

PERSON INTERVIEWED	TITLE/ORGANIZATION	PHONE NUMBER	EMAIL ADDRESS
Tina Beach	Mgr Standards & Compliance	(509) 734-4576	Tima.beach@cngc.com
Patti Chartrey	Pipeline Safety	(509) 405-4231	Pattichartrey@cngc.com

ENTITY NAME	PART OF PLAN AND/OR EVALUATION	PHONE NUMBER	EMAIL ADDRESS
Pipeline Association for Public Awareness (PAPA)	NA Affected public mailing	(719) 375-3873	www.pipelineawareness.org
PAPA	Emergency official mailing	(719) 375-3873	www.pipelineawareness.org
PAPA	Evaluations	(719) 375-3873	www.pipelineawareness.org
PAPA	Excavator mailing	(719) 375-3873	www.pipelineawareness.org
PAPA	Implementation	(719) 375-3873	www.pipelineawareness.org
PAPA	Local public official mailing		www.pipelineawareness.org
PAPA	Public Official Mailings		www.pipelineawareness.org
PAPA	Message content development		www.pipelineawareness.org
PAPA	Plan development		www.pipelineawareness.org
PAPA	Pre-test materials		www.pipelineawareness.org
PAPA	Public meetings		www.pipelineawareness.org
Paradigm	Affected public Transmission mailing	(877) 477-1162	www.pdigm.com
Celeritas	Affected publicTransmission mailing	(913) 491-9000	Cac-support@celeritas.com
Sander Resources	Affected public Transmission & HP mailing	(713) 208-0273	Ins@sanderresources.com
Service Center	PAP 2011 Annual evaluation	(800) 634-6549	www.rp1162pipelineawareness.net
Kemper Odell	PAP media advertising for non customers, implementation	(888) 522-3112	www.kemperodell.com
Central Surveys	PAP affected public assessment	(712) 246-1630	www.central surveys.com
Parker/Wright	developed creativie media	(325) 282-2232	dbsmedia@earthlink.net
MDU Resources	news letters in bill stuffers	(701) 530-1065	ann.martin@mdu.com
AG News	non customer, customer advertising for affected public	(800) 624-6397	Donphillips
Cowlitz County	contractors assoc, affected non customers, safety customer affected public	(000) 000-0000	Jeanette@lcca.net
I	original baseline for affected public in 2007	(877) 399-0720	www.hr2cloud.com

INSPECTOR REPRESENTATIVE(S)	PHMSA/STATE	REGION/STATE	EMAIL ADDRESS	LEAD
Patti Johnson	State	WA	pjohnson@utc.wa.gov	<input checked="" type="checkbox"/>
John Ivey	State	OR	john.ivey@state.org.us	<input type="checkbox"/>

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 both gas and liquid lines, use the appropriate table for intrastate and/or interstate.

Jurisdictional to Part 192 (Gas) Mileage (Intrastate)

COMPANY NAME	OPERATOR ID	PRODUCT TYPE	STATE	GATHERING	TRANSMISSION	DISTRIBUTION*	REMARKS (new?)
				INTRASTATE	INTRASTATE	INTRASTATE	
CASCADE NATURAL GAS CORP	2128	nat gas	WA	0	123.51	4358.33	17553 ft HCA
CASCADE NATURAL GAS CORP	2128	nat	OR	0	20.62	1461.58	7918 ft HCA

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.

Please provide a comment or explanation for inspection results for each 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?

- 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.

CODE REFERENCE: § 192.616 (h); § 195.440 (h)

<input type="radio"/> S - Satisfactory (explain) <input checked="" type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not Applicable (explain) <input type="radio"/> N/C - Not Checked (explain)

COMMENTS:

Bullet 1 and 4. Reviewed the 10-7-2005 initial program replaced by the 6-19-2006 developed and published Written program. CNG's current version is dated 5-25-2012, Rev 3. The new PAP was presented to staff at the beginning of the inspection.

Bullet 2. Probable violation: CNG failed to address one clearinghouse deficiency.

1. CNG did not include One-call Requirements under Baseline Message Type for Affected Public.

Bullet 3. The PAP is kept in CNG headquarters office in Kennewick WA. Tina Beach is CNG's Manager, Standards and Compliance, as well as the designated person to administer and manage the written program.

AOC 1. In regard to CNG's designated person the PAP reads "currently" the Program Administrator is the Manager, Standards and Compliance. The word currently is not appropriate, if the designated persons title changes, the PAP must be updated.

AOC 2. CNG failed to name the Program Administrator as required in API 1162 Section 2.7, section 3. This should be included.

AOC 3. CNG's Public Awareness Program is not getting the attention it needs. An example of this is the 2011 natural gas standard inspection (docket 110020), a probable violation was written for not having conducted an annual PAP audit in 2010. Responding to the 2010 probable violation should have been an indicator that CNG's PAP needed attention and a 2011 annual PAP audit was required. Another example is the fact that CNG has not documented supplemental activities or included supplemental activities when need. See AOC 4.

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)?

- 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.

CODE REFERENCE: § 192.616 (a); § 195.440 (a), API RP 1162 Section 2.5 and 7.1

- S - Satisfactory (explain)
- U - Unsatisfactory (explain)
- N/A - Not Applicable (explain)
- N/C - Not Checked (explain)

COMMENTS:

Bullet 1. A management support Statement is in PAP and signed by VP operations, Eric Martuscelli. The statement does not give detail how management participates in the PAP and does not discuss funding. Funding is discussed on pages 3 and 9 of the PAP. Procedure for funding allocation request and management resource is discussed but not guaranteed.

Bullet 2. CNG's PAP failed to identify how management participates in the PAP or provided documentation of managements participation. During the inspection CNG explained Management participates by approving funding for different programs i.e. 811 day, hydro race, scoreboard at fairgrounds.

Bullet 3. CNG failed to provide the name the Program Administer in the PAP. This is a AOC since there is some inconsistency across country.

Bullet 3 cont. CNG failed to identify all the roles and responsibilities of their designated person.

AOC CNG's Public Awareness Program is not getting the attention it needs. An example of this is the 2011 natural gas standard inspection (docket 110020), a probable violation was written for not having conducted an annual PAP audit in 2010. Responding to the 2010 probable violation should have been an indicator that CNG's PAP needed attention and a 2011 annual PAP audit was required. Another example is the fact that CNG has not documented supplemental activities or included supplemental activities when need.

AOC In regard to CNG's designated person the PAP reads "currently" the Program Administrator is the Manager, Standards and Compliance. If the designated person title changes, the PAP must be updated

Bullet 4. PAP does not specify resources or funding allocations. Procedure for funding allocation request and management resource is discussed but not guaranteed.

B. # of employees and their titles not included in the PAP.

Involved employees duties are not included. All staff is not appropriate wording.

Bullet 5. CNG has used and uses many external support. When external support changes the PAP is not updated. External support not in PAP. See the external support page of this inspection that CNG created during the inspection

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?

- 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 stations, valves, breakout tanks, odorizers).

CODE REFERENCE: § 192.616 (b); § 195.440 (b), API RP 1162 Section 2.7 and Section 4

<input type="radio"/> S - Satisfactory (explain) <input checked="" type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not Applicable (explain) <input type="radio"/> N/C - Not Checked (explain)

COMMENTS:

Bullet 1 no system types/assets are included in CNG's PAP. -ie distribution, transmission etc

Bullet 2 No unique attributes and characteristics of the pipeline and facilities such as compressor stations, valves, and odorizer are not included in the PAP

No baseline message is provided or special supplemental efforts undertaken as determined by pipeline attributes and characteristics in regard to specific pipeline segments.

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?

- 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

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

<input type="radio"/> S - Satisfactory (explain) <input checked="" type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not Applicable (explain) <input type="radio"/> N/C - Not Checked (explain)

COMMENTS:

CNG failed to provide activities to advise municipalities and school districts of pipeline facility locations

For affected public

1. notification areas and distance determined for transmission is 660 feet either side of pipeline.

AOC PAP incorrectly states approximately 660 feet from pipeline. Word approximately not appropriate

PV CNG does not have list of affected public on distribution for non customers pipelines that includes property owners, business, schools, municipalities

NOTE? Cross reference

PV CNG cannot identify non customers on distribution pipelines.

Don't have area of distribution system defined. They stated they used county records

Practice to contact public officials and emergency response not in PAP

PAP cannot identify property owners not living on distribution pipelines

PV xx PAP does not baseline property owners

PAP does not mail to non customer on distribution line renters i.e. occupant, resident

RESEARCH JUST TO CHANGE SUBJECT

See list of all groups

*no list for non customers on distribution line

*reviewed Excavators list

* colabortive with Avista and Transcanada, done by paridgm, for emergency officials. Did group meetings emergency responders, excavators and Public officials, reviewed RSVP list for Kennewick ,52 attended and 81 rsvped. For Baker, OR, 30 attended rsvped 51 Could not find sign in sheet, reviewed the evaluation form filled out at the end of the meeting for Kennewick, revi.

NOTE: all information is not uploaded to share point, unsure of where information and doucmentation was. Could not findbaker OR information, Tina agreed due to lack of people !!! Spent

id all data sources used to id stakeholder audience, ***** need removed?????Reviewed public official mailing from PAPA called "Pipeline Awareness Safety Information for Pullic officials", mailed in fall of 2010 does not include emergency phone number and information number rather it directd to a www pipelineawareness.org site for phone numbers for at least 131 companies. Nothing else mailed with this . CNG says this is baseline PV PV IT is not. AS supplemental CNG meets one on one with all public officials who receive the Pipline Awareness. ** Public officasls requires all information to be sent once every 3 years. CNG sends 1/3 information every years - In 2009 PAPA Pipeline Awareness Safety Information for Public Official, in 2010 same publication name and 2011 Pipeline awareness : Safety I;nformation for public officials -A lot of educational information but lots does not apply to CNG (talks about gathering lines etc.)

Where is 2004 utc study done on pipeline safety act of 2002 based on Bellingham - they followed recommendation!!!!!!!

Public officials get all emergency mailings plus public official newsletter.

Emergency Officials

PVPV reviewed Pipeline Association fro Public Awareness for emergency official, it does not include information or emergency phone numbers

*data source is sic, based on safety source and info usa-both outside providers-does not mail to contracotrs requesting locates because a large numbser returned.

Excavators

2009 sent PAP

2010 Pap provided 2010 Excavation safety guide and dirrectory
2011 PAP provided 2011 Excavation safety guide & directory - met all requirements
called emergency #, and got answeare and good description of procedure

Bullet 3
See last question

Bullet 4
NOTE: for reviewing training attendace last question took over hour could not find material, could not read paridgm material.

Rview map by WA compressor station-PV COULD NOT FIND COMPRESSOR SATION ON MAP.

PV VPV PV Review map where transmission starts near shelton. PV PV cannot get to map provided by paridgn up. Cannot verify the document list alone specific facilities during inspection. - Tina called Paridgm PV VPV set up web inare to review PV PV John do we agree!!! That tina can't provide infor

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?

• Identify where in the operator’s PAP the combination of messages, delivery methods, and delivery frequencies are included for the following stakeholders: (1) affected public (2) emergency officials (3) local public officials, and (4) excavators.

- Affected public
- Emergency officials
- Public officials
- Excavators

CODE REFERENCE: § 192.616 (f); § 195.440 (f), API RP 1162 Sections 3-5

<input type="radio"/> S - Satisfactory (explain) <input checked="" type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not Applicable (explain) <input type="radio"/> N/C - Not Checked (explain)

COMMENTS:
CNG did not use API 1162 definition of Affected Public in its PAP.

In PAP .04 page 5 for all 4 groups

PV missed one call on affected public

PV never a written explanation why no supliement activites conducted

PV the one call requirement is missing from Public Officials

For excavayors in 2011, 11064 mailings sent in WA, reviewed mailing information for all PAPA mailings.

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?

- 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.

CODE REFERENCE: § 192.616 (c),(i); § 195.440 (c),(i)

<input type="radio"/> S - Satisfactory (explain) <input checked="" type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not Applicable (explain) <input type="radio"/> N/C - Not Checked (explain)

COMMENTS:

Bullet 1

first annual review completed in 2012, it included 2007 thru 2011. dated 5-15-2012

PV no annual report for each year,

PV no procedure PAP for effectiveness eval

PV wrote 2007 by Hurbert , summary of telephone results. PV same as 2010. was used as 4 yr effectiveness eval.

AOC showed CNG performing poorly, Hurbert results indicated 68% did not know about call before you dig. Info from 2010

PV no 4 yr cng effectiveness eval

Bullet 3

PV **Statcal sample not in PAP

PV **Margin of error size not in PAP

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?

- 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.

CODE REFERENCE: § 192.616 (g); § 195.440 (g), API RP 1162 Section 2.3.1

<input checked="" type="radio"/> S - Satisfactory (explain) <input type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not applicable (explain) <input type="radio"/> N/C - Not Checked (explain)

COMMENTS:

* no spanish for emergency and public officials

Bullet 2 and 3.

*City data website used (it is compiled from census material) reviewed city data for each district. CNG also polled staff for and ask what language they see. Reviewed doc two district with this language qustion, it was Mt Vernon and Bellingham on 4-26-2012

*in PAP is section .043

*some information in spanish, reviewed CNG's newsletter in bill stuffers are always both languages, also papa poster is in magaize both languages is just for excavators.

*Emergency officials and Public officials do not get spanish

* For non customers all tv and radio and newspaper advertisements in both languages. Reviewed tv and radio and newspaper adds both excellent in both languages

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)?
-
- 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

CODE REFERENCE: § 192.616 (d), (f); § 195.440 (d), (f)

<input type="radio"/> S - Satisfactory (explain) <input checked="" type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not applicable (explain) <input type="radio"/> N/C - Not Checked (explain)

COMMENTS:

From 1.01 CNG’s PAP failed to have appropriate baseline frequency for Affected Public. FOLLOWING ADDRESS HERE
 CNG very confusing, CNG separated distribution and transmission and the broke down farther into customer and non customer

PV Bullet 1. do not have onc call under affectd public in PAP , but they are doing

Bullet 2-5 ok reviwed yesterday

bullet 6 looked at some not all

bullet 7 Called numbers ok

PV process and procedures in schools and municipals not spelled out in PAP and no list

going forward starting to get list of all schools.
 Reviewed RP 1162 Collaborative Program, letter to school administrator- NOT in PAP as supplement

Reviewed Service Company, A comprehensive review, statement of findings, comments and recommendations for considertion to cascade's public awareness porgram and written program. This consultant identified most of the pvs we have found.

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?

- Verify that the operator developed and delivered messages advising municipalities, school districts, businesses, residents of pipeline facility locations.

CODE REFERENCE: § 192.616 (e)(f); § 195.440 (e)(f)

<input type="radio"/> S - Satisfactory (explain) <input checked="" type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not applicable (explain) <input type="radio"/> N/C - Not Checked (explain)

COMMENTS:

Specially tailored message for schools and municipalities not done, just part of mailings.

No written PAP procedure for listing of schools, in service area, s/b under message type

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?

- Identify message delivery (using the operator’s last five years of records) for the following stakeholder audiences:

- Affected public
- Emergency officials
- Public officials
- Excavators

CODE REFERENCE: § 192.616 (c); § 195.440 (c)

<input checked="" type="radio"/> S - Satisfactory (explain) <input type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not applicable (explain) <input type="radio"/> N/C - Not Checked (explain)

COMMENTS:

CNG did meet baseline,

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?

- Affected public
- Emergency officials
- Public officials
- Excavators

Determine if the operator has considered and/or included other relevant factors for supplemental enhancements.

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP 1162 Section 6.2

<input type="radio"/> S - Satisfactory (explain) <input checked="" type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not applicable (explain) <input type="radio"/> N/C - Not Checked (explain)

COMMENTS:

PAP did not consider relevant factors

CNG did not doc reviewing any relevant factors to enhance supplemental

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?

- 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.

CODE REFERENCE: § 192.616 (c), § 195.440 (c), API RP 1162 Section 4.4

<input type="radio"/> S - Satisfactory (explain) <input checked="" type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not applicable (explain) <input type="radio"/> N/C - Not Checked (explain)

COMMENTS:

Bullet 1
Liaison for emergency officials is .041, reviewed emergency responder contact check list

bullet 2
CNG's written PAP did not make emergency response plan available

bullet 3
PAP did not describe expectaiton for emergency responders

PAP did not state expectations same for emergency responders all areas

not in PAP, what to do with emergency responder contact information

bullet 4
not in PAP, how CNG determined the affected emergency response organizations have or have not adequate and proper resources to respond.

bullet 5
PV not in PAP and way to documentation that emergency responders who did not attend training received information

3. Program Evaluation & Continuous Improvement (Annual Implementation 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?

- Verify the operator performed an annual audit or review of the PAP for each implementation year.

CODE REFERENCE: § 192.616 (c), (i); § 195.440 (c), (i), API RP 1162 Section 8.3

- S - Satisfactory (explain)
- U - Unsatisfactory (explain)
- N/A - Not applicable (explain)
- N/C - Not Checked (explain)

COMMENTS:

Repeat violation 110020. PV 9. 480-93-180 Plans and procedures failed to follow their procedure 500.072 in 2010. Did not complete the required annual self audit for implementation and resource eval.

Did not complete annual audit for 2007 thru 2011. Did one for every year in 2012

PAP LACKS MARGIN OF ERROR
 PAP FAILED TO INCLUDE METHODOLOGIES USED TO MEASURE PROGRAM IMPLEMENTATION, BEHAVIOR ETC

PV FAILED TO IDENTIFY HOW THEY WILL MAINTAIN THEIR LIAISON RELATIONSHIP WITH EMERGENCY OFFICIALS
 PV did not maintain doc to verify liason relations, no doc

PV FAILED TO IDENTIFY THEY HAD LEARNED THE RESPONSIBILITY AND RESOURCES OF EACH GOVERNMENT ORG AND EMERGENCY RESPONDERS

PV FAILED TO EVALUATE EFFECTIVENESS AND EXAMINE BOTTOM LINE RESULTS

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?

• Determine how the operator conducts annual audits/reviews of its PAP.

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.3

- S - Satisfactory (explain)
- U - Unsatisfactory (explain)
- N/A - Not applicable (explain)
- N/C - Not Checked (explain)

COMMENTS:

PV Bullet 1 Needs procedure for conducting audits and reviews not just general statement and explanation. Need to say what utilize material for and why you are using it and determine if additional.

Asked service center, report identified the same things we did in the inspection. In report titled comprehensive review, statement of findings, comments and recommendations for consideration to cng public awareness program

MDU says will be intergrating all manuals in Jan 2013. CNG WA knows intregated given to Joe and Dave not adequate but they were not told that.

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?

- ☑ 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.

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.3

- S - Satisfactory (explain)
- U - Unsatisfactory (explain)
- N/A - Not applicable (explain)
- N/C - Not Checked (explain)

COMMENTS:

reviewed memo titled 2011 Public Awareness Program implementation annual review to

NO ANNUAL AUDITS WERE Done until 2012.

3rd Party review recommended changes in PAP. Some of the changes were made in review of 3rd party vendors but did not define what changes were based on.

2012 changes were based on review of from A&BGC (the service center) recommendations dated 2011 and 2012.

CNG follows PAPA and provided the following information for staff review PAPA 9-22-2009 annual meeting minutes, PAPA summary of 2010 program improvements, PAPA general meeting minutes 4-3-2012, PAP general meeting minutes 1-3-2012, PAPA general meeting minutes 9-6-2011,9-7-2010 PAPA general meeting minutes,9-22-2009 PAPA general meeting minutes and 9-14-2011 PAPP general meeting minutes

4. Program Evaluation & Continuous Improvement (Effectiveness Evaluations)

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?

- ☑ 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.

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP1162 Section 8.4

- S - Satisfactory (explain)
- U - Unsatisfactory (explain)
- N/A - Not Applicable (explain)
- N/C - Not Checked (explain)

COMMENTS:

Did not prepare 4 yr effectiveness

bullet 1 CNG did not write own effectiveness eval but as a result of central surveys inc eval in 2010 and Herbert Readseach in 2007 CNG has made improvements to the plan as explained in 2010 public awareness program implementation annual review dated 5-15-2012.

bullet 2 CNG did not complete/prepare a 4 yr effectiveness eval

Bullet 3 4 yr eval has a form to be filled out in new pap. However, there is no procedure. All items on form must be documented. CNG will put in PAP

bullet 4 sample size in new PAP ok

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?

- 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

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.4.1

- S - Satisfactory (explain)
- U - Unsatisfactory (explain)
- N/A - Not Applicable (explain)
- N/C - Not Checked (explain)

COMMENTS:

PV all bullets not in PAP although done

bullet 1 Central Survey tracked all mailing sent in 2010. Did track

bullet 2. questionnaires in direct mailings, telephone survey

bullet 3. CNG used Central Survey documentation to determine the statistical sample size and margin of error for CNG

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?

- 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

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.4.1

<input type="radio"/> S - Satisfactory (explain) <input checked="" type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not Applicable (explain) <input type="radio"/> N/C - Not Checked (explain)

COMMENTS:

prior to 2012 CNG failed to provide justification for not estimating the percentage of individuals or entities actually reached in each stakeholder group.

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

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.4.2

<input checked="" type="radio"/> S - Satisfactory (explain) <input type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not Applicable (explain) <input type="radio"/> N/C - Not Checked (explain)

COMMENTS:

Bullet 1 and 2 that understood message ???
 Reviewed 3rd party 2011 results, WA and OR the same percentages, 32% did understand and retain the message. 68% did not understand. No supplementals conducted

CNG used PAPA material and it is pretested, so is paradigm and celartis

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?

- 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

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.4.3

- S - Satisfactory (explain)
- U - Unsatisfactory (explain)
- N/A - Not Applicable (explain)
- N/C - Not Checked (explain)

COMMENTS:

Bullet 1. per paridgn 2011 survey stakeholders demonstrated learned behaviors per answers and \ PV procedsure not in PAP

bullet 2 althoughh not in written eval after dec 11 mailing of sniff cards, accecement of web site hits was completed and found increase compared to the prior months PV procedure not in PAP

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?

- 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.

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.4.4

- S - Satisfactory (explain)
- U - Unsatisfactory (explain)
- N/A - Not Applicable (explain)
- N/C - Not Checked (explain)

COMMENTS:

bullet 1. look at CNG damage prevention stats, collect stats and send to state on annual report but not mentioned in PAP
PV not in PAP

bullet 2.
damage prevention tracked internally, not included in annual report, Reviewed 2009, 2010 and 2011 substructure 2009, 2010 and 2011 substructure damage report home owner, substructure damage report contractors. 2009 37449 locates
2010 47,114 locates
2011 49,900 locates

Bullet 3. AOC other bottom line results such as perception of safety asked in survey question and response was not positive, done by central survey 5 answered and 33% had poor perception of CNG safety

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?

- ☑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.

CODE REFERENCE: § 192.616 (c), § 195.440 (c), API RP 1162 Section 2.7 Step 12 and 8.5

<input checked="" type="radio"/> S - Satisfactory (explain) <input type="radio"/> U - Unsatisfactory (explain) <input type="radio"/> N/A - Not Applicable (explain) <input type="radio"/> N/C - Not Checked (explain)

COMMENTS:

Bullet 1. effectiveness eval not good
 PV did not conduct 4 year eval

Bullet 2 CNG does have a plan or procedure that outlines how changes made in PAP cp #1

Bullet 3
 CNG has not made changes based on assessments,

CNG does have going forward, no pv written - CNG form GNG 800 is mangement of change form. Plan and procedure is found in cp 01 in O&M manual not PAP

5. Inspection

SUMMARY:

FINDINGS: