Welcome

Workshop on Public Awareness Programs for Pipeline Operators

<u>Day 1, Session 1</u>

Co-Sponsors











Office of Pipeline Safety

Research & Special Programs Administration



Welcome

Public Awareness Program Workshop

Jeff Wiese

U. S. Department of Transportation
Research and Special Programs Administration
Office of Pipeline Safety

Why we are here

- OPS supports RP 1162 and plans to propose incorporation by reference in regulations.
- Pipeline Safety Act requires review of program by 12/17/03
- OPS will assure review complete by requiring formal self-assessments by 12/17/03.
- OPS will NOT require operators to submit written public awareness programs or plans by 12/17/03.
- We need your input to self-assessment form to finalize and develop process for operator submittals
- OPS will issue an Advisory Bulletin formalizing process

Self-Assessments

- Self Assessments will also be used <u>in aggregate</u> to determine where more assistance is needed to develop and implement adequate public awareness programs.
- Reinforce that while RP 1162 practices used as comparison, OPS expects alignment with RP 1162 will take some time after 12/17/04.
- Informal self-assessments:
 - Provide opportunity for questions to support a more informed response
 - Provide assurance that industry is committed to improved public awareness programs

Introduction

Public Awareness Program Workshop

Denise Hamsher

Enbridge

Trade Association Representatives

- AGA Phil Bennett
 - Daphne Magnuson
- APGA Bob Cave
- API Marty Matheson
 - Louise Scott
- AOPL Ben Cooper
 - Raymond Paul
- INGAA Terry Boss

OPS and NAPSR Representatives

OPS

- Jeff Wiese OPS
- Janice Morgan OPS
- Herb Wilhite Cycla contract
- Phil Schaenman Tridata contract

NAPSR

 Eddie B. Smith, Kentucky Public Service Commission

RP 1162 Task Force Members

*Lori Komatar Williams (replaced John Pepper/Duke)

*Tony Franchina Shell

*Gary Panebianco Niagara Mohawk, a National Grid Co.

*Denise Hamsher Enbridge

Jack Adams Gulf South Pipelines

Richard Allen Explorer Pipeline

Molly Atkins El Paso Pipeline Group

(replacing Susan Waller, Leticia Bailey, Delbert Fore)

Michael Bellman Yankee Gas

Ron Embry Exxon-Mobil

Jerry Engelhardt Kinder Morgan

Kathleen Hearn Keyspan Energy

*Taskforce Co-Leaders

Observers & Resources

OPS

Jeff Wiese and Herb Wilhite (Cycla)

NAPSR

- Eddie B. Smith Kentucky PSC
- Alternate: Mary McDaniel Texas Railroad Commission

API Staff

- Louise Scott, Andrea Johnson, and Susan Waller (contract Energy Outreach)
- Many others who monitored

Objectives of Workshop

- Understand RP 1162
 - Background and drivers
 - Components
 - Examples from other companies
 - Next Steps
- Respond to NTSB recommendations
- Guide industry in complying with Pipeline Safety Improvement Act of 2002

Meeting Guidelines

- Safety moment
- Remember to turn cell phones off and pagers to 'off' or 'vibrate'
- Meeting is web-cast
- Agenda distributed at registration
- Presentations posted on OPS website following meeting
- Questions
 - Use microphones
 - Web-cast viewers
- Lunch on your own
- Request workshop evaluations

Why pay attention to RP 1162

- OPS Commitment To Improve Operators' Public Education Programs
- Pipeline Safety Improvement Act (PSIA) Of 2002
- OPS's Intent To Incorporate RP 1162 Guidance By Reference Into Pipeline Safety Regulations
- Bottom Line Is To Ensure Operators Can Develop Effective Public Awareness Programs In A Deliberate And Business-like Manner.

Why was RP 1162 Developed?

- OPS and industry recognized need for guidelines and importance of raising awareness
- Replaces RP 1123 published in 1990 by API for liquid petroleum pipelines
- Pipeline Safety Improvement Act of 2002 contains public communication provisions
- NTSB recommended public education improvements
- Integrity Management Rules prompt need for supplemental public awareness effort

The Process

- Pipeline Leadership Support:
 - AGA, APGA, AOPL, API and INGAA
 - API publishing organization
- Established taskforce
 - Co-chaired and representatives of each sector
 - OPS and NAPSR Observers
- ANSI consensus standard process
- Determined scope and guiding principles
- Addressed comments in two reviews
 - Preliminary draft
 - Ballot draft

Actively Sought Input

- Posted on API website
- Interested Persons Input
 - Email updates
 - Meeting with key stakeholders
- Presented at numerous conferences
- Conducted 3 focus group surveys of public and emergency officials
- Applied findings from survey of public

Structure of RP

- Sections
 - Introduction, scope, objectives, glossary
 - Quick reference tables
 - Defining audience
 - Messages
 - Delivery Frequency
 - Means of Delivery
 - Baseline and Supplementary Elements
 - Documentation
 - Evaluation
- Appendices are optional more detailed guidance and examples

Public Awareness Program Workshop

Tony Franchina
Shell Pipeline Company

Applicability:

- Hazardous Liquid Pipelines (Intrastate and Interstate)
- Natural Gas Transmission Pipelines (Intrastate and Interstate)
- Local Distribution (LDC) Pipelines
- Gathering Pipelines

Principles:

- Pipeline Operator Public Awareness Responsibility
- Promote stronger, more consistent, and more effective public awareness programs
- Written in language allowing enforcement to a core set of requirements

RP Objectives:

- Provide a framework (management system) for public awareness program development, implementation, and administration.
- Provide recommended baseline program and guidance and considerations for determining supplemental activities
- Provide guidance for program performance evaluation and continuous improvement

Public Awareness Program Objectives:

- 1. Public Awareness of Pipelines
- 2. Prevention and Response

Communication of Relevant Information:

- Pipeline Safety
- Damage Prevention
- Emergency Response Liaison
- Emergency Contacts
- General Pipeline Awareness

Overview of RP1162 Benefits to the Operator:

- Enhanced public safety
- Decreased third party damage
- Improved performance
- Enhanced emergency response coordination
- Improved relationships with affected public
- Less resistance to pipeline activities
- Preservation of ROW from encroachments
- Improved pipeline operator's reputation

Scope:

RP1162 Focuses On:

- Public awareness along <u>existing</u> pipeline routes
- Transmission, local distribution and gathering pipelines
- Framework for integrity management overview communications

Scope:

RP1162 Does Not Focus On:

- Communication of operator specific data
- Public consultation for new pipeline construction
- Data reporting to or operator history with OPS and data availability by OPS
- Communication following incident response

Key Stakeholder Audiences:

- Affected Public
- Emergency Response Officials
- Local Public Officials
- Excavators

Public Awareness Program Process Guide Establish P.A. Program Administration with **Management Support** (Steps 1 - 4)**Evaluate Program** Determine the and Implement Identify the Messages Continuous Stakeholder (Step 6) **Improvement Audiences** (Steps 11 and 12) (Step 5) Establish the **Frequencies** (Step 7) Assess Need for Implement the **Establish Program Program and** Delivery Enhancement (i.e. Track Progress Methods **Supplemental** (Step 8) (Step 10) Activities) (Step 9)

Figure 2-1

Steps 1 – 4

Public Awareness Program Workshop

Gary Panebianco

Niagara Mohawk – A National Grid Company

First step of developing and implementing formal and effective Pipeline Public Awareness Program is defining program objectives.

➤ Give all key stakeholders essential pipeline awareness information.

Stakeholders include:

- Affected public
- Local public officials
- Emergency officials
- Excavators

Pipeline awareness basic information includes:

- Pipelines in the stakeholders' surrounding environment and obtaining more detailed information
- Pipeline's past safe role transporting energy
- Operators prudent measures to prevent accidents
- Operator's plan for management of accidents if they occur
- Stakeholders can play an important role preventing and responding to accidents

- ➤ Educate stakeholders on prevention and response actions to pipeline accidents.
 - Call operators on possible leaks or unauthorized excavations
 - Educating response agencies on operator's emergency response plans
 - Request facility locations before digging
 - One-Call requirements in their area
 - How community land uses may affect pipeline safety
 - Individuals creating encroachments
 - Hazards associated with unintended releases
 - An overview of the operator's prevention and response plan
 - How to contact the operator for additional information or to provide further comments

- Meet compliance requirements:
 - Public Education (49 CFR Parts 192.616 and 195.440)
 - Emergency Responder Liaison Activities (49 CFR Parts 192.615 and 195.402)
 - Damage Prevention (49 CFR Parts 192.614 and 195.442)
 - Pipeline Safety Improvement Act of 2002

Step 2: Obtaining Management Commitment and Support:

For a public awareness program to effectively achieve its stated objectives, management must be committed and continually supportive.

The public awareness program should include:

- 1. A written statement (preferably from senior management) demonstrating commitment to achieving effective public awareness included in the plans or procedures.
- 2. Leadership and participation by management
 - Making public awareness program as important as other safety programs.
 - Demonstrating the organization's desire to succeed.

- 3. Commitment by management to provide resources and funding.
 - Program resources to achieve all of the stated objectives will likely be incremental to most operators already affected by CFR Parts 192 and 195.
 - Consideration by management that most companies are doing more with less people and funding.
 - Funding requirements will be commensurate to program objectives and scope as applied to the operators facilities.

Step 3 – Identify Program Administration:

- ➤ The written pipeline public awareness program should include:
 - The names and titles of the individuals responsible to develop, implement and periodically evaluate the program
 - The senior level of management with ultimate responsibility for the program's development and implementation
- ➤ The roles and responsibilities of each individual should be recorded against their name or job title.

While the complete written awareness program will likely be too extensive to include in the operator's O&MP Manual, it should include at a minimum:

- The statement of management commitment (Step #2)
- Roles and responsibilities (by group or title)
- The documented requirement for a written program and evaluation process
- Program summary

Public Awareness Program Administration

Step 4 – Identify Pipeline Assets within the Program:

- An operator may choose to segment their program in several ways:
 - One program for all assets (typical for small companies or LDCs)
 - One program for like assets (e.g., transmission, distribution)
 - One program per geographical area
 - One program per pipeline system
 - One program per pipeline segment
- > Each program should have an administrator(s):
 - The administrators can be the same for multiple programs

Public Awareness Program Administration

- ➤ Each individual program's administrator should be documented as specified in Step #3.
 - Names and titles of responsible individuals
 - Senior management ultimately responsible
 - Roles and responsibilities of each
- ➤ Document each program administrator in the O&MP manual.

Identify the Stakeholder Audiences

Step 5

Public Awareness Program Workshop

Lori Komatar

Williams

IDENTIFYING THE STAKEHOLDER AUDIENCES

- AFFECTED PUBLIC
- EMERGENCY OFFICIALS
- LOCAL PUBLIC OFFICIALS
- EXCAVATORS

AFFECTED PUBLIC

- Residents who live on or adjacent to ROW
 - Tenants/Occupants
 - Landowners (who occupy the site)
 - Farmers
 - Homeowners/Neighborhood associations
 - Businesses/Industrial Facilities
 - LDC Customers and non-customers

EMERGENCY OFFICIALS

- Fire Departments
- Police/Sheriff Departments
- Local Emergency Planning Comm (LEPC)
- County/State Emergency Mgt Agencies
- Other Emergency Response organizations
- Other Public Safety organizations

LOCAL PUBLIC OFFICIALS

- Planning/Zoning Boards
- Licensing/Permitting Departments
- Building/Code Departments
- City/County Managers
- Mayors and other Elected Officials
- Public Utility Boards
- Local "governing councils"

EXCAVATORS/LAND DEVELOPERS/ONE-CALL CENTERS

- Public Agencies and Private Companies who are involved in any form of earthen excavation and one-call centers responsible for locate notifications
 - Contractors/Construction companies
 - Public Works officials
 - Road maintenance departments
 - Timber/Landscape companies
 - Fence companies/Drain Tilers/Wells

EXCAVATORS/LAND DEVELOPERS/ONE-CALL CENTERS

- Fence companies/Drain Tilers/Wells
- Major homebuilders/land developers
- Regional one-call centers

WHAT YOU NEED TO DO?

- Establish methods to identify audiences
- Establish list for each audience type
- Establish program coverage area
- Document methods used and output

Stakeholders Case Study

Techniques in identifying & effectively reaching the four primary audiences

Panel Members

- Jerry Engelhardt, KinderMorgan
 - Reaching audiences with direct mail
- Mike Bellman, Yankee Gas
 - Stakeholder Audience Identification
- Bev Chipman, Williams
 - Reaching city/county planners & county supervisors / commissioners

Reaching audiences with direct mail

Jerry Engelhardt

Kinder Morgan

Direct Mail as One Technique

- Efficient and cost effective method to communicate appropriate messages to large number of recipients along pipeline right-of-way
- Conserves internal resources
- Ready supply of competent vendors
- Technology already good and continuing to improve

Define Recipients

- Residents in buffer zone
- Businesses in buffer zone
- Excavators doing business in county
- Elected officials in cities intersecting buffer zone and county/area officials

Define Recipients

- Emergency responders having the potential to respond to an event on your pipeline
- Schools/churches near the PL route

How to ID Recipients

- Residents in buffer zone
 - GIS map of PL married to population data base
 - Address data base
 - May want to purchase telephone numbers for use in emergencies or local testing
- Businesses in buffer zone
 - PL GIS married to business location data base

How to ID Recipients

- Excavators
 - SIC Codes selected for "digging"
 - Construction, heavy equipment operators, public works, well boring, etc.
 - County wide coverage to communicate with entities that may dig near the PL

How to ID Recipients

- Elected officials
 - SIC codes
- Emergency responders
 - SIC codes
 - May need to verify with local info
- Schools/churches
 - SIC codes

Design Brochure(s)

- Define messages for effective communication and compliance
- Begin with one brochure --- improve by tweaking brochure for each audience
- Attract the recipient to read the brochure

Design Brochure (continued)

- Consider design vendor to maximize reader interest
- Size brochure to qualify for minimum postal rate
- Design for automated addressing from recipient computer data base

Brochure Content

- Pipeline purpose and reliability
- How to identify a pipeline route
- Damage prevention/One Call
- Leak recognition and response
- Pipeline location- "artistic" map
- How to get additional information
 - PL operator
 - NPMS

Execution

- Identify at least five key players
 - Overall coordinator of mailer campaign
 - Mapping provider
 - Brochure(s) designer
 - Printer
 - Mailing vendor
- Could be combined into one "turn key" provider
- Use competitive bidding for cost efficiency

Verification

- Verification of direct mail distribution
 - Certification statement
 - Zip code summary
 - Where sent and how many
 - Listing of SIC Codes and counties
 - Form 3602 receipts
- Secure mailing receipts from mail vendor

Continuous Improvement

- Evaluate campaign periodically for:
 - Effectiveness in communicating
 - New/improving technologies to lower cost or improve effectiveness
 - Supplemental or improved messages for specific areas
 - Links to other communications programs

Public Awareness Program Workshop

Mike Bellman Yankee Gas

- Yankee Gas Services Company
 - One of three Local Distribution Companies (LDC) serving Connecticut
 - Medium size LDC part of a combination electric/gas utility (Northeast Utilities)
 - 191,000 natural gas customers
 - 71 cities and towns served
- CT town structure vs. county administration



- Inventoried current communications
- Reviewed:
 - Web site
 - Print materials Corporate Communications
 - Video materials
 - Operations notices
 - Fire Department training
 - Blasting precautions
 - Buried fuel lines
 - 4th grade school safety program



- Categorized existing messages according to stakeholder audience
- Compared to Pipeline Safety Improvement Act (PSIA) and RP 1162 recommendations
 - Did we reach each audience category? (Section 3)
 - Did we reach appropriate members of the audience category? (Section 3)
 - Gap Analysis



Stakeholder Audience Identification The "Gaps": School Districts

- PSIA mentions coverage of "School Districts".
 What constitutes a school district?
 - We reach elementary school principals to offer natural gas safety training to 4th graders
 - We maintain lists of local School Superintendents in our emergency plans
 - But no outreach or communication to:
 - Middle and High Schools
 - Private Schools
 - Vocational / Technical Schools
 - Colleges



Stakeholder Audience Identification The "Gaps": School Districts

- Connecticut State Department of Education Website
 - Connecticut Education Directory http://www.csde.state.ct.us/public/der/ directory/index.htm
 - Lists public and private schools
 - Lists School Superintendents and Principals by town
 - Includes title, name, address, telephone, fax number



Stakeholder Audience Identification The "Gaps": School Districts

- National Association of Independent Schools
 - Website includes a search function
 - -http://www.nais.org/



Stakeholder Audience Identification The "Gaps": Public Officials

- Good identification in our Emergency Plans, updated at least annually
 - Town Managers, Mayors, Public Works officials
 - Information found on Town Web sites or through phone contact
 - Ongoing relationship and contact with permitting officials
- But, past communications not formalized, documented or consistent



Stakeholder Audience Identification The "Gaps": Emergency Officials

- Long-term relationships with Fire Chiefs and Fire Marshals
- But, no formal contact or documented communications with:
 - State Office of Emergency Management
 - Local Police (other than security issues arising from 9/11)
 - State Police



- Summary
 - Inventory your current communications
 - Involve the entire organization
 - Communications
 - Operations
 - Marketing
 - Check with other gas companies individually or through industry groups (American Gas Association, Northeast Gas Association)
 - Identify your "Gaps"
 - Develop a strategy to fill those "Gaps"



Williams Northwest Case Study: Targeting County Planners & County Commissioners

Bev Chipman

Williams

Why County Planners?

New Development

- Infill and growth closing in on existing rights-of-way
- Difficult to reach developers early

Promote Partnership

- Create awareness of local operations
- Avoid potential problems and public debate
- Document concerns early

Process for Reaching Planners

- Identify county planning boards
 - Time intensive start up
 - Requires annual updates
- Mass mailing to planner list
 - Introductory letter and then frequency as per RP 1162
- Developer handbook/brochure
- Local district operations assume responsibility on-going and annual communication

Documentation

- Mailing, letters, etc.
- Attendance at planning meetings (as appropriate)
- Annual reporting from district documenting activities

Reaching County Commissioners

- Goal
 - Awareness of local operations
 - Facilities, operations, safety, local taxes
 - Promote value of service (Wirthlin study)
 - Strengthen local relationships

Process for Reaching County Commissioners

- Identify county commissioners
 - Time intensive start up Internet & phone
 - Requires annual updates
- Send initial introductory letter and ongoing letters as new members join commission
- Prepare folders on local officials, assets, property taxes, payroll, employees and distribute to districts, governmental affairs, etc. for background

Documentation

- Mailing, letters, etc.
- Attendance at planning meetings (as appropriate)
- Annual reporting from district documenting activities

Conclusions

- Staffing required to develop program, maintain and document
- Must have local district/operations support and involvement
 - Time
 - Resources
- Effective <u>IF</u> maintained and incorporated into operations