

**PUBLIC AWARENESS PROGRAM EFFECTIVENESS INSPECTION
SPECIFIC INFORMATION**

Control Information

Inspection Start Date*:	9-28-2011	
Inspection End Date*:	9-29-2011	
OpID:	31522	
Parent Operator Name:	KB Pipeline	
Unit ID (s):		
State/Other ID:		
Activity Record ID No.		
Address of Company Official*: 121 SW Salmon Street Portland, OR 97204	Company Official*:	Bill Nicholson
	Title*:	Sr VP Customer Service, Transmission & Distribution
	Phone Number*:	503.464.8855
	Fax Number:	503.464.2222
	Email Address*:	Bill.nichols@pgn.com
Web Site:	N/A	
Total Mileage (from page 3)*:	19	
Total Mileage in HCA:	0	
Number of Services (For Distribution):	N/A	
Alternate MAOP (80% Rule):	N/A	
No. of Special Permits:	N/A	

Initial Date of Public Awareness Program*:	June 9, 2011
Title of Current PAP*:	KB Pipeline Public Awareness Plan
Current PAP Version*:	1
Current PAP Date*:	September 1, 2011

Post Inspection Information	
Date Submitted for Approval:	
Director Approval:	
Approval Date:	

** Required field*

Persons Interviewed*	Title/Organization*	Phone Number	Email Address
Robert Cosentino	Pres & CEO Cosentino Consulting Inc.	360.200.4959	bob@cosentinoconsulting.com
Kathy Davies	Portland General Electric	503.464.7300	Kathy.davies@pgn.com

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

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

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

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

Inspector Representative(s)*	PHMSA/State*	Region/State*	Email Address	Lead*
John Haddow	Western	John Haddow	Western	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N
Tom Finch	Western	Tom Finch	Western	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N
Patti Johnson	WA	Patti Johnson	WA	<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

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)
KB Pipeline	31522	Processed gas	WA	0	18	0	
KB Pipeline	31522	Processed gas	OR	0	1	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)
NA							

(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.)

Total Mileage:	19
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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)*	Comments: The major owner, Portland General Electric took over operations of KB in Jan 2011. Portland General Electric hired Cosentino Consulting Inc. to manage operations. Cosentino Consulting's PA program was adopted June 9, 2011. The previous operator initially developed and published KB's original PA program in the correct time frame. Reviewed Cascade's corrected Clearinghouse deficiencies from PHMSA WR records. KB records are at the Beaver Power Plant. CNG records are in Kennewick.
<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:
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<input type="checkbox"/> U - Unsatisfactory (explain)*	KB has 3 owners: Portland General Electric, US Gypsum and NW Natural. The 3 owners have each has signed a letter of support and committed resources to the PAP. Kathy Davies is Manager for Portland General Electric and is responsible for the PA. 503 464-7300, 121 SW Salmon ST, Portland, OR 97204. Cosentino Consulting Inc. manages the PA program External resources are used, they include PAPA , LEPC (Local Emergency Planning Committee) and Cereritias (for mailings)
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

1.03 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: PA Plan states all KB assets are included. KB provided a map that included Beaver Plant pipeline facilities and its previous operator’s facilities. KB is currently creating a new map with only its facilities.
<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)*	<p>Comments:</p> <p>Operator determines stakeholder notification areas in Section V of PA Plan:</p> <ul style="list-style-type: none"> • Affected Public - 660 feet either side of line. • Emergency officials – in County assets are in. Public Officials - County assists are in • Emergency - county assists are in. • Excavators - 10 miles on all sides of line. <p>Each data group determined by Celeritas.</p> <p>Sent total of 1,258 pieces of mail to all stakeholders. Celeritas provides this information to KB.</p> <p>Using KB’s new plan, KB is able to 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. This is provided by Celeritas.</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	

1.05 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)*	<p>Comments:</p> <p>In PAP Section V</p> <ul style="list-style-type: none"> • Affected Public: Reviewed 1. Pipeline Safety brochure • Emergency officials: Reviewed 1. Letter dated 4-11 to fire and police departments. There are no volunteer fire depts. 2. Emergency responder’s handbook.
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	

	<p>These were hand delivered with a dozen donuts. 18 were delivered on this 19 mile pipeline. There are no volunteer fire departments on pipeline</p> <ul style="list-style-type: none"> • Public Officials: Reviewed <ol style="list-style-type: none"> 1. pg 14 Mailing, 2. Local Emergency Planning Committee, if KB can't reach thru committee a personal call is made. 3. Sign in for Columbia Emergency Planning Assoc, KB also provides all information provided to emergency officials do (see above). 4. Cowlitz county fire dept training that KB participated in. • Excavators: Reviewed <ol style="list-style-type: none"> 1. Section 11 of plan 2. Celeritias mailing used resident brochure which includes required information. In addition, KB has a mailing brochure that is sent.
<p>Check exactly one box above. * Required field</p>	

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 type="checkbox"/> S – Satisfactory (explain)*	<p>Comments:</p> <p>KB's previous operator uses Pipeline Association for Public Awareness (PAPA). Although requirements have been met, KB's previous operator DID NOT have company specific effectiveness evaluations for KB or itself.</p> <p>KB is establishing baseline data now. Since Cosentino Consulting Inc. took over KB operations in Jan. 2011, there has not been</p>
<input checked="" type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	

	<p>enough time to evaluate if the new message is understood. KB has been looking for one call trends and following the new PA Plan, section X, Process for management of input feedback comments received. The January 2011 PA Plan includes requirements for both annual and 4 year effectiveness written evaluations.</p> <p>This is a 19 mile pipeline, only ¼ of the line has population, the rest of the line is on Weyerhaeuser land.</p> <p>Supplemental Mailing frequencies are in Section 9 page 16 of the PA Plan and mailing frequencies are in Section 7 page 13</p> <p>Cosentino Consulting Inc. (new consultant) will have enough information to determine a statistical sample size in early 2012.</p>
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)*	<p>Comments:</p> <p>In English and Spanish, reviewed the brochure. Section 6 page 11</p> <p>Based additional language need from the US City-Data.com web site. Site uses census Prior to June 9, 2011, for this new program</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	

2.02 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: Need to review doc

- 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: All required information was delivered to each of the stakeholder audiences and this information was reviewed during the inspection Called phone number on brochure and it is good
<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: Section V Stakeholder Audiences. Develop and deliver messages
<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 what has been sent for new program and old program
<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: New plan section 9 page 16. Any observations made by employees
<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.
- 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)*	Comments: Relationship maintained: Reviewed sign in for public official with Columbia Emergency Planning Assoc, KB Pipeline letter to first responders and liaisons, Cowlitz County Fire Training, PAPA, One Call KB has made delivered its emergency response to police and fire depts. KB has provided its emergency response plan to first responders Operator’s expectations. KB has asked in letter to first responders, sent with emergency handbook, and has offered training but no interest from emergency responders is documented. Certificate of Mailing is available No known volunteer fire dept on list. No schools near the line
<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. 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 type="checkbox"/> S – Satisfactory (explain)*	Comments: Previous operator did not have documentation of annual audit or supplemental information. Reviewed 3rd party review (Behavior Center Inc.) for 2007 and 2010 However, they did perform all requirements following PAPA guidelines.
<input checked="" 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: Previous operator, CNG used PAPA, and they use Behavior Center Inc. Reviewed 3rd Party Contractor review for 2007 and 2010
<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 type="checkbox"/> S – Satisfactory (explain)*	Comments: Previous operator did assess results but did not have documentation of assessing the results or any changes made as a result of the audit.
<input checked="" 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 type="checkbox"/> S – Satisfactory (explain)*	Comments: Not enough information is available to do effectiveness evaluation till 1st of year. Previous operator did not develop any other documentation to review PAPA information; they do go to the PAPA meetings and insist that is adequate review. PAPA meetings in and of themselves are not a completely adequate review.
<input checked="" type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	

	Evaluation done but no doc provided.
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: Cosentino has provisions for all in his plan. That should be OK.
<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	

4.03 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)*	Comments: New KB program has provisions.
<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: New KB plan has provisions for making this determination. PAPA does too. This is satisfactory
<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:
-----------------------------------------------------------------	-----------

<input type="checkbox"/> U - Unsatisfactory (explain)*	Reviewed CNG summary of (mail) survey findings.
<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)*	Comments: Reviewed CNG summary of (mail) survey findings. CNG follows PAPA process.
<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 type="checkbox"/> S - Satisfactory (explain)*	Comments: KB cannot document that they have identified and/or implemented improvements based on assessments and findings".
<input checked="" 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	

5. Inspection Summary & Findings

5.01 Summary

KB Pipeline is moving forward to correct PAP items that Cascade Natural Gas had not accomplished in the past.

5.02 Findings

RECOMMEND WARNING LETTER for all unsatisfactory items as follows:

1.06 Written Evaluation Plan

3.01 Measuring Program Implementation

3.03 Program Changes and Improvements

4.01 Evaluating Program Effectiveness

4.07 Program Changes

The Warning Letter is recommended because KB and their consultant have just taken over and are trying to be prudent.