

III. Program Objectives

The objectives of Atmos Energy’s Pipeline Safety Public Awareness Program are the following:

- A. To better educate the affected public about the presence of our natural gas pipelines in the areas where we operate.
- B. To better inform those who live or work near our pipelines about how to recognize a natural gas release or emergency, potential hazards and how to respond appropriately.
- C. To better educate excavators, contractors, and the public to take steps to prevent damage to our pipelines and to respond safely and promptly should their actions damage our pipelines.
- D. To better inform stakeholders about our organization’s emergency operating procedures and related safety procedures in the event of an emergency.
- E. To help first responders better handle an emergency involving our pipelines.
- F. To explain the role pipelines, play in energy delivery and how stakeholders can learn whether pipelines are located near them.

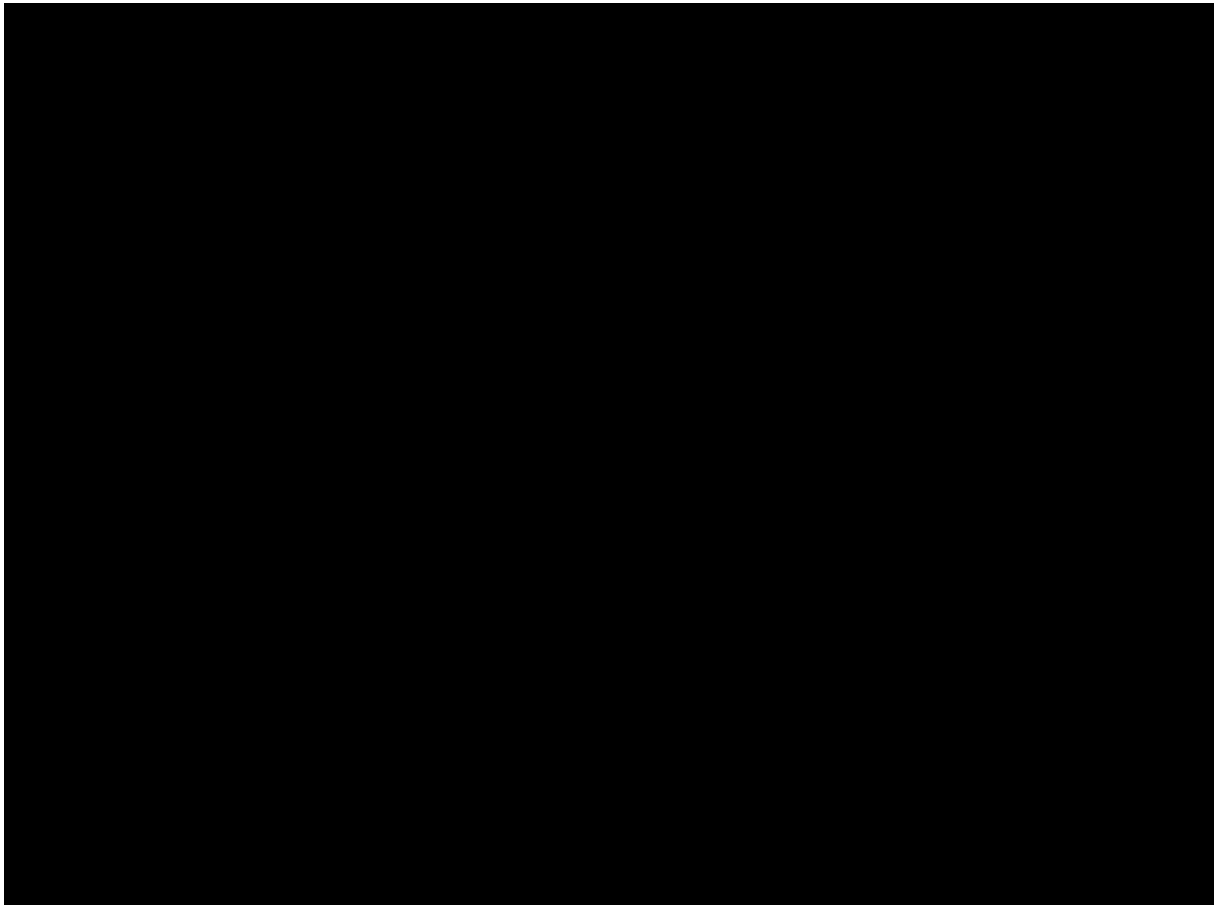
IV. Program Responsibilities

Atmos Energy Corporation’s Plan Administrator is responsible for managing the company’s Pipeline Safety Public Awareness Program. The Plan Administrator reports to the Plan Owner, and all work and recommendations are approved by the Plan Owner. Atmos Energy Corporation relies on State Administrators to help guide the conduct of the overall program. Operating in this manner enables the Plan Administrator to develop the best processes and solutions, to draw upon qualified employees with the expertise to implement these solutions, and to make the best policies and standards for the entire enterprise. The State Administrators contribute a diversity of professional and specialized knowledge, and they represent all of the company’s operating units. Diagram 1 below shows the relationships of the Plan Administrator, Plan Owner, and State Administrators.

V. Plan Administrator Functions

Specifically, the Plan Administrator performs the following functions for managing Atmos Energy's Pipeline Safety Public Awareness Program:

- A. Maintains the program's written plan (this document) and controls any changes to it.
- B. Evaluates the need for all supplemental communications and directs their preparation.
- C. Prepares annual program budgets for approval by the Plan Owner.
- D. Directs the compilation and updating of lists of all key audiences and monitors changes to these lists.
- E. Directs the preparation by Corporate Communications of communications plans, messages and materials, such as public awareness safety advertising, customer safety bill inserts, brochures and collateral, pipeline right of way mailings, public opinion surveys of key audiences, media and public relations campaigns to support damage prevention awareness, leak detection and response, and right-of-way encroachment awareness and reviews pre/posttests of communications materials and results of assessment surveys.
- F. Directs the preparation of the company's pipeline right of way mailer to raise awareness about pipeline safety among those within our pipeline buffers, manages the geocoding and mailing of the ROW brochure by outside vendors and reviews assessment surveys.
- G. Directs the company's contact programs by State Administrators with emergency responders and excavators and reviews feedback data provided by the program vendors.
- H. Conducts an annual self-evaluation of the program's results and prepares a written report.
- I. Conducts at least every four years an effectiveness assessment of the program's results in improving pipeline safety awareness among the four key audiences, prepares a written report of the assessment and reports findings to the Plan Owner.
- J. Determines changes or events that necessitate adding supplemental communications.



VIII. Program Assessment

Annually, the Plan Administrator will coordinate an assessment of the program's annual implementation and results, using information from the internal groups discussed above, the State Administrators, outside public awareness service providers, opinion surveys, media penetration, data about critical measures, such as number of damages and leaks, or reviews of program results from regulatory inspections.

In evaluating the program, the Plan Administrator will be guided by the following objectives:

- A. Members of the key stakeholder audiences from the affected public, emergency officials, public officials and excavators are properly identified, and reasonable efforts have been made to compile complete lists of those within each key audience.
- B. Messages to each stakeholder audience are appropriate and are understood.

- C. Channels are reaching each stakeholder audience with adequate penetration.
- D. Messages are delivered as specified in our program.
- E. Effectiveness measurements are comprehensive, state-specific to the degree possible and consistent with Sections 18-23 of the Pipeline and Hazardous Materials Safety Administration Form 21 Public Awareness Program Effectiveness Inspection, May 2015, Rev. IA v3.1.5.
- F. Program modifications reflect changing situations, the results of stakeholder feedback or regulatory audits, and other effectiveness evaluations.

The Plan Administrator will prepare a detailed written self-evaluation annually, will communicate these findings and any recommended changes to the Plan Owner promptly and will implement approved changes thereafter. The annual self-evaluation will include any decisions about conducting or not conducting supplemental communications and the reasons for those decisions. The annual self-evaluation reports will be preserved with supporting documentation for regulatory inspection and audits. Changes to the program will be noted in the program document's Revision History.

To provide an independent, third-party assessment of the program, which qualifies as one of the three approved forms of annual assessment (see API RP 1162 Section 8.3 and PHMSA Form 21 Section 16), the Plan Owner may consider engaging qualified auditing firms to review the required processes and documentation of this Pipeline Safety Public Awareness Program.

At least every four years, the Plan Administrator will oversee a detailed effectiveness assessment of the program's overall results. This effective assessment will comply with API RP 1162 Section 8.4 (First Edition, December 2003) and PHMSA Form 21 Sections 18-23, as revised. As required by Section 8.4, the Plan Administrator will collect, assess, and document verifiable results for the following four measures of the program's effectiveness.

- A. 8.41 Measure 1 – Outreach: Percentage of Each Intended Audience Reached with Desired Messages
- B. 8.42 Measure 2 – Understandability of the Content of the Message
- C. 8.43 Measure 3 – Desired Behaviors by the Intended Stakeholder Audience
- D. 8.44 Measure 4 – Achieving Bottom Line Results

Although Atmos Energy is responsible for its own public awareness program in each state where it operates, it supports collaborative alliances to achieve economies of scale and message consistency statewide. These alliances also help promote best practices and cooperation among operators.

Atmos Energy's largest collaborative effort is the Texas Pipeline Awareness Alliance, which the company helped form in 2005. By joining together, Atmos Energy, CenterPoint Energy, Texas Gas Service, Transmission Operators, Texas municipal utilities and smaller LDCs along with natural-gas and hazardous liquids transmission operators are much better able to reach the state's nearly 22.6 million adults in the affected public in Texas out of a total population of 30.3 million in 2022. TPAA advertises in 20 designated market areas covering all 254 counties across Texas, including the nation's fifth largest DMA, Dallas-Fort Worth.

X. *Program Summary*

The remaining sections of this program document contain the following:

- A. Detailed identification of the stakeholders to whom we address our pipeline safety public awareness communications, how these audiences were identified and how data from the U.S. Census were used to make language-community analyses by state and county
- B. Specifics for complying with baseline program requirements of API RP 1162 and other public awareness efforts, including the procedures to be performed by our identified employees
- C. Message types, message frequencies, channels for distribution and message maps of key materials for communicating with stakeholders
- D. Processes used to establish a baseline of pipeline safety awareness for each key audience

- E. Procedures for evaluating, documenting, and reporting the effectiveness of the program
- F. Quantitative changes or major events that could require supplemental public awareness communications
- G. Processes, tools, and resources for administering the program, record keeping and maintaining a repository of all communications and program materials
- H. Additional information about the program, distribution, definitions, and system details

02) TARGETING PIPELINE SAFETY PUBLIC AWARENESS COMMUNICATIONS

This chapter provides the guidelines that we follow to identify stakeholder audiences, essential messages, and communication channels to reach each key audience.

I. Identifying Stakeholder Audiences

2.1.1 Objective

Atmos Energy will continually work to identify and evaluate the members of the stakeholder audiences for our Pipeline Safety Public Awareness Program. Annually, the Plan Administrator, with help from other groups, will review audiences using the stated methods to identify stakeholders.

2.1.2 Methods to Identify Stakeholders

To accomplish the objectives of our program, stakeholder audiences are identified using a variety of means that may depend on both company and outside resources. Our outside consultants and vendors supporting this work are listed starting on page 58. The key criteria for determining audiences are our pipeline locations and the stakeholders in the geographic locations of our pipelines.

2.1.3 Internal sources or methods used for determining appropriate stakeholders may include:

- A. Operations personnel who routinely work with emergency officials and excavators
- B. Compliance and public affairs managers who routinely work with governmental and regulatory bodies, including municipalities

- C. Right-of-way records and contacts
 - D. Customer Service System database
 - E. Lists of franchised cities and environs and lists of counties having company assets
 - F. Reportable incidents and lists of violators causing pipeline damages (DIMP program)
 - G. Company service area maps, shapefiles, charts, and proprietary data
- 2.1.4 External sources or methods used for determining appropriate stakeholders may include:
- A. U.S. Postal Service Zip Codes™
 - B. U.S. Census Bureau population and demographic data
 - C. Vendors' geospatial databases and geographic information systems (GIS) for mapping
 - D. Excavator data from state One-Call centers, state pipeline associations, Enertech and KorTerra
 - E. Local telephone directories, including listings from the Yellow Pages or online
 - F. Published resources, commercial databases, SOC and SIC codes, and trade-association lists
 - G. Data from vendors who conduct meetings with key stakeholders, including sign-in sheets
 - H. Nielsen Audio and Nielsen audience ratings, stations' cumulative reach, propagation maps

II. Identified Stakeholder Audiences

For purposes of this program, the following audiences have been identified as stakeholders:

2.2.1 Affected Public in Areas Where We Operate

- A. Local distribution company (LDC) customers, based on the company's customer accounts

- B. Adults in our service area, 18 years and older, including non-customers, based on U.S. Census Bureau 2020 population data for the boundaries of our service area cities, towns, environs, or counties, as delineated using the company's 811 Call Center shape-file maps
- C. Residents along our transmission pipeline rights of way, based on geospatial coding of land parcels within a buffer 1,000 feet on each side of our transmission pipelines; the company has chosen the wider buffers to provide a greater margin of safety than the recommended minimum 660 feet in Appendix B of API RP 1162 2003 edition to help ensure that we reach the people living and working along our rights of way.
- D. Places of congregation and identified sites within the potential impact radius near our transmission pipelines and gathering lines, at a minimum based on geospatial coding of such places within 1,000 feet of our facilities:
- E. Businesses
- F. Schools, public, private and charter, preschools, trade, military, colleges, and universities
- G. Places of worship
- H. Hospitals, medical facilities, mental institutions, and long-term care facilities
- I. Prisons, reformatories, and jail schools
- J. Parks and recreational areas
- K. Day care facilities and Head Start centers
- L. Residents near our natural gas storage or other major operational facilities, with a buffer 1,000 feet from the extents of the storage field, based on company property leases, rights-of-way data and geospatial coding of nearby land parcels

2.2.2 Emergency Response Officials in Areas Where We Operate

- A. Emergency operating centers and 911 Call Center operators, based on service area lists
- B. Fire and rescue departments, based on geospatial coding of locations in the service area

- C. Law enforcement agencies, based on geospatial coding of agencies in the service area
- D. Local emergency planning commissions, based on commissions in the service area
- E. County emergency management agencies, based on agencies in the service area

2.2.3 Public Officials in Areas Where We Operate

- A. Elected officials of cities/townships, counties/parishes, and unified government officials
- B. Public utility commissioners and staffs
- C. City managers and directors of municipal utility systems in the service area
- D. Municipal, county/parish and state public-works managers and building-code directors
- E. Planning and zoning boards
- F. Public school officials, including independent school district superintendents, transportation heads, facilities managers, police or security chiefs and campus principals, including heads of alternative, reformatory, and jail schools
- G. Administrators of private, parochial and charter K–12 schools; preschools, Montessori schools and Head Start programs; military schools, junior colleges, and universities
- H. Hospital administrators, prison wardens, public-institution directors, and heads of long-term care facilities
- I. U.S. Forest Service Regions 2 and 8, National Park Service regions, state parks directors
- J. Permitting authorities for community events, festivals, parks, and recreational facilities

2.2.4 Excavators in Areas Where We Operate

- A. Construction companies, including fencing, drain and tile, and landscaping businesses
- B. Excavation contractors, including drilling, boring and blasting businesses
- C. Demolition companies, logging companies and forestry-land owners
- D. Equipment rental companies
- E. Public works officials, including heads of municipal utilities
- F. Highway departments and other road construction or maintenance entities
- G. Home builders, remodeling contractors, plumbers, and drain-cleaning businesses
- H. Land developers
- I. Utility contractors
- J. Railroad companies and private railroad operators
- K. One-Call centers

III. Messages

The content, frequency, and delivery of our messages to stakeholders are assessed to satisfy federal pipeline safety public awareness requirements and any supplemental state requirements.

2.3.1 Key Messages

- A. Pipeline purpose and reliability
- B. Awareness of hazards and prevention measures, including cross bores
- C. Emergency preparedness
- D. How to recognize and respond to a leak
- E. How to report a natural gas release or incident
- F. One-Call notification requirements
- G. Right-of-way encroachment
- H. Pipeline location information available in the National Pipeline Mapping System (NPMS)
- I. How to obtain additional safety information and how to contact Atmos Energy

2.3.2 Frequency of Messages

Atmos Energy annually evaluates the frequency of the messages to stakeholder audiences. Most of Atmos Energy's public awareness communications well exceed the minimum required frequency, and numerous supplemental delivery methods are used, such as meetings, events, websites, door hangers, etc.

2.3.3 Delivery of Messages

Atmos Energy uses a variety of delivery methods and communication channels to implement our Pipeline Safety Public Awareness Program. Delivery methods are selected to align with audience characteristics and to provide the most-efficient channels and media mix.

IV. Plan for Pipeline Safety Public Awareness Communications

Stakeholder audiences, specific messages, delivery frequencies and potential delivery methods for each stakeholder group are identified in the table below. Many of the delivery methods are in both English and Spanish (see Demographic Analysis on page 32).

Table 5: Pipeline Safety Public Awareness Communications Plan

Stakeholder Audience	Message Type	Delivery Frequency	Delivery Method
<i>Affected Public</i>			
Residents along transmission pipeline rights of way (ROW) Places of congregation and identified sites within the potential impact radius near our transmission pipelines and gathering lines, based on geospatial coding of such places within 1,000 feet of our facilities	Pipeline purpose (wellhead to burner tip) and reliability	Once every two years	Direct mailing of printed materials
	Awareness of hazards and prevention measures undertaken		Limited-detail maps
	Damage prevention awareness		Pipeline markers
	One-Call requirements		Personal contacts as needed Media relations
	Leak recognition and response		Paid advertising
	Right-of-way encroachment		Internet sites; social media
	Pipeline location information (purpose of a marker, description of a marker and information provided by a marker)		
	Information about operator’s Integrity Management Program		
	How to get more information and to contact Atmos Energy or 911		
	Availability of a list of pipeline operators through NPMS		
	Existence of Railroad Commission of Texas damage prevention rule (Texas only)		
	Any planned major maintenance or construction activity	As appropriate	Personal contacts as needed Public notices

PUBLIC AWARENESS PROGRAM

Chapter 2: Targeting Pipeline Safety Public Awareness Communications

Stakeholder Audience	Message Type	Delivery Frequency	Delivery Method
			Media relations
Residents near storage or other major operational transmission facilities	Facility-specific information, including company contact information Facility purpose	Once every two years	Direct mail printed materials Pipeline markers Personal contacts as needed
LDC customers	Pipeline purpose and reliability Awareness of hazards and prevention measures undertaken Damage prevention awareness Leak recognition and response One-Call requirements Right-of-way encroachment How to get more information and to contact Atmos Energy or 911 Existence of Railroad Commission of Texas damage prevention rule (Texas only) Propane leak recognition and response and awareness of propane hazards with all the above messages (Jurisdictional Systems in Tennessee only) Snow and ice hazards for customers in colder climates	Twice annually	Bill inserts Bill-print messages Billing envelope Call 811 logo Billing-envelope messages New-customer packets Brochures Internet sites; social media Paid advertising Media relations Customer Contact Center IVR on-hold messages Door hanger Pipeline markers Yard signs Outdoor display banners Direct mail or letters Energy assistance contacts with low-income customers
	Maintaining your natural gas lines	Within 90 days of becoming a customer; annually thereafter	New-customer packets Bill inserts and brochures Bill-print messages
Non-customers	Pipeline purpose and reliability Awareness of hazards and prevention measures undertaken Damage prevention awareness Leak recognition and response	Once annually	Personal contacts as needed Internet sites; social media Paid advertising Media relations Festivals/community events

Stakeholder Audience	Message Type	Delivery Frequency	Delivery Method
	One-Call requirements Right-of-way encroachment		National 811 Day promotions and advertising
	How to get more information and to contact Atmos Energy or 911 Existence of Railroad Commission of Texas damage prevention rule (Texas only)		Pipeline markers Meetings of civic clubs, city councils, chambers of commerce, homeowners groups Advertising specialty items Outdoor display banners

Emergency Officials

	Pipeline purpose (wellhead to burner tip) and reliability Awareness of hazards and prevention measures undertaken (priority to protect life first) Damage prevention measures Potential hazards Emergency preparedness communications, company contact and response information One-Call requirements Leak recognition and response Pipeline location information (purpose of a marker, description of a marker and information provided by a marker) Availability of maps (NPMS) Specific description of product transported and any potential special hazards (applies only to gathering line areas) How to get more information and to contact Atmos Energy or 911	Once annually	Personal contact as needed Direct mail printed materials Brochure with information for emergency responders Group meetings Telephone calls Training Emails Media relations Internet sites; social media Pipeline markers DVDs and CDs providing professional information Online portal to advise Texas emergency responders about company's Emergency Operating Procedures Tabletop emergency preparedness exercises Maps (as required) Company's Emergency Operating Procedures document
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PUBLIC AWARENESS PROGRAM

Chapter 2: Targeting Pipeline Safety Public Awareness Communications

Stakeholder Audience	Message Type	Delivery Frequency	Delivery Method
			Firefighter 101 training
	Emergency Operating Procedures, detailing Atmos Energy’s practices for dealing with a natural gas release or resulting hazardous incident		
	Existence of Railroad Commission of Texas damage prevention rule (Texas only)		
Public Officials			
	Pipeline purpose (wellhead to burner tip) and reliability	Once every three years	Direct mail letters and printed materials
	Awareness of hazards and prevention measures undertaken		Personal contacts as needed
	Damage prevention awareness		Telephone calls
	Leak recognition and response		Emails
	Information concerning communications to the affected public and emergency officials		Paid advertising
	Right-of-way encroachment		Media relations
	One-Call requirements		Internet sites; social media
	Pipeline location information (purpose of a marker, description of a marker and information provided by a marker)		Pipeline markers
	Availability of maps (NPMS)		Yellow line-location flags with company’s contact number
	How to get additional information and contact Atmos Energy or 911		State municipal association contacts
	Existence of Railroad Commission of Texas damage prevention rule (Texas only)		School association meetings
	Pipeline integrity programs		School pipe testing (Texas)
			Presentations to city councils, school boards or other official agencies
			Maps (as required)
			Official proclamations
Excavators			

PUBLIC AWARENESS PROGRAM

Chapter 2: Targeting Pipeline Safety Public Awareness Communications

Stakeholder Audience	Message Type	Delivery Frequency	Delivery Method
Excavators/Contractors/ Land Developers	Pipeline purpose (wellhead to burner tip) and reliability	Once annually	Direct mail printed materials
	Awareness of hazards and prevention measures undertaken, including cross bores		Brochure about damage prevention awareness
	Damage prevention awareness		One-Call center outreach
	One-Call requirements		Pipeline markers
	Right-of-way encroachment		Yellow line-location flags with company's contact number
	Leak recognition and response		Personal contacts as needed
	Pipeline location information, availability of maps (NPMS)		Internet sites; social media
			Paid advertising
			Media Relations
	How to get additional information and contact Atmos Energy or 911		Emails
	Existence of Railroad Commission of Texas damage prevention rule (Texas only)		Advertising specialty items
	Possible presence of Extron or Aldyl-A polyethylene pipe and company's accelerated actions to replace remaining strings and to warn affected contractors (Virginia only)		Outdoor display banners
			Yard signs
			Training
			Excavator meetings
			Cross-bore awareness brochure for plumbers, drain-cleaning technicians and municipal sewer and wastewater workers
One-Call Centers	Pipeline location information	Requirements of the applicable One-Call center	One-Call center membership
	Other requirements of the applicable One-Call center		Requirements of the applicable One-Call center
	Existence of Railroad Commission of Texas damage prevention rule (Texas only)		Maps (as required)
			Internet sites; social media

III. Program Assessment and Evaluation

This section reviews methods to assess the effectiveness of our Pipeline Safety Public Awareness Program. It also identifies those responsible for collecting assessment information and for evaluating the program.

IV. Evaluation Objectives

In evaluating the effectiveness of our program and materials, we will ask the following questions:

- A. Is the information reaching the intended stakeholder audience?
- B. Is the intended stakeholder audience aware of our messages?
- C. Does the intended stakeholder audience understand our messages?
- D. Are the messages for the intended stakeholder audience delivered effectively and frequently enough to achieve the desired results?
- E. Has the intended stakeholder audience responded appropriately to our pipeline safety public awareness program by changing attitudes, beliefs, or behaviors?
- F. Is our Pipeline Safety Public Awareness Program improving our pipeline safety results?
- G. Is our public awareness program operating efficiently?

V. Core Topics

The following core topics underlie our Pipeline Safety Public Awareness Program:

- A. Awareness of natural gas facilities in your home, neighborhood, or workplace
- B. Purpose of pipelines
- C. How to recognize a natural gas leak
- D. What to do if you detect a natural gas leak
- E. How to get help if you detect a natural gas leak
- F. The benefits of calling a One-Call center before you dig
- G. The legal requirement under state law to call 811 before you dig

- H. Your responsibility for maintaining natural gas lines on your property (if applicable)
- I. Preventing pipeline damages by not encroaching on rights of way

VI. Standards for Assessing Program Effectiveness

In assessing the effectiveness of our program, the identified employees will do the following:

- A. The Plan Administrator is responsible for selecting suitable public-opinion-survey vendors to track measurable responses from the affected public about the program activities and will direct the vendors' work and reporting.
- B. The Manager of Marketing Services will work with the company's Customer Service Group to obtain pipeline safety data from customer-satisfaction public opinion surveys.
- C. The Manager of Marketing Services will direct the company's advertising media buyers to perform audience penetration analyses at the state level, using independent ratings from Nielsen Audio, Nielsen, NCC or other reliable sources to report reach, frequency, and cumulative impressions of our safety communications among the affected public.
- D. Corporate Communications will monitor Google Analytics to track pageviews of safety pages on the company's Internet website, atmosenergy.com, as well as social media data about viewings of the company's pipeline safety videos on YouTube and relevant postings on its Facebook and Twitter accounts.
- E. State Administrators and division compliance managers will obtain feedback following meetings with various identified stakeholders, using standardized questionnaires about pipeline safety public awareness and pertinent verbatim comments from meetings, contacts, and discussions.
- F. The Plan Administrator will coordinate surveys of the stakeholder audiences to confirm their awareness of pipeline-safety materials and messages, assess their understanding of the messages and measure their attitudes and behaviors (or expected behaviors) regarding pipeline safety public awareness.
- G. The Plan Administrator will instruct mailing vendors to specify the ancillary endorsement Electronic Service Requested to assess bulk delivery of

required pipeline-right-of-way mailers, public-official mailings or others and will initiate follow-up mailings or contacts, if needed.

- H. Division compliance managers, working with the State Administrators, will review the number of requests for line locates and leaks, number of damages caused by no line-locate request and other pertinent damages data.
- I. Corporate Communication and Plan Administrators will periodically obtain and review other benchmarks or evaluations of pipeline safety public awareness programs, such as the percentage of each stakeholder audience being reached.

VII. Assessment Methods and Margin of Error

For each of the four key stakeholder audiences, the Plan Administrator will use assessment methods best suited to obtaining and measuring reliable feedback from the audience. The Plan Administrator will also use, if available, outside data from state regulatory commissions, national or state collaborative efforts, vendors' survey reports and industry benchmarking. Typically, the Plan Administrator will rely on four assessment methods. They are the following:

A. Random-sample survey of a stakeholder group:

Public opinion surveys require a sufficient size audience, techniques to draw a random sample from it (such as random-digit-dialing telephone surveying) and the ability to complete enough samples for a reasonable level of confidence and sampling error. Atmos Energy has used random sample surveys to assess the affected public since 2006 and beginning 2018 for Emergency Officials, Public Officials, and Excavators. This type of survey requires choosing a survey vendor that can conduct thousands of interviews because, based on experience, it takes approximately 30 calls to achieve one completed interview. The number of completed interviews determines the margin of error, or tolerance, in the results for a given level of confidence.

B. Census survey of all members of a stakeholder group:

When groups are too small or too difficult to reach by conventional random sampling, a census survey can be used to attempt to reach every member of the audience to measure awareness, attitudes, and behaviors. A census survey can be conducted by telephone, email, U.S. mail or in person. It is hindered by the often-small number of responses and the difficulty of achieving true randomness among the respondents.

C. Feedback forms collected at meetings or distributed to a stakeholder group:

Feedback forms are typically used with emergency officials and excavators to measure awareness and attitudes before and after meetings, which is a pre/posttest, or simply after a meeting or communication by Atmos Energy's vendors or by those conducting meetings for state collaborative efforts.

D. Focus group with members of a stakeholder audience:

A focus group provides qualitative, but not quantitative, assessment. A skilled focus-group facilitator can elicit attitudes and preferences that might otherwise be hard to measure with quantitative surveys. However, professional focus group organizers usually must pay people to participate; therefore, the motivation of the participants tends to limit the randomness of the response. Focus groups also suffer from interpersonal dynamics and regional preferences; a dominant individual or a widely held belief in the area can bias results.

3.6.1 Margin of Error

Margin of error indicates the accuracy of a survey's findings at a given confidence level (typically at 95 percent). The percentage of error is interrelated with the size of the stakeholder audience in a state, the confidence level chosen and the number of completed random samples of the audience. In general, Atmos Energy will seek a margin of error of ± 10 percent or less in random samples.

Appendix E.3.3 of API RP 1162 notes that the statistical error of a random sample survey is about $1/\sqrt{n}$, where n is the size of the sample. Generally, 100 completed samples would achieve the goal. However, for smaller stakeholder audiences, completing enough samples can be difficult and very costly. Based on our past experience with random samples of the affected public, the survey firm has had to make approximately 30 random-digit-dial calls to complete one sample.

For smaller stakeholder audiences, a census survey may be the only practicable way to measure a reasonable percentage. Nevertheless, even census surveys of smaller audiences in some states may result in margins of error that exceed ± 10 percent (see audience sizes in Table 4 on page 23).

VIII. Bottom Line Results

The ultimate goal of Atmos Energy's Pipeline Safety Public Awareness Program is to safeguard life and property. To that end, the Plan Administrator will take into account the following outcomes and document them in the quadrennial program assessments.

- A. Data about pipeline damages, hits and near misses from company records and any data from state regulatory agencies
- B. Injuries and deaths reported to the U.S. Department of Transportation or to state regulatory agencies
- C. Injuries of company employees associated with pipeline incidents, as reported to the U.S. Occupational Safety and Health Administration
- D. Liabilities for property loss or damage, based on data from the company's Risk Management Department
- E. Reportable incidents of natural gas ignition, using criteria in Section 27 of the company's Operations and Maintenance Manual

IX. Assessment of Evaluation Information

No more than four years apart, the Plan Administrator will prepare a consolidated report assessing the program's effectiveness. This report will be used in the overall evaluation of the program. It will be distributed to the Plan Owner, State Administrators and company departments and groups having responsibilities for the Pipeline Safety Public Awareness Program, as identified in Chapter 1, as part of the ongoing program assessment and improvement activities.

3.9.1 The consolidated report will cover the following points:

- A. Summarized results of surveys, polls, feedback forms, etc., for each key stakeholder group
- B. Any significant concerns or feedback that our baseline program and its messages, media or materials are not adequately communicating with the designated stakeholder audience.
- C. Any quantifiable risk-management statistics that reflect the cost/benefit of our Pipeline Safety Public Awareness Program
- D. Summary of discussions, including consideration of any proposed supplemental communications and decisions about the supplemental communications.
- E. Recommendations for program improvements, including any new resource needs.

X. Availability of Public Awareness Program Materials

Program documents, communications materials, stakeholder surveys, evaluation forms, program assessments, audit findings and other key documents will be available to key company employees.

Internal employee feedback about program materials can be sent to the Plan Administrator.