

**PUBLIC AWARENESS PROGRAM EFFECTIVENESS INSPECTION
SPECIFIC INFORMATION**

Control Information

Inspection Start Date*:	08-30-2016	
Inspection End Date*:	08-31-2016	
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*: P.O. Box 90868 M/S PSE-12N Bellevue, WA 98009-0868	Company Official*:	Booga Gilbertson
	Title*:	Senior VP Operations
	Phone Number*:	(425) 462-3843
	Fax Number:	(425) 462-3770
	Email Address*:	bk.gilbertson@pse.com
Web Site:	Pse.com	
Total Mileage (from page 3)*:	12614	
Total Mileage in HCA:	4.63	
Number of Services (For Distribution):	789,272 approx.	
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*:	7th Version
Current PAP Date*:	August 2016

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

* *Required field*

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

Persons Interviewed*	Title/Organization*	Phone Number	Email Address
Booga Gilbertson	Senior Vice President, Operations	(425) 462-3843	bk.gilbertson@pse.com
H. Grant Ringel	Director, Communications	(425) 462-3181	grant.ringel@pse.com
Cheryl McGrath	Manager, Gas Compliance & Regulation	(425) 462-3207	cheryl.mcgrath@pse.com
Charlie Gadzik	Customer Safety Communications Manager	(425) 456-2727	charlie.gadzik@pse.com
Stephanie Silva	Gas Compliance Program Manager	(425) 462-3923	stephanie.silva@pse.com
Lee Maxwell	Senior Regulatory Compliance Analyst	(425) 462-3575	lee.maxwell@pse.com
Monica Ferguson	Regulatory Compliance Analyst	(425) 462-3087	monica.ferguson@pse.com
Shari Silva-Compton	Public Awareness Program Manager		

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*
Anthony Dorrrough		WA	adorroug@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	19.145	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	7.96	12,596	4.63

(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:	12, 623.105
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- Supply company name and Operator ID, if not the master operator from the first page (i.e., for subsidiary companies).
 - Use OPS-assigned Operator ID. Where not applicable, leave blank or enter N/A
 - Use only 2-letter State codes, e.g., TX for Texas.
 - Enter number of applicable miles in applicable columns. (Only positive values. No need to enter 0 or N/A.)
- [^] Please do not include Service Line footage. This should only be MAINS.
 * Required Field

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~ 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: Bullet #1: Verified PAP Bullet #2: Reviewed Clearing House Letter Bullet #3: Located on Standard's website, and Page 5 Bullet #4: Distribution submitted June 2006, and published after Clearing House correction in October 2006. Sumas was purchased in 2008 and is included in the PAP, this is an interstate facility. Jackson Prairie submitted June 2006, published after same Clearing House correction in 2006.
<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: Located in Section 18, Process Manual Section 1-Procedure 5; Section 2-Procedure 2.3; and Section 3-Procedure 3.1. Bullet #1: Verified, Found in Appendix E Bullet #2: Management participates mainly through a newly formed "Executive Safety Committee"
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	

	<p>Bullet #3: Resources found in Appendix B Bullet #4: List of all individuals involved, found in Appendix B Bullet #5: External Support Resources found in Appendix B, in Table 1 <i>Successfully addresses concerns from follow up inspection in 2013 [AOC 18: Determine how management participates; verify resources; determine how many employees involved and their roles.]</i></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>Comments: Bullet #1: Distribution: Verified Jackson Prairie: Verified, Reviewed list, letters, map, buffer & materials. Sumas: Verified, included with distribution system but considered isolated interstate pipeline. Bullet #2: System assets/types included on Pages 7 & 8, Sections 4.4.1 thru 4.4.5 <i>Successfully addresses concerns from follow up inspection in 2013 [AOC 17: Address where unique attributes in each system are.]</i></p>
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
<p>Check exactly one box above. * Required field</p>	

1.04 Stakeholder Audience Identification

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

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

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

- Affected public
- Emergency officials
- Public officials

Excavators

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	Comments: <i>Located in Section 14 & 16, Process Manual Section 5-Procedure 5.1 & 5.2</i> Bullet #1: Took largest impact zone [660-ft] and pushed it out to [1000-ft] Bullet #2: Process found on Page 9, Section 6.3.2, Table 1; Also Appendix D – Program Procedures. Used County Parcel Records. Bullet #3: Reviewed SWARR Station located in Renton, and cross-referenced with mailing list <i>Successfully addresses concerns from follow up inspection in 2013 [AOC 14, 15 & 16: Identify how operator determines stakeholder notification; notification areas and distance; procedure and process.]</i>
<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)*	Comments: <i>Located in Section 13, Process Manual Section 4-Procedures 4.3 thru 4.6</i> Messages, delivery methods and frequencies are found on Page 9, Table 2 for distribution and Table 3 for transmission. -Reviewed, 7,700 total for the pipeline -Verified, postal delivery for mailings to stakeholders <i>Successfully addresses concerns from follow up inspection in 2013 [AOC 13: Document and track delivered messages to the individual stakeholder groups.]</i>
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

1.06 Written Evaluation Plan

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

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

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

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	Comments: Bullet #1: Verified, found in Appendix C – Program Guidelines Bullet #2: Verified, found in Appendix C – Program Guidelines Bullet #3: Market Strategies, a third-party-firm performs survey sample size and margin-of-error surveys. Procedure Flow Chart found in Appendix C
<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. 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: Bullet #1: Yes. Spanish, Mandarin, Vietnamese, Chinese. Bullet #2: Monitors Call Center and documents requests for translation services. Bullet #3: Online Census Data together with their own Call Center research. Spanish = 84.0 Mandarin = 3.0 Vietnamese = 1.0 Chinese = .96
<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: Bullet #1: Verified Bullet #2: Verified, conducted test call.
<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: Verified, viewed Proximity Notice, Editorial Calendar and sample Newsletter Articles. There is also a link in the E-Bill to Safety 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: Viewed records dating from 2014 to present.
<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: <i>Located in Section 12, Process Manual Section 1- Procedures 1.1 thru 1.3 & 1.6</i> See Table #4; PSE makes program enhancement considerations and then uses best judgement in regards to implementation. <i>Examples:</i> <i>-Bertha Tunnel Project – implemented extra media communication about settlement and gas odors.</i> <i>-Greenwood Incident- provided informational access and offered presentations about natural gas properties.</i> <i>-Cle Elum Odorization Incident 2014- Made calls to plumbers, and recorded informational message that was sent out to customers.</i> <i>-Customers with UG-Fuel-Line- PSE maintains/inspects and sends out a newsletter message.</i> <i>Successfully addresses concerns from follow up inspection in 2013 [AOC 12: Determine relevant factors to determine the need for supplemental program enhancements as described in API RP 1162 for each stake holder audience.]</i>
<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)*	<p>Comments: <i>Located in Section 11, Process Manual Section 4-Procedure 4.4</i></p> <p>Bullet #1: Liaison contact depends on the situation, PSE meets with local fire and police and also provides facility tours at their Jackson Prairie location. The main thrust of coordination is provided through [8] scheduled trainings. PSE also provides instruction to local fire training academies and attends County sponsored emergency management meetings.</p> <p>Bullet #2: Verified, viewed (Emergency OPS) webpage and emergency system restoration plan.</p> <p>Bullet #3: Viewed Expectation letter and email example. Expectations vary depending upon location.</p> <p>Bullet #4: PSE records and evaluates the response they receive from emergency responders. They also evaluate data provided by the Pipeline Association for Public Awareness.</p> <p>Bullet #5: PSE provides email about scheduled trainings to every Fire and Police Chief within their territory. And if one were to miss a scheduled training, PSE can provide them access to the training information and material on a webpage dedicated especially for Emergency Responders. Viewed email of attendance sheets for Jackson Prairie and Sumas facilities.</p> <p><i>Successfully addresses concerns from follow up inspection in 2013 [AOC 11: Make emergency response plan available, identify expectations for emergency responders and identify whether the</i></p>
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	

	<i>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.]</i>
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 checked="" type="checkbox"/> S – Satisfactory (explain)*	Comments: <i>Yes, verified. Located in the: Self-Assessment.</i>
<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: <i>Located in Section 10, Process Manual Section 1- Procedure 1.1 thru 1.7</i> <i>Verified, Annual Audit is performed internally.</i> <i>Successfully addresses concerns from follow up inspection in 2013 [AOC 10: Conduct annual audits/reviews of the PAP.]</i>
<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: <i>Located in Section 9, Process Manual Section 1- Procedures 1.2, 1.3 & 1.6</i> Bullet #1: Yes. Located in the Annual Assessment, and then identifies areas of focus for the subsequent year. <i>Successfully addresses concerns from follow up inspection in 2013 [AOC 9: Assess the results of its Annual PAP Audit/Review then develop and implement changes in its program.]</i>
<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)*	Comments: <i>Located in Section 8, Process Manual Section 2- Procedures 2.1 thru 2.3</i> Bullet #1: Verified. Bullet #2: Completed; 2013. Bullet #3: A combination of efforts, including mailed surveys and third party contractor participation. Bullet #4: Located in Appendix D, plan flow, third party contractor conducted evaluation. <i>Successfully addresses concerns from follow up inspection in 2013 [AOC 8: Conduct 4-year evaluation.]</i>
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

4.02 Measure Program Outreach

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

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

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

- Affected public
- Emergency officials
- Public officials
- Excavators

<input checked="" type="checkbox"/> S – Satisfactory (explain)*	Comments: <i>Located in Section 9, Process Manual Section 4-Procedure 4.2</i> Bullet #1: A PSE determined process that covers each stakeholder audience. Bullet #2: Uses an online survey to reach the general public and uses a mailed survey to reach everyone else. Bullet #3: Uses same process mentioned in bullet #2. Successfully addresses concerns from follow up inspection in 2013 [AOC 7: Track the number of individuals or entities reached within each intended stakeholder audience group.]
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

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: <i>Located in Sections 8 & 9, Process Manual Sections 4 & 5-Procedures 4.2 & 5.3</i> Bullet #1: Verified, and sends results via email. Bullet #2: Verified.
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	

	<p><i>Successfully addresses concerns from follow up inspection in 2013 [AOC 5: Determine the statistical sample size and margin-of-error for each of the four intended stakeholder audiences.] [AOC 6: Estimate the percentage of individuals or entities actually reached within each intended stakeholder audience group.]</i></p>
<p>Check exactly one box above. * Required field</p>	

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)*	<p>Comments: <i>Located in Section 8, Process Manual Sections 2 & 4-Procedures 2.2 & 4.2</i> Bullet #1: Verified. Bullet #2: Verified. Bullet #3: PSE has pre-tested a scratch & sniff brochure. <i>Successfully addresses concerns from follow up inspection in 2013 [AOC 4: Evaluate data to assess the percentage of the intended stakeholder audience that understood and retained the key information in each PAP message.]</i></p>
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
<p>Check exactly one box above. * Required field</p>	

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: <i>Located in Sections 4.2 & 8, Process Manual Section 4-Procedure 4.2</i> Bullet #1: Verified. Bullet #2: Verified. <i>Successfully addresses concerns from follow up inspection in 2013 [AOC 2: Use evaluation results and data to determine if the stakeholders have demonstrated the intended learned behaviors.] [AOC 3: Determine whether appropriate prevention behaviors have been understood by the stakeholder audiences.]</i></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>Comments: Bullet #1: PSE measures bottom line results by tracking third party incidents and the consequences of excavation damages. Bullet #2: Verified, PSE’s Contractor Management also measures near misses. Bullet #3: Customers are encouraged to give feedback as to their perception of the program</p>
<input type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	

	through numerous means, impromptu polls, surveys and online content.
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: <i>Located in Section 2, Process Manual Section 2-Procedure 2.3.2</i> Bullet #1: Verified. Bullet #2: PSE identified and documented needed changes based on its 4-year evaluation. Bullet #3: Verified. <i>Successfully addresses concerns from follow up inspection in 2013 [AOC 1: Implement, document and verify improvements recommended in the 4-year evaluation.]</i>
<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	

5. Inspection Summary & Findings

5.01 Summary

The 2016 Standard Comprehensive Public Awareness Inspection (PA) for Puget Sound Energy (PSE) was conducted at corporate headquarters in Bellevue, WA on August 30, 2016. An exit interview was at the same location on August 31, 2016.

The last PA inspection for PSE in November 2011 resulted in [18] Areas Of Concern (AOC) being noted. The noted AOC’s were later cleared by PSE and verified by the Commission with a follow-up inspection in February 2013.

Staff referenced these AOC’s through-out the 2016 inspection to further verify that needed changes had been identified and implemented. As a result, a list of significant changes implemented by PSE to the Public Awareness Program (PAP) has been tabulated by staff below:

- Have created an “Executive Safety Committee” comprised of senior officers which meets 6-8 times per year, and discusses safety implementation and reports provided by the PAP.
- Have created a new Public Awareness position: “Customer Safety Communications Manager”
- Have created a new Public Awareness field inspector position
- Added resources and aligned functions and talents around greater communication
- Have improved documentation
- Have created more impactful communications
- Increased frequency of communication messages

- Have created a self-assessment template
- Implemented digital record keeping
- Have created an online survey for use by key employees
- Have created a “Scratch and Sniff” brochure and then tested and researched the message
- Uses email as a PA medium and outreach to excavators
- Have increased efforts to enhance the PAP by inviting and helping a local news agency in 2014 to develop and broadcast a story about the “Cross-Bore Threat”.
- Implemented a survey of five different areas of effectiveness in an effort to develop a baseline for program effectiveness.
- Reallocated funds to public awareness in an effort to create more effective Television Ads.
- Created more training for Emergency Responders
- Implemented survey of First Responders after an incident, for enhanced training data.

A complete hard copy of PSE’s Pipeline Safety Awareness Program 2012 Self-Assessment can be found in Staff’s inspection report folder.

5.02 Findings

Staff found No Probable Violations or Areas of Concern at this time