PUBLIC AWARENESS PROGRAM EFFECTIVENESS INSPECTION SPECIFIC INFORMATION

Control Information

Inspection Start Date*:	March 28, 2017
Inspection End Date*:	March 29, 2017
OpID:	31232
Parent Operator Name:	Avista Corp
Unit ID (s):	
State/Other ID:	WA
Activity Record ID No.	

Address of Company Official*: 1411 E Mission Ave P.O. Box 3727 Spokane WA 99202-3727	**Company Official***:	Heather Rosentrater
	Title*:	Vice President, Energy Delivery
	Phone Number*:	(509) 495-4430
	Fax Number:	
	Email Address*:	heather.rosentrater@avistacorp.com

Web Site:	www.Avistautilities.com
Total Mileage (from page 3)*:	WA = 3412 ID = 1958 OR = 2285 Total = **7655 Miles**
Total Mileage in HCA:	WA = 0 ID = 0 OR = 0.08 Total = **0.08 Miles**
Number of Services (For Distribution):	WA = 154,812 ID = 80,875 OR = 109,314 Total = **345,001 Services**
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 10**
Current PAP Date*:	**June 30, 2015**

Post Inspection Information	
Date Submitted for Approval:	
Director Approval:	
Approval Date:	

* Required field

Persons Interviewed*	Title/Organization*	Phone Number	Email Address
Randy Bareither, PE	Pipeline Safety Engineer	(509) 495-8716	Randy.bareither@avistacorp.com
Dawn Donahoo	Safety Specialist/ PA Program Lead	(509) 495-2646	Dawn.donahoo@avistacorp.com
Tony Klutz	Safety Manager	(509) 495-2648	Anthony.klutz@avistacorp.com
Seth Fiest	Safety Specialist	(509) 495-4599	Seth.fiest@avistacorp.com
Eric Rosentrater	Safety Training & Labor Manager	(509) 495-4106	Eric.rosentrater@avistacorp.com
Grant Forsythe	Senior Forecaster & Economist	(509) 495-2765	Grant.forsythe@avistacorp.com
Karen Cash	Compliance Manager	(509) 495-2856	Karen.cash@avistacorp.com
Linda Burger	Underground Damage Prevention Administrator	(509) 495-4423	Linda.burger@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
JD Power & Associates	Communications Evaluation	(805) 418-8000	
Paradigm	Liaison w/first responder	(316) 928-4749	
Celeritas	Liaison w/first responder	(913) 491-9000	
The Pipeline Group	Liaison w/first responder	(432) 685-1731	
Walt's Mailing	Mailing & Address Service	(509) 924-5939	
Market Decisions Corp	Voice of Customer & Online Evaluations	(800) 344-8725	

DNL Enterprises	First Responder & Excavator Outside Training Provider	(509) 921-1462	
CSI	Effectiveness Evaluation	(712) 246-1630	
Cathy Duer: Hanna & Associates	Advertising, Agency/ TV, Radio, Newsprint	(208) 667-2428	

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

Inspector Representative(s)*	PHMSA/State*	Region/State*	Email Address	Lead*
John Ivey	State	Western/ OR		☒ Y ☐ N
David Hoy	State	Western/ OR		☒ Y ☐ N
Darrin Ulmer	State	Western/ ID		☐ Y ☒ N
Anthony Dorrough	State	Western/ WA		☐ Y ☒ N
				☐ Y ☐ 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 <u>one row per state</u>. 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**	**3393.33**	**0**
Avista Corp	**31232**	**Nat Gas**	**ID**	**None**	**0.00**	**1957.65**	**0**
Avista Corp	**31232**	**Nat Gas**	**OR**	**None**	**38.69**	**2246.73**	**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** **Distribution = 7543.71** **Total = 7655.15 miles**

1. Supply company name and Operator ID, if not the master operator from the first page (i.e., for subsidiary companies).
2. Use OPS-assigned Operator ID. Where not applicable, leave blank or enter N/A

3. Use only 2-letter State codes, e.g., TX for Texas.
4. 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).
- Review any Clearinghouse deficiencies and verify the operator addressed previous Clearinghouse deficiencies, if any, addressed in the operator's PAP.
- Identify the location where the operator's PAP is administered and which company personnel is designated to administer and manage the written program.
- Verify the date the public awareness program was initially developed and published.

☒ S – Satisfactory (explain)*	Comments:
☐ U - Unsatisfactory (explain)*	Bullet #2: *Reviewed
☐ N/A - Not Applicable (explain)*	Bullet #3: Page 7 PAP,
☐ N/C – Not Checked (explain)*	*Successfully addresses concerns from inspection in 2012*
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.
- Determine if the operator uses external support resources for any implementation or evaluation efforts.

☒ S – Satisfactory (explain)*	Comments:
☐ U - Unsatisfactory (explain)*	Bullet #2: Funding; (2017) $505,000, (2016) $430,000; Personnel Resources and Promotion.
☐ N/A - Not Applicable (explain)*	*Successfully addresses concerns from inspection in 2012*
☐ N/C – Not Checked (explain)*	
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).

	Comments:
☒ S – Satisfactory (explain)*	Bullet #2: Page 6 PAP
☐ U - Unsatisfactory (explain)*	*Successfully addresses concerns from inspection in 2012*
☐ N/A - Not Applicable (explain)*	
☐ 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.
- Select a location along the operator's system and verify the operator has a documented list of stakeholders consistent with the requirements and references noted above.

☒ Affected public
☒ Emergency officials
☒ Public officials
☒ Excavators

	Comments:
☒ S – Satisfactory (explain)*	-Covered on pages 12 thru 36 PAP
☐ U - Unsatisfactory (explain)*	-General Public page 14 PAP
☐ N/A - Not Applicable (explain)*	-Emergency Responders page 19 PAP
☐ N/C – Not Checked (explain)*	-Excavators page 23 PAP
	-Public Officials pages 26-27 PAP
	-Schools page 29
	-Farmers page 30 PAP
	-Railroads page 31 PAP
	-Cross Bores page 34 PAP
	Avista still utilizes SIC Codes but hopes to improve their determination capabilities by adding an additional support resource; CULVER.
	Successfully addresses concerns from inspection in 2012
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
☒ Emergency officials
☒ Public officials
☒ Excavators

	Comments:
☒ S – Satisfactory (explain)*	-Covered on pages 12 thru 36 PAP
☐ U - Unsatisfactory (explain)*	*Successfully addresses concerns from inspection in*
☐ N/A - Not Applicable (explain)*	*2012*
☐ 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.

	Comments:
☒ S – Satisfactory (explain)*	-Covered on page 42 PAP
☐ U - Unsatisfactory (explain)*	*Successfully addresses concerns from inspection in*
☐ N/A - Not Applicable (explain)*	*2012*
☐ 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.

- Identify the process the operator used to determine the need for additional languages for each stakeholder audience.
- Identify the source of information the operator used to determine the need for additional languages and the date the information was collected.

	Comments:
☒ S – Satisfactory (explain)*	-Covered on page 11 PAP
☐ U - Unsatisfactory (explain)*	Avista utilizes an Economist/Forecaster to help identify frequency by collecting language data.
☐ N/A - Not Applicable (explain)*	Records indicate that Hispanic language has been trending over the past five years. Each of their
☐ N/C – Not Checked (explain)*	offices have Spanish language brochures with "Scratch & Sniff"; Spanish language PA DVD's; and visually based information packets. Avista acknowledges that a lot of the migrant farming population within their area cannot read, so they found a training outfit that provides a special DVD for training migrant workers and uses visually based information. *Successfully addresses concerns from inspection in 2012*
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
☒ Public officials
☒ Excavators

	Comments:
☒ S – Satisfactory (explain)*	Reviewed 2013 Effectiveness Research Report
☐ U - Unsatisfactory (explain)*	The following tables are covered in the report.
☐ N/A - Not Applicable (explain)*	These findings will be updated in 2017 in the next report.
☐ N/C – Not Checked (explain)*	-Affected Public; Tables 1, 3, 5, 10, 16 & 21
	-Excavators; Tables 5, 7-9, 11, 13, 15-19, 21

	-First Responders & Emergency Officials; Tables 1, 6-7, 8-9, 10, 12-14, 19-20 -Public Officials; Tables 4-6, 9-12, 15 *Successfully addresses concerns from inspection in 2012*
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.

	Comments:
☒ S – Satisfactory (explain)*	Avista contracts with PAPA and PARADIGM to do an annual public safety outreach. -Sent GIS maps to all schools with adjacent lines in 2013-14 -Airs messages on their website and in radio ads -TROW brochure *Successfully addresses concerns from inspection in 2012*
☐ U - Unsatisfactory (explain)*	
☐ N/A - Not Applicable (explain)*	
☐ 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

	Comments:
☒ S – Satisfactory (explain)*	-Covered on pages 12 thru 36 PAP *Successfully addresses concerns from inspection in 2012*
☐ U - Unsatisfactory (explain)*	
☐ N/A - Not Applicable (explain)*	
☐ 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

	Comments:
☒ S – Satisfactory (explain)*	-Covered on pages 37 thru 40 PAP *Successfully addresses concerns from inspection in 2012*
☐ U - Unsatisfactory (explain)*	
☐ N/A - Not Applicable (explain)*	
☐ 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.
- Verify the operator has made its emergency response plan available, as appropriate and necessary, to emergency response officials.
- Identify the operator's expectations for emergency responders and identify whether the expectations are the same for all locations or does it vary depending on locations.
- Identify how the operator determined the affected emergency response organizations have adequate and proper resources to respond.
- Identify how the operator ensures that information was communicated to emergency responders that did not attend training/information sessions by the operator.

	Comments:
☒ S – Satisfactory (explain)*	-Covered in C01m165 Public Awareness/ First Responders/ Capabilities Folder. In addition Avista belongs to the following state associations; WA-PAW; Idaho-IDPA; PANW (Pacific NW) consolidation of WA and OR. First Responders Capabilities form is mailed to all Fire Stations. There is also a physical visit or phone call to each. Avista uses their own database and does not rely on the PAPA database. *Successfully addresses concerns from inspection in 2012*
☐ U - Unsatisfactory (explain)*	
☐ N/A - Not Applicable (explain)*	
☐ 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.

	Comments:
☒ S – Satisfactory (explain)*	-Internal Audits are performed by Randy Bareither; Reviewed Audits 2013 thru 2016.
☐ U - Unsatisfactory (explain)*	*Successfully addresses concerns from inspection in 2012*
☐ N/A - Not Applicable (explain)*	
☐ 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.

	Comments:
☒ S – Satisfactory (explain)*	Reviewed Internal Audits 2014 thru 2016.
☐ U - Unsatisfactory (explain)*	*Successfully addresses concerns from inspection in 2012*
☐ N/A - Not Applicable (explain)*	
☐ 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.

	Comments:
☒ S – Satisfactory (explain)*	*2014 Annual Review – within mailings informed schools they could request a map of the Avista pipeline in their proximity.
☐ U - Unsatisfactory (explain)*	*2015 Annual Review- Implemented action items for Effectiveness Evaluation; Improve SIC and frequency of communication to excavators.
☐ N/A - Not Applicable (explain)*	*2016 Annual Review- Updated brochure to
☐ N/C – Not Checked (explain)*	

	Parcel/Property Owners asking those stakeholders to pass along information or request additional information from their tenants. *Successfully addresses concerns from inspection in 2012*

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).
- Document when the effectiveness evaluation was completed.
- Determine what method was used to perform the effectiveness evaluation (in-house, by 3rd party contractor, participation in and use the results of an industry group or trade association).
- Identify how the operator determined the sample sizes for audiences in performing its effectiveness evaluation.

	Comments:
☒ S – Satisfactory (explain)*	Avista hired contractor Culver Company in 2014 to enhance their effectiveness evaluations. Reviewed Culver Binder (documentation) . *Successfully addresses concerns from inspection in 2012*
☐ U - Unsatisfactory (explain)*	
☐ N/A - Not Applicable (explain)*	
☐ 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

	Comments:
☒ S – Satisfactory (explain)*	-Reviewed Culver Binder (documentation) .
☐ U - Unsatisfactory (explain)*	*Successfully addresses concerns from inspection in*
☐ N/A - Not Applicable (explain)*	*2012*
☐ 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

	Comments:
☒ S – Satisfactory (explain)*	-Reviewed Culver Binder (documentation) .
☐ U - Unsatisfactory (explain)*	*Successfully addresses concerns from inspection in*
☐ N/A - Not Applicable (explain)*	*2012*
☐ 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

☒ S – Satisfactory (explain)*	Comments:
☐ U - Unsatisfactory (explain)*	Reviewed 2013 Effectiveness Research Report
☐ N/A - Not Applicable (explain)*	The following tables are covered in the report. These findings will be updated in 2017 in the next report.
☐ N/C – Not Checked (explain)*	-Affected Public; Tables 1, 3, 5, 10, 16 & 21
	-Excavators; Tables 5, 7-9, 11, 13, 15-19, 21
	-First Responders & Emergency Officials; Tables 1, 6-7, 8-9, 10, 12-14, 19-20
	-Public Officials; Tables 4-6, 9-12, 15
	Successfully addresses concerns from inspection in 2012
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

☒ S – Satisfactory (explain)*	Comments:
☐ U - Unsatisfactory (explain)*	Reviewed 2013 Effectiveness Research Report
☐ N/A - Not Applicable (explain)*	The following tables are covered in the report. These findings will be updated in 2017 in the next report.
☐ N/C – Not Checked (explain)*	-Affected Public; Tables 7, 9
	-Excavators; Tables 4, 23
	-First Responders & Emergency Officials; Tables 16-17
	-Public Officials; Table 7, 19
	Successfully addresses concerns from inspection in 2012
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.
- Verify the operator measured bottom-line results by tracking third-party incidents and consequences.
- Determine if the operator considered and attempted to measure other bottom-line measures, such as the affected public's perception of the safety of the operator's pipelines. If not, determine if the operator has provided justification in its program or procedural manual for not doing so.

	Comments:
☒ S – Satisfactory (explain)* ☐ U - Unsatisfactory (explain)* ☐ N/A - Not Applicable (explain)* ☐ N/C – Not Checked (explain)*	Reviewed [9] year trend of damage/ locate ratios by state. Avista indicates they have not had any federally reported excavation damage incidents since Apr 2013. *Successfully addresses concerns from inspection in 2012*
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.

	Comments:
☒ S – Satisfactory (explain)* ☐ U - Unsatisfactory (explain)* ☐ N/A - Not Applicable (explain)* ☐ N/C – Not Checked (explain)*	Reviewed Effectiveness Survey results per stakeholder groups: -Affected Public Page 17 -Emergency responders Page 21 -Excavators Page 25 -Public Officials Page 28 *Successfully addresses concerns from inspection in 2012*
Check exactly one box above. * Required field	

5. Inspection Summary & Findings

5.01 Summary

5.02 Findings