Docket No. SA-534 Exhibit No. 4-H

# NATIONAL TRANSPORTATION SAFETY BOARD

Washington, D.C.

Survival Factors Group Chairman Factual Report – Appendix G PG&E's Public Awareness Program Plan

(23 Pages)



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## PACIFIC GAS AND ELECTRIC COMPANY

GAS TRANSMISSION AND DISTRIBUTION
GAS ENGINEERING
GAS INTEGRITY MANAGEMENT AND TECHNICAL SUPPORT



# Procedure No. RMP-12

# Pipeline Public Awareness Plan

Prepared By:	Public Awareness Program M	<del></del>
Approved By: (	Date:	
Approved By: Original signed	Date: . Director, Gas Asset Strategy	
Approved By: Original signed	Date: , VP – Gas Transmission	

Rev. No.	Date	Description	Prepared By	Approved  Manager Integrity Management	Approved Director System Integrity& Tech Services	Approved  Sr. Director Gas Engineering	Approved Vice President – Gas Transmission and Distribution
1		Revised to incorporate LDC facilities prior to submittal to OPS					
2	10/5/06	Revised to incorporate gas gathering facilities into plan				-	
3	4/8/08	Revised to include Clearinghouse comments and added LDC criteria					
4	7/18/08	Revised to address CPUC comments-see change form for this revision for details				_	<u> </u>
5	1/26/10	Org changes					f



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# Pacific Gas and Electric Company Pipeline Public Awareness Plan

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#### 1.0 PROGRAM OBJECTIVES

The objective of PG&E's Pipeline Public Awareness Program is to enhance public safety and environmental protection through increased public awareness and knowledge. This document provides guidance for Pacific Gas and Electric Company (PG&E) to develop and actively manage a comprehensive, consistent Pipeline Public Awareness Program that can be regularly assessed and enhanced, while remaining in compliance with federal regulatory requirements as outlined in 49CFR Part 192, and API RP 1162. This program will establish consistent objectives, tools and measurement components while maintaining the flexibility necessary to weigh the needs of various regions or audiences.

#### 1.1 PG&E's Pipeline Public Awareness Program Has Three Main Components

#### Public Education -

This program will raise the affected public's and key stakeholders' awareness of the presence of PG&E's natural gas pipelines in their community and help them better understand PG&E's role in transporting and delivering energy. A more informed public will better understand pipeline safety measures and contribute to reducing the likelihood of emergencies and/or releases.

#### Promote Safe Work Practices -

This program will help third parties understand the steps that should be taken to prevent and respond to pipeline emergencies. Through a broad-reaching education effort, third parties will better understand the safe and proper ways to work around pipeline facilities and the required actions prior to excavation. Additionally, it will educate first response agencies (police and fire) on the safe handling of utility emergencies.

#### Continuous Improvement -

PG&E will annually evaluate its Pipeline Public Awareness Program to assess its effectiveness and determine what enhancements should be made. This evaluation will include a review of changing regulations to ensure their inclusion into the updated plan.

#### 1.2 Business Units

The pipeline assets included in the PG&E's Pipeline Public Awareness Program include:

 All gas pipelines in California owned by PG&E and Standard Pacific Pipeline Inc.



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#### 1.3 Personnel

The personnel identified in Table 1 are responsible for overseeing, implementing and supporting the PG&E Pipeline Public Awareness Program.

# Table 1 – Key Personnel

Title	Department	Name	Responsibility
Vice President	Gas Transmission and Distribution	F	Executive champion and approver for major changes to program.
Senior Director	Gas Engineering		Oversees and approves the program's budgetary and resource requirements. Approves revisions to RMP-12
Director	Integrity Management & Technical Services		Oversees and approves the program's budgetary and resource requirements. Approves revisions to RMP-12
Manager	Integrity Management		
Supervising Engineer	Integrity Management		Ensure the compliance with company and regulatory policies and procedures. Approves revisions to RMP-12
Gas Transmission Pipeline Public Awareness Program Manager (PPAPM)	Integrity Management		Oversee and manage RMP-12 to ensure compliance with company and regulatory policies and procedures.  Responsible for implementing the components of the Pipeline Public Awareness Program.  Coordinate personnel responsible for local implementation of the field components of the Pipeline Public Awareness Program.  Lead a cross-functional committee made up of representatives from various departments, including gas transmission employees,
			Governmental Affairs, Building and Land Services, Communications, Operations, Maintenance and Construction. This team will support the continuous improvement of the Pipeline Public Awareness Program.
Public Safety Program Manager (PSPM)	Safety, Health and Claims	•	Oversee and manage the utility's Public Safety Information Program to ensure compliance with regulatory expectations.



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#### 1.4 Organizational Changes

As organizational changes take place, the Pipeline Public Awareness Program Manager will update the list of individuals and assignments identified above in Table 1. If a new Pipeline Public Awareness Program Manager is assigned, it is the responsibility of the Supervisor of Gas System Integrity to ensure that the new Pipeline Public Awareness Program Manager is aware of his or her responsibilities as they apply to the implementation of this plan.

#### 2.0 COMMITMENT TO PROGRAM

DATE: 10/3/2006

Pacific Gas and Electric Company recognizes that public awareness and understanding of gas pipeline operations is vital to the continued safe operation of its gas pipeline facilities.

The Company's Pipeline Public Awareness Program is an important part of our overall commitment to pipeline and public safety. Not only do the steps identified in this plan help establish communications with key stakeholders, they also help the public understand the significant role they play in preventing third-party accidents.

PG&E's commitment to educating the public and other key stakeholders will ultimately help to better protect people, property and the environment – thereby maintaining the reliability of the pipeline system, which our customers and communities depend upon.

PG&E is committed to fully support the successful implementation of this comprehensive Pipeline Public Awareness Program, complying with the standards established by our regulators.

Vice President, Gas Transmission & Distribution Pacific Gas and Electric Company



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#### 3.0 STAKEHOLDER AUDIENCES

#### 3.1 Affected Public (LDC)

Any persons receiving PG&E gas or electric service.

## 3.2 Affected Public (Gas Transmission and Gas Gathering)

Includes the following landowners, adjacent residents, businesses or places of congregation served by or along PG&E's gas transmission or gas gathering pipelines:

- Landowners: People who occupy residences or are tenants on land where the pipeline is buried (this is not meant to include absentee landowners).
  - Tenants (actual occupants, residents)
  - Farmers
  - Businesses on ROW
- Residents located adjacent (within the potential impact radius) of the pipeline centerline or of gas storage and other operational facilities
  - Landowners (actual occupants, residents)
  - Tenants
  - Farmers
  - Identifiable homeowners associations or groups
  - Identifiable neighborhood organizations
- Places of congregation Identified sites adjacent (i.e., within the potential impact radius or 660 feet, whichever is greater) to the pipeline centerline or gas storage and other operational facilities as noted by PG&E's Integrity Management Program, including:
  - Businesses
  - Schools
  - Places of worship
  - Hospitals and other medical facilities
  - Prisons
  - · Parks and recreation areas
  - Day-care facilities
  - · Senior centers

#### 3.3 Local and State Emergency Response

Local, state or regional officials, agencies and organizations with emergency response and/or public safety jurisdiction along the pipeline route including:

Fire departments



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- Police/sheriff departments
- Local Emergency Planning Committees (LEPCs)
- County and State Emergency Management Agencies (EMAs)
- Other emergency response organizations
- Other public safety organizations

# 3.4 Local Public Officials and Planning Agencies

Local, city, county or state officials and/or their staffs having land use and street/road jurisdiction along the pipeline route including:

- · Planning boards
- Zoning boards
- Permit/Licensing departments
- · Building code enforcement departments
- City and County Managers
- Elected officials
- Public Utility Boards
- Local Governing Councils
- Public work officials
- Public street, road and highway departments (CalTrans)

#### 3.5 Excavators

Companies that perform or direct excavation work including:

- Contractors
- Construction companies
- Excavation equipment rental companies
- Timber companies
- Fence building companies
- · Drain tiling companies
- Landscapers
- Well drillers

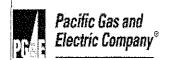
#### 3.6 Land Developers

Companies and private entities involved in land development and planning including:

- Home builders
- · Land developers

#### 3.7 One-Call Centers

In California these include USA North and USA South. These are the organizations established to notify underground facility owner/operators of proposed excavations.



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#### 4.0 MESSAGE CONTENT

Messages will be tailored for each targeted stakeholder audience. Messages will provide an overview of how pipelines operate and the hazards that may result from activity in close proximity to these facilities and potential hazards due to routine operations. Messages will include the utility's measures undertaken to prevent the impact to public safety, property and the environment.

### 4.1 Affected Public (LDC)

Information to be communicated

- Pipeline purpose and reliability
- · Awareness of hazards / prevention measures undertaken
- · Damage prevention awareness
- One-Call requirements (USA)
- · Leak recognition and response
- Pipeline marker information including description and purpose.
- How to obtain additional information / Company contact info
- Availability of operator list through National Pipeline Mapping System (NPMS) – https://www.npms.phmsa.dot.gov/.
- Multi-lingual contact number for translation of brochure

#### 4.2 Affected Public (Gas Transmission and Gas Gathering)

Information to be communicated

- Pipeline purpose and reliability
- Awareness of hazards / prevention measures undertaken
- Damage prevention awareness
- One-Call requirements (USA)
- Leak recognition and response
- Pipeline marker information including description and purpose.
- How to obtain additional information / Company contact info
- Availability of operator list through National Pipeline Mapping System (NPMS) – https://www.npms.phmsa.dot.gov/.
- Multi-lingual contact number for translation of brochure



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#### 4.3 Local and State Emergency Response Agencies

Information to be communicated

- Pipeline purpose and reliability
- · Pipeline marker information including description and purpose
- Awareness of potential hazards and prevention measures undertaken
- PG&E's emergency preparedness
- Expectations of emergency responders
- · Response for pipeline vs. compressor station emergencies
- Pipeline location information (as approved by Corporate Security) and availability of NPMS - https://www.npms.phmsa.dot.gov/.
- · How to obtain additional information / company contact info
- Maintenance program summary

#### 4.4 Local Public Officials and Planning Agencies

Information to be communicated

- · Pipeline purpose and reliability
- Pipeline marker information including description and purpose
- Awareness of hazards and prevention measures undertaken
- Emergency preparedness communications / response
- One-Call requirements (USA)
- Pipeline location information (as approved by Corporate Security) and availability of NPMS https://www.npms.phmsa.dot.gov/
- How to obtain additional information / company contact info
- How to obtain an overview of PG&E's Integrity Management Plan
- Summary of High Consequence Area designation, if applicable and request to review HCA's in local area

#### 4.5 Excavators

Information to be communicated to excavators & contractors

- Pipeline purpose and reliability
- Awareness of hazards and prevention measures undertaken
- Damage prevention awareness
- One-Call requirements (USA)
- · Leak recognition and response
- · How to obtain additional information / company contact info



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### 4.6 Land developers

Information to be communicated to land developers

- Pipeline purpose and reliability
- Awareness of hazards and prevention measures undertaken
- Damage prevention awareness
- One-Call requirements (USA)
- · Leak recognition and response
- ROW encroachment prevention
- · Availability of pipeline location information and operators through NPMS

#### 4.7 One-Call Centers

Information to be communicated to One-Call Centers

• Pipeline location information (USA buffers or map books)



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# 5.0 MESSAGE DELIVERY METHODS AND/OR MEDIA

# 5.1 Affected Public (LDC)

Table 2

Method	Baseline	PG&E Bill Stuffer
		The bill stuffer will include a safety message in the major California languages that instruct the reader to call a phone number for translation of the safety message.
	Supplemental	Supplemental activities include:  1. Personal Contact – Utility personnel will communicate pipeline safety messages during face-to-face contact with members of the affected public at local farm shows and other community events. In addition, employees will communicate with the public as appropriate during leak surveys, ground patrols, mark and locate meetings, and when resolving encroachments.
		2. Construction/Maintenance Alerts – Field supervisors select the most effective way to contact the affected public prior to any significant maintenance or construction activity, including using letters, door-hangers or personal contact.
		3. Website – PG&E's Public Safety website at <u>www.PGE.com</u> will be maintained by the Utility Public Safety Program Manager to include relevant safety and damage prevention information.
		4. Educational items Brochures, calendars, key chains, pens, and give-away items containing the company's emergency contact information or USA information to be distributed during personal contact.
		<ul> <li>5. One-Call System Participation - Work with California one-call centers (USA North and USA South - DigAlert) to encourage the communication of safe and proper excavation methods to the public.</li> </ul>



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Frequency	Baseline	Twice each year
	Supplemental	Refer to Table 8
Strategy	Baseline	PG&E's distribution pipelines lie within its gas and electric service territory. Providing the information with a bill stuffer will ensure that all persons with gas distribution pipelines near their residence will be informed regardless of whether they utilize gas or only electric.
	Supplemental	Supplemental activities provide field supervisors with the flexibility necessary to meet the unique public awareness needs specific to their region or area.
Documentation	Baseline & Supplemental	Primary documentation is stored electronically.



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# 5.2 Affected Public (Gas Transmission and Gas Gathering) Table 3

		Table 3
Method	Baseline	A targeted direct-mail program to persons who do not receive the semi-annual bill stuffer.
	Supplemental	In areas where a significant number of people do not speak English, mailers will be developed in the native language of the population or a phone number will be provided for translation of the mailer.  Examples of supplemental activities include:  1. Personal Contact — Utility personnel will communicate pipeline safety messages during face-to-face contact with members of the affected public at local farm shows and other community events.
		2. Website – PG&E's Public Safety website at <u>www.PGE.com</u> will be maintained by the Utility Public Safety Program Manager to include relevant safety and damage prevention information.
		<ul> <li>3. Educational items Brochures, calendars, key chains, pens, and give-away items containing the company's emergency contact information or USA information to be distributed during personal contact.</li> </ul>
		4. One-Call System Participation - Work with California one-call centers (USA North and USA South - Dig Alert)to encourage the communication of safe and proper excavation methods to the public
		<ul> <li>5. Notify land owners and property tenants of shallow transmission lines on their property (GIB 181))</li> </ul>
		6. Provide standby personnel when contractor is digging within 5 feet of the pipeline. (GIB 151)
Frequency	Baseline	Every two years
	Supplemental	Refer to Table 8
Strategy	Baseline	PG&E's gas transmission/gathering pipelines traverse areas of California that are not served by PG&E. A targeted mailing to the affected public will provide the most effective means of information distribution.
	Supplemental	Supplemental activities provide field supervisors with the flexibility necessary to meet the unique public awareness needs specific to their region or area.
Documentation	Baseline & Supplemental	Primary documentation is stored electronically.



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# 5.3 Local And State Emergency Response Agencies

Method	Baseline	Annually PG&E will communicate with local and state emergency response agencies through targeted distribution of print materials or personal contact.	
	Supplemental	The following shall be utilized to enhance communication:	
		Emergency Drills – When appropriate, field locations should invite local emergency responders to participate in mock emergency drill exercises.	
		Emergency Training – As requested, provide the "Responding to Utility Emergencies" instructional materials to fire and police agencies.	
·		3. Joint Meeting —Gas Transmission field locations will supplement their baseline outreach by participating in a biennial meeting. Meetings to be held jointly with other pipeline companies for emergency response officials in the High Desert area.	
		Online Access – Website to allow emergency response officials to order safety related messages.	
		Wallet Card – Card with emergency contact numbers when responding to a pipeline emergency.	
Frequency	Baseline	Annually	
	Supplemental	Refer to Table 8	
Strategy	Baseline	While face-to-face communication is preferred, PG&E will also attempt to make contact with emergency responders through written correspondence from the local field supervisor, as well as provide a more detailed presentation or facility tour at the emergency response official's request.	
	Supplemental	Face-to-face interaction between emergency response officials and PG&E personnel will help establish the trust necessary to work together during a crisis.	
Documentation	Baseline & Supplemental	Primary documentation is stored electronically.	



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# 5.4 Local Public Officials and Planning Agencies

Method	Baseline Supplemental	Using the Pipeline Association for Public Awareness (PAPA), PG&E will conduct a targeted direct mail program to deliver its messages to the local public officials, governing councils and planning agencies in cities, towns and counties in which PG&E operates.  1. Personal Contact – These letters would include an offer to meet with that agencies' leadership.
Frequency	Baseline	Every three years.
	Supplemental	Refer to Table 8
Strategy	Baseline	Due to the large number of public officials located in each county, the most complete and efficient means of disseminating information is through direct mail.
	Supplemental	Upon request, face-to-face meetings will be scheduled and completed utilizing support from the local operations supervisor, land and government relations, as appropriate.
Documentation		Primary documentation is stored electronically through PAPA.



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# 5.5 Excavators, Developers, Contractors and One-Call Centers

Method	Baseline  Excavators,  Developers &  Contractors	To deliver its messages to excavators, developers and contractors, PG&E will conduct annual targeted mailings.
	Baseline One Call Centers	PG&E will maintain membership in the applicable regional One Call centers (USA) where it has operations.
	Supplemental	USA – One Call Events – Safety Awareness for Excavators (SAFE) events.
	Excavators, Contractors, Ag Operators	Some field locations may elect to supplement their baseline outreach by participating in a single meeting for contractors, held jointly with other pipeline companies.
		<ol> <li>Offer to the Excavators and Contractors, free of charge, our PG&amp;E safety video "Excavation Safety" and "Contractor Beware" safety educational materials</li> <li>Offer Ag Operators our Ag Worker Beware safety educational materials.</li> </ol>
	Supplemental  Land Developers	Contractor Beware brochures – English and Spanish More detailed safety guidelines may be distributed to land developers via mail.
	Supplemental One Call Centers	Personal Contact – Be an active board member of the USA One-Call Centers.
Frequency	Baseline	Annually
	Supplemental	Refer to Table 8
Strategy	Baseline	Due to the large number of excavators located in each county, the most complete and efficient means of disseminating information is through direct mail.
	Supplemental	As needed, face to face meetings with land developers may be conducted and detailed construction guidelines may be distributed.
Documentation		Primary documentation is stored electronically.



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### 5.6 Method, Message & Frequency Summary

### Table 7 - Summary

Audience	Requirement	Method	Frequency	Coordination
Affected Public	Baseline	Bill Stuffer	2x/year	PSPM
(LDC)	Supplemental	<ul> <li>Maintenance &amp;</li> <li>Construction Alerts</li> <li>Personal Contact</li> <li>Use items</li> </ul>	As needed	Field
Affected Public (Gas Transmission & Gas Gathering)	Baseline	Targeted mailing	Every two years	PPAPM
Local and State Emergency Response & Planning Agencies	Baseline	<ul> <li>Targeted         distribution of print         materials         OR         <ul> <li>Group Meeting</li> </ul> </li> </ul>	Annual	SH&C (PUBLIC SAFETY) Gas Transmission and Distribution
	Supplemental	<ul> <li>Meeting/ Station</li> <li>Tours</li> <li>ER Training</li> <li>Mock Drills</li> <li>Joint Meeting</li> <li>Participation in</li> <li>Emergency Response</li> <li>Organizations</li> </ul>	As needed	Field
Local Public Officials	Baseline	■ Letters	3 years	Gas Transmission and Distribution SH&C (PUBLIC SAFETY)
	Supplemental	Personal Contact	As needed	Field
Excavators Contractors Ag Operators Land Developers One Call Centers	Baseline	<ul><li>Letter and/or</li><li>Brochure</li><li>One Call</li><li>membership</li></ul>	Annual	Transmission PPAPM/SH&C (PUBLIC SAFETY)



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Excavators Contractors Ag Operators	Supplemental	<ul><li>Joint Meeting</li><li>USA One-Call events</li></ul>	As needed	Field
		<ul><li>Excavator</li><li>newsletter</li><li>Farmer's mailer</li></ul>	As needed	Field
One Call Centers	Supplemental	Personal Contact	As needed	Field



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### 6.0 SUPPLEMENTAL ENHANCEMENTS OF BASELINE PROGRAM

#### All Audiences

The message content, delivery medium and delivery frequency will be supplemented beyond the baseline where some additional level of public awareness communication is desired. Those supplemental measures are listed in section 5. PG&E will take supplemental measures along pipelines considering the following relevant factors:

Relevant Factors	Delivery Medium	Assessment
Nelevallt   actors	Benvery Mediani	Frequency
Potential Hazards	Customer Letters will be issued for known	When identified
1 Otential Flazards	locations with shallow transmission pipe	with follow up in
	(usually through Gas Mapping).	and 6 months
HCA's	Annual assessment identified through risk	As needed
I HCA'S	analysis and First Responder's meetings then	Asticcaca
	stored into GIS. Verbal or written	
	communications to customers when pipeline	
	safety is undermined.	
Deputation density	Identified by risk analysis and stored in GIS	yearly
Population density	Letters or verbal communication will be made	As needed
Land development		ASTIEEded
activity	with developers when proposed development	
	/improvement plans identify an area in conflict	
	with a gas transmission facility.	0
Land farming activity	Attend and participate in local farm shows	2x year
Third-party damage	Written or verbal communications to third	As needed
incidents	parties who have been identified through SH&C	
	as being continually negligent while working	
	around our facilities.	
Environmental	Generally environmental conditions need not be	As needed
considerations	considered when planning activities to reduce	
	the likelihood of third party damage to natural	
	gas pipeline due to the lack of negative	
	environmental effects.	
Pipeline history in an	Annual assessment through risk analysis and	As needed
area	stored into GIS.	
Specific local	Special permits for pipeline operating at higher	As needed
situations	stress level due to population density	
Regulatory	Based on issuance of any new relevant	As needed.
requirements	bulletins or regulations by PHMSA or CPUC.	
	Regulatory Support & Analysis will monitor.	· · · · · · · · · · · · · · · · · · ·
Results from previous	Conduct a Program Effectiveness survey	Review results of
Public Awareness	every 4 years	study every 4
Program evaluations		years
Other relevant needs	PG&E provides standby personnel free of	As needed
	charge to <u>all</u> third party excavators digging	
	within 5 feet of a PG&E transmission line	



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### 7.0 PROGRAM DOCUMENTATION AND RECORDKEEPING

#### 7.1 Documentation

PG&E will maintain records of key program elements to demonstrate the level of implementation of the Pipeline Public Awareness Program. Primary documentation will be maintained on an internal SharePoint website Record keeping will include:

- Lists, records and other documentation of stakeholder audiences with whom PG&E has communicated
- · Copies of all materials provided to each stakeholder audience
- All program evaluations
- Retention Period The record retention period for all documentation listed above will be a minimum of five (5) years.
- Program changes

#### 7.2 Responsibilities

#### 7.2.1 Field Offices

- Collect sign-in sheets during FRP and ERD meetings.
- Document all records of mock drill participants.
- Record of invitation or attendee list for excavator or emergency official joint meetings.
- Maintain and file lists of damage prevention group meetings attended.
- Maintain and file lists of PSIP/FRP meetings attended.
- Maintain contact list that includes names and addresses of local emergency response personnel.
- Maintain and file copies of invitation letters sent to emergency response personnel for joint meetings, emergency drills, training or FRP and ERD meetings.
- Record contact or correspondence made with landowners, public officials or excavators where appropriate safety messages are delivered.
- Record correspondence sent to landowners to advise them of upcoming maintenance / construction activities.



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#### 7.2.2 Pipeline Public Awareness Program Manager

- Develop list of all affected public to receive targeted mailer.
- Identify the major language groups being supported by PG&E's call center.
- Ensure major language groups are addressed using a reference to contact PG&E for a safety message about pipelines.
- Ensure the PG&E call center has translations of the brochures in the major language groups.
- Document samples of all mailers, brochures and packet materials.
- Coordinate with all PG&E employees participating in PSIP...

#### 7.2.3 Public Safety Program Manager

- Manage mailing list for the following target markets
  - Excavators, contractors and land developers, within the counties PG&E operates, who receive and request Contractor Beware safety materials and videos.
  - Schools, within the counties PG&E operates, who receive and request our Safe Kids safety materials.
  - Agricultural Operators, within the counties PG&E operates, who receive and request Ag Worker Beware safety materials.



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#### 8.0 PROGRAM EVALUATION AND EFFECTIVENESS

#### 8.1 Purpose

The primary purpose of the evaluation of the Pipeline Public Awareness Program is:

- Assess whether the current program is effective in achieving its goals.
- Provide information on implementing improvements to the program.
- Demonstrate whether the program is being implemented as planned.

#### 8.2 Annual Review

PG&E will complete an annual internal self-assessment of whether the program is being implemented according to the guidelines set forth in this public awareness plan. The audit will be organized by the program administrator and coordinated at the PG&E level. The results of the annual review will be documented and transmitted to the "Key Personnel," Table 1 along with action plans to address any needed changes.

#### 8.3 Measuring Program Effectiveness

**PG&E** will participate in the Public Awareness Program Effectiveness Research Survey (PAPERS), a national industry-sponsored evaluation program developed and supported by the American Petroleum Institute (API), Association of Oil Pipelines (AOPL), and the Interstate Natural Gas Association of America (INGAA).

This broad, industry-wide approach provides operators with meaningful, comparable, consistent insight on communications efforts that meet the intent of the RP1162 regulatory requirements. The evaluation of program effectiveness will be performed at least once every four years.

#### **Contractor Credentials**

The PAPERS program was developed in coordination with Harris Interactive, a large market research firm known for pioneering leadership in the online market research industry. Harris Interactive has a reputation as a leading strategic research firm with a depth of knowledge in the energy industry. In 2005, Harris Interactive conducted a pilot study on behalf of API to establish a robust approach to meeting the recommendations of RP1162.



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#### Methodology

The PAPERS program methodology was designed to evaluate the effectiveness of each pipeline operator's program. The survey will measure the reception and comprehension of key messages by each of the four key stakeholder audiences. Evaluation methods will include respondents along the right-of-way for all pipeline systems a company provides. The results will be presented in aggregate for the individual company – not by pipeline system.

The PAPERS program has identified the most effective research approach for each of the stakeholder audiences identified in RP1162: the Affected Public, Local Public Officials, Emergency Responders and Excavators.

#### Affected Public

Analysis from the pilot study indicated that a mail survey is the most effective methodological approach to reach this audience. To provide the most accurate and robust survey results, the PAPERS program will utilize GIS data to locate addresses within a certain buffer zone (generally 660 feet or 1,000 feet) of the pipelines. With this information, a sufficient number of potential respondents will be randomly selected to complete the survey. This approach will account for areas of high population density and areas of high consequence by including a representative portion of these areas in the sample.

#### Local Public Officials

Analysis from the pilot study indicated that a telephone survey is the most effective methodological approach to reach Local Public Officials. The PAPERS program will utilize pipeline location and information purchased from an outside source to identify an appropriate sample of public officials within applicable jurisdictions. Yellowbook's Municipal Leadership Directories will be used to obtain sample information.

#### 8.4 Annual Revisions

As a result of the annual review, a revised Pipeline Public Awareness Program procedure shall be issued when necessary by the Manager of System Integrity and Technical Services and all "Key Personnel" shall receive a copy of the new revision with the key changes noted.