

Exhibit No. _____ (DMC-6)
Docket No. TO-011472
Witness: Dan Cummings

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Washington Utilities and Transportation Commission,)	DOCKET NO. TO-011472
)	
)	
Complainant,)	
)	
v.)	
)	
Olympic Pipe Line Company, Inc.)	
)	
Respondent.)	

EXHIBIT TO
REBUTTAL TESTIMONY OF
DAN CUMMINGS

OLYMPIC PIPE LINE COMPANY

June 11, 2002

Developing a Recommended Practice for Pipeline Public Awareness Programs

A consensus standard developed under
the ANSI guidelines

Revised 5/1/02



Guiding Principles

- The Recommended Practice will aim to improve public awareness of pipelines nationwide
- To extent feasible, apply similar standards to hazardous liquids and natural gas pipelines
- A tiered approach will accommodate differences of systems, risks and stakeholder needs
- Focus on public awareness for stakeholders along existing pipeline corridors
- Stakeholder involvement and input is being sought

Who is involved?

- **Any interested party may contribute views and comments**
- **Co-Sponsored by:**
 - American Petroleum Institute (API) – publisher
 - Association of Oil Pipelines (AOPL)
 - Interstate Natural Gas Association of America (INGAA)
 - American Gas Association (AGA)
 - American Public Gas Association (APGA)
- **Other Participants and Observers**
 - U.S. DOT, Office of Pipeline Safety (OPS)
 - Gas Technology Institute (GTI)
 - National Association of Pipeline Safety Representatives (NAPSR)

Public Awareness Programs only one facet of communication needs

- Development of Recommended Practice is only **part** of the solution to pipeline communication challenges
- Separate outreach and communication efforts are complementary to development of this standard and include:
 - Industry association outreach and websites
 - Public consultation on pre-siting of pipelines
 - Facility or incident-specific outreach
 - Communications on security issues
 - Regulatory reporting
 - OPS outreach and website communications
 - Media education and relationships
 - Legislative relationships and awareness
 -etc.

Background and Drivers

- Prior API Recommended Practice for liquid pipelines was educational rather than a model (and no longer in print)
- Desire to expand scope to natural gas transmission and distribution pipelines
- Congress has proposed public communications provisions
- OPS is committed to raising public awareness requirements
- OPS Advisory Committee communication task force recognized gaps in public awareness efforts
- Prior NTSB recommendations on public education
- Increasing number of proactive programs implemented by companies have motivated development of industry-wide guidelines to enhance effectiveness.

Process and Scope

- Development follows ANSI consensus standard-making process (using API as publisher) (see www.ansi.org)
- Focuses on public awareness programs for existing pipelines
- Does **not** focus on public outreach for new pipeline construction or incident response communications, but elements may be useful for these situations
- Establishes minimum standards for practical and effective programs for all pipeline operators and suggests guidelines for supplementary practices effective with some audiences
- Focuses on key stakeholders near the pipeline
- May be considered for incorporation by reference in federal regulations, following public notice & comment



Primary Audiences

- Landowners, residents, and places of congregation (businesses, schools, etc.) near the pipeline
- Local and state emergency planning and response agencies who share responsibility for protecting the nation's energy infrastructure
- Local officials and "governing councils"
- Excavators and locators



How to get involved

- Monitor progress and provide comments and input via API website at:

<http://www.api.org/pipelinepublicawareness/>

- Provide input when asked or surveyed
- Comment on draft documents through the official ANSI public comment process
- Comment during rulemaking process if the Office of Pipeline Safety proposes to incorporate Recommended Practice (in whole or part) by reference in federal pipeline regulations (49 CFR Parts 192 and 195)

Who is involved or supporting Taskforce*?

- Co-Chair – Shell Pipeline (representing API and Common Ground Alliance)
- Co-Chair – Duke Energy (representing INGAA)
- Co-Chair - Niagara Mohawk (representing AGA)
- Kinder Morgan - API
- ExxonMobil - API
- El Paso - INGAA
- Williams - INGAA
- City Utilities - APGA
- Enbridge - API and INGAA
- American Gas Association
- National Association of Pipeline Safety Repr.**
- Kentucky
- Texas - Alternate
- Gas Technical Institute
- Association of Oil Pipelines
- American Petroleum Institute
- Office of Pipeline Safety **

* Each person represents industry, however their company or association is noted

** Regulator observers



Timeline

- ↓ Nov 2001 - Kickoff
- ↓ Apr 2002 - Working Draft
- ↓ Feb-July 2002 - Consultation and
drafting
- ↓ Fall 2002 - Interested party review
- ↓ End of Year 2002 – Publish

Tentative Outline

- Introduction and Scope
- Public Awareness Program Development – The “Approach”
- Determining Audience
 - Message Content (and needs assessment)
 - Message / Delivery Tools – The what and the how
 - Frequency Requirements
 - Program Evaluation and Effectiveness
 - Program Documentation
 - Conclusions

(cont'd)

Tentative Outline (cont'd)

- Appendices
 - Communications Toolbox
 - Matrices
 - Tables
- Definitions / Terminology
- Templates/Forms
- References to applicable regulations
- Website Links