

# Inspection Output (IOR)

Generated on 2023.August.15 13:32

## Report Filters

Assets **HQ Public Awareness / HQ PA**

Results **All**

## Inspection Information

Inspection Name	8570 Avista HQ Public Awareness	Operator(s)	AVISTA CORP (31232) Lead Anthony Dorrrough	Plan Submitted	01/24/2023
Status	STARTED	Supervisor	Dennis Ritter	Plan Approval	--
Start Year	2023	Director	Scott Rukke	All Activity Start	08/15/2023
System Type	GD			All Activity End	08/15/2023
Protocol Set ID	WA.GD.2022.02			Inspection Submitted	--
				Inspection Approval	--

## Inspection Summary

### Inspection Scope and Summary

This Headquarters Public Awareness (HQ PA) inspection was conducted jointly with the Idaho Public Utilities Commission (PUC) on Tuesday [Aug 15] with Avista representatives available via Microsoft TEAMS online followed by an exit interview. The inspection included a review of Avista's PA plan, procedure and associated records. The last HQ PA inspection was Mar 20, 2019 held jointly with the Idaho Public Utilities Commission (PUC) with no apparent findings.

### Facilities visited and Total AFOD

Plan, Procedures and Records: 1 Day

### Summary of Significant Findings

There were no significant findings

### Primary Operator contacts and/or participants

Randy Bareither PE, Pipeline Safety Engineer, Avista, (509) 434-6783

Salina, Simpson, Public Safety Specialist, Avista salina.simpson@avistacorp.com

Tyler Proszek, Damage Prevention Program Administrator, Avista tyler.proszek@avistacorp.com

Robert Hughes, Damage Prevention Analyst, Avista robert.hughes@avistacorp.com

Jeff Brooks, Pipeline Safety Program Manager, PUC jeff.brooks@puc.idaho.gov

Matt Galli, Pipeline Safety Inspector, PUC matt.galli@puc.idaho.gov

### Operator executive contact and mailing address for any official correspondence

Josh DiLuciano, VP Energy Delivery, Avista, josh.diluciano@avistacorp.com

## Scope (Assets)

#	Short Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Total Inspected	Required % Complete
1.	HQ PA	HQ Public Awareness	unit	--	Storage Fields Bottle/Pipe - Holders Offshore	25	25	25	100.0%

8570 Avista HQ Public Awareness

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Report Filters: Results: all

#	Short Name	Long Name	Asset Type	Asset IDs	Excluded Topics	Planned	Required	Inspected	Total %	Required Complete
					GOM OCS Cast or Ductile Iron Copper Pipe Aluminum/Amphoteric					

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

## Plans

Plan #	Assets	Focus Directives	Involved Groups/Subgroups	Qst Type(s)	Extent	Notes
1.	HQ PA	Public Awareness Program Effectiveness (Form 21)	PRO, PRR, FR, GDIM, LPGIM, MISCTOPICS, GENERIC	P, R, O, S	Detail	--

## Plan Implementations

Activity #	Name	SMART Act#	Start Date	End Date	Focus Directives	Involved Groups/Subgroups	Assets	Qst Type(s)	Planned	Required	Inspected	Total %	Required Complete
1.	Avista PA	--	08/15/2023	--	08/15/2023	all planned questions	all assets	P, R	25	25	25	100.0%	

1. Since questions may be implemented in multiple activities, but answered only once, questions may be represented more than once in this table.
2. Percent completion excludes unanswered questions planned as "always observe".
3. Question counts and completion percents are filtered to include only questions planned for and results applied to the filtered Assets.

## Forms

No items matched the search conditions.

## Results (all values, 25 results)

30 (instead of 25) results are listed due to re-presentation of questions in more than one sub-group.

### PRO.SUBLPUBAWARE: Public Awareness Program

1. Question Result, ID, References NA, PD.PA.MSTRMETER.P, 192.616(j) (192.616(h)) (also presented in: MISCTOPICS.PUBAWARE)  
 Question Text Does the public awareness program for a master meter or petroleum gas system meet the requirements of Part 192?  
 Assets Covered HQ PA  
 Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

### PRR.OM: Operations And Maintenance

2. Question Result, ID, Sat, EP.ERG.LIAISON.R, 192.605(a) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), References 192.616(c), ADB-05-03) (also presented in: MISCTOPICS.PUBAWARE)  
 Question Text Do records indicate liaisons established and maintained with appropriate fire, police and other public officials and utility owners in accordance with procedures?  
 Assets Covered HQ PA  
 Result Notes Located on C01m165/Public Awareness/Public Safety Form for community outreach and First Responder Training. Capabilities files can be found on the Gas Wiki. Moving to use Intalex in the future for the PA

form. Police, Public Officials and Utility Owners are areas where Avista needs to improve their established liaison activity. Reviewed first responder training.

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

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

Assets Covered [HQ PA](#)

Result Notes Avista has Spanish and Russian brochures available upon request. This is added to the back of their Natural Gas (NG & E) Safety Guides and Excavator Safety brochures which states, "For assistance with alternative languages, please call 800-227-9187." Their school program also offers a Spanish natural gas and electric safety book for free upon request. Pipeline markers have English and Spanish instruction.

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

Question Text *Do records indicate program effectiveness evaluation(s) have been performed and cover all program requirements and all systems covered by the program?*

Assets Covered [HQ PA](#)

Result Notes Reviewed Effectiveness Surveys prior to the audit.

In 2017, Avista Utilities retained the services of a third-party consultant (Culver Co.) – who maintains expertise in RP 1162 effectiveness metrics as well as utility public safety outreach in general -- to assess the effectiveness of the Program (the resulting surveys are hereinafter referred to as the 2017 and 2021 Effectiveness Evaluations).

Per API Recommended Practices 1162, the study gauged the following dimensions: the effectiveness of Avista's outreach, participants' knowledge of key natural gas pipeline safety messages, and the impact of this knowledge on participants' behavior. The key Avista stakeholders interviewed included members of the affected public, comprising affected publics along the transmission right-of-way (ROW) and in the distribution service areas; excavators; emergency response officials; and public officials. Sample sizes were predetermined based on stakeholder population evaluations and are as follows:

- 400 completed affected public distribution interviews, 300 with Avista customers and 100 non-customers
- 150 completed affected public transmission ROW interviews
- 150 completed excavator interviews
- 62 completed emergency response official interviews
- 76 completed public official interviews

Their consultant leveraged proprietary PA Plan questionnaires that have been used by gas-only and dual-commodity utilities nationwide. Questionnaires were modified with Avista's input, and reliable and valid questions from Avista's previous effectiveness survey were added. All interviews were conducted via telephone and a random sampling process was employed. Research concluded in December 2017.

In 2021, Avista retained the same consultant, which used the same random sampling process and conducted the following number of interviews in each stakeholder group during the summer of 2021:

- 432 completed affected public distribution interviews, 402 with Avista customers and 30 non-customers
- 30 completed affected public transmission ROW interviews

- 150 completed excavator interviews
- 58 completed emergency response official interviews
- 61 completed public official interviews

The following considerations account for variances between the 2021 research reports and that of previous years:

“Culver Company regularly updates survey questionnaires to meet best practices within the industry. Though that does, at times, disallow for apples-to-apples representation of data from year to year, it does ensure that the questions are posed to respondents in such a way as to elicit the most accurate and timely responses. When benchmarking against previous years’ data is not included, more often than not, that is the reason, and footnotes are added to those slides within the report to account for such. Likewise, when new questions are added (e.g., to account for trends noticed within the industry, changes made to the mailings/communications, etc.), you will not see a reference to previous years’ data.”

“Since the timing of this research cycle fell within that of the Covid-19 pandemic, in some situations, recruiting stakeholder respondents proved to be difficult (e.g., with the audiences of Public Officials and Affected Public in particular). Nevertheless, Culver’s methodology allows for alignment with best-in-class standards even when a lower number of respondents is garnered.

Moreover, the margin of error remains at a 95% confidence level, with the +/- percentage remaining within an acceptable range, as well as one that is on par with other research firms within the industry. For the Affected Public audience specifically, though the Transmission numbers were lower than in previous year, we do anticipate a rebound effect during the next research cycle. Please also note that for Affected Public, the NPMS would only apply to Transmission population.”

5. Question Result, ID, NA, PD.PA.MSTRMETER.R, 192.616(j) (192.616(h), API RP 1162 Section 2.7 (Step 12), API RP 1162 References Section 8.5) (also presented in: MISCTOPICS.PUBAWARE)

Question Text *Do records indicate the public awareness program for a master meter or petroleum gas system operator has met the requirements of Part 192?*

Assets Covered HQ PA

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

## MISCTOPICS.PUBAWARE: Public Awareness Program Effectiveness

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

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

Assets Covered HQ PA

Result Notes The Public Awareness (PA) Plan document revision 13, page 8 provides program development details. This was established June 20, 2006, Current Revision 13.

Avista’s initial Public Awareness Program was developed June 20, 2006. The program was submitted to the Office of Pipeline Safety Clearinghouse on September 8, 2006. The program was reviewed and revised according to the Revision Log on page 5 and 6.

Avista Confirmation Number: 312

Avista Operator ID: 31232

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

7. Question Result, ID, References [Sat, PD.PA.MGMTSUPPORT.P, 192.616\(a\) \(API RP 1162 Section 2.5, API RP 1162 Section 7.1\)](#)  
 Question Text *Does the operator's program documentation demonstrate management support?*  
 Assets Covered [HQ PA](#)  
 Result Notes [The PA Plan Revision 13, page 4, see 'Management Commitment and Support', has a letter from the CEO. The Natural Gas and Electric Operations managers support public awareness by providing personnel to reach out, train and educate our four stakeholder groups – Public Officials, First Responders, Excavators/Contractors and the Affected Public. Supporting personnel include those listed in Appendix A of the PA Plan.](#)
8. Question Result, ID, References [Sat, PD.PA.ASSETS.P, 192.616\(b\) \(API RP 1162 Section 2.7 Step 4\)](#)  
 Question Text *Does the program clearly identify the specific pipeline systems and facilities to be included in the program, along with the unique attributes and characteristics of each?*  
 Assets Covered [HQ PA](#)  
 Result Notes [PA Plan, Revision 13, page 7, see 'Pipeline Assets included in the Program'](#)

### **Pipeline Assets Included in the Program**

Headquartered in Spokane, Washington, Avista Utilities delivers natural gas to more than 365,000 residential, commercial, and industrial customers. This Program covers all jurisdictional pipelines within Avista's service territory. Sections of RP1162 do not apply to Avista such as natural gas gathering lines or hazardous liquids pipelines.

The service territory spans across three states, Washington, Oregon, and Idaho. Avista operates more than 19,000 miles of distribution pipeline that encompasses both steel and plastic pipe. Other appurtenances of the system include gate stations, odorizers, district regulator stations, valves, miscellaneous fittings, and meter set assemblies.

Avista also operates approximately 76.6 miles of natural gas transmission pipeline located in Spokane and Stevens Counties in Washington, in addition we have 14.7 miles natural gas transmission in Klamath Falls Oregon as depicted in Figures 2 and 3 of Appendix G. These steel pipelines encompass valves and miscellaneous fittings. General maps of the Avista gas service territories and transmission facilities are located in Appendix G.

### **Unique Attributes**

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

As of March 21, 2023, Avista has no High Consequence Areas (HCA) within its transmission network.

Single public awareness program used for all pipeline assets.

9. Question Result, ID, References [Sat, PD.PA.AUDIENCEID.P, 192.616\(d\) \(192.616\(e\), 192.616\(f\), API RP 1162 Section 2.2, API RP 1162 Section 3\)](#)  
 Question Text *Does the program establish methods to identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents?*  
 Assets Covered [HQ PA](#)  
 Result Notes [PA Plan Revision 13 \(pages 14-44\)](#)

Identification of the Affected Public pg. 18, Emergency Responders pg. 23, Excavators pg. 29, Public Officials pg. 36, Schools pg. 41, Farmers pg. 42, Railroads pg. 43, Plumbers/Drain Maintainers pg. 44.

Ways to identify their stakeholders: SIC/NAICS codes, lists by zip code, purchased lists from Culver Co in 2019-2022. These mailing lists targeted Public Officials, Excavators (ARW lists), Emergency Responders, and Avista's School Program, which is also contracted through Culver.

Zip codes are used to identify the territories and they provide some overlap in areas where more than one utility may operate. For example, Adams/Grant County would have both Avista Utilities and Cascade Natural. These customers receive education materials from both companies and the information is consistent. Also, where Emergency Responders and Public Officials are targeted, their partner pipelines often collaborate on an event. For example, PANW/PAPA, Williams 66, etc.

The SIC - 9111 Executive Offices pulls the following departments: Offices of chief executives and their advisory and interdepartmental committees and commissions, City and town managers' offices, County supervisors' and executives' offices, and Mayors' offices. Since the SIC data does not always provide the most accurate contact at a municipality Culver does their due diligence to try find the appropriate recipients.

Affected (General) Public:

They communicate to businesses and residents within their 'Affected (General) Public' outreach.

Emergency Officials (EO or ER):

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

Public Officials (PO):

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

They utilize the same methodology for the EO/ER list as we use for the PO list. That is, we will include all counties that have Avista service area zip codes in them. That allows us to reach, for example, an emergency official who serves on the county level, but may not be physically located in one of your service area zips.

Excavators:

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

10. Question Result, ID, References [Sat, PD.PA.AUDIENCEID.R, 192.616\(d\) \(192.616\(e\), 192.616\(f\), API RP 1162 Section 2.2, API RP 1162 Section 3\)](#)

Question Text *Do records identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents to which it sends public awareness materials and messages?*

Assets Covered [HQ PA](#)

Result Notes Stakeholder audiences mailing list history of where it was obtained and/or purchased annually from:

Affected Public: comes from our customer list; Transmission ROW comes from Avista GIS department

Emergency Responders: Culver 2019-2022

Excavators: Culver 2019- 2022

Public Officials: Culver 2019- 2022

Schools: 2019 – 2022 contracted with Culver Co School Program on Avista website.

In addition, Pipeline Association for Public Awareness (PAPA) sends out mailings to Public Officials, Emergency Responders, and Excavators on behalf of Avista. This has occurred from 2013 to the present.

11. Question Result, ID, References [Sat, PD.PA.MESSAGES.P, 192.616\(c\) \(API RP 1162 Section 3, API RP 1162 Section 4, API RP 1162 Section 5\)](#)

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

Assets Covered [HQ PA](#)

Result Notes Located in PA Plan Revision 13 (pgs. 14-44)

12. Question Result, ID, References [Sat, PD.PA.SUPPLEMENTAL.P, 192.616\(c\) \(API RP 1162 Section 6.2\)](#)

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

Assets Covered [HQ PA](#)

Result Notes Located in PA Plan Revision 13 (pgs. 14-44)

13. Question Result, ID, References [Sat, PD.PA.EDUCATE.R, 192.616\(d\) \(192.616\(f\)\)](#)

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

Assets Covered [HQ PA](#)

Result Notes Reviewed brochures prior to audit for (4) stakeholder groups showing above noted 5 areas of emphasis identified with labeling.

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

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

Assets Covered HQ PA

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

**Schools:** They sent actual GIS maps to all Schools in our areas that have adjacent gas lines in 2021. They give schools the option to receive or not receive the maps on our eSMARTkids Website (Avista.e-smartonline.net).

**Businesses and Residents:** These are treated like the Affected Public. Avista has 30-second radio ads on the Call Before You Dig topic. This is how we advise these stakeholders of the general location/existence of underground gas facilities. Transmission ROW brochure provides an outline of this messaging. Natural Gas Safety area on Avista website highlights existence of underground gas facilities as well.

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

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

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

Assets Covered HQ PA

Result Notes Reviewed brochures prior to audit for (4) stakeholder groups showing above noted 5 areas of emphasis identified with labeling.

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

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

Assets Covered HQ PA

Result Notes Located on C01m165/Public Awareness/Public Safety Form for community outreach and First Responder Training. Capabilities files can be found on the Gas Wiki. Moving to use Intalex in the future for the PA form. Police, Public Officials and Utility Owners are areas where Avista needs to improve their established liaison activity. Reviewed first responder training.

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

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

Assets Covered HQ PA

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

Please refer to page 13 of the PAP Revision 13.

Additional information:



Language data used by the Senior Forecaster comes from the U.S. Census bureau for the counties in our service area. The data are drawn from the American Community Survey (ACS) and represents the average of the survey data for the period 2017-2021. These periods represent averages using annual estimates that the Census may not make available for individual counties. The ACS is the most comprehensive source of regional data currently available. The ACS identifies the languages spoken at home for those five-years old and older. The five-year average is used to smooth out outliers that may be present in any single ACS. The ACS is completed every year for counties so we can update each year with the five-year average. Therefore, the data is capturing the language skills of our customers.

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

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

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

18. Question Result, ID, References Sat, PD.PA.LANGUAGE.R, 192.616(g) (API RP 1162 Section 2.3.1) (also presented in: PRR.OM)  
Question Text *Were materials and messages developed and delivered in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?*  
Assets Covered HQ PA  
Result Notes Avista has Spanish and Russian brochures available upon request. This is added to the back of their Natural Gas (NG & E) Safety Guides and Excavator Safety brochures which states, "For assistance with alternative languages, please call 800-227-9187." Their school program also offers a Spanish natural gas and electric safety book for free upon request. Pipeline markers have English and Spanish instruction.
19. Question Result, ID, References Sat, PD.PA.EVALPLAN.P, 192.616(i) (192.616(c), API RP 1162 Section 8, API RP 1162 Appendix E)  
Question Text *Does the program include a process that specifies how program implementation and effectiveness will be periodically evaluated?*  
Assets Covered HQ PA  
Result Notes Avista conducts an internal review/assessment annually on the years that there is not a third-party review or a regulatory inspection. See PA Plan Revision 13 pgs. 52-53
20. Question Result, ID, References Sat, PD.PA.EVALIMPL.R, 192.616(c) (192.616(i), API RP 1162 Section 8.3)  
Question Text *Has an audit or review of the operator's program implementation been performed annually since the program was developed?*  
Assets Covered HQ PA  
Result Notes Reviewed records provided prior to audit.
- 2022: 11/16/2022 Internal Randy Bareither
- 2021: 08/18/2021 OPUC Regulatory Audit
- 2020: 09/24/2020 Internal Randy Bareither
- 2019: 03/2019 WUTC, IPUC Regulatory Audit
- 2018: 11/12/18 Internal Randy Bareither
- 2017: 3/28/17 WUTC, IPUC, OPUC Regulatory Audit
- 2016: 5/26/16 Internal Randy Bareither

2015: 8/13/15 Internal Randy Bareither  
2014: 12/29/14 Internal Randy Bareither  
2014: WUTC, IPUC, OPUC Regulator Audit (5/7, 5/8)  
2013: 12/16/13 Internal Randy Bareither  
2013: WUTC, IPUC, OPUC Regulatory Audit (3/5)

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

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

Assets Covered HQ PA

Result Notes Reviewed records provided prior to audit.

2022: 11/16/2022 Internal Randy Bareither  
2021: 08/18/2021 OPUC Regulatory Audit  
2020: 09/24/2020 Internal Randy Bareither  
2019: 03/2019 WUTC, IPUC Regulatory Audit  
2018: 11/12/18 Internal Randy Bareither  
2017: 3/28/17 WUTC, IPUC, OPUC Regulatory Audit  
2016: 5/26/16 Internal Randy Bareither  
2015: 8/13/15 Internal Randy Bareither  
2014: 12/29/14 Internal Randy Bareither  
2014: WUTC, IPUC, OPUC Regulator Audit (5/7, 5/8)  
2013: 12/16/13 Internal Randy Bareither  
2013: WUTC, IPUC, OPUC Regulatory Audit (3/5)

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

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

Assets Covered HQ PA

Result Notes Reviewed 2020/2022 records provided online during the audit.

2019: No NOPVs or AOCs from WUTC/IPUC audit. No changes needed.

2020: Recommended changes by Randy to Rev 12 of the PAP doc.

2021: OPUC audit cited Avista with an AOC for better engagement with Electric and other util. Paradigm ROS 2022 succeeded in getting reps from local elect-coop.

2022: Recommendations from Randy:

- Get safety guide links added back to e-bill in May (to replicate what standard billing gets in May) – done.
- Look into ability to get Pipeline Purpose and Reliability messaging broadcast – budget cuts, not able to add anything this year.
- Documenting interactions with Emergency Responders (on 165 drive) – now tracked in Intelix but still need to work on getting managers to enter information more consistently.
- PA Program achieving “Bottom Line Results” – will continue to discuss damages with Tyler and Robert. Working on getting “No Call” brochure created.

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

Question Text *Do records indicate program effectiveness evaluation(s) have been performed and cover all program requirements and all systems covered by the program?*

Assets Covered [HQ](#) [PA](#)

Result Notes [Reviewed Effectiveness Surveys prior to the audit.](#)

In 2017, Avista Utilities retained the services of a third-party consultant (Culver Co.) – who maintains expertise in RP 1162 effectiveness metrics as well as utility public safety outreach in general -- to assess the effectiveness of the Program (the resulting surveys are hereinafter referred to as the 2017 and 2021 Effectiveness Evaluations).

Per API Recommended Practices 1162, the study gauged the following dimensions: the effectiveness of Avista’s outreach, participants’ knowledge of key natural gas pipeline safety messages, and the impact of this knowledge on participants’ behavior. The key Avista stakeholders interviewed included members of the affected public, comprising affected publics along the transmission right-of-way (ROW) and in the distribution service areas; excavators; emergency response officials; and public officials. Sample sizes were predetermined based on stakeholder population evaluations and are as follows:

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- 61 completed public official interviews

The following considerations account for variances between the 2021 research reports and that of previous years:

“Culver Company regularly updates survey questionnaires to meet best practices within the industry. Though that does, at times, disallow for apples-to-apples representation of data from year to year, it does ensure that the questions are posed to respondents in such a way as to elicit the most accurate and timely responses. When benchmarking against previous years’ data is not included, more often than not, that is the reason, and footnotes are added to those slides within the report to account for such. Likewise, when new questions are added (e.g., to account for trends noticed within the industry, changes made to the mailings/communications, etc.), you will not see a reference to previous years’ data.”

“Since the timing of this research cycle fell within that of the Covid-19 pandemic, in some situations, recruiting stakeholder respondents proved to be difficult (e.g., with the audiences of Public Officials and Affected Public in particular). Nevertheless, Culver’s methodology allows for alignment with best-in-class standards even when a lower number of respondents is garnered.

Moreover, the margin of error remains at a 95% confidence level, with the +/- percentage remaining within an acceptable range, as well as one that is on par with other research firms within the industry. For the Affected Public audience specifically, though the Transmission numbers were lower than in previous year, we do anticipate a rebound effect during the next research cycle. Please also note that for Affected Public, the NPMS would only apply to Transmission population.”

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

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

Assets Covered HQ PA

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

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

In addition, Avista is measuring outreach through quantitative four-year evaluation, including the 2017 & 2021 Effectiveness Evaluation.

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

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

Assets Covered HQ PA

Result Notes Determination as to whether the recipients understand key elements of the message is another measure of the effectiveness of the PA Program. Avista is measuring understandability with both quantitative and qualitative tactics. This includes the quantitative 4-year effectiveness evaluation, including the 2017 and 2021 research, and the qualitative 2018 and 2021 pre-test of materials effectiveness research.

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

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

Assets Covered HQ PA

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

A desired result of the Avista PA Program is that the behavior of audiences may be enhanced to include learned and demonstrated behaviors. Avista is measuring changes in behavior with both quantitative and qualitative tactics. This includes the quantitative 4-year effectiveness evaluations, including the 2017 and 2021 effectiveness research, and the qualitative 2018 and 2022 pre-test of materials effectiveness research.

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

Question Text *Were bottom-line results of the program measured by tracking third-party incidents and consequences including: (1) near misses, (2) excavation damages resulting in pipeline failures, (3) excavation damages that do not result in pipeline failures?*

Assets Covered HQ PA

Result Notes Reviewed year-end tracking

Avista completes monthly and year end tracking. This information is provided to key stakeholders for review by the Damage Prevention (DP) Administrator.

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

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

Assets Covered HQ PA

Result Notes The PA Plan has been updated to show the recommendations, for each stakeholder group, from the most recent Effectiveness Survey results. In 2023-2024, brochures and other materials will be updated as recommended.

Affected Public: pg. 19-22

Emergency Responders: pg. 26-28

Excavators: pg. 32-36

Public Officials: pg. 38-40

29. Question Result, ID, References NA, PD.PA.MSTRMETER.P, 192.616(j) (192.616(h)) (also presented in: PRO.SUBLPUBAWARE)

Question Text *Does the public awareness program for a master meter or petroleum gas system meet the requirements of Part 192?*

Assets Covered HQ PA

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

30. Question Result, ID, References NA, PD.PA.MSTRMETER.R, 192.616(j) (192.616(h), API RP 1162 Section 2.7 (Step 12), API RP 1162 Section 8.5) (also presented in: PRR.OM)

Question Text *Do records indicate the public awareness program for a master meter or petroleum gas system operator has met the requirements of Part 192?*

Assets Covered HQ PA

Result Notes No such relevant facilities/equipment existed in the scope of inspection review.

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