

PUBLIC AWARENESS PROGRAM EFFECTIVE INSPECTION SPECIFIC INFORMATION

Control Information

INSPECTION START DATE:	3/12/2012				
INSPECTION END DATE:	3/14/2012				
OPERATOR ID:	31232				
OPERATOR NAME:	AVISTA CORP				
STATE/OTHER ID:	WA				
ACTIVITY RECORD ID NUMBER	2606				
COMPANY OFFICIAL:	Jason Thackston				
COMPANY OFFICIAL STREET:	1411 East Mission, PO Box 3727				
COMPANY OFFICIAL CITY:	Spokane				
COMPANY OFFICIAL STATE:	WA				
COMPANY OFFICIAL ZIP:	99220				
COMPANY_OFFICIAL_TITLE:	Vice President, Energy Delivery				
PHONE NUMBER:	(509) 495-8550				
FAX NUMBER:	(509) 777-5892				
EMAIL ADDRESS:	jason.thackston@avistacorp.com				
WEB SITE:	www.avistacorp.com				
TOTAL MILEAGE:	3,412				
TOTAL MILEAGE IN HCA:	0				
NUMBER OF SERVICES (DISTR):	145396				
ALTERNATE MAOP (80% RULE):	0				
NUMBER OF SPECIAL PERMITS:	0				
INITIAL DATE OF PAP:	1/1/2012				
TITLE OF CURRENT PAP:	Public Awareness Program RP-1162				
CURRENT PAP VERSION:	Revision 5, 01.02.12				
CURRENT PAP DATE:	1/2/2012				
DATE SUBMITTED FOR APPROVAL:	3/22/2012				
DIRECTOR APPROVAL:	David Lykken, WA Pipeline Safety Director				
APPROVAL DATE:	3/28/2012				
OPERATORS COVERED UNDER PROGRAM:	<table style="border-collapse: collapse;"> <thead> <tr> <th style="border-bottom: 1px solid black;">OPERATOR ID</th> <th style="border-bottom: 1px solid black;">NAME</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">31232</td> <td>AVISTA CORP</td> </tr> </tbody> </table>	OPERATOR ID	NAME	31232	AVISTA CORP
OPERATOR ID	NAME				
31232	AVISTA CORP				

UNITS COVERED UNDER PROGRAM:

PERSON INTERVIEWED	TITLE/ORGANIZATION	PHONE NUMBER	EMAIL ADDRESS
Sandy Bayley	Public Safety Manager	(509) 495-4811	sandy.bayley@avistacorp.com
Terry Bushnell	Director Human Resources	(509) 495-4540	terry.bushnell@avistacorp.com
Randy Bareither	Pipeline Safety Engineer	(509) 495-8716	randy.bareither@avistacorp.com
Tom Jannings	Safety Specialist	(509) 495-4368	tom.jannings@avistacorp.com
Collette Bottinelli	Marketer	(509) 495-2793	collette.bottinelli@avistacorp.com

ENTITY NAME	PART OF PLAN AND/OR EVALUATION	PHONE NUMBER	EMAIL ADDRESS
J D Power & Assoc.	Communications Evaluator	(805) 418-8000	None provided
Paradigm	Liaison w/1st Responders	(316) 928-4749	None provided
Celertas	Liaison w/1st Responders	(913) 491-9000	None provided
The Pipeline Group	Liaison w/1st Responders	(432) 685-1731	None provided
Walt's Mailing	Mailing & Address Svc.	(509) 924-5939	None provided
Market Decisions Corp	Voice of Customer & Online Evaluations	(800) 344-8725	None provided
DNL Enterprises	1st Responder & Excavator Outside Training Provider	(509) 921-1462	None provided
CSI	Effectiveness Evaluation	(712) 246-1630	None provided
Cathy Duer: Hanna & Associates	Advertising/TV, Radio, Newspring	(208) 667-2428	None provided

INSPECTOR REPRESENTATIVE(S)	PHMSA/STATE	REGION/STATE	EMAIL ADDRESS	LEAD
State/Stephanie Zuehlke	State	WA	szuehlke@utc.wa.gov	<input checked="" type="checkbox"/>
State/John Ivey	State	OR	john.ivey@state.or.us	<input type="checkbox"/>
State/Ellis Hire	State	ID	ellis.hire@puc.idaho.gov	<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 (Interstate)

COMPANY NAME	OPERATOR ID	PRODUCT TYPE	GATHERING	TRANSMISSION	DISTRIBUTION*	REMARKS (new?)
			INTERSTATE	INTERSTATE	INTERSTATE	
AVISTA CORP	31232	Nat Gas	0	0	0	

Jurisdictional to Part 192 (Gas) Mileage (Intrastate)

COMPANY NAME	OPERATOR ID	PRODUCT TYPE	STATE	GATHERING	TRANSMISSION	DISTRIBUTION*	REMARKS (new?)
				INTRASTATE	INTRASTATE	INTRASTATE	
AVISTA CORP	31232	Nat Gas	WA	0	72.67	72.67	

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

NAME	PRODUCT TYPE	OPERATOR ID	TRANSMISSION		REMARKS
			INTERSTATE	INTRASTATE	
AVISTA CORP	Nat Gas	31232	0		

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

NAME	OPERATOR ID	PRODUCT TYPE	STATE	TRANSMISSION		REMARKS
				INTRASTATE	INTRASTATE	
AVISTA CORP	31232	Nat Gas	WA	0		

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)
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COMMENTS:

PAP administered from Headquarters of Avista (same address as on page 1 this form) by the Safety Department (Page 3 & 4 of the Plan). Clearinghouse submitted on 09.08.06. Director of Human Resources, Gerry Bushnell, Sandy Bayley (Substance Abuse Coordinator.) administers P/A Program on Half-time Basis (See page 3.) Tom Jannings manages and has Oversight of the Field. Clearinghouse written

06.20.06 - verified original plan. Avista failed to correct identified Clearinghouse deficiencies.

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:

Sandy Bayley utilizes internal resources such as advertising media to communicate messages. External support are identified on pages 3 & 4 of the Plan under Outside Resources Committed to Program Administration such as, Advertising agency, various trade associations, subject matter experts, etc. and managers are identified for each Avista location. Letter by Dennis Vermillion verified signature of President of Avista Utilities (page 1 of Plan). Page 3 & 4 identify all individuals providing program support company-wide. They reference a coordinators guide to identify specific duties attached to each position. Managers are identified for each location. No evidence of adequate resources to carry out the PAP; no evidence or indication of management participation in the development and implementation of the PAP, and oversight of external support resources regarding implementation and evaluation efforts of PAP.

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

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| <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) |
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COMMENTS:

Avista's specific pipeline assts - mileages/services under state jurisdiction contain no detail regarding the unique attribute and characteristics. (See Section 2, page 3 of their plan.) Avista identified use of GIS but does not identify the frequency and data source used to identify each stakeholder audience. Avista does not have a process to complete this activity in their plan. See Table A, page 7 of the Plan. Affected Public (See Table A identified those who live within 1000ft of the transmission and adjacent. Avista identified they utilize Sic Codes to determine affected public - this process is not identified in their plan. (and is no longer the accurate standard normally used to classify industry - NAICS is the newer more detailed classification system for industry). Avista failed to provide comprehensive records/methods to determine each stakeholder audience. Referenced on page 5, Section 5 Stakeholder Audiences. Emergenc Officials. Avista has 8 Emergenc Officials in Colville. Idaho staff reviewed emergenc officials in Sandpoint, ID. Oregon staff reviewed emergency officials in La Grande, OR. Avista's plan identifies contacts that they do no know why they are contacting such as, the US Army Recruiter (completed through Walt's Mailing Service is a local company that identifies what lists apply to Avista.) Avista doesn't review the data/info provided b Walt's lists to determine accuracy and.or applicability. Avista is unaware of whether the consider/contact/include any BLM areas or Forest Service contacts First Responders identified b Avista: US Army Recruiting, Stevens County, City of Colville, State Patrol, Stevens County District Court, Stevens County Fire District 9, and Fire District 10. No information on follow-up with First Responders. Avista identified they have had problems obtaining appropriate information. Public Officials - Sandy went to Walt's and they went to a different broker to identify a more accurate list.

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

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| <ul style="list-style-type: none"> <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) |
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COMMENTS:

Avista identified use of GIS but does not identify the frequency and data source used to identify each stakeholder audience. Avista does not have a process to complete this activity in their plan. See Table A, page 7. Review of location along system: Affected public: (See Table A identified those who live within 1000ft of the transmission and adjacent. Avista utilizes Sic Codes to determine affected public - this process is not identified in their plan. New accepted method rather than Sic Codes is NAICS (North American Industry Classification System) which distinguishes industry classification separations with greater and more accurate detail than Sic Codes). Avista failed to provide comprehensive records/methods to determine each stakeholder audience. Referenced on Page 5, Section 5 Stakeholder Audiences. Emergency Officials: Avista has 8 Emergency Officials in Colville. Idaho staff reviewed emergency officials in Sandpoint, ID. Oregon staff reviewed emergency officials in La Grande, OR. Avista's plan identifies contacts that they do not know why they are contacting such as, the US Army Recruiter (completed through Walt's Mailing Service, a local company that identified what lists apply to Avista.) Avista doesn't review Walt's lists to determine accuracy and/or applicability. Avista is unaware of whether they consider/contact/include any BLM areas or Forest Service contacts. First Responders identified by Avista are: US Army Recruiting, Stevens county, City of Colville, State Patrol, Stevens County District Court, Stevens County Fire district 9, and Fire District 10. No information on follow-up with First Responders. Avista identified they have had problems obtaining appropriate information. Public Officials: Sandy went to Walt's Mailing Lists services and they Walt's went to a different address broker to identify a more accurate list. Excavators: Walt's also provides excavators lists from a list broker. Underground/overhead facility locations then ask Walt's to provide a list of excavators by zip code. No verification of accuracy of list. Avista Program Administration failed to provide evidence of a plan that effectively identifies stakeholder audiences including recordkeeping and oversight. No verification of accuracy of list.

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

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

COMMENTS:

Avista failed to implement and deliver their baseline and supplemental message information in accordance with their written program for all stakeholder audiences for all locations. Although some notification was provided to stakeholder audiences, these audiences were not provided all of the information contact Avista describes in Section 6, page 10-18. Locations such as La Grande, OR; Goldendale and Stevenson, WA, have not been represented - no documentation of baseline & supplemental activity reaching these locations as identified in the plan since message is regionalized and all locations are not receiving the information identified in the plan. Avista failed to provide evidence that Goldendale and Stevenson, WA received any messages. Supplemental messages and activities has not been addressed - Avista needs to address annually whether needed or not for stakeholders except public officials. Collette Bottinelli internal marketing and communications Dept. Marketing Communications Manager with Representative from Hanna & Assoc. Agency (outside marketing agency). Supplemental messages and activities has not been addressed - need to address annually whether needed or not. Transmission: disconnect between noting locations such as public parks and playgrounds and the actual getting the responsible parties the notification of the pipeline proximity as identified in Table A the Affected Public for Transmission. Distribution: Locations such as La Grande, OR; Goldendale and Stevenson, WA have not been represented - no documentation of baseline and supplemental activity reaching these locations as identified in the plan since message is regionalized and all locations are not receiving the information identified in the plan. Avista failed to provide evidence that Goldendale and Stevenson, WA received any messages. Emergency Officials: Completed supplemental activities in Colville in 2011. Excavators: Documentation/records do not show all baseline activity matching the baseline messages. Supplemental messages and activities has not been addressed - need to address annually whether needed or not. Goldendale and Stevenson have not been represented in - no documentation of baseline & supplemental activity reaching these locations since message is regionalized. Avista failed to implement and deliver their baseline and supplemental message

information in accordance with their written program for all stakeholder audiences for all locations. Although some notification was provided to stakeholder audiences, these audiences were not provided all of the information content described in Section 6, page 10-18. Locations such as La Grande, OR; Goldendale and Stevenson, WA, have not been represented - no documentation of baseline & supplemental activity reaching these locations as identified in the plan since message is regionalized and all locations are not receiving the information identified in the plan. Avista failed to provide evidence that Goldendale and Stevenson, WA received any messages. Supplemental messages and activities has not been addressed - Avista needs to address annually whether needed or not for stakeholders except public officials.

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)

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

COMMENTS:

1. Avista PA Plan mimics API RP 1162. Avista failed to follow Section 8 Program Evaluation - annual Audits, stat sample sizes and margin-of-error, etc. 2. Avista does not complete ALL 3 evaluation methods as they have stated with regard to their program language, approach, technique, and frequencies. 3. Avista's written program evaluation plan is ineffective.

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

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

COMMENTS:

Avista's plan fails to identify the frequency by which they identify the need of alternate language review. Message is presently delivered in English, Spanish, and Russian. Avista also has an interpreter on staff. Avista measure need to address additional language based upon most recent US census information (trigger is >10%). Last completed in 2010 with frequency of every 2 years but this frequency is not detailed in the plan.

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)

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

COMMENTS:

Avista cannot verify all information was delivered to each of the primary stakeholder audiences. And, under Emergency Officials Messaging, the Plan does not include one-call notification.

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)

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

COMMENTS:

Avista's Plan fails to cover any facility location information both developed and delivered to all affected municipalities and school districts.

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 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)
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COMMENTS:
 Avista failed to provide evidence of what was provided in each and every message they sent and when the message was sent.

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)
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COMMENTS:
 Avista considered relevant factors for supplemental enhancements but failed to effectively address them. See 1.05 above for details. Supplemental enhancements are included in the plan but no records evidencing they were provided to all stakeholder audiences.

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

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

COMMENTS:

Avista failed to include in their plan and provide records showing they maintain their liaison with all required emergency officials. No records to prove training and no records proving contact or how the operator maintains their relationship with this stakeholder audience. Avista identified they do not have a way to provide emergency officials with a copy of their EOP. However, they failed to identify how they make their EOP available for emergencies. Avista failed to track whether emergency response organizations have adequate and proper resources to respond. Also, Avista failed to ensure the information was communicated to all emergency personnel including those that did not attend training/information sessions by the operator. Avista Public Safety Coordinator maintains the company relationship with Emergency Response Officials. They only report the training sessions and do not record daily contacts. No records to demonstrate contact. Avista states that they are at the offices where it occurs. The manual provided does not contain all info but Avista identified that the Area Coordinators have comprehensive data. Staff identified that Randy had arranged with UTC to have this PA represent the PA for all 2012 standard inspection. The plan shows reporting is required quarterly but they don't have quarterly records. No emergency official documentation of training other than a copy of a DVD they sent out to first responders. Avista must make their EOP available. Avista plan states EOP is communicated through the Gas First Responder Training and the Mock Emergency Drills. Drills are conducted by the Gas Engineering Department. No records available showing operator expectations for emergency responders, no records identifying expectations regardless of the location. Avista identified no follow-up for no-shows to Emergency Response Training and Drills and therefore, no way to determine their preparedness - they don't track this. Avista also does not track how they ensure that information was communicated to emergency responders that did not attend

training/information sessions Avista has held.

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:

Avista failed to complete a self-audit for 2010 and 2009. They were incorrectly utilizing mini-regulatory audits (approx. 3 questions in a standard LDC inspection) as their self audit tool. The P/A inspection completed by regulatory agency was not a comprehensive P/A inspection. Avista failed to complete ALL 3 methodologies identified in their plan in accordance with the identified frequencies. Avista Program page 17 language identify that they will self audit more frequently than ever 4 years. Also see Docket 080107 for details regarding Avista PAP self Audits. Avista's Plan identifies they will complete all 3 self-audit methods annually - they did not complete any.

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:

Avista failed to complete annual self-audits. A self-audit was performed in January 2012 but all corrections have not been implemented and no corrective action has been scheduled and many issues have not been remediated. No timeframe for remediation of deficiencies has been established and remediation timeframes have not been addressed in their plan.

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:

Avista failed to complete a full and thorough audit until the assessment of their plan in 2012. A self-audit was performed in January 2012 but all corrections/remediation has not been implemented. No corrective action has been scheduled and many issues have not been remediated. No timeframe for remediation of deficiencies has been established and the remediation timeframes have not been addressed in the Plan.

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:

Avista failed to complete an effectiveness evaluation. The intent of the effectiveness evaluation is for the operator to review their assessment results, document their findings on how effective their P"AP is, and implement changes (if needed). Avista failed to provide requested program documentation for Sandpoint, ID in accordance with 49 CFR 192.616(i) - staff requested an expanded emergency responder list and Avista's contract with CSI (for the purpose of reviewing survey request details.) No evaluation of the pipeline segment or environment - all same. Avista identified the sample size was determined by 3rd party who stated in the study that the sample size provided met certain requirements. The sample size included X from 3 different states without documentation. The identified sample size does not statistically support/respond to the way the survey was compiled/completed showing the sample was representative or address whether it was representative of all 3 states. Avista was unable to provide evidence of what they requested their 3rd party to

include in their effectiveness study

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:

Avista failed to complete an effectiveness evaluation. And, Avista failed to track their actual program outreach for each of the stakeholders. The intent of the effectiveness evaluation is for the operator to review their assessment results, document their findings on how effective their PAP is, and implement changes (if needed).

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

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

COMMENTS:

Avista failed to complete an effectiveness evaluation. And, Avista failed to address all three states in their statistical assessment/study/evaluation. The intent of the effectiveness evaluation is for the operator to review their assessment results, document their findings on how effective their PAP is, and implement changes (if needed).

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 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)
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COMMENTS:
 Avista failed to complete an effectiveness evaluation. The intent of the effectiveness evaluation is for the operator to review their assessment results, document their findings on how effective their PAP is, and implement changes (if needed).

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

<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)
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COMMENTS:
 Avista failed to complete an effectiveness evaluation. The intent of the effectiveness evaluation is for the operator to review their assessment results, document their findings on how effective their PAP is and implement changes (if needed).

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:

Avista failed to complete an effectiveness evaluation. The intent of the effectiveness evaluation is for the operator to review their assessment results, document their findings on how effective their PAP is, and implement changes (if needed). Avista had no documentation tracking near misses. Avista identified they focus on locates only. No excavation damages that do not result in pipeline failures. Avista failed to consider and attempt to measure other bottom-line measures and did not justify a reason for not measuring. Avista has no procedure, either way, for including any of the above in their plan. Avista did not complete an eval, did not review an eval, and did not measure an eval..

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

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

COMMENTS:

Avista failed to complete an effectiveness evaluation. The intent of the effectiveness evaluation is for the operator to review their assessment results, document their findings on how effective their PAP is, and implement changes (if needed).

5. Inspection

SUMMARY:

Overall, Avista failed to effectively administer, monitor, and manage their Public Awareness Program. The states of Washington, Idaho, and Oregon completed a team inspection with the consensus that all Sections of Form 21 rated as unsatisfactory . See below findings for details.

FINDINGS:

1. 49 CFR §192.616(a) Public Awareness.

Finding(s) - Written Public Education Program:

Avista failed to correct Clearinghouse deficiencies.

Finding(s) - Management Support:

Avista failed to provide evidence of adequate resources used to carry out the PAP.

Finding(s) – Management Support:

Avista failed to provide evidence or indication of managements participation in the development and implementation of the PAP.

Finding(s) – Management Support:

Avista failed to provide oversight of external support resources regarding implementation and evaluation efforts of PAP.

2. 49 CFR §192.616(b) Public Awareness.

Finding(s) - Unique Attributes and Characteristics:

Avista failed to define the specific pipeline assets or systems covered in the program and assess the unique attributes and characteristics of the pipeline and facilities.

3. 49 CFR §192.616(g) Public Awareness.

Finding(s) – English and other languages:

Avista's plan failed to identify the frequency by which they will determine the need for an alternate language review.

4. 49 CFR §192.616(d) & (f) Public Awareness.

Finding(s) - Stakeholder Audience Identification:

Avista's Program Administration failed to provide evidence of a plan that effectively identifies stakeholder audiences including recordkeeping and oversight. Specific examples follow:

a. Avista identified use of GIS but failed to identify the frequency and data sources used to identify each stakeholder audience.

b. Avista does not have a process to complete recordkeeping and oversight activities in their plan

c. Avista failed to verify and review the accuracy of their stakeholder audience lists.

d. Avista failed to provide comprehensive records used to determine each stakeholder audience.

Finding(s) – Message type and content:

Avista failed to provide records to verify all information was delivered to each of the stakeholder audiences.

Finding(s) – Message type and content:

Avista's written plan failed to include a one-call notification messages for Emergency Officials.

5. 49 CFR §192.616(e-f) Public Awareness.

Finding(s) – Messages on pipeline facility locations:

Avista's plan failed to include developed and delivered facility location information messages to all affected municipalities and school districts.

6. 49 CFR §192.615(c) Emergency plans.

Finding(s):

Avista failed to provide records evidencing they have established and maintained liaison with appropriate fire, police, and other public officials.

Finding(s):

Avista failed to provide records evidencing that they learned the responsibility and resources of each government organization that may respond to a gas pipeline emergency.

7. 49 CFR §192.616(c) & (i) Public Awareness.

Finding(s) - Written Evaluation Plan:

Avista failed to evaluate their program implementation and effectiveness and with the required frequency.

a. Avista failed to complete annual evaluations.

b. Avista failed to complete all three evaluation methods in accordance with their program language and tables regarding approach, technique, and frequencies.

c. Avista's written program evaluation plan is ineffective. Avista does not have a process to complete recordkeeping and oversight activities in their plan.

Finding(s) – Measuring program implementation:

Avista failed to complete self-audits for the years 2009 and 2010.

Finding(s) – Measuring program implementation:

Avista failed to measure their program implementation using all methodologies identified in their plan.

8. 49 CFR §192.616(c) Public Awareness.

Finding(s) - Message frequency and message delivery:

Avista failed to implement and deliver their baseline and supplemental message information in accordance with their written program for all stakeholder audiences for all locations.

a. Avista failed to provide documentation that audiences were provided all of the information content described in their plan.

b. Avista failed to include/represent locations such as the cities of Goldendale and Stevenson in the plan at all.

c. Avista failed to provide documentation of baseline and supplemental activity reaching locations such as the cities of Goldendale and Stevenson.

d. Avista's messages are regionalized and all locations are not receiving the information identified in the plan.

e. Avista failed to address supplemental messages and activities with the required frequency for all stakeholders.

Finding(s) - Baseline Message Delivery Frequency:

Avista failed to provide records evidencing what they provided to stakeholders in each and every message they sent.

Finding(s) - Baseline Message Delivery Frequency:

Avista failed to provide records evidencing when they provided information to stakeholders in each and every message they sent.

Finding(s) - Considerations for Supplemental Program Enhancements:

Avista considered relevant factors for supplemental enhancements but failed to effectively address them.

- a. Avista failed to provide documentation that audiences were provided all of the information content described in their plan.
- b. Avista failed to include/represent locations such as the cities of Goldendale and Stevenson in the plan at all.
- c. Avista failed to provide documentation of baseline and supplemental activity reaching locations such as the cities of Goldendale and Stevenson.
- d. Avista's messages are regionalized and all locations are not receiving the information identified in the plan.
- e. Avista failed to address supplemental messages and activities with the required frequency for all stakeholders.

Finding(s) - Maintaining Liaison with Emergency Response Officials:

Avista's plan failed to identify how they will maintain their liaison relationship with all required emergency officials.

Finding(s) - Maintaining Liaison with Emergency Response Officials:

Avista failed to provide records evidencing the maintaining of a liaison relationship with all required emergency officials.

Finding(s) - Maintaining Liaison with Emergency Response Officials:

Avista failed to provide records evidencing notification to emergency response officials of the location of their emergency response plan (EOP).

Finding(s) - Maintaining Liaison with Emergency Response Officials:

Avista failed to provide records evidencing what/whether emergency response organizations have adequate and proper resources to respond.

Finding(s) - Maintaining Liaison with Emergency Response Officials:

Avista failed to provide records evidencing/ensured required information was communicated to all emergency response officials including those that did not attend training/information sessions held by the operator.

Finding(s) – Acceptable methods for program implementation audits:

Avista failed to complete annual self-audits in accordance with their plan which identifies three methods of self-audits are to be completed annually.

Finding(s) – Program Changes and Improvements:

Avista failed to perform annual assessment audits of their program in 2009 and 2010. Avista performed their first self-audit in January 2012.

- a. Avista failed to develop and implement changes in its program as a result of their annual assessment audit.
- B. Avista's plan fails to identify timeframe for changes/improvements/corrective action documented in their annual audit/review.

Finding(s) – Evaluating program effectiveness:

Avista failed to complete an effectiveness evaluation of their program that meets with regulatory requirements.

Finding(s) – Measure program outreach:

Avista failed to measure program outreach by tracking actual program outreach for each stakeholder audience within all areas along all assets and systems covered by their program.

Finding(s) – Measure percentage stakeholder reached:

Avista failed to measure percentage of stakeholders reached. Avista failed to represent all regional areas in their study.

Finding(s) – Measure understandability of message content:

Avista failed to evaluate effectiveness and assess the percentage of intended stakeholder audiences that understood and retained the key information in the messages received, within all assets and systems covered by its program.

Avista failed to represent all regional areas in their study.

Finding(s) – Measure Desired Stakeholder Behavior:

Avista failed to evaluate effectiveness and examine results to determine if the stakeholders have demonstrated the intended learned prevention behaviors.

Finding(s) – Measure Bottom-Line Results:

Avista failed to evaluate effectiveness and examine bottom-line results of its program.

Finding(s) – Program changes:

Avista failed to evaluate effectiveness and did not document needed changes and/or modifications to its program.