

**PUBLIC AWARENESS PROGRAM EFFECTIVE INSPECTION
SPECIFIC INFORMATION**

Control Information: (copy and fill-in for each Operator)

Inspection Date(s):		04.04.11 through 04.26.11	
Operator ID:		2128	
OpID:	2128	Name of Operator:	Cascade Natural Gas Corporation
State/Other ID:		WA	
Unit ID No.		Bellingham District	
Activity Record ID No.			
CompanyAddress: 8113 W. Grandridge Blvd. Kennewick, WA 99336		Company Official:	Tim Clark
		Title:	VP Operations
		Phone Number:	509.734.4586
		Fax Number:	509.737.9803
Web Site:	www.cngc.com	Email Address:	Tim.clark@intgas.com
Total Mileage Represented:		1554 miles	
Mileage in HCA:		9,853 ft, (1.866 mi.)	

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		Title:	Title:
		Phone Number:	Phone Number:
		Fax Number:	Fax Number:
Web Site:	www.cngc.com	Email Address:	Tim.clark@intgas.com
Total Mileage Represented:		1554 miles	
Mileage in HCA:		9,853 ft, (1.866 mi.)	

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OpID	Persons Interviewed	Title/Organization	Phone Number	Email Address
2128	Mike Eutsey	PL Safety Specialist/CNG	509.734.4681	Mike.eutsey@cngc.com
2128	Tina Beach	Mgr Stds & Compliance/CNG	509.734.4576	Tina.beach@cngc.com
2128	Ryan Lindblom	Engineer II	509.734.4551	Ryan.lindblom@cngc.com

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

OpID	Third Party Company PAP/Evaluation Support	Part of Plan and/or Evaluation	Phone Number	Email Address
	Celeritas, Overland Park, KS	Affected Public Mailing	913.491.9000	www.pipelineawareness.com
	Kris Cossins	Affected Public Mailing	913.498.5103	Kcoussins@celeritas.com
	Central Surveys Inc. Shenandoah, IA	Overall assessment of plan effectiveness in June 2010	712.246.1630	csinc@sentralsurveys.com
	Behavior Research Ctr. Inc., Pheonix, AZ (prepared for Pipeline Assoc. for PA (PAPA))	Behavioral research re: contact audience	602.258.4554	Not used.

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

PHMSA/State Representatives	Region/State	Email Address
Stephanie Zuehlke	WA	szuehlke@utc.wa.gov

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

Remarks:

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

List each company and subsidiary separately, broken down by state (using 2-letter designation). 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 (Gas Operator)	Operator ID	State	Interstate Gathering	Interstate Transmission	Interstate Distribution*	Remarks
zero						

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

Jurisdictional to Part 192 (Gas) Mileage (Intrastate)

Company (Gas Operator)	Operator ID	State	Intrastate Gathering	Intrastate Transmission	Intrastate Distribution*	Remarks
Cascade Natural Gas	2128	WA	0	44	1554	

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

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

Company (Liquid Operator)	Operator ID	State	Interstate Transmission	Remarks
zero				

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

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

Company (Liquid Operator)	Operator ID	State	Intrastate Transmission	Remarks
zero				

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

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 in column #3, e.g., TX for Texas.
4. Enter number of applicable miles in all other columns. (Only positive values. No need to enter 0 or n/a.)
5. * Please do not include Service Line footage. This should only be MAINS.

1. Administration and Development of Public Awareness Program

1.01 Written Public Education Program

Does the operator have a written continuing public education program in accordance with the general program recommendations in the American Petroleum Institute's (API) Recommended Practice (RP) 1162 (incorporated by reference), that was developed no later than June 20, 2006 for operators in existence on June 20, 2005, except for master meter or petroleum gas system operators covered under § 194.616(j). Master meter or petroleum gas system operators covered under § 194.616 (j) should have developed a written procedure by June 13, 2008? **(Code Reference: § 192.616 (h); § 195.440 (h))**

<input checked="" type="checkbox"/> S - Satisfactory	Comments:
<input type="checkbox"/> U - Unsatisfactory (explain)	
<input type="checkbox"/> N/A – Not Applicable (explain)	
<input type="checkbox"/> N/C - Not Checked	
Check exactly one box above.	

1.02 Program Objectives

Does the operator's program address the objectives of increasing the awareness of the public and key stakeholders of the presence and location of pipelines in their communities and informing the public of appropriate steps to prevent, identify, and respond to pipeline emergencies? **(Code Reference: § 192.616 (a); § 195.440 (a))**

<input checked="" type="checkbox"/> S - Satisfactory	Comments: Reference of CP 500
<input type="checkbox"/> U - Unsatisfactory (explain)	
<input type="checkbox"/> N/A – Not Applicable (explain)	
<input type="checkbox"/> N/C - Not Checked	
Check exactly one box above.	

1.03 Management Commitment and Support

Does the operator's program include a "statement of support"? (i.e., is there evidence of a commitment of participation, resources, and allocation of funding? **(Code Reference: § 192.616 (a); § 195.440 (a))**

<input checked="" type="checkbox"/> S - Satisfactory	Comments: Michael Gardner has identified that he is signatory for executive support – he is no longer VP of Operations: Tim Clark is Written as AOC in letter.
<input type="checkbox"/> U - Unsatisfactory (explain)	
<input type="checkbox"/> N/A – Not Applicable (explain)	
<input type="checkbox"/> N/C - Not Checked	
Check exactly one box above.	

1.04 Unique Attributes and Characteristics of the Pipeline and Facilities

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? (Code Reference: § 192.616 (b); § 195.440 (b))

<input checked="" type="checkbox"/> S - Satisfactory	Comments: Operator has identified separate program review for transmission, distribution stakeholder audiences
<input type="checkbox"/> U - Unsatisfactory (explain)	
<input type="checkbox"/> N/A – Not Applicable (explain)	
<input type="checkbox"/> N/C - Not Checked	
Check exactly one box above.	

1.05 Stakeholder Audiences

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? (Code Reference: § 192.616 (d), (e); § 195.440 (d), (e))

<input checked="" type="checkbox"/> S - Satisfactory	Comments:
<input type="checkbox"/> U - Unsatisfactory (explain)	
<input type="checkbox"/> N/A – Not Applicable (explain)	
<input type="checkbox"/> N/C - Not Checked	
Check exactly one box above.	

1.06 Message Frequency and Message Delivery

Does the operator's program and the media used define the combination of messages, delivery methods, and delivery frequencies to comprehensively reach all areas in which the operator transports gas, hazardous liquid, or carbon dioxide? (Code Reference: § 192.616 (f); § 195.440 (f))

<input checked="" type="checkbox"/> S - Satisfactory	Comments: The program and the media used must be as comprehensive as necessary to reach all areas in which the operator transports gas. 1 Newspaper ads in 4 local papers and see below table. TV spots on CNN and ESPN during football season
<input type="checkbox"/> U - Unsatisfactory (explain)	
<input type="checkbox"/> N/A – Not Applicable (explain)	
<input type="checkbox"/> N/C - Not Checked	
Check exactly one box above.	
Residence Along Local Distribution System	Annual Twice annually incl. R/W clearing notification Bill insert titled Pub Awareness & Safety = newsletter-copy in folder
LDC Customers	Twice annually – same as above
One-Call Centers	As required of One-Call Center One-call outreach magazine excav.

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	Safety manuals –annual plus do one-call meeting with one-call svcs in approx 05 or 05 prior to most spring excav.	
Emergency Officials	Annual PAPA folder incl. scenarios. CD among other things.	
Public Officials	3 years –cycle w/new message every three years. Annually – Pipeline Awareness Brochure	
Excavator and Contractors	Annual One-call outreach magazine excav. Safety manuals –annual plus do one-call meeting with one-call svcs in approx 05 or 05 prior to most spring excav.	

1.07 Pre-Test Materials

Does the operator pre-test program materials and messages for stakeholder appeal and clarity, understandability, and retainability? If not, did the operator provide justification in its program or procedural manual? **(Code Reference: § 192.616 (c); § 195.440 (c))**

<input checked="" type="checkbox"/> S - Satisfactory	Comments: Creative ads came through Parker & Wright Media marketing ads. Tina Beach reviewed Parker and Wright focus group studies through PAPA prior to purchase and airing. The ads were personalized for CNG. Reviewed invoices for TV spots in multiple locations. <u>Do not follow CP 500.075 however you did complete the review in another manner.</u>
<input type="checkbox"/> U - Unsatisfactory (explain)	
<input type="checkbox"/> N/A – Not Applicable (explain)	
<input type="checkbox"/> N/C - Not Checked	
Check exactly one box above.	

1.08 Written Evaluation Plan

Does the operator's program include a written evaluation plan 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? **(Code Reference: § 192.616 (c); § 195.440 (c))**

<input type="checkbox"/> S - Satisfactory	Comments: CP 500.072 requires that the program shall be self-audited for implementation and resource eval. There is no Senior Director of Safety & Engineering for review – CP's were not followed in 2010 and CP's need to be updated to address no Senior Director.
<input checked="" type="checkbox"/> U - Unsatisfactory (explain)	
<input type="checkbox"/> N/A – Not Applicable (explain)	
<input type="checkbox"/> N/C - Not Checked	
Check exactly one box above.	

2. Program Implementation

2.01 English and other Languages

Has the operator developed and does the operator 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? **(Code Reference: § 192.616 (g); § 195.440 (g))**

<input checked="" type="checkbox"/> S - Satisfactory	Comments:
<input type="checkbox"/> U - Unsatisfactory (explain)	
<input type="checkbox"/> N/A – Not Applicable (explain)	
<input type="checkbox"/> N/C - Not Checked	
Check exactly one box above.	

2.02 Message Type and Content

Did the messages the operator delivered target the four primary stakeholder audiences to specifically include provisions to educate the public, appropriate government organizations, and persons engaged in excavation related activities on:

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

(Code Reference: § 192.616 (d); § 195.440 (d))

<input checked="" type="checkbox"/> S - Satisfactory	Comments: this msg positive frequency and effectiveness is partly attributable to reduced number of dig-ins in conjunction with economic factors of late.
<input type="checkbox"/> U - Unsatisfactory (explain)	
<input type="checkbox"/> N/A – Not Applicable (explain)	
<input type="checkbox"/> N/C - Not Checked	
Check exactly one box above.	

2.03 Message Type and Content

Did the operator develop and deliver messages to advise affected municipalities, school districts, businesses, and residents of pipeline facility location? **(Code Reference: § 192.616 (e); § 195.440 (e))**

<input checked="" type="checkbox"/> S - Satisfactory	Comments:
<input type="checkbox"/> U - Unsatisfactory (explain)	
<input type="checkbox"/> N/A – Not Applicable (explain)	
<input type="checkbox"/> N/C - Not Checked	
Check exactly one box above.	

2.04 Baseline Message Delivery Frequency

Has the operator implemented its program such that the delivery frequencies 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? **(Code Reference: § 192.616 (c); § 195.440 (c))**

<input checked="" type="checkbox"/> S - Satisfactory	Comments: Meets/exceeds requirements for 811 info
<input type="checkbox"/> U - Unsatisfactory (explain)	
<input type="checkbox"/> N/A – Not Applicable (explain)	
<input type="checkbox"/> N/C - Not Checked	
Check exactly one box above.	

2.05 Considerations for Supplemental Program Enhancements

Did the operator consider relevant factors along all of its pipeline systems for supplemental program enhancements as described in API RP 1162 in its development and delivery of materials and messages to the stakeholder audiences? **(Code Reference: § 192.616 (c); § 195.440 (c))**

<input checked="" type="checkbox"/> S - Satisfactory	Comments: Under CP 500.074
<input type="checkbox"/> U - Unsatisfactory (explain)	
<input type="checkbox"/> N/A – Not Applicable (explain)	
<input type="checkbox"/> N/C - Not Checked	
Check exactly one box above.	

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? **(Code Reference: § 192.615 (c) or § 195.402 (c))**

<input checked="" type="checkbox"/> S - Satisfactory	Comments:
<input type="checkbox"/> U - Unsatisfactory (explain)	
<input type="checkbox"/> N/A – Not Applicable (explain)	
<input type="checkbox"/> N/C - Not Checked	
Check exactly one box above.	

3. Program Evaluation & Continuous Improvement (Annual Implementation Audits)

3.01 Measuring Program Implementation

Has the operator performed annual audits of its program implementation since it was developed? If not, did the operator provide justification in its program or procedural manual? **(Code Reference: § 192.616 (c), (i); § 195.440 (c), (i))**

<input type="checkbox"/> S - Satisfactory	Comments: CNG did not follow the annual audit details in accordance with their CP's
<input checked="" type="checkbox"/> U - Unsatisfactory (explain)	
<input type="checkbox"/> N/A - Not Applicable (explain)	
<input type="checkbox"/> N/C - Not Checked	
Check exactly one box above.	

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 audits of its program implementation? If not, did the operator provide valid justification for not using one of these methods? If not, did the operator provide justification in its program or procedural manual? (Code Reference: § 192.616 (c); § 195.440 (c))

<input checked="" type="checkbox"/> S - Satisfactory	Comments:		
<input type="checkbox"/> U - Unsatisfactory (explain)			
<input type="checkbox"/> N/A - Not Applicable (explain)			
<input type="checkbox"/> N/C - Not Checked			
Check exactly one box above.			
Party Company PAP/Evaluation	Part of Plan and/or Evaluation	Phone Number	Email Address
as, Overland Park, KS	Affected Public Mailing	913.491.9000	www.pipelineawarenes
ossins	Affected Public Mailing	913.498.5103	Kcoussins@celeritas.co
l Surveys Inc. Shenandoah, IA	Overall assessment of plan effectiveness in June 2010	712.246.1630	csinc@centralsurveys.c
or Research Ctr. Inc., Pheonix, AZ	Behavioral research re. contact audience	602.258.4554	Not used.
ed for Pipeline Assoc. for PA (PAPA)			

3.03 Program Changes and Improvements

Did the operator make changes to improve the program and/or implementation process based on evaluating annual audit results? If not, did the operator provide justification in its program or procedural manual? (Code Reference: § 192.616 (c); § 195.440 (c))

<input checked="" type="checkbox"/> S - Satisfactory	Comments: However, procedure manual CP 500 has not been updated with changes to plan identified in subsequent meetings.
<input type="checkbox"/> U - Unsatisfactory (explain)	
<input type="checkbox"/> N/A - Not Applicable (explain)	
<input type="checkbox"/> N/C - Not Checked	
Check exactly one box above.	

4. Program Evaluation & Continuous Improvement (Effectiveness Evaluations)

4.01 Evaluating Program Effectiveness

Did the operator perform an evaluation of its program by June 2010 (or no more than 4 years following the date of program development) 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? **(Code Reference: § 192.616 (c); § 195.440 (c))**

<input checked="" type="checkbox"/> S - Satisfactory	Comments:
<input type="checkbox"/> U - Unsatisfactory (explain)	
<input type="checkbox"/> N/A – Not Applicable (explain)	
<input type="checkbox"/> N/C - Not Checked	
Check exactly one box above.	

4.02 Multiple Program Effectiveness Evaluations

For operators implementing multiple public awareness programs for different systems and/or operating entities, did the operator conduct a program effectiveness evaluation for each program? If not, did the operator provide justification in its program or procedural manual? **(Code Reference: § 192.616 (c) § 195.440 (c))**

<input checked="" type="checkbox"/> S - Satisfactory	Comments:
<input type="checkbox"/> U - Unsatisfactory (explain)	
<input type="checkbox"/> N/A – Not Applicable (explain)	
<input type="checkbox"/> N/C - Not Checked	
Check exactly one box above.	

4.03 Measure Program Outreach

In evaluating its program effectiveness, did the operator measure actual program outreach for each stakeholder audience within all areas along all systems covered by its program? If not, did the operator provide justification in its program or procedural manual? **(Code Reference: § 192.616 (c); § 195.440 (c))**

<input checked="" type="checkbox"/> S - Satisfactory	Comments:
<input type="checkbox"/> U - Unsatisfactory (explain)	
<input type="checkbox"/> N/A – Not Applicable (explain)	
<input type="checkbox"/> N/C - Not Checked	
Check exactly one box above.	

4.04 Measure Percentage Stakeholders Reached

Can the operator demonstrate the methodology used to track the number of individuals or entities reached within an intended audience and its methodology to estimate the percentage of the individual stakeholders 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? **(Code Reference: § 192.616 (c); § 195.440 (c))**

<input checked="" type="checkbox"/> S - Satisfactory	Comments:
<input type="checkbox"/> U - Unsatisfactory (explain)	
<input type="checkbox"/> N/A – Not Applicable (explain)	
<input type="checkbox"/> N/C - Not Checked	
Check exactly one box above.	

4.05 Measure Understandability of Message Content

In evaluating its program 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 systems covered by its program? If not, did the operator provide justification in its program or procedural manual? **(Code Reference: § 192.616 (c); § 195.440 (c))**

<input checked="" type="checkbox"/> S - Satisfactory	Comments:
<input type="checkbox"/> U - Unsatisfactory (explain)	
<input type="checkbox"/> N/A – Not Applicable (explain)	
<input type="checkbox"/> N/C - Not Checked	
Check exactly one box above.	

4.06 Measure Desired Stakeholder Behavior

In evaluating its program effectiveness, did the operator attempt to determine whether appropriate preventive behaviors have been learned 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? **(Code Reference: § 192.616 (c); § 195.440 (c))**

<input checked="" type="checkbox"/> S - Satisfactory	Comments:
<input type="checkbox"/> U - Unsatisfactory (explain)	
<input type="checkbox"/> N/A – Not Applicable (explain)	
<input type="checkbox"/> N/C - Not Checked	
Check exactly one box above.	

4.07 Measure Bottom-Line Results

In evaluating its 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? **(Code Reference: § 192.616 (c); § 195.440 (c))**

<input checked="" type="checkbox"/> S - Satisfactory	Comments:
<input type="checkbox"/> U - Unsatisfactory (explain)	
<input type="checkbox"/> N/A – Not Applicable (explain)	
<input type="checkbox"/> N/C - Not Checked	
Check exactly one box above.	

4.08 Documenting Changes (Effectiveness Evaluation)

Did the operator identify and document needed changes or modifications to its public awareness program(s) based on the results of its program effectiveness evaluation? If not, did the operator provide justification in its program or procedural manual? **(Code Reference: § 192.616 (c), § 195.440 (c))**

<input checked="" type="checkbox"/> S - Satisfactory	Comments:
<input type="checkbox"/> U - Unsatisfactory (explain)	
<input type="checkbox"/> N/A – Not Applicable (explain)	
<input type="checkbox"/> N/C - Not Checked	
Check exactly one box above.	

5. Program Documentation & Record Keeping

5.01 Documentation of Annual Audit Results

Did the operator document implementation changes to the PAP based on annual audit findings?
(Code Reference: § 192.616 (i), § 195.440 (i))

<input checked="" type="checkbox"/> S - Satisfactory	Comments:
<input type="checkbox"/> U - Unsatisfactory (explain)	
<input type="checkbox"/> N/A – Not Applicable (explain)	
<input type="checkbox"/> N/C - Not Checked	
Check exactly one box above.	

5.02 Documentation of Program Effectiveness Evaluation

Did the operator document the PAP effectiveness evaluation and results?
(Code Reference: § 192.616 (i); § 195.440 (i))

<input checked="" type="checkbox"/> S - Satisfactory	Comments:
<input type="checkbox"/> U - Unsatisfactory (explain)	
<input type="checkbox"/> N/A – Not Applicable (explain)	
<input type="checkbox"/> N/C - Not Checked	
Check exactly one box above.	

6. Inspection

6.01 Summary

CNG appears to be committed to PAP. Appears that updates are required in the areas of improvement and refinement of their CP's. Documentation was provided which show that CNG is moving toward improvement and enhancement of their ways in which they review their effectiveness from an internal standpoint.

6.02 Findings

CNG PAP is listed in their O&M manual under CP 500. CNG's first audit (not self-audit) of effectiveness and message implementation was completed in 2010 and the 2011 annual is not yet completed. Tina provided docs for staff review of plan changes and improvement dated August 2010 and late 2010 (after August 2010). However, CNG's present CP's are not entirely being followed and are in need of revision per Tina.