

# Inspection Output (IOR)

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## Inspection Information

Inspection Name	Avista Headquarters PA	Operator(s)	AVISTA CORP (31232)	Plan Submitted	01/04/2019
Status	PLANNED	Lead	Scott Rukke	Plan Approval	01/07/2019 by Joe Subsits
Start Year	2019	Team Members	David Cullom, Derek Norwood, Scott Anderson, Darren Tinnerstet	All Activity Start	03/19/2019
System Type	GD	Observer(s)	Deborah Becker, Rell Koizumi	All Activity End	03/21/2019
Protocol Set ID	GD.2018.02	Supervisor	Joe Subsits	Inspection Submitted	--
		Director	Sean Mayo	Inspection Approval	--

## Inspection Summary

This is a headquarters audit of Avista Utilities Public Awareness program and will be conducted in Spokane WA.

Avista Rep for PA:

Dawn Donahoo, Public Safety Specialist, 509-495-2646

Randy Bareither, Pipeline Safety Engineer, 509-495-8716, cell 509-434-6783

Idaho inspectors participating:

Bruce Perkins - (208) 334-0326; Darrin Ulmer - (208) 334-0321; Kyle Russo - (208) 334-0333

Notes:

1. Advisory Bulletin (ADB-10-08)

**SUMMARY:** PHMSA is issuing an Advisory Bulletin to remind operators of gas and hazardous liquid pipeline facilities that they must make their pipeline emergency response plans available to local emergency response officials. PHMSA recommends that operators provide their emergency response plans to officials through their required liaison and public awareness activities. PHMSA intends to evaluate the extent to which operators have provided their emergency plans to local emergency officials when PHMSA performs future inspections for compliance with liaison and public awareness code requirements.

2. ADB-05-03 - coordination with other utilities including electric. This document alerts pipeline operators about the need to preplan for emergency response with utilities whose proximity to the pipeline may impact the response. Coordination with electric and other utilities may be critical in responding to a pipeline emergency. Preplanning would facilitate actions that may be needed for safety, such as removing sources of ignition or reducing the amount of combustible material.

## Scope (Assets)

Short # Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1. 88960	Avista Utilities Corp - (HQ)	unit	88960	Compressor Stations Storage Fields Bottle/Pipe - Holders Vault	23	23	23	100.0%

Short # Label	Long Label	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
				Onshore Offshore GOM OCS Cast or Ductile Iron Copper Pipe Aluminum pipe Plastic pipe Abandoned				

1. Percent completion excludes unanswered questions planned as "always observe".

## Plans

Plan # Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent	Notes
1. 88960	n/a	PD.PA.PROGRAM.P, PD.PA.MESSAGEFREQUENCY.R, EP.ERG.LIAISON.R, PD.PA.LANGUAGE.P, PD.PA.LANGUAGE.R, PD.PA.EVALPLAN.P, PD.PA.EVALIMPL.R, PD.PA.AUDITMETHODS.R, PD.PA.PROGRAMIMPROVE.R, PD.PA.EVALEFFECTIVENESS.R, PD.PA.MEASUREOUTREACH.R, PD.PA.MGMTSUPPORT.P, PD.PA.MEASUREUNDERSTANDABILITY.R, PD.PA.MEASUREBEHAVIOR.R, PD.PA.MEASUREBOTTOM.R, PD.PA.CHANGES.R, PD.PA.ASSETS.P, PD.PA.AUDIENCEID.P, PD.PA.AUDIENCEID.R, PD.PA.MESSAGES.P, PD.PA.SUPPLEMENTAL.P, PD.PA.EDUCATE.R, PD.PA.LOCATIONMESSAGE.R	P, R, O, S	Detail	

## Plan Implementations

Activity # Name	SMAR T Act#	Start Date End Date	Focus Directives	Involved Groups/Subgroups	Asset s	Qst Type(s)	Planned	Required	Total Inspected	Required % Complete
1 Avista PA 778	--	03/19/2019	n/a	all planned questions	all assets	all types	23	23	23	100.0%
2		03/21/2019								

1. Since questions may be implemented in multiple activities, but answered only once, questions may be represented more than once in this table.

2. Percent completion excludes unanswered questions planned as "always observe".

## Forms

No.	Entity	Form Name	Status	Date Completed	Activity Name	Asset
1.	Attendance List	Office Records	COMPLETED	3/20/2019	Avista PA 7782	88960

## Results (all values, 23 results)

26 (instead of 23) results are listed due to re-presentation of questions in more than one sub-group.

### PRR.OM: Operations And Maintenance

- Question Result, ID, Sat, EP.ERG.LIAISON.R, 192.605(a) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), References 192.616(c), ADB-05-03) (also presented in: MISCTOPICS.PUBAWARE)  
Question Text *Do records indicate liaisons established and maintained with appropriate fire, police and other public officials and utility owners in accordance with procedures?*

Assets Covered 88960

Result Notes ADB-05-03 recommends coordination with other utilities for emergency response.

Handled by each local construction area.

.605(c)

Avista Public Safety Report - done for each year.

Avista issues a capabilities letter to local emergency response officials.

Reviewed records for WA and parts of ID with Idaho's inspectors.

2. Question Result, ID, Sat, PD.PA.LANGUAGE.R, 192.616(g) (API RP 1162 Section 2.3.1) (also presented in: References MISCTOPICS.PUBAWARE)

Question Text *Were materials and messages developed and delivered in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?*

Assets Covered 88960

Result Notes Avista does English Spanish primarily and parts of Spokane are conducted in Russian. Avista has a matrix and database in customer service.

3. Question Result, ID, Sat, PD.PA.EVALEFFECTIVENESS.R, 192.616(c) (API RP 1162 Section 8.4) (also presented in: References MISCTOPICS.PUBAWARE)

Question Text *Have effectiveness evaluation(s) of the program been performed for all stakeholder groups in all notification areas along all systems covered by the program?*

Assets Covered 88960

Result Notes Avista uses a third party contractor.

2009 Central Services

2013 Culver

2017 and 2018 both Culver.

In-depth telephone interviews were completed in December 2018 as part of the 2017/2018 Effectiveness Evaluation by Culver Co. The initial effectiveness evaluation was done by Central Surveys in 2009, and in 2013/2014 a third party independent consultant completed the effectiveness evaluations.

In 2013 & 2017, Avista Utilities retained the services of a third-party consultant – who maintains expertise in RP 1162 effectiveness metrics as well as utility public safety outreach in general -- to assess the effectiveness of the Program (the resulting survey is hereinafter referred to as the 2013 Effectiveness Evaluation). Per API Recommended Practices 1162, the study gauged the following dimensions: the effectiveness of Avista's outreach, participants' knowledge of key natural gas pipeline safety messages, and the impact of this knowledge on participants' behavior.

The key Avista stakeholders interviewed included members of the affected public, comprising affected publics along the transmission right-of-way (ROW) and in the distribution service areas; excavators; emergency response officials; and public officials. Sample sizes were predetermined based on stakeholder population evaluations and are as follows:

- 400 completed affected public distribution interviews
- 200 completed affected public transmission ROW interviews
- 141 completed excavator interviews

- 50 completed emergency response official interviews
- 50 completed public official interviews

## MISCTOPICS.PUBAWARE: Public Awareness Program Effectiveness

4. Question Result, ID, References Sat, PD.PA.PROGRAM.P, 192.616(a) (192.616(h))

Question Text *Has the continuing public education (awareness) program been established as required?*

Assets Covered 88960

Result Notes Yes, THE PAP document revision 11, page 7 provides program development details this information. This was established June 20, 2006, Current Revision 11.

Avista's initial Public Awareness Program was developed June 20, 2006. The program was submitted to the Office of Pipeline Safety Clearinghouse on September 8, 2006. The program was reviewed and revised according to the Revision Log on page 4 and 5.

Avista Confirmation Number: 312

Avista Operator ID: 31232

System Types: Gas Distribution: Natural Gas – Private (ID, OR, WA)

5. Question Result, ID, References Sat, PD.PA.MGMTSUPPORT.P, 192.616(a) (API RP 1162 Section 2.5, API RP 1162 Section 7.1)

Question Text *Does the operator's program documentation demonstrate management support?*

Assets Covered 88960

Result Notes THE PAP Program 2019, Revision 11, page 3, see 'Management Commitment and Support', has a letter from the President. The Natural Gas Dept. and Electric Dept. managers support public awareness by providing personnel to reach out, train and educate our four stakeholder groups – Public Officials, First Responders, Excavators/Contractors and the Affected Public. Supporting personnel include those listed in Appendix A.

6. Question Result, ID, References Sat, PD.PA.ASSETS.P, 192.616(b) (API RP 1162 Section 2.7 Step 4)

Question Text *Does the program clearly identify the specific pipeline systems and facilities to be included in the program, along with the unique attributes and characteristics of each?*

Assets Covered 88960

Result Notes PAP, Revision 11, page 7, see 'Pipeline Assets included in the Program'

Pipeline Assets Included in the Program

Headquartered in Spokane, Washington, Avista Utilities delivers natural gas to more than 345,000 residential, commercial and industrial customers. This Program covers all jurisdictional pipelines within Avista's service territory. Sections of RP1162 do not apply to Avista such as natural gas gathering lines or hazardous liquids pipelines.

The service territory spans across three states, Washington, Oregon, and Idaho. Avista operates more than 13400 miles of distribution pipeline that encompasses both steel and plastic pipe. Other appurtenances of the system include gate stations, odorizers, district regulator stations, valves, miscellaneous fittings, and meter set assemblies.

Avista also operates approximately 76.6 miles of natural gas transmission pipeline located in Spokane and Stevens Counties in Washington, in addition we have 14.7 miles natural gas transmission in Klamath Falls Oregon as depicted in Figures 2 thru 4 of Appendix G. These steel pipelines encompass valves and miscellaneous fittings.

General maps of the Avista gas service territories and transmission facilities are located in Appendix G.

### Unique Attributes

Avista has reviewed its system for unique attributes for consideration in this Program. The company does not own any liquefied natural gas facilities, propane gas facilities, compressor stations or any other facility the company considers to be a unique attributes other than an underground storage facility near Chehalis, Washington. Avista is a joint owner of the Jackson Prairie Natural Gas Storage Facility, which is operated by Puget Sound Energy, and is covered for the purposes of public awareness and other regulatory matters by their compliance program.

As of December 31, 2018, the company has one High Consequence Areas (HCA) within its transmission network. The HCA was created due to an identified site (community center building in a retirement subdivision) in the PIR. (PIR stands for Potential Impact Radius; basically, it's a calculation given in the DOT code that represents the circular area around any particular point on the pipeline that would be affected if the pipeline were to rupture at that point). Avista will provide this facility information on pipeline safety on an annual basis. (Patrol completed Dec. 2018).

HCA

[Sundance Meadows Community Center](#)

[10421 N Jimmy Dr.](#)

[Nine Mile Falls, WA 99026](#)

7. Question Result, ID, Sat, PD.PA.AUDIENECID.P, 192.616(d) (192.616(e), 192.616(f), API RP 1162 Section 2.2, API RP 1162 References Section 3)

Question Text *Does the 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?*

Assets Covered 88960

Result Notes Review PAP Revision 11 PAP Plan (page 13 through 51)

Identification of the Affected Public is noted on Page 13, Emergency Responders is Page 20, Excavators is Page 27, Public Officials is Page 36, Schools are located on Page 40, Farmers Page 41, Railroads Page 42, Plumbers/Drain Maintainers Page 44.

We communicate to businesses and residents within our 'General Public' outreach, see page 13 on the PAP.

Ways to identify our stakeholders – SIC/NAICS codes, Lists by zip code, purchased lists from Walt's Mailing Services, (see detail on question 5) in 2016-2019 Avista purchased lists from Culver targeted for Public Officials, Excavators (includes Farmers) and Emergency Responders, (Plus School Program is contracted through Culver).

See detail – zip codes are used to identify the territories, we use zip codes so we have some overlap- in that the zip code may have other utilities in the area for example, Adams/Grant County would have both Avista Utilities and Cascade Natural. These customers receive education materials from both companies

and the information is consistent. Also where Emergency Responders and Public Officials are targeted, our partner pipelines often join together on an event. (For example PANW/PAPA)

The SIC: 9111 Executive Offices pulls the following departments listed below. In addition to using the SICs, Culver also does research so there are additional municipality contacts on the mailing list. Since the SIC data does not always provide the most accurate contact at a municipality Culver does their due diligence to try find the appropriate recipients.

Offices of chief executives and their advisory and interdepartmental committees and commissions.

- Advisory commissions, executive
- City and town managers' offices
- County supervisors' and executives' offices
- Mayors' offices

## 2. Emergency Officials (EO or ER):

This year's list consists of mailing records obtained using SICs as well as records from a national database of public safety agencies and officials. Some of the SICs used in the 2018 have been moved over to the Public Officials list (9111 Executive offices, 9121 Legislative bodies, 9131 Executive and Legislative offices combined, and 9199 General Government, not elsewhere classified). In addition, this list follows the same protocol as the Public Officials list developed last year and is on a county level.

## 3. Public Officials (PO):

Public Officials are a unique group and a more complex approach is required for developing an accurate list in line with RP 1162. Unlike Excavator lists, which rely heavily on SIC codes, PO lists require additional sources and manual research. The primary reason for this is that many of the names included in the standard Public Officials SIC codes are not always Public Officials as described by RP 1162, so we remove those. In addition, many Public Officials names aren't captured by using only SIC codes. A SIC code may provide the record for the Mayor of Hope, ID but not the Mayor of Spokane, WA, so Culver expands their research to account for those POs as well. Nonetheless, we have included a tab on this workbook with a list of the SIC codes that were used. These SIC codes are used nationally by dual-commodity utilities.

This year's list consists of mailing records obtained using SICs as well as records from a national database of public safety agencies and officials. Some of the SICs used in the 2018 have been moved over to the Public Officials list (9111 Executive offices, 9121 Legislative bodies, 9131 Executive and Legislative offices combined, and 9199 General Government, not elsewhere classified).

We utilize the same methodology for the EO/ER list as we use for the PO list. That is, we will include all counties that have Avista service area zip codes in them. That allows us to reach, for example, an

emergency official who serves on the county level, but may not be physically located in one of your service area zips.

4. Excavators:

**Identification of Excavator Stakeholder Group**

A third party consultant will identify members of this stakeholder audience who are located within the Asset County through which the pipeline asset traverses or in service territories using local telephone directories, government websites. Zip codes and locations are reviewed throughout Avista territory prior to each mailing to determine reach and scope of current excavator stakeholder group. Several options are available to provide address lists. Avista utilizes a third party consultant to update address lists annually. In addition, the PA Program may supplement third-party contact information by using One-Call Centers (One Call Concepts, Dig Line, Password) contact lists, claims and group meetings.

8. Question Result, ID, References Sat, PD.PA.AUDIENCEID.R, 192.616(d) (192.616(e), 192.616(f), API RP 1162 Section 2.2, API RP 1162 Section 3)

Question Text *Do records 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 to which it sends public awareness materials and messages?*

Assets Covered 88960

Result Notes March audit file– mailing lists/receipts/brochure/letter

Stakeholder Audiences

Mailing list history of where it was obtained and/or purchased annually from:

Affected Public:

- General comes from our customer list
- TROW comes from Avista GIS department

First Responders/Emergency Responders

2017 & 2018 Culver

Excavators

2017 & 2018 All Culver

Public Officials

2017 & 2018 All Culver

In addition – Mailings from Pipeline Association for Public Awareness (PAPA) include mailings to Public Officials, Emergency Responders, and Excavators on behalf of Avista. This allows Avista to collaborate with other Pipeline Companies in their outreach. This has occurred from 2013 to the present.

Schools

2014 – 2018 contracted with Culver Co School Program on Avista website

9. Question Result, ID, References Sat, PD.PA.MESSAGES.P, 192.616(c) (API RP 1162 Section 3, API RP 1162 Section 4, API RP 1162 Section 5)

Question Text *Does the program define the combination of messages, delivery methods, and delivery frequencies to comprehensively reach all affected stakeholder audiences in all areas where gas is transported?*

Assets Covered 88960

Result Notes Reviewed media advertising schedules and costs for 2018. Affected (General) Public is noted on Page 13-15, Emergency Responders is Page 20-22, Excavators is Page 27-31, Public Officials is Page 36-37,

10. Question Result, ID, References Sat, PD.PA.SUPPLEMENTAL.P, 192.616(c) (API RP 1162 Section 6.2)

Question Text Were relevant factors considered to determine the need for supplemental public awareness program enhancements for each stakeholder audience, as described in API RP 1162?

Assets Covered 88960

Result Notes Pages 47 - 51 PAP.

11. Question Result, ID, References Sat, PD.PA.EDUCATE.R, 192.616(d) (192.616(f))

Question Text Did delivered messages specifically include provisions to educate the public, emergency officials, local public officials, and excavators on: (1) Use of a one-call notification system prior to excavation and other damage prevention activities; (2) Possible hazards associated with unintended releases from a gas pipeline facility; (3) Physical indications of a possible release; (4) Steps to be taken for public safety in the event of a gas pipeline release; and (5) Procedures to report such an event?

Assets Covered 88960

12. Question Result, ID, References Sat, PD.PA.LOCATIONMESSAGE.R, 192.616(e) (192.616(f))

Question Text Were messages developed and delivered to advise affected municipalities, school districts, businesses, and residents of pipeline facility locations?

Assets Covered 88960

Result Notes Affected Municipalities is in the same grouping as Public Officials. Mayors, Public Works Directors, etc. Annual public officials mailing from Avista shows examples of possible pipeline locations. In addition, Avista contracts with PAPA and Paradigm to do annual public safety outreach.

School Districts- We sent actual GIS maps to all Schools in our areas that have adjacent gas lines in 2018. We give schools the option to receive or not receive by indicating this fact on our eSMARTkids Website (Avista.e-smartonline.net). Maps are on network drive c01m165/Public Awareness / GIS School Maps.

Businesses and Residents- Treated just like Affected Public. "These days, buried utilities are everywhere.." is said on a 30-second radio ad on Call Before You Dig topic. TROW brochure with outline of messaging. (Natural Gas Safety on website)

Customer brochures, "Natural Gas and Electric Safety", "Natural Gas Safety" state, "It takes a system of underground pipelines to bring natural gas right to your home or business".

13. Question Result, ID, References Sat, PD.PA.MESSAGEFREQUENCY.R, 192.616(c) (API RP 1162 Table 2-1, API RP 1162 Table 2-2, API RP 1162 Table 2-3)

Question Text Did the delivery of materials and messages meet or exceed the baseline delivery frequencies specified in API RP 1162, Table 2-1 through Table 2.3?

Assets Covered 88960

Result Notes Reviewed the master mailing list schedule of when the mailings went out and what letters and brochures went out and when, 2017-2018.

Customer outreach: The initial touch is with the June Insert Mailing, the second is the Connections throughout the year.

Reviewed the schedule online.

14. Question Result, ID, References Sat, EP.ERG.LIAISON.R, 192.605(a) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), 192.616(c), ADB-05-03) (also presented in: PRR.OM)

Question Text Do records indicate liaisons established and maintained with appropriate fire, police and other public officials and utility owners in accordance with procedures?

Assets Covered 88960

Result Notes ADB-05-03 recommends coordination with other utilities for emergency response.



Handled by each local construction area.

.605(c)

Avista Public Safety Report - done for each year.

Avista issues a capabilities letter to local emergency response officials.

Reviewed records for WA and parts of ID with Idaho's inspectors.

15. Question Result, ID, References Sat, PD.PA.LANGUAGE.P, 192.616(g) (API RP 1162 Section 2.3.1)

Question Text *Does the program require that materials and messages be provided in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?*

Assets Covered 88960

Result Notes A threshold of 10% or greater in our service territory identified as non-English speaking targets the additional language need. Any language with a threshold of 10% or more shall have the following verbiage noted on applicable brochures in that language: "For assistance with alternative languages, please call 800-227-9187".

Please refer to page 12 of the PAP Revision 11.

Language data used by the Senior Forecaster comes from the U.S. Census bureau for the counties in our service area. The data are drawn from the American Community Survey (ACS) and represents the average of the survey data for the period 2013-2017. These periods represent averages using annual estimates that the Census may not make available for individual counties. The ACS is the most comprehensive source of regional data currently available. The ACS identifies the languages spoken at home for those five-years old and older. The five year average is used to smooth out outliers that may be present in any single ACS. The ACS is completed every year for counties so we can update each year with the five year average. Therefore, the data is capturing the language skills of our customers.

Non English speaking customers calling into Avista's Customer Service Center will be connected to a third party interpreter who is employed by a Language Line Translation Service.

Avista had our Natural Gas Safety brochure translated into Spanish and is set out on all public safety outreach.

Our School Program has Spanish books that teachers and parents can order. These are provided through a third party consultant.

16. Question Result, ID, References Sat, PD.PA.LANGUAGE.R, 192.616(g) (API RP 1162 Section 2.3.1) (also presented in: PRR.OM)

Question Text *Were materials and messages developed and delivered in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?*

Assets Covered 88960

Result Notes Avista does English Spanish primarily and parts of Spokane are conducted in Russian. Avista has a matrix and database in customer service.

17. Question Result, ID, References Sat, PD.PA.EVALPLAN.P, 192.616(i) (192.616(c), API RP 1162 Section 8, API RP 1162 Appendix E)

Question Text *Does the program include a process that specifies how program implementation and effectiveness will be periodically evaluated?*

Assets Covered 88960

Result Notes Avista conducts an internal review/assessment annually on the years that there is not a third party review or a regulatory inspection.

See PAP Revision 11 page 54 and Appendix I sample review forms.

18. Question Result, ID, References Sat+, PD.PA.EVALIMPL.R, 192.616(c) (192.616(i), API RP 1162 Section 8.3)

Question Text *Has an audit or review of the operator's program implementation been performed annually since the program was developed?*

Assets Covered 88960

Result Notes Reviewed annual audit records.

2018: 11/12/18 Internal Randy Bareither

2017: 3/28/17 WUTC, IPUC, OPUC Regulatory Audit

2016: 5/26/16 Internal Randy Bareither

2015: 8/13/15 Internal Randy Bareither

2014: 12/29/14 Internal Randy Bareither

2014: WUTC, IPUC, OPUC Regulator Audit

2013: 12/16/13 Internal Randy Bareither

2013: WUTC, IPUC, OPUC Regulatory Audit

19. Question Result, ID, References Sat, PD.PA.AUDITMETHODS.R, 192.616(c) (192.616(i), API RP 1162 Section 8.3)

Question Text *Was one or more of the three acceptable methods (i.e., internal assessment, 3rd-party contractor review, or regulatory inspections) used to complete the annual audit or review of program implementation?*

Assets Covered 88960

Result Notes Yes

2018: 11/12/18 Internal Randy Bareither

2017: 3/28/17 WUTC, IPUC, OPUC Regulatory Audit

2016: 5/26/16 Internal Randy Bareither

2015: 8/13/15 Internal Randy Bareither

2014: 12/29/14 Internal Randy Bareither

2014: WUTC, IPUC, OPUC Regulator Audit

2013: 12/16/13 Internal Randy Bareither

2013: WUTC, IPUC, OPUC Regulatory Audit

20. Question Result, ID, References Sat, PD.PA.PROGRAMIMPROVE.R, 192.616(c) (API RP 1162 Section 8.3)

Question Text *Were changes made to improve the program and/or the implementation process based on the results and findings of the annual audit(s)?*

Assets Covered 88960

Result Notes 2016

See Randy's 2016 Audit

2017

The one probable violation in 2017 was that Avista's PA procedures do not provide adequate specificity regarding "availability of program documentation for regulatory review". An update/change has been edited into Revision 11 PA Plan documenting this. The three very minor Areas of Concern were addressed in the response letter to OPUC on 5/4/17:

"Future revisions and updates to the Program will be made electronically and applicable documentation and evaluation results associated with the Program shall be available for review by State and Federal Pipeline Safety representatives when requested".

See page 53 of the PAP Revision 11:

Record Retention Period

All documentation and records related to the PA Program are dated and retained by Avista for a minimum of five (5) years.

Record Retention Sites

Program evaluation material, lists, records, documentation, and copies of all material provided to each stakeholder audience related to the PA Program which are generated by the Corporate Office, shall be maintained in a compliance file or on-line file in the Corporate Office.

**2018**

Complete Revision 11 of the PAP, add recommendations of the current Effectiveness Survey for 2017/2018 (question #3)

21. Question Result, ID, References Sat, PD.PA.EVALEFFECTIVENESS.R, 192.616(c) (API RP 1162 Section 8.4) (also presented in: PRR.OM)

Question Text *Have effectiveness evaluation(s) of the program been performed for all stakeholder groups in all notification areas along all systems covered by the program?*

Assets Covered 88960

Result Notes Avista uses a third party contractor.

2009 Central Services

2013 Culver

2017 and 2018 both Culver.

In-depth telephone interviews were completed in December 2018 as part of the 2017/2018 Effectiveness Evaluation by Culver Co. The initial effectiveness evaluation was done by Central Surveys in 2009, and in 2013/2014 a third party independent consultant completed the effectiveness evaluations.

In 2013 & 2017, Avista Utilities retained the services of a third-party consultant – who maintains expertise in RP 1162 effectiveness metrics as well as utility public safety outreach in general -- to assess the effectiveness of the Program (the resulting survey is hereinafter referred to as the 2013 Effectiveness Evaluation). Per API Recommended Practices 1162, the study gauged the following dimensions: the effectiveness of Avista's outreach, participants' knowledge of key natural gas pipeline safety messages, and the impact of this knowledge on participants' behavior.

The key Avista stakeholders interviewed included members of the affected public, comprising affected publics along the transmission right-of-way (ROW) and in the distribution service areas; excavators; emergency response officials; and public officials. Sample sizes were predetermined based on stakeholder population evaluations and are as follows:

- 400 completed affected public distribution interviews
- 200 completed affected public transmission ROW interviews
- 141 completed excavator interviews
- 50 completed emergency response official interviews
- 50 completed public official interviews

22. Question Result, ID, References Sat, PD.PA.MEASUREOUTREACH.R, 192.616(c) (API RP 1162 Section 8.4.1)

Question Text *In evaluating effectiveness, was actual program outreach for each stakeholder audience tracked?*

Assets Covered 88960

Result Notes Report was reviewed.

The goal of this portion of the evaluation is to establish a methodology to track the number of individuals or entities reached within an intended audience; and estimate the percentage of the stakeholders actually reached within the target geographic region along the pipeline.

To validate the accuracy of the mailing list and delivery rates, Avista randomly selects 400 recipients (a sample sufficient to be projectable with a margin of error of approximately +/-5% at the .95 confidence interval) and sends the outreach using First-Class Postage. All other outreach mailers are distributed using First Class and standard (bulk) rates. Avista tracks the delivery rates and re-mails returns where feasible.

In addition, Avista is measuring outreach through quantitative four-year evaluation, including the 2013 & 2017 Effectiveness Evaluation.

[Here is a sample of the outreach findings from the 2017 Effectiveness Evaluation:](#)

- Affected Public: Recall of safety messages sponsored by Avista, and more specifically of pipeline safety messages, decline somewhat from 2013. This decline is consistent with a nationwide decline which was validated by J.D. Power in a nationwide study, and a more multi-modal communications plan for the affected public is called for.
- Emergency Responders: This group reports a higher recall of natural gas pipeline safety information received from Avista and other sources. Emergency response officials received this information through a variety of channels.
- Public Officials: Among public officials there also is a high level of recall of natural gas pipeline safety information received and recalled from Avista and other sources. Public officials also received this information through a variety of channels.
- Excavators: Excavators' safety information recall from Avista and other sources declined marginally in the past 12 months, consistent with another national trend. As with the Affected Public, a more multi-modal approach to outreach is called for.

23. Question Result, ID, References Sat+, PD.PA.MEASUREUNDERSTANDABILITY.R, 192.616(c) (API RP 1162 Section 8.4.2)

Question Text *In evaluating program effectiveness, was the percentage of each stakeholder audience that understood and retained the key information from the messages determined?*

Assets Covered 88960

Result Notes Reviewed in the Effectiveness Survey report. Very good detailed report.

See [Detail Findings in the Effectiveness Survey](#)

Affected Public – p. 11-36

Emergency Officials – p. 8-31

Excavators – p. 13 – 57

Public Officials – p. 12-30

Determination as to whether the recipients understand key elements of the message is another measure of the effectiveness of the PA Program. Avista is measuring understandability with both quantitative and qualitative tactics. This includes the quantitative 4-year effectiveness evaluation, including the 2013 and 2017 research, and the qualitative 2014 and 2018 pre-test of materials effectiveness research.

Here is a sample of the understandability findings from the 2017 Effectiveness Evaluation:

- Affected Public: As was found in 2013, Transmission respondents had a greater awareness of the location of nearby pipelines and pipeline markers than did Distribution respondents. The affected public, in both areas, continues to be very familiar with natural gas smell; however, again as in 2013, they lacked awareness of other (i.e., visual or auditory) warning signs.
- Emergency Responders: Virtually all first responders were aware of distribution facilities in their communities as well as of pipeline markers, gas leak indicators and hazards, pipeline leak response protocols, and the 811 system. Three-fourths were also aware of the National Pipeline mapping system (NPMS).
- Public Officials: Like Emergency Responders, almost all public officials were aware of natural gas distribution pipelines in their communities (but were not as aware of transmission and other natural gas assets), as well as the 811 system.
- Excavators: Excavators continued to be very aware of 811 and the required wait time after notification, the use of pipeline markers, and pipeline leak hazards and indicators. Additionally, about seven in ten excavators were confident in their ability to recognize and use locator markers and were well aware of appropriate actions to take in the event of a leak.

24. Question Result, ID, References Sat, PD.PA.MEASUREBEHAVIOR.R, 192.616(c) (API RP 1162 Section 8.4.3)

Question Text *In evaluating program effectiveness, was evaluation made of whether appropriate preventive, response, and mitigative behaviors were understood and likely to be exhibited?*

Assets Covered 88960

Result Notes Avista did a good job of noting any response deficiencies and implementing additional messaging to target audiences.

In the effectiveness research we gauge those three elements: Prevention, Response, Mitigative. However, the terms we typically use/measure (per the RP) are recall, knowledge/understandability, and behavior change.

For excavator for instance, the data in detailed findings that falls under these three categories cover those Prevention, Response, and Mitigative elements:

- Pipeline Location Identification (prevention/mitigative)

- 811 Knowledge (prevention/response/mitigative)
- Knowledge Check (prevention/response)

A desired result of the Avista PA Program is that the behavior of audiences may be enhanced to include learned and demonstrated behaviors. Avista is measuring changes in behavior with both quantitative and qualitative tactics. This includes the quantitative 4-year effectiveness evaluations, including the 2013 and 2017 effectiveness research, and the qualitative 2014 and 2018 pre-test of materials effectiveness research.

Here is a sample of the key findings involving behavior change from the 2017 Effectiveness Evaluation:

- **Affected Public:** The affected public members who recall the Avista safety mailing engaged with it, spending about five minutes reading it themselves, and over half passed it along to others.
- **Emergency Responders:** Emergency response officials in Avista's service area are well prepared to respond effectively to a natural gas pipeline incident, and four in ten used utility safety materials in training and safety discussions with their colleagues.
- **Public Officials:** Public officials reported a high level of awareness of the various steps utility companies take to assess pipeline hazards and protect them from damage, with 97% associating pipeline companies with efforts to make people aware of the 811 "Call Before You Dig" number. As in 2013, the vast majority of public officials appeared well equipped to respond effectively to a pipeline break in the future.
- **Excavators:** Nearly all excavators reported, as they did in 2013, that they consistently check for the presence of a natural gas pipeline before digging but four in ten reported that, despite that safety precaution, they or someone in their company have unexpectedly encountered a pipeline while digging.

25. Question Result, ID, References Sat+, PD.PA.MEASUREBOTTOM.R, 192.616(c) (API RP 1162 Section 8.4.4)

Question Text *Were bottom-line results of the program measured 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?*

Assets Covered 88960

Result Notes Good statistics. Good follow up.

Reviewed Avista's Ymonthly and year end tracking is provided to all key stakeholders in addition to the Public Safety Specialist from the Damage Prevention Administrator (see example). Near miss is considered when damaged but not leaking and they are included (damage no leak). Measured and reviewed by monthly/district/state. (see annual summary printout)

26. Question Result, ID, References Sat, PD.PA.CHANGES.R, 192.616(c) (API RP 1162 Section 2.7 (Step 12), API RP 1162 Section 8.5)

Question Text *Were needed changes and/or modifications to the program identified and documented based on the results and findings of the program effectiveness evaluations?*

Assets Covered 88960

Result Notes The PAP was updated with the recommendation following the Effectiveness Survey results per stakeholder group. In 2019, the brochures will be updated as recommended.

Continuous Improvement Recommendations found in Appendix J and Continuous Improvement, p. 62

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Report Parameters: Results: all

Inspection documentation, including completed protocol forms, summary reports, executive summary reports, and enforcement documentation are for internal use only by federal or state pipeline safety regulators. Some inspection documentation may contain information which the operator considers to be confidential. In addition, supplemental inspection guidance and related documents in the file library are also for internal use only by federal or state pipeline safety regulators (with the exception of documents published in the federal register, such as advisory bulletins). Do not distribute or otherwise disclose such material outside of the state or federal pipeline regulatory organizations. Requests for such information from other government organizations (including, but not limited to, NTSB, GAO, IG, or Congressional Staff) should be referred to PHMSA Headquarters Management.