

**PUBLIC AWARENESS PROGRAM EFFECTIVENESS INSPECTION
SPECIFIC INFORMATION**

Control Information

Inspection Start Date*:	March 12, 2012	
Inspection End Date*:	March 14, 2012	
OpID:	31232	
Parent Operator Name:	Avista Corp.	
Unit ID (s):	None	
State/Other ID:	WA	
Activity Record ID No.		
Address of Company Official*: 1411 E. Mission, P.O. Box 3727 Spokane, WA 99202-3727	Company Official*:	Jason Thackston
	Title*:	Vice President, Energy Delivery
	Phone Number*:	(509) 495-8550
	Fax Number:	
	Email Address*:	jason.thackston@avistacorp.com
Web Site:	www.avistautilities.com	
Total Mileage (from page 3)*:	3412.00 miles total in WA 1957.65 miles total in ID <u>2285.50 miles total in OR</u> 7655.15 miles total includes transmission & distribution	
Total Mileage in HCA:	0.00 (Zero) in WA 0.00 (zero) in ID <u>0.08 miles in OR</u> 0.08 miles total	
Number of Services (For Distribution):	145,396 total in WA 71,459 total in ID <u>99,898 total in OR</u> 316,753 total services for Distribution	
Alternate MAOP (80% Rule):	None	
No. of Special Permits:	None	

Initial Date of Public Awareness Program*:	June 20, 2006
Title of Current PAP*:	Public Awareness Program RP-1162
Current PAP Version*:	Revision 5, 01.02.12
Current PAP Date*:	January 2, 2012

Post Inspection Information	
Date Submitted for Approval:	3/26/2012
Director Approval:	JS
Approval Date:	3/27/2012

* Required field

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

Persons Interviewed*	Title/Organization*	Phone Number	Email Address
Sandy Bayley/	Public Safety mgr Avista	509.495.4811	sandy.bayley@avistacorp.com
Terry Bushnell	Dir HR	509.495.4540	terry.bushnell@avistacorp.com
Randy Bareither	Pipeline Safety Eng	509.495.8716	randy.bareither@avistacorp.com
Tom Jannings	Safety Specialist	509.495.4368	tom.jannings@avistacorp.com
Collette Bottinelli	Avista Marketing	509.495.2793	collette.bottinelli@avistacorp.com

To add rows, press TAB with cursor in last cell.

External Support Entity Name*	Part of Plan and/or Evaluation*	Phone Number	Email Address
J D Power & Assoc.	Communications Eval.	805.418.8000	None provided
Paradigm	Liaison w/1 st Responder	316.928.4749	None provided
Celeritas	Liaison w/1 st Responder	913.491.9000	None provided
The Pipeline Group	Liaison w/1 st Responder	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	1 st Responder & Excavator Outside Training Provider	509.921.1462	None provided
CSI	Effectiveness Eval.	712.246.1630	None provided
Cathy Duer: Hanna & Associates	Advertising Agency/TV, Radio, Newsprint	208.667.2428	None provided

To add rows, press TAB with cursor in last cell.

Inspector Representative(s)*	PHMSA/State*	Region/State*	Email Address	Lead*
Stephanie Zuehlke	State	Western/WA	Szuehlke@utc.wa.gov	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N
Ellis Hire	State	Western/ID	Ellis.hire@puc.idaho.gov	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N
John Ivey	State	Western/OR	John.ivey@state.or.us	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N
				<input type="checkbox"/> Y <input type="checkbox"/> N
				<input type="checkbox"/> Y <input type="checkbox"/> N

To add rows, press TAB with cursor in last cell.

*** Required field**

Mileage Covered by Public Awareness Program (by Company and State)

Based on the **most recently submitted annual report**, list each company and subsidiary separately, broken down by state (using 2-letter designation). Also list any new lines in operation that are not included on the most recent annual report. If a company has intrastate and/or interstate mileage in several states, use one row per state. If there are both gas and liquid lines, use the appropriate table for intrastate and/or interstate.

Jurisdictional to Part 192 (Gas) Mileage (Interstate)

Company Name (Gas Operator)	Operator ID	Product Type*	State*	Interstate Gathering Mileage*	Interstate Transmission Mileage	Interstate Distribution Mileage [^] *	Remarks (new or in HCA)
None							

(To add rows, press TAB with cursor in last cell.)

Jurisdictional to Part 192 (Gas) Mileage (Intrastate)

Company Name (Gas Operator)	Operator ID	Product Type*	State*	Intrastate Gathering Mileage*	Intrastate Transmission Mileage*	Intrastate Distribution Mileage [^] *	Remarks (new or in HCA)
Avista Corp	31232	Nat Gas	WA	None	72.67	3,339.33	0
Avista Corp	31232	Nat Gas	ID	None	0.00	1,957.65	0
Avista Corp	31232	Nat Gas	OR	None	38.69	2,246.73	0.08

(To add rows, press TAB with cursor in last cell.)

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

Company Name (Liquid Operator)	Operator ID	Product Type*	State*	Interstate Transmission Mileage*	Remarks (new or in HCA~)
None					

(To add rows, press TAB with cursor in last cell.)

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

Company Name (Liquid Operator)	Operator ID	Product Type*	State*	Intrastate Transmission Mileage*	Remarks (new or in HCA~)
None					

(To add rows, press TAB with cursor in last cell.)

Total Mileage:	Transmission: 111.36 mi. Distribution 7543.71 mi. Total 7655.15
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- Supply company name and Operator ID, if not the master operator from the first page (i.e., for subsidiary companies).
 - Use OPS-assigned Operator ID. Where not applicable, leave blank or enter N/A
 - Use only 2-letter State codes, e.g., TX for Texas.
 - Enter number of applicable miles in applicable columns. (Only positive values. No need to enter 0 or N/A.)
- [^] Please do not include Service Line footage. This should only be MAINS.
 * Required Field
 ~ Use Total HCA as reported on annual reports.

Please provide a comment or explanation for each inspection question.

1. Administration and Development of Public Awareness Program

1.01 Written Public Education Program

Does the operator have a written continuing public education program or public awareness program (PAP) in accordance with the general program recommendations in the American Petroleum Institute's (API) Recommended Practice (RP) 1162 (incorporated by reference), by the required date, except for master meter or petroleum gas system operators?

(Reference: § 192.616 (h); § 195.440 (h))

- Verify the operator has a written public awareness program (PAP). Okay
- 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.
Headquarters Avista, Safety Department Page 3 and page 4 of Plan.
- Verify the date the public awareness program was initially developed and published.

<input type="checkbox"/> S – Satisfactory (explain)*	Comments: Clearinghouse submitted on 09.08.06 Dir. Of HR. Terry Bushnell, Sandy Bayley (Substance Abuse Coord.) administers on Half-time Basis (see page 3.Tom manages field. Tom Jannings has field oversight. Clearinghouse written 06.20.06 – verified original plan. Avista failed to correct Clearinghouse deficiencies.
<input checked="" type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

1.02 Management Support

Does the operator's program include a statement of management support (i.e., is there evidence of a commitment of participation, resources, and allocation of funding)?

(Reference: § 192.616 (a); § 195.440 (a); API RP 1162 Section 2.5 and 7.1)

- Verify the PAP includes a written statement of management support.
- Determine how management participates in the PAP.
- Verify that an individual is named and identified to administer the program with roles and responsibilities.
- Verify resources provided to implement public awareness are in the PAP. Determine how many employees involved with the PAP and what their roles are. Sandy utilizes internal resources such as advertising to communicate messages.
- Determine if the operator uses external support resources for any implementation or evaluation efforts. They are identified on Page 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 location.

<input type="checkbox"/> S – Satisfactory (explain)*	Comments: Letter by Dennis Vermillion verified signature of President of Avista Utilities (Page 1 of Plan).
<input checked="" type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	

<input type="checkbox"/> N/C – Not Checked (explain)*	Page 3 & Page 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 mgmt. participation in the development and implementation of the PAP, and oversight of external support resources regarding implementation and evaluation efforts of PAP.
Check exactly one box above. * Required field	

1.03 Unique Attributes and Characteristics

Does the operator’s program clearly define the specific pipeline assets or systems covered in the program and assess the unique attributes and characteristics of the pipeline and facilities?

(Reference: § 192.616 (b); § 195.440 (b); API RP 1162 Section 2.7 and Section 4)

- Verify the PAP includes all of the operator’s system types/assets covered by PAP (gas, liquid, HVL, storage fields, gathering lines etc).
- Identify where in the PAP the unique attributes and characteristics of the pipeline and facilities are included (i.e. gas, liquids, compressor station, valves, breakout tanks, odorizer).

<input type="checkbox"/> S – Satisfactory (explain)*	Comments: Avista’s specific pipeline assets - mileages/services under state jurisdiction contain no detail regarding the unique attributes and characteristics. (See Section 2, page 3 of their plan.)
<input checked="" type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

1.04 Stakeholder Audience Identification

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

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

- Identify how the operator determines stakeholder notification areas and distance on either side of the pipeline.
- Determine the process and/or data source used to identify each stakeholder audience. Review to see whether this is to be completed on an annual basis. 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.
- 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. Colville requested location.
 - 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. Sic Codes are not a way to effectively determine affected public. 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. ID staff reviewed emergency officials in Sandpoint, ID. OR 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 is a local company that identifies 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 ID’d by 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. For Public Officials Sandy went to Walt’s and they went to a different broker to identify a more accurate list.

Public officials: For Public Officials Sandy went to Walt’s and they went to a different broker to identify a more accurate list.

Excavators: Walt’s also provides excavators list from a list broker. Ungrd/ovhd facility locations then ask Walt’s to provide a list of excavators by zip code. No verification of accuracy of list.

<input type="checkbox"/> S – Satisfactory (explain)*	Comments: 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. 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. Avista utilizes Sic Codes to determine affected public. Sic Codes are not a way to effectively determine affected public. Avista failed to provide comprehensive records/methods to determine each stakeholder audience.
<input checked="" type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

1.05 Message Frequency and Message Delivery

Does the operator’s program define the combination of messages, delivery methods, and delivery frequencies to comprehensively reach all affected stakeholder audiences in all areas in which the operator transports gas, hazardous liquid, or carbon dioxide?

(Reference: § 192.616 (c); § 195.440 (c); API RP 1162 Sections 3-5)

- Identify where in the operator’s PAP the combination of messages, delivery methods, and delivery frequencies are included for the following stakeholders:

Affected public Transmission – will see this AM * TV, newsprint, radio – Collette Bottinelli internal marketing and communications Dept. Mktg Communications Mgr. w/Rep. from Hanna & Assoc. Agency (outside marketing agency). Supplemental messages and activities has not been addressed – need to address annually whether needed or not . ATransmission: Disconnect btwn 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, WA, 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.

Emergency officials: They send out incident training CD to all – Review list this afternoon. Reviewed 2011 Paradigme. Completed annually. Supplemental messages and activities have not been addressed – need to address annually whether needed or not.

Public 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.

<input type="checkbox"/> S – Satisfactory (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 content described Section 6, page 10-18. Locations such as La Grande, OR, Goldendale, WA, 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.
<input checked="" type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

1.06 Written Evaluation Plan

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

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

- Verify the operator has a written evaluation plan that specifies how the operator will conduct and evaluate self-assessments (annual audits) and effectiveness evaluations.
- Verify the operator’s evaluation process specifies the correct frequency for annual audits (1 year) and effectiveness evaluations (no more than 4 years apart).

- Identify how the operator determined a statistical sample size and margin-of-error for stakeholder audiences' surveys and feedback.

<input type="checkbox"/> S – Satisfactory (explain)*	Comments: <ol style="list-style-type: none"> Plan language mimics API RP 1162. Avista failed to follow Section 8 Program Eval.- Annual Audits. Avista does not complete all 3 evaluation methods as they have stated with regard to their program language, approach, technique, and frequencies. Avista's written program evaluation plan is ineffective.
<input checked="" type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

2. Program Implementation

2.01 English and other Languages

Did the operator develop and deliver materials and messages in English and in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?

(Reference: § 192.616 (g); § 195.440 (g); API RP 1162 Section 2.3.1)

- Determine if the operator delivers material in languages other than English and if so, what languages. Spanish and Russian. They also have an interpreter on staff.
- Identify the process the operator used to determine the need for additional languages for each stakeholder audience. – based upon most recent US census information > 10%.
- Identify the source of information the operator used to determine the need for additional languages and the date the information was collected. Last completed in 2010 with frequency of @ 2yrs. – this has not been detailed in the plan.

<input type="checkbox"/> S – Satisfactory (explain)*	Comments: Avista's plan fails to identify the frequency by which they identify the need of alternate language review.
<input checked="" type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

2.02 Message Type and Content

Did the messages the operator delivered specifically include provisions to educate the public, emergency officials, local public officials, and excavators on the:

- Use of a one-call notification system prior to excavation and other damage prevention activities;
- Possible hazards associated with unintended releases from a gas, hazardous liquid, or carbon dioxide pipeline facility;
- Physical indications of a possible release;
- Steps to be taken for public safety in the event of a gas, hazardous liquid, or carbon dioxide pipeline release; and
- Procedures to report such an event (to the operator)?

(Reference: § 192.616 (d); (f); § 195.440 (d), (f))

- Verify all required information was delivered to each of the primary stakeholder audiences.
- Verify the phone number listed on message content is functional and clearly identifies the operator to the caller.

- Affected public
- Emergency officials Does not include one-call notification under their Emergency Officials Messaging in their Plan.
- Public officials
- Excavators

<input type="checkbox"/> S – Satisfactory (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.
<input checked="" type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

2.03 Messages on Pipeline Facility Locations

Did the operator develop and deliver messages to advise affected municipalities, school districts, businesses, and residents of pipeline facility location?

(Reference: § 192.616 (e), (f); § 195.440 (e), (f))

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

<input type="checkbox"/> S – Satisfactory (explain)*	Comments: Avista’s Plan fails to cover any facility location information both developed and delivered to all affected municipalities and school districts.
<input checked="" type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

2.04 Baseline Message Delivery Frequency

Did the operator’s delivery for materials and messages meet or exceed the baseline frequencies specified in API RP 1162, Table 2-1 through Table 2.3? If not, did the operator provide justification in its program or procedural manual?

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

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

- Affected public
- Emergency officials
- Public officials
- Excavators

<input type="checkbox"/> S – Satisfactory (explain)*	Comments: Avista failed to provide evidence of what was provided in each and every message they sent and when.
<input checked="" type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

2.05 Considerations for Supplemental Program Enhancements

Did the operator consider, along all of its pipeline systems, relevant factors to determine the need for supplemental program enhancements as described in API RP 1162 for each stakeholder audience?

(Reference: § 192.616 (c); § 195.440 (c); API RP 1162 Section 6.2)

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

- Affected public
- Emergency officials
- Public officials
- Excavators

<input type="checkbox"/> S – Satisfactory (explain)*	Comments: Avista considered relevant factors for supplemental enhancements but failed to effectively address them. See 1.05 above. Supplemental enhancements are included in the plan but no records evidencing they were provided to all stakeholder audiences.
<input checked="" type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

2.06 Maintaining Liaison with Emergency Response Officials

Did the operator establish and maintain liaison with appropriate fire, police, and other public officials to: learn the responsibility and resources of each government organization that may respond, acquaint the officials with the operator’s ability in responding to a pipeline emergency, identify the types of pipeline emergencies of which the operator notifies the officials, and plan how the operator and other officials can engage in mutual assistance to minimize hazards to life or property?

(Reference: § 192.616 (c); § 195.440 (c); API RP 1162 Section 4.4)

- Examine the documentation to determine how the operator maintains a relationship with appropriate emergency officials. Public Safety Coordinator maintains the company relationship. 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 id’d that they area coordinators have comprehensive data. I identified that Randy had arranged with UTC to have this PA represent the PA for all 2012 std. inspections. The plan show reporting is required quarterly but they don’t have records.

- Verify the operator has made its emergency response plan available, as appropriate and necessary, to emergency response officials. No documentation of training other than copy of DVD 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 gas eng dept.
- 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. No records showing this detail.
- Identify how the operator determined the affected emergency response organizations have adequate and proper resources to respond. Avista identified no follow-up for no-shows and therefore, no way to determine their preparedness – they don’t track this.
- Identify how the operator ensures that information was communicated to emergency responders that did not attend training/information sessions by the operator. They don’t track this.

<input type="checkbox"/> S – Satisfactory (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 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.
<input checked="" type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

3. Program Evaluation & Continuous Improvement (Annual Audits)

3.01 Measuring Program Implementation

Has the operator performed an audit or review of its program implementation annually since it was developed? If not, did the operator provide justification in its program or procedural manual?

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

- Verify the operator performed an annual audit or review of the PAP for each implementation year. No complete self-audit was completed in 2010 and 2009. They were utilizing mini-regulatory audits only. The P/A inspection completed by regulatory agency was not a comprehensive P/A – only mini’s – so not acceptable to use the regulatory inspections identified for years - Avista Program page 17 language needs to be corrected to read that one of the methodologies is to be utilized rather than all three.

<input type="checkbox"/> S – Satisfactory (explain)*	Comments:
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<input checked="" type="checkbox"/> U - Unsatisfactory (explain)*	No complete self-audit was completed in 2010 and 2009. They were utilizing mini-regulatory audits only. The P/A inspection completed by regulatory agency was not a comprehensive P/A. Avista failed to complete all methodologies identified in their plan in accordance with the identified frequencies.
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

3.02 Acceptable Methods for Program Implementation Audits

Did the operator use one or more of the three acceptable methods (i.e., internal assessment, 3rd-party contractor review, or regulatory inspections) to complete the annual audit or review of its program implementation? If not, did the operator provide valid justification for not using one of these methods?

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

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

<input type="checkbox"/> S – Satisfactory (explain)*	Comments: Avista failed to complete annual self-audits. A self-audit was performed in January 2012 but all corrections have 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. Remediation timeframes have not been addressed in the plan.
<input checked="" type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

3.03 Program Changes and Improvements

Did the operator make changes to improve the program and/or the implementation process based on the results and findings of the annual audit? If not, did the operator provide justification in its program or procedural manual?

(Reference: § 192.616 (c); § 195.440 (c); API RP 1162 Section 8.3)

- Determine if the operator assessed the results of its annual PAP audit/review then developed and implemented changes in its program, as a result.
- If not, determine if the operator documented the results of its assessment and provided justification as to why no changes were needed.

<input type="checkbox"/> S – Satisfactory (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 have 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. Remediation timeframes have not been addressed in the plan.
<input checked="" type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

4. Program Evaluation & Continuous Improvement (Effectiveness)

4.01 Evaluating Program Effectiveness

Did the operator perform an effectiveness evaluation of its program (or no more than 4 years following the effective date of program implementation) to assess its program effectiveness in all areas along all systems covered by its program? If not, did the operator provide justification in its program or procedural manual?

(Reference: § 192.616 (c); § 195.440 (c); API RP 1162 Section 8.4)

- Verify the operator conducted an effectiveness evaluation of its program (or no more than 4 years following the effective date of program implementation). Completed.
- Document when the effectiveness evaluation was completed. January 5, 2009.
- 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). No evaluation of pipeline segment or environment – all same.
- Identify how the operator determined the sample sizes for audiences in performing its effectiveness evaluation. Sample size determined by 3rd party who stated in the study that the sample size provided met certain requirements. Ellis requested a copy of the contract to show what Avista requested.

<input type="checkbox"/> S – Satisfactory (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 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).
<input checked="" type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

4.02 Measure Program Outreach

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

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

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

- Affected public
- Emergency officials
- Public officials
- Excavators

<input type="checkbox"/> S – Satisfactory (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).
<input checked="" type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

4.03 Measure Percentage Stakeholders Reached

Did the operator determine the percentage of the individual or entities actually reached within the target audience within all areas along all systems covered by its program? If not, did the operator provide justification in its program or procedural manual?

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

- Document how the operator determined the statistical sample size and margin-of-error for each of the four intended stakeholder audiences.
- Document how the operator estimated the percentage of individuals or entities actually reached within each intended stakeholder audience group.

- Affected public
- Emergency officials
- Public officials
- Excavators

<input type="checkbox"/> S – Satisfactory (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).
<input checked="" type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

4.04 Measure Understandability of Message Content

In evaluating effectiveness, did the operator assess the percentage of the intended stakeholder audiences that understood and retained the key information in the messages received, within all areas along all assets and systems covered by its program? If not, did the operator provide justification in its program or procedural manual?

(Reference: § 192.616 (c); § 195.440 (c); API RP 1162 Section 8.4.2)

- Examine the operator’s evaluation results and data to assess the percentage of the intended stakeholder audience that understood and retained the key information in each PAP message.
- Verify the operator assessed the percentage of the intended stakeholder audience that (1) understood and (2) retained the key information in each PAP message.
- Determine if the operator pre-tests materials.

- Affected public
- Emergency officials
- Public officials
- Excavators

<input type="checkbox"/> S – Satisfactory (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).
<input checked="" type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

4.05 Measure Desired Stakeholder Behavior

In evaluating its public awareness program effectiveness, did the operator attempt to determine whether appropriate preventive behaviors have been understood and are taking place when needed, and whether appropriate response and mitigative behaviors would occur and/or have occurred? If not, did the operator provide justification in its program or procedural manual?

(Reference: § 192.616 (c); § 195.440 (c); API RP 1162 Section 8.4.3)

- Examine the operator’s evaluation results and data to determine if the stakeholders have demonstrated the intended learned behaviors.
- Verify the operator determined whether appropriate prevention behaviors have been understood by the stakeholder audiences and if those behaviors are taking place or will take place when needed.

- Affected public
- Emergency officials
- Public officials
- Excavators

<input type="checkbox"/> S – Satisfactory (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).
<input checked="" type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

4.06 Measure Bottom-Line Results

In evaluating its public awareness program effectiveness, did the operator attempt to measure bottom-line results of its program by tracking third-party incidents and consequences including: (1) near misses, (2) excavation damages resulting in pipeline failures, (3) excavation damages that do not result in pipeline failures? Did the operator consider other bottom-line measures, such as the affected public's perception of the safety of the operator's pipelines? If not, did the operator provide justification in its program or procedural manual?

(Reference: § 192.616 (c); § 195.440 (c); API RP 1162 Section 8.4.4)

- Examine the operator’s process for measuring bottom-line results of its program. **No documentation tracking near misses.**
- Verify the operator measured bottom-line results by tracking third-party incidents and consequences. **Avista identified they focus on locates only. No excavation damages that do not result in pipeline failures.**

- 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. **Not done and not reviewed.**

<input type="checkbox"/> S – Satisfactory (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).
<input checked="" type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

4.07 Program Changes

Did the operator identify and document needed changes and/or modifications to its public awareness program(s) based on the results and findings of its program effectiveness evaluation? If not, did the operator provide justification in its program or procedural manual?

(Reference: § 192.616 (c); § 195.440 (c); API RP 1162 Section 2.7 Step 12 and 8.5)

- Examine the operator’s program effectiveness evaluation findings.
- Identify if the operator has a plan or procedure that outlines what changes were made.
- Verify the operator identified and/or implemented improvements based on assessments and findings.

<input type="checkbox"/> S – Satisfactory (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).
<input checked="" type="checkbox"/> U - Unsatisfactory (explain)*	
<input type="checkbox"/> N/A - Not Applicable (explain)*	
<input type="checkbox"/> N/C – Not Checked (explain)*	
Check exactly one box above. * Required field	

5. Inspection Summary & Findings

5.01 Summary

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5.02 Findings

<p>Annual advertising Review for 2011 in the market place. 811 conveyance: TV (15 sec.), Radio (April-August (3 different spots), Print (B/W newspaper) and on-line Media Vender Sites (April print ad & online in May and August – call before dig & gas get out in Oct.)</p>
