§ 191, 192 and chapter 480-93 C,
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	

	<p>the following areas need to be reviewed and revised: E's has a written plan. It lacks detail regarding process and procedure (including documentation)</p> <ol style="list-style-type: none">1. to implement, document and verify improvements recommended in its 4 year evaluation (Form 21 question 4.07)2. to use evaluation results and data to determine if the stakeholders have demonstrated the intended learned behaviors (Form 21 question 4.05)3. to determine whether appropriate prevention behaviors have been understood by the stakeholder audiences (found in PAP II Section 8) (Form 21 question 4.05)4. to evaluate data to assess the percentage of the intended stakeholder audience that understood and retained the key information in each PAP message. (Form 21 question Form 21 question 4.04)5. to determine the statistical sample size and margin-of-error for each of the four intended stakeholder audiences. (Form 21 question 4.03)6. to estimate the percentage of individuals or entities actually reached within each intended stakeholder audience group. (Form 21 question 4.03)7. to track the number of individuals or entities reached within each intended stakeholder audience group (Form 21 question 4.02)8. for conducting the 4 year evaluation. (Form 21 question 4.01)9. to assess the results of its annual PAP audit/review then develop and implement changes in its program (Form 21 question 3.03)10. to conduct annual audits/reviews of its PAP. (Form 21 question 3.02)11. to make its emergency response plan available; identified the operator's expectations for emergency responders and identified whether the expectations are the same for all 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.(Form 21 question
--	--

	2.06) 12. to determine relevant factors to determine the need for supplemental program enhancements as described in API RP 1162 for each stakeholder audience (Form 21 question 2.05)
Check exactly one box above. * Required field	

2. 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: Even scratch and sniff are 4 different languages, English, Spanish, Korean and Russian. Based on analysis on customers in service area, used 2010 census stats to confirm. * HDR Firm did study of language spoken in home. 82.99 English, 5.24 Spanish, 1.54 Chinese, 1.11 Tagalog, 1.09 Vietnamese, 1.07korean, 6.96 other *Call center stats show that Spanish need 10 times more assistance with language, even though ¼ of pop is Asian. * from one call and excavators found out need Spanish because of excavator crew make up. All PSE call before is in English and Spanish.
<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	

2.02 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)*	Comments: *Reviewed editorial calendar. Includes safety electronic and printed material for all groups. * called phone number
<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)*	Comments: Reviewed Transmission line proximity notice, covered transmission. For distribution in bill stuffers, in customer electric letter get gas notification. Internet banking can get to full bill insert from bank site.
<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	

2.04 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 all
<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: PSE has considered and/or included relevant factors for supplemental enhancements. However, the written program lacks details and clarity. For 2012 will be focusing on the 811 phone number.
<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	

2.06 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.

4. Identify how the operator determined the affected emergency response organizations have adequate and proper resources to respond.
5. 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)*	Comments: 1. Reviewed marginal way example. Multiple contacts at fire and police and officials, knows training officers and Fire chiefs 2. PSE PA does not say make available emergency response plan available. However, it is on PSE web and training site, titled Natural Gas Safety Tips. Emergency Response plan is called Energy System restoration Plan 3. List started from Fire chief and build up with WSP and all first responders 4. For distribution ok by liaison. 5. At Jackson Prairie most are fire department volunteers. But PSE knows there is no way local fire could handle an incident there. PSE has well blow out company, named Boots and Hoots (3 rd party) prepared for an incident at Jackson Prairie and the local fire departments would be security. 6. At Jackson Prairie, material is hand delivered. PSE distribution works with fire departments, all invited to attend trainings, reviewed attendance sheet, for those who did not attend, they are invited to next training and provide handouts
<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) prd	

3. 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: Yes, done annual audits.
<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: PSE’s annual audit done internally. Using web site and all feedback. Jackson Prairie has face to face feedback.
<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: Yes
<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 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 3rd 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)*	<p>PSE did 4 year, completed in 2009 because started early when Bellevue incident occurred. PSE uses a combination of in house and 3rd party methods.</p> <p>Sample sizes: 1000 residential, 1000 nonresidential, this was determined based on judgment intended to produce results with a margin of +3.1 percent which is a 95% confidence level.</p> <p>Same size Jackson size: Jackson Prairie and Sumas included in 1000.</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	

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.
 - ***NOTE may be different AOC for different employee task groups and required action by them**

- Affected public
- Emergency officials
- Public officials
- Excavators

<input type="checkbox"/> S – Satisfactory (explain)*	<p>Comments:</p> <p>PSE did track actual program outreach for each stakeholder audience within all areas along all assets and systems covered by its program, reviewed annual key stakeholder eval, make from on line survey. Outreach method is the same</p> <p>Reviewed 2006 Public Awareness Plan baseline, it identified the gaps in each of the 4 groups</p> <p>PSE did not break out individual zip codes to determine how many Jackson Prairie residents from distribution system. However, PSE has 100% coverage of Jackson Prairie because of one on one contact, with residents and all emergency and public</p>
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	

	officials on the system.
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)*	PSE’s in house research department reached 1000 residential and 1000 nonresidential to get 95% confidence level. Margin of error was 3.1%. As reported in the Nov 2009 Gilmore 4 year survey Mailings reached all customers and non-customers and Gilmore study did stats. Weekly PSE reviews web training/feedback site
<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:
---	-----------

<input type="checkbox"/> U - Unsatisfactory (explain)*	<ul style="list-style-type: none"> Reviewed web site survey called “survey monkey” to determine stakeholder audience that understood and retained the key information in each PAP message. Web site survey includes all stakeholder group. Also used all training and presentations (includes schools and families) – prior to presentation asked questions and after presentation asked questions. This determined if message was adequate and was considered the pretest.
<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)*	<p>Comments: Reviewed Natural Gas Awareness (Pinehurst survey) in regard to the “know how to detect gas question”. Also reviewed Natural Gas 3rd Party dig in bar chart from May 2008 – May 2011. It is apparent that in April of each year, which is called WA call before you dig month that locate calls increased. Also, in every April dig ins went down or remained the same. In May of each year the dig ins dropped except in May of 2009. Graph shows continual decline in dig ins and shows the total number of locates has gone down. PSE believes this drop is due to the economy. Two charts reviewed indicated that appropriate behaviors are increasing.</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	

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)*	<p>PSE did attempt to measure bottom line results by tracking 3rd party incidents and consequences for excavation damages that did and did not result in pipeline failure.</p> <p>PSE's Contractor Management does measure bottom line for near misses but currently this information is not in the PAP. It will be included in the future</p> <p>PSE did attempt to measure public perception of the safety of the operator's pipeline by poll in 2005. After the San Bruno incident, PSE received many calls about gas lines, PSE provided individuals with maps and fact sheets, they also wrote letters describing pipes and inspections. This information was also posted on the web site. All contacts were urged to call back with additional questions</p> <p>PSE did not do any special public awareness messages for the Jackson Prairie facility after the San Bruno incident.</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	

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)*	Comments:
---	-----------

<input type="checkbox"/> U - Unsatisfactory (explain)*	PSE identified and documented needed changes in its public awareness program based on its 4 year evaluation.
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

5. Inspection Summary & Findings

5.01 Summary

PSE has a written Public Awareness Program Plan; however, the PAP lacks detail and clarity. API 1162 Section 7.1 “Each operator of a hazardous liquid pipeline system, natural gas transmission pipeline system, gathering pipeline system or a natural gas distribution pipeline system should establish (and periodically update) a written Public Awareness Program designed to cover all required components of the program described in this RP”. WAC 480-93-180 Plan and Procedures, requires plans and procedures for meeting all applicable requirements of 49 CFR §§ 191, 192 and chapter 480-93 WAC.

5.02 Findings

The following areas need to be reviewed and revised:

PSE’s has a written plan. It lacks detail regarding process and procedure (including documentation)

1. to implement, document and verify improvements recommended in its 4 year evaluation (Form 21 question 4.07)
2. to use evaluation results and data to determine if the stakeholders have demonstrated the intended learned behaviors (Form 21 question 4.05)
3. to determine whether appropriate prevention behaviors have been understood by the stakeholder audiences (found in PAP II Section 8) (Form 21 question 4.05)
4. to evaluate data to assess the percentage of the intended stakeholder audience that understood and retained the key information in each PAP message. (Form 21 question Form 21 question 4.04)
5. to determine the statistical sample size and margin-of-error for each of the four intended stakeholder audiences. (Form 21 question 4.03)
6. to estimate the percentage of individuals or entities actually reached within each intended stakeholder audience group. (Form 21 question 4.03)
7. to track the number of individuals or entities reached within each intended stakeholder audience group (Form 21 question 4.02)
8. for conducting the 4 year evaluation. (Form 21 question 4.01)
9. to assess the results of its annual PAP audit/review then develop and implement changes in its program (Form 21 question 3.03)
10. to conduct annual audits/reviews of its PAP. (Form 21 question 3.02)
11. to make its emergency response plan available; identified the operator’s expectations for emergency responders and identified whether the expectations are the same for all 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.(Form 21 question 2.06)
12. to determine relevant factors to determine the need for supplemental program enhancements as described in API RP 1162 for each stakeholder audience (Form 21 question 2.05)