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July 30, 2013

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Mr. David Barrett  
Director, Central Region  
Pipeline and Hazardous Materials Safety Administration  
901 Locust Street, Suite 462  
Kansas City, MO 64106-2641

**RE: CPF 3-2013-1012M, Notice of Amendment**

Dear Mr. Barrett:

In responding to PHMSA's Notice of Amendment (NOA) dated July 2, 2013, Alliance Pipeline L.P. (APL) chooses option "A" and will not contest the NOA. Accordingly, APL has adjusted its plan(s).

In preparation for and during the PHMSA public awareness audit of Alliance Pipeline L.P. (APL) in October 2011, APL identified various inadequacies and shortfalls in its Public Awareness Plan. Immediately following the Audit summary with PHMSA, APL began to revise the Public Awareness Plan (PAP), which is now complete. The plan has been changed based on the feedback from the Audit summary session with PHMSA (H. Winnie) and from the PAP version reviewed. The new plan was reviewed by a multi-stakeholder group and approved as the corporate plan in June 2012.

The PAP as audited was titled "US Public Awareness Plan" (Internal Document Reference: INT-PLAN-0005) and has now been superseded by a document that is titled "Community and Corridor Stakeholder Engagement Plan" (Internal Document Reference: COR-PLAN-0003).

This revised plan is "borderless" and reflects APL's commitment to alignment of public awareness best practices in both the US and Canada. Therefore, as evidence of our commitment, in the attachment you will find APL's response to the issues identified by PHMSA and the referenced excerpts from the new plan.

Alliance Pipeline appreciates PHMSA's efforts during the audit and the valuable input regarding areas to improve our plans and procedures. We find this process useful to further refining our damage prevention efforts.

Please contact Michael McGrath, Team Leader Pipeline Performance and Compliance with comments, questions or concerns.

Sincerely,

Michael L. McGonagill  
Senior Vice President & COO  
Alliance Pipeline L.P.

MLM:rjvg  
cc: Harold Winnie (email)  
Enclosure: APL's response to each issue in the NOA

**Alliance Pipeline L.P.**  
**Response to the Notice of Amendment CPF 3-2013-1012M**  
**Issued July 21, 2013 - Summary Document of Amendments to Public Awareness Plan**  
**July 30, 2013**

Alliance Pipeline L.P. (APL) submits the following in response to PHMSA's Notice of Amendment (NOA) dated July 2, 2013:

**1. 192.615 Emergency Plans**

**Inadequacy:** Alliance's procedures are inadequate because the liaison relationship requirement does not include a capability assessment, does not address who should get the emergency response plan, and does not assess the responsiveness of the emergency responders. In addition, the procedures are inadequate because the phrase "*attention is given to emergency officials*" is not defined in the Public Awareness Plan (PAP).

**APL's response:** The APL plan was amended to address capabilities assessment. In addition, the database was expanded to collect supplementary information on capabilities. Emergency responders are provided an abbreviated guide to Alliance's emergency response plan.

**Reference:** Included are excerpts from the Community and Corridor Stakeholder Engagement Plan (COR-PLAN-0003) Section 5.3, 5.3.1 and Table 7 Pages 36, 37, 38 and 39.



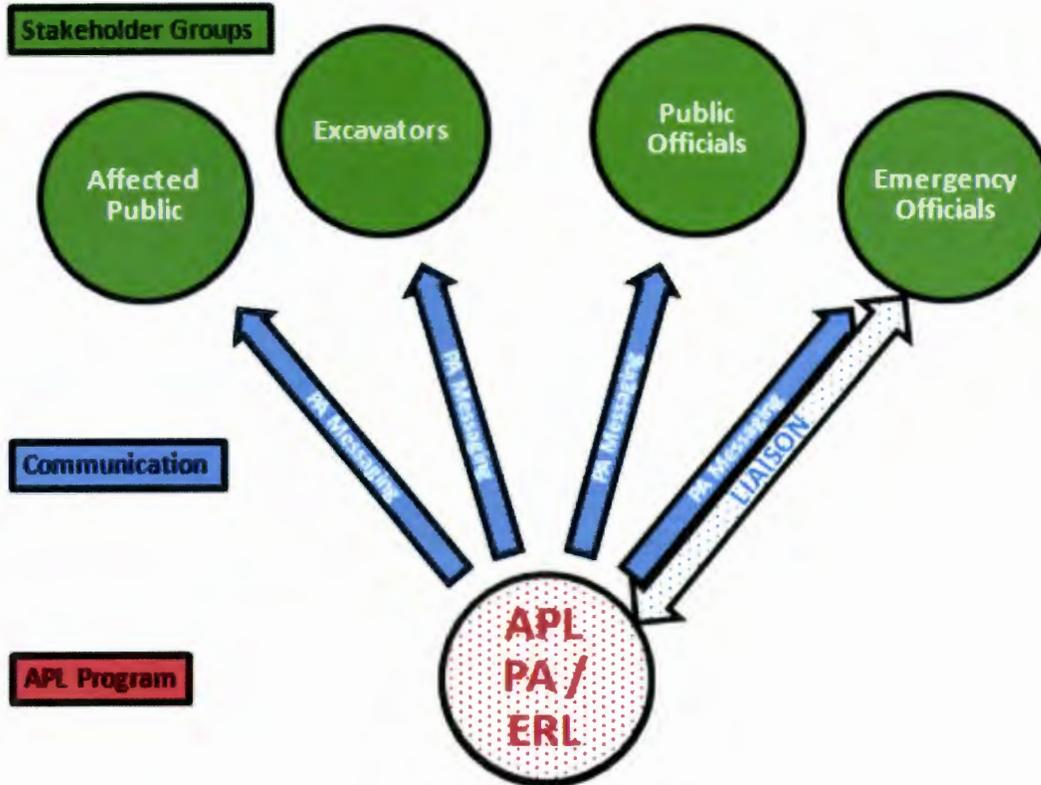
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**5.3 Emergency Response Liaison (ERL)**

Refer also to [COR-PRAC-0011 Emergency Response Liaison \(#787173\)](#)

ERL can occur at any opportunity (face-to-face, phone, or email) as long as there is the ability for interaction.

Table 7 Emergency Response Liaison



Where PA messaging is intended to be a message delivered to intended stakeholders (one way communication), ERL is intended facilitate two-way communication, specifically between APL and Emergency Officials. In practice almost every PA event involving Emergency Officials can also be an opportunity for liaison. As such, every APL EP participating in such an event can function as an ERL. Additionally there are opportunities for ERL that are outside of a PA event. For example an APL EP who is a member of a fire department may function as a liaison.

APL will first establish and then maintain liaison with the Emergency Official Stakeholders identified as "Primary" in 3.0. Secondary Emergency Official Stakeholders would likely only respond to an APL incident as mutual aid and will be under the direction of incident command (Primary Emergency Official Stakeholder).



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The ERL function will:

1. Allow APL to learn the responsibility and resources of each Emergency Official that may respond to a gas pipeline emergency;
2. Acquaint the officials with the APL's ability to respond to a gas pipeline emergency;
3. Identify the types of gas pipeline emergencies of which APL notifies the officials; and
4. Plan how APL and officials can engage in mutual assistance to minimize hazards to life or property. Every plan must focus on protecting lives first. All plans and messaging shall be consistent with the guidance given in Sections 2 and 5 of HSE-PLAN-0031 Emergency Response Plan and with COM-PLAN-0001 Crisis Communications Plan.
5. Consult with officials prior to and after updating the ERP.
6. Encourage officials to engage with APL in emergency response exercises. APL will host and/or coordinate as many exercises as the plan calls for (without guarantee that the agencies will participate). See also HSE-PRAC-0134 Exercises.

ERL minimum list of activities and the suggested intervals are as follows. If there is a discrepancy between this table and HSE-PRAC-0134 Exercises, HSE-PRAC-0134 Exercises the ERP will prevail.

ERL contact with a primary Emergency Official should not exceed three years without explanation in the APL database.

Collaborative events where Emergency Officials are absent necessitates follow-up. Mailing the materials made available at the events is usually sufficient. However at least every 3 years there shall be some kind of follow-up with a Liaison activity.

**Table 8 - ERL Outreach and Engagement Activities and Frequency**

Activity		Frequency
Exercise, Tabletop (Isolated Functional)		Discretionary
Exercise, Functional (Coordinated Functional)		APL will make available annually (except year in which a Full-Scale exercise is conducted) to primary Emergency Official audience.
Exercise, Full-Scale		APL will make available every three years to primary Emergency Official audience
1	Consultation (ERP update)	Best covered in conjunction with Full Scale Exercise but not to exceed every three years
2	Update Communications Protocols	Best in conjunction with Full Scale Exercise but not to exceed every three years
3	Test integration (interoperability) and Communications between operator and Agency	In conjunction with Full Scale Exercise but not to exceed every three years
4	Testing of Notification Procedures	Best in conjunction with Full Scale Exercise but not to exceed every three years

\* Emergency response exercises should simulate a wide range of potential geographic and weather conditions as well as worst-case spill or gas release scenarios.



### 5.3.1 Emergency Response Agency Contacts, Resources, & Capabilities

APL will gather and verify the information which would be necessary in the event of an emergency. Minimally, the information in the following table.

Table 9 - Emergency Resources and Capabilities

ER RESOURCES & CAPABILITIES
Verification of Contact info
Agency responsibility in event of emergency
Communications (interoperability)
Establishing a perimeter / Gas detection
Evacuations
Barricading Roads / Restricting Access
Muster Points & Evacuation for critical structures

**2. 192.616(a) Public Awareness**

**Inadequacy:** Alliance's procedures are inadequate because its Public Awareness Plan does not identify the edition of API RP 1162 referenced in the Federal Code it uses.

**APL's response:** The plan has been amended to reference API Recommended Practice 1162 First Edition, December 2003.

**Reference:** Included is the excerpt from the Community and Corridor Stakeholder Engagement Plan (COR-PLAN-0003) Section 1.0 Introduction Page 2.



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**1.0 INTRODUCTION**

Excerpt:

In addition to being compliant with CFR Part 192, and NEB regulations, this plan is written to follow the guidance provided in the American Petroleum Institute's (API) Recommended Practice (RP) 1162, First Edition, December 2003.

**3a. 192.616(c) Public Awareness**

**Inadequacy:** Alliance's procedures are inadequate because its Public Awareness Plan does not have a process to determine the affected stakeholder notification areas and distance on either side of its pipeline.

**APL's response:** The APL plan was updated to include the methodology in which Alliance uses to identify affected stakeholder groups along the right-of-way and within the Emergency Planning Zone (EPZ).

**Reference:** Included is the excerpt from the Community and Corridor Stakeholder Engagement Plan (COR-PLAN-0003) Section 3.0 Stakeholder Audiences Pages 7 and 8.



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**3.0 STAKEHOLDER AUDIENCES**

APL will have two levels of Stakeholder Audiences; Primary and Secondary.

APL will maintain the Primary Audience database in an effort to communicate as required with that stakeholder group. The Secondary Audience database information will not be actively maintained as that outreach would occur as a matter of circumstance or in conjunction with collaborative efforts.

APL has tailored its communications coverage based on its particular pipeline location (mostly rural) and release consequences. Some specific examples of audiences included in API RP 1162 are excluded from inclusion as a result of APL's tailored communications coverage. However, other audiences shall receive specific supplemental messaging as warranted.



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**Figure 2 - Stakeholder Audiences**

<b>STAKE HOLDER AUDIENCES</b>	<b>PRIMARY AUDIENCE IDENTIFIED BY</b>	<b>SECONDARY AUDIENCE IDENTIFIED BY</b>
<b>Affected Public</b>	Any within the EPZ	Any outside of the EPZ
Residents located adjacent to the Transmission ROW Residents near Operational Facilities Residents within HCAs Residents/owners - Tract Party Tenant Farmers Associations Businesses / Legal Entity Places of Congregation		
Mineral Rights Holders	Any with rights on APL R/W	N/A
Gas Transmission Pipeline Customers	Customer Base	N/A
<b>Aboriginal Communities</b>	* See Definitions that follow	N/A
<b>Emergency Officials</b>	jurisdictional responsibilities to APL's PL	No jurisdictional responsibilities to APL's PL
Fire Departments Hazardous Materials Teams Facility Fire Departments RCMP/Police/Sheriff (Law Enforcement) Emergency Management Spill / Leak Response Contractors 911 Centers / Emergency Dispatch Parks & Rec?		
<b>Local Public Officials</b>	jurisdictional responsibilities to APL's ROW	No jurisdictional responsibilities to APL's ROW
Mayors, Managers, Administrators, or Commissioners Planning / Zoning boards Public Works Highway and Street Departments Engineering Departments	As Identified during a POI for development.	N/A
Elected Officials	As Identified Gov. Relations Manager	N/A
<b>Excavators</b>	Excavators in APL ROW last 5 years	Other Excavators not in APL ROW last 5 years
Drain Tile Installers APL Contractors		
Land Developers	As identified when collecting POI data.	N/A
First Call/One Call Centers	All applicable Centers	N/A
<b>Geophysical Contractors</b>	* See Definitions that follow	N/A

### 3b. 192.616(c) Public Awareness

**Inadequacy: Alliance's procedures are inadequate because its Public Awareness Plan does not identify the frequency for performing an effectiveness evaluation.**

**APL's response:** The APL plan was updated to include the interval for effectiveness evaluations.

**Reference:** Included is the excerpt from the Community and Corridor Stakeholder Engagement Plan (COR-PLAN-0003) Section 8.4 Effectiveness Assessment Page 47.



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### 8.4 Effectiveness Assessment

This assessment will be periodic but not to exceed once every four years. When conducted, the assessment will be done in conjunction with the annual implementation audit. This will serve to provide direction when developing the annual tactical plan.

The assessment will intend to measure the following:

#### 8.4.1 Outreach

Whether the information is reaching the intended stakeholder audiences.

#### 8.4.2 Understandability

If the recipient audiences are understanding the messages delivered.

#### 8.4.3 Behavioral Changes

Whether the recipients are motivated to respond appropriately in alignment with the information provided.

#### 8.4.4 Achieving Bottom Line Results

If the implementation of the Public Awareness Program is impacting bottom-line results (such as reduction in the number of incidents caused by third-party damage).

In the event that a trigger generates an education/enforcement action, the audit and/or evaluation will include a measurement to determine if the action created a change in behavior.

**3c. 192.616(c) Public Awareness**

**Inadequacy:** Alliance's procedures are inadequate because its Public Awareness Plan statements in section 4.2 through 4.5 use the phrase "may include" under the message content for each stakeholder audience. There are certain messages for each stakeholder audience that API 1162 requires. Additionally, in 2010, the Public Official and Emergency Responder brochures were missing the Emergency Preparedness message as required by API RP 1162.

**APL's response:** The APL plan was updated to include all required messaging for each stakeholder group.

**Reference:** Included is the excerpt from the Community and Corridor Stakeholder Engagement Plan (COR-PLAN-0003) Section 4.4 Messages by Targeted Audience and Messaging Frequency Table 3 – Message Delivery Frequency Pages 24, 25 and 26.



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**4.4 Messages by Targeted Audience and Messaging Frequency**

Table 3 - Message Delivery Frequency

MESSAGES	Affected Public	Emergency Officials	Public Officials	Excavators
<b>4.1 (C.1) PIPELINE PURPOSE AND RELIABILITY</b>	2	1	3	1
<b>4.2 (C.2) HAZZARD AWARENESS AND PREVENTION MEASURES (Less Detailed for all Audiences)</b>	2		3	1
<b>4.2 (C.2) HAZZARD AWARENESS AND PREVENTION MEASURES (More Detailed for Emergency Official Audiences)</b>		1		
C.2.1 Overview of Potential Hazards	2	1		
C.2.2 Overview of Potential Consequences		1		
C.2.3 Summary of Prevention Measures Undertaken	2	1		
C.2.4 Optional Summary of Pipeline Industry Safety Record				
<b>4.3 LEAK RECOGNITION AND RESPONSE</b>	2			1
4.3.1 (C.3.1) Potential Hazards of Products Transported	2	*1		1
4.3.2 (C.3.2) How to recognize a Pipeline Leak	2			1
4.3.3 (C.3.3) Response to a Pipeline Leak	2			1
4.3.4 (C.3.4) Liaison with Emergency Officials			3	
<b>4.4 EMERGENCY PREPAREDNESS COMMUNICATIONS</b>		1	3	
4.4.1 (C.4.1) Priority to Protect Life		1		
4.4.2 (C.4.2) Emergency Contacts		1		
4.4.3 (C.4.3) Emergency Preparedness Response Plans		1		
<b>4.4.4 (C.4.4) Emergency Preparedness - Drill and Exercises</b>		5		
<b>4.5 (C.5) DAMAGE PREVENTION - 192.614 (c)(2)(ii)</b>	2	1	3	1
<b>4.6 (C.6) PIPELINE LOCATION INFORMATION</b>	2	1	3	1
4.6.1 (C.6.1) Transmission Pipeline Markers	2	1	3	1
4.6.2 (C.6.2) Transmission Pipeline Mapping (NPMS - US Only)	2	1	3	1
<b>4.7 HIGH CONSEQUENCE AREAS (HCAs) AND INTEGRITY MANAGEMENT PROGRAM OVERVIEW FOR TRANSMISSION OPERATORS **</b>				
4.7.1 (C.7.1) Message Content for Affect Public within HCAs	2			1
4.7.2 (C.7.2) Message Content for Emergency Official's within HCAs		1		
4.7.3 (C.7.3) Message Content for Public Officials within HCAs			3	



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MESSAGES	Affected Public	Emergency Officials	Public Officials	Excavators
<b>4.8 (C.8) CONTENT ON OPERATOR WEBSITES</b>	Supplemental - Subject to periodic review and annual audit			
C.8.1 Company Information				
C.8.2 Information on Pipeline Operations				
C.8.3 Transmission Pipeline Maps				
C.8.4 Public Awareness Program Information				
C.8.5 Emergency Information				
C.8.6 Damage Prevention Awareness				
<b>4.9 (C.9) ROW ENCROACHMENT PREVENTION</b>	S		S	
<b>4.10 (C.10) PIPELINE MAINTENANCE CONSTRUCTION ACTIVITIES</b>	S	S	S	
<b>4.11 (C.11) SECURITY</b>	2	1	3	1
<b>4.12 (C.12) FACILITY PURPOSE (i.e. Compressor Stations)</b>	X	X	X	
<b>II</b> Description of the Safety Zone.	2	S	S	1
<b>II</b> Activities in the safety zone that require notification.	2	S	S	1
<b>II</b> Guidelines and service standards for processing crossing requests.	2	S	S	1
* One-Call Requirements - API 1162 Table 2-1 (baseline)	2		3	1
* How to get additional Information - API 1162 Table 2-1 (baseline)		1	3	1
* Information on IMP - API 1162 Table 2-1 (supplemental)				
* Special Incident response notification and/or evacuation measures appropriate to product or facility - API 1162 Table 2-1 (supplemental)				
* Overview of integrity measures undertaken - API 1162 Table 2-1.2 (supplemental)				
* One-Call System Performance - API 1162 Table 2-1 (supplemental)				
* Accurate Line Location Information - API 1162 Table 2-1 (supplemental)				
* One-Call System Improvements - API 1162 Table 2-1 (supplemental)				
<b>192.616 (d)(5) Procedures for reporting a gas pipeline release</b>	2		3	1
<b>192.615 (c)(1) Liaison To learn the responsibility and resources of each government organization</b>		P		
<b>192.615 (c)(2) Liaison to acquaint officials with the operators ability to respond</b>		P		
<b>192.615 (c)(3) Liaison to acquaint officials with the types of emergencies the operator notices ER of.</b>		P		



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MESSAGES	Affected Public	Emergency Officials	Public Officials	Excavators
192.615 (c)(3) Liaison to plan how the operator and the officials can engage in mutual assistance.		P		
Supplemental Information as suggested by 1162 4. Message Content - Pipeline Operator & Pipeline Operations	S	S	S	S
System-specific information including pipe diameter, operating pressure, product transported, and potential impact radius. (NTSB P-11-8)	2	1	3	1

\* From Table 2-1 in API RP1162.

\*\* Though identified as a supplemental message, because APL will be committed to INGAA's Guiding Principles, the entire system (not just HCAs) will be subject to integrity management principals. As such messaging will be conveyed to stakeholders across the system.

Legend:

- Numerical Value = Frequency in years
- P = Periodic, frequency as necessary
- S = Supplemental, frequency as necessary
- X = Specific messaging not pertinent to entire stakeholder group
- Blank = Discretionary
-  = Baseline activity from API RP1162 Section 2, Table 2 in but not defined in Section 4
-  = Supplemental activity from API RP1162 Section 2, Table 2 in but not defined in Section 4
-  = ERL activity
-  = Supplemental activity

### 3d. 192.616(c) Public Awareness

**Inadequacy:** Alliance's procedures are inadequate because its Public Awareness Plan does not explain how the supplemental elements were identified from the elements listed in section 6.2 of API RP 1162. In addition, the supplemental elements do not identify specific messaging required for stakeholder audience groups during annual reviews. Alliance does not have a process to capture new data for supplemental program enhancements.

**APL's response:** The revised plan expands upon how APL will identify the need for supplemental messages and the content of supplemental messages. In addition "target audience" was added to the supplemental program trigger charts.

**Reference:** Included is the excerpt from the Community and Corridor Stakeholder Engagement Plan (COR-PLAN-0003) Section 6.0 Supplemental Enhancements to Baseline Program and Table 10 – Supplemental Program Trigger Chart Pages 40 to 44.



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### 6.0 SUPPLEMENTAL ENHANCEMENTS TO BASELINE PROGRAM

#### 6.1 Definition

Due to differences in pipeline conditions, consequences, population, property development, excavation activities and other issues along the APL system, there may be necessity to enhance or supplement the baseline program. The terms 'enhancement' and 'supplemental' are used interchangeably and refer to those communication measures added to the Public Awareness Program beyond the baseline program elements. APL will enhance its baseline program with supplemental program components when conditions along the pipeline suggest that a more intensive effort is needed to respond to a threat or mitigate an identified risk. The three forms of supplements are as follows:

##### 6.1.1 Increased Frequency (Shorter Interval)

Increased frequency refers primarily to providing communications to specific stakeholder audiences on a more frequent basis (shorter interval) than the baseline recommendation.

##### 6.1.2 Enhanced Message Content and Delivery/Media Efforts

Enhanced message content and delivery/media efforts refer to providing communications activities beyond those identified in the baseline, using enhanced or customized message content, and/or different, or additional, delivery methods/media to reach the intended audience.

##### 6.1.3 Coverage Areas

Coverage areas refer to broadening the stakeholder audience coverage area beyond those contained in the baseline. This can also be considered widening the buffer distance for reaching the stakeholder audience along the pipeline route.

#### 6.2 Considerations of Relevant Factors

During program evaluations APL will assess relevant factors along the pipeline route to consider what components of the Public Awareness Program should be enhanced.

APL will consider the following factors:

- Potential hazards
- High Consequence Areas
- Population density
- Land development activity
- Land farming activity
- Third-party damage incidents
- Environmental considerations
- Pipeline history in an area



- Specific local situations
- Regulatory requirements
- Results from previous Public Awareness Program evaluations
- Third Party activities increasing
- Other relevant needs.

### 6.2.1 Supplemental Program Trigger Charts

Dependent upon a relevant factor (see Section 6.2) there may be a necessity for supplemental messaging/activities. The following trigger chart identifies some of the conditions that might necessitate a supplemental activity or message. The list is not all inclusive nor are the actions exclusive. Additionally, the annual review will not necessarily be the only driver for a supplemental activity/message. If a condition is immediately recognized, an activity or message can occur immediately. The Stakeholder Consultation and Engagement Coordinator will oversee the supplemental activity. Further, the Stakeholder Consultation and Engagement Coordinator is responsible for documenting the decisions and actions taken.

Table 10 - Supplemental Program Trigger Chart

Trigger	Description / Audience	Activity Result(s)						Supplemental Activity / Message(s)
		Site Inspection	Newsletter Coverage/Educate	Notification letter	Informational Mailer or Handout	Personal Contact	Door Hanger	
<b>Pipeline Maintenance Activities</b>								
Pipeline maintenance	Brush removal / Affected Public	X		X			X	<ul style="list-style-type: none"> <li>• 2-day notification</li> <li>• Project overview</li> <li>• Contact information</li> <li>• One / First Call</li> <li>• NPMS</li> <li>• Website</li> </ul>
Crop loss program	Annual repayment program / Affected Public	X		X				<ul style="list-style-type: none"> <li>• Annual letter</li> <li>• Program overview</li> <li>• Contact information</li> <li>• One / First Call</li> <li>• NPMS</li> <li>• Website</li> </ul>



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Trigger	Description / Audience	Activity Result(s)						Supplemental Activity / Message(s)
		Site Inspection	Newsletter Coverage/Educate	Notification letter	Informational Mailer or Handout	Personal Contact	Door Hanger	
Pipeline maintenance	ILI runs / Affected Public			X	X			<ul style="list-style-type: none"> <li>• 2-day notification</li> <li>• Project overview</li> <li>• Contact information</li> <li>• One / First Call</li> <li>• NPMS</li> <li>• Website</li> </ul>
Pipeline maintenance	Marker replacement / Affected Public			X		X		<ul style="list-style-type: none"> <li>• 2-day notification</li> <li>• Project overview</li> <li>• Contact information</li> <li>• One / First Call</li> <li>• NPMS</li> <li>• Website</li> </ul>
Pipeline maintenance	Depth-of-cover / Affected Public	X		X		X		<ul style="list-style-type: none"> <li>• 2-day notification</li> <li>• Project overview</li> <li>• Contact information</li> <li>• One / First Call</li> <li>• NPMS</li> <li>• Website</li> </ul>
Pipeline maintenance	Survey / inspection – Affected Public			X		X		<ul style="list-style-type: none"> <li>• 2-day notification</li> <li>• Project overview</li> <li>• Contact information</li> <li>• One / First Call</li> <li>• NPMS</li> <li>• Website</li> </ul>
<b>Safety-Related Activities</b>								
Aerial patrol	Inspection of ROW / Affected Public	X	X					<ul style="list-style-type: none"> <li>• Program overview</li> <li>• Integrity management</li> </ul>



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Trigger	Description / Audience	Activity Result(s)						Supplemental Activity / Message(s)
		Site Inspection	Newsletter Coverage/Educate	Notification letter	Informational Mailer or Handout	Personal Contact	Door Hanger	
Safety related condition	Corrosion, geotechnical / All	X		X		X		<ul style="list-style-type: none"> <li>• 2-day notification</li> <li>• Project overview</li> <li>• Contact information</li> <li>• One / First Call</li> <li>• NPMS</li> <li>• Website</li> </ul>
Potential encroachment	New structures in area / All	X			X	X	X	<ul style="list-style-type: none"> <li>• Landowner kit</li> <li>• Pipeline nearby brochure</li> <li>• Contact information</li> <li>• One / First Call</li> <li>• NPMS</li> <li>• Website</li> </ul>
Agricultural Deep Plowing	Affected Public				X	X		<ul style="list-style-type: none"> <li>• Landowner kit</li> <li>• Pipeline nearby brochure</li> <li>• Contact information</li> <li>• One / First Call</li> <li>• NPMS</li> <li>• Website</li> </ul>
Unauthorized digging	Lack of One-Call ticket to initiate locate of pipeline (review case-by-case) / Excavators	X	X		X	X	X	<ul style="list-style-type: none"> <li>• Additional radio and/or print advertisements</li> <li>• Damage prevention awareness</li> <li>• One-Call requirements</li> <li>• Pipeline location information</li> <li>• Pipeline nearby brochure</li> <li>• One / First Call</li> </ul>



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Trigger	Description / Audience	Activity Result(s)						Supplemental Activity / Message(s)
		Site Inspection	Newsletter Coverage/Educate	Notification letter	Informational Mailer or Handout	Personal Contact	Door Hanger	
Station blow-down	Planned or unplanned / Emergency Officials, Affected Public					X		<ul style="list-style-type: none"> <li>• Phone-Call to neighboring landowners</li> <li>• Incident overview</li> <li>• Contact information</li> </ul>
<b>Public Relations Activities</b>								
Community investment	Delivery of grant checks / Affected Public				X	X		<ul style="list-style-type: none"> <li>• Pipeline nearby brochure</li> </ul>
Tour request	Coordination of public visits / Any					X		<ul style="list-style-type: none"> <li>• Pipeline nearby brochure</li> </ul>
10% or greater non English speaking	Translate / Affected Public					X		<ul style="list-style-type: none"> <li>• Translate the appropriate messages and deliver.</li> </ul>

### 3e. 192.616(c) Public Awareness

**Inadequacy:** Alliance's procedures are inadequate because its Public Awareness Plan does not have a process for an annual implementation review that identifies changes, tracks the changes and tracks the progress in making changes based on the findings.

**APL's response:** The APL plan was expanded to formalize the methodology in which annual implementation audits are conducted. A format (form/checklist) was developed to conduct and document the Annual Implementation Audit.

**Reference:** Included are the excerpts from the Community and Corridor Stakeholder Engagement Plan (COR-PLAN-0003) Section 8.0 Program Evaluation, Section 8.3 Annual Implementation Audit and Section 8.3.1. Audit Methodology Pages 45 and 46.



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## 8.0 PROGRAM EVALUATION

All APL Program Evaluations shall be documented and retained as records for a period of not less than five years. Informal evaluations may take place at any time. Two formal (documented) evaluations will be conducted and will be referred to as the "Annual Implementation Audit" and the "Effectiveness Assessment". They will be explained in detail later in this section (Sections 8.3 and 8.4, respectively).

### 8.1 Purpose and Scope

The primary purposes of the evaluation are to:

- Assess whether the current program is effective in achieving the objectives.
- Provide information on implementing effectiveness improvements.



### 8.3 Annual Implementation Audit

The annual audit will be scheduled in advance on a recurring basis by the Stakeholder Consultation and Engagement Coordinators. All APL EPs and contractors with an assigned PA function will be asked to participate in part or in whole. The audit has historically been conducted late in the last quarter which allows for the development of the following year's tactical plan.

The audit should have in-person attendance by those with the primary responsibilities. Specifically the Stakeholder Consultation and Engagement Coordinators, Pipeline Performance & Compliance Coordinator, and the Land, Right of Way, and Corridor Managers.

The audit will intend to answer the following questions:

- Has the plan been developed and written to address the objectives, elements, and baseline schedule?
- Has the program been implemented and documented according to the plan (is documentation compiled and archived)?

Additionally there will be an audit of ERL functions and an O&M plan review (pertaining specifically to this Plan).

[COR-FORM-0018 PA – Annual Implementation Audit \(#787174\)](#)

#### 8.3.1 Audit Methodology

APL will typically conduct an internal audit annually. The internal working group at a minimum must include the Stakeholder Consultation and Engagement Coordinators and the Pipeline Performance & Compliance Coordinator. If another method is chosen the decision summary must be recorded in the audit documentation. The other methods are:

- Third-party Audit
- Regulatory Inspection

**3f. 192.616(c) Public Awareness**

**Inadequacy:** Alliance's procedures are inadequate because its Public Awareness Plan does not have a process that incorporates the use of the Land Information Systems and Applications (LISA) database for measuring program outreach or how to analyze information by stakeholder.

**APL's response:** Section 8 of the revised plan now references the process for outreach utilizing information maintained within the APL LISA system (database). These metrics are capture in the Annual Implementation Audit format (form/checklist).

**Reference:** Included are the excerpts from the Community and Corridor Stakeholder Engagement Plan (COR-PLAN-0003) Section 8.2 Evaluation Elements Page 46.



**Public Awareness Plan  
Community and Corridor Stakeholder Engagement**

**8.2 Evaluation Elements**

**8.2.1 Measures**

The program evaluation measures will include:

- Measurements,
- Means, and
- Frequencies.

**8.2.2 Measurements**

The Measurements will reflect:

- If the processes outlined in the yearly "Tactical Plan" were followed.
- The effectiveness of the program and plan.

### 3g. 192.616(c) Public Awareness

**Inadequacy:** Alliance's procedures are inadequate because its Public Awareness Plan does not expound on the information being reviewed and analyzed for the effectiveness evaluation review. The process is not adequate for measuring the program's outreach by individual stakeholder audience and measuring the percentage reached by individual stakeholder audience. Further, the Alliance procedures do not measure that intended stakeholder audiences understand and retain the key information of the messages presented as well as demonstrate the intended learned behaviors.

**APL's response:** The APL plan now includes the methodology in which Alliance will analyze stakeholder outreach, retention and understandability.

**Reference:** Included is the excerpt from the Community and Corridor Stakeholder Engagement Plan (COR-PLAN-0003) Section 8.4 Effectiveness Assessment Page 47.



#### Public Awareness Plan Community and Corridor Stakeholder Engagement

### 8.4 Effectiveness Assessment

This assessment will be periodic but not to exceed once every four years. When conducted, the assessment will be done in conjunction with the annual implementation audit. This will serve to provide direction when developing the annual tactical plan.

The assessment will intend to measure the following:

#### 8.4.1 Outreach

Whether the information is reaching the intended stakeholder audiences.

#### 8.4.2 Understandability

If the recipient audiences are understanding the messages delivered.

#### 8.4.3 Behavioral Changes

Whether the recipients are motivated to respond appropriately in alignment with the information provided.

#### 8.4.4 Achieving Bottom Line Results

If the implementation of the Public Awareness Program is impacting bottom-line results (such as reduction in the number of incidents caused by third-party damage).

In the event that a trigger generates an education/enforcement action, the audit and/or evaluation will include a measurement to determine if the action created a change in behavior.

### 3h. 192.616(c) Public Awareness

**Inadequacy:** Alliance's procedures are inadequate because its Public Awareness Plan does not have a process to determine the requirement for pretesting of messages.

**APL's response:** The APL plan now includes a methodology for pretesting messaging.

**Reference:** Included is the excerpt from the Community and Corridor Stakeholder Engagement Plan (COR-PLAN-0003) Section 4.1 Message Understandability Page 15.



#### Public Awareness Plan Community and Corridor Stakeholder Engagement

#### 4.1 Message Understandability

New messaging formats shall be checked for "understandability" prior to implementation. Focus groups are the preferred method. The Stakeholder Consultation and Engagement Coordinator is responsible for this and the documentation.

Upon initial design or major redesign of materials, APL will pre-test materials in a focus group before they are distributed. The focus group must have a minimum of 6 participants. While focus groups may be professionally facilitated, feedback about public awareness materials will be gained by an informal discussion run by the Stakeholder Consultation and Engagement Coordinator(s). Often participants will be asked to review draft materials and comment on message clarity and what appealed or did not appeal to them. Focus groups may also be used to provide input on the relative effectiveness of various means of delivery.

Focus group participants may be EPs who are not familiar with the public awareness program, citizens living along a pipeline, representatives of homeowner associations, or business people along the pipeline.

Target stakeholder audiences generally are not mixed. The participants usually are not chosen at random but rather are selected to be reasonably representative of the stakeholder group and capable of articulating their reactions to the materials.

**3i. 192.616(c) Public Awareness**

**Inadequacy:** Alliance's procedures are inadequate because its Public Awareness Plan does not include the process that documents bottom-line result measures.

**APL's response:** The revised APL plan now addresses the measuring of bottom-line results.

**Reference:** Included is the excerpt from the Community and Corridor Stakeholder Engagement Plan (COR-PLAN-0003) Section 8.4.4 Achieving Bottom Line Results Page 47.



Public Awareness Plan  
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**8.4.4 Achieving Bottom Line Results**

If the implementation of the Public Awareness Program is impacting bottom-line results (such as reduction in the number of incidents caused by third-party damage).

In the event that a trigger generates an education/enforcement action, the audit and/or evaluation will include a measurement to determine if the action created a change in behavior.

**3j. 192.616(c) Public Awareness**

**Inadequacy:** Alliance's procedures are inadequate because its Public Awareness Plan does not identify program changes based on the results and findings of its program effectiveness evaluation.

**APL's response:** The APL plan now includes the methodology used to identify program changes and measure the results of changes.

**Reference:** Included are the excerpts from the Community and Corridor Stakeholder Engagement Plan (COR-PLAN-0003) Section 8.5 Effectiveness Methodology and Figure 6 – Public Awareness Process Guide Pages 47 and 48.



**Public Awareness Plan  
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**8.5 Effectiveness Methodology**

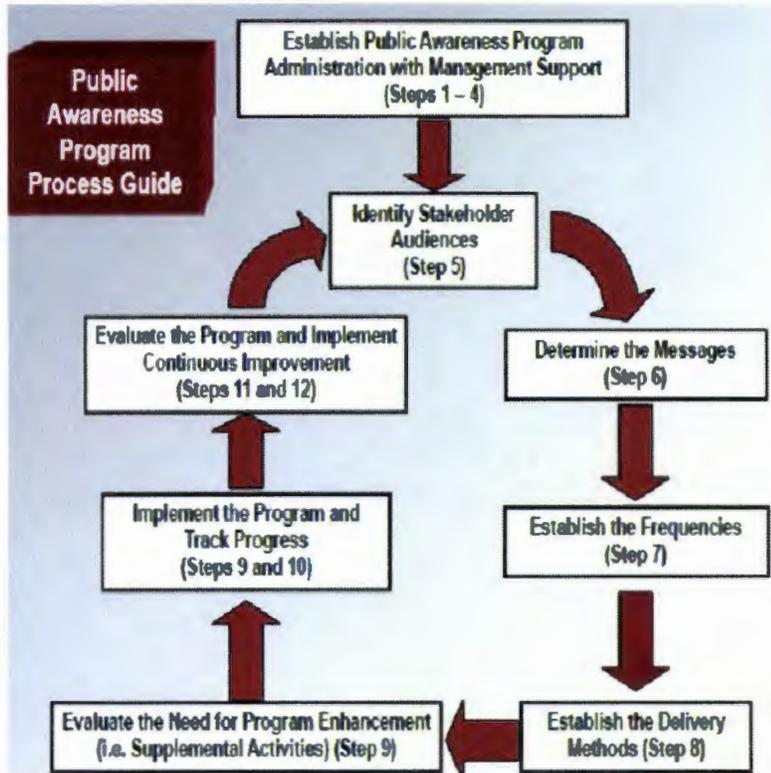
APL will conduct an effectiveness audit in one or a combination of the following methods:

- In-house survey
- Third-party Survey
- Industry Group or Trade Association Survey

A process of continuous improvement is initiated and each evaluation cycle looks for improvements in efficiency and effectiveness.

The entire PA process and where continuous improvement fits in is displayed in the following graphic:

Figure 6 - Public Awareness Program Process Guide



\* Referenced from API RP1162 Fig 2-1

#### 4. § 192.616(g) Public Awareness

**Inadequacy:** Alliance's procedures are inadequate because its Public Awareness Plan does not have a process for identifying other languages, and does not define the terminology, "significant concentration of non-English speaking stakeholders."

**APL's response:** The APL plan was updated to include a methodology that is used to identify a significant population of non-English stakeholder groups. The Annual Implementation Audit captures the deliberate review of any significant concentrations of non-English speaking stakeholders.

**Reference:** Included is the excerpt from the Community and Corridor Stakeholder Engagement Plan (COR-PLAN-0003) contained within Section 4.1 Message Understandability Page 16.



Public Awareness Plan  
Community and Corridor Stakeholder Engagement

#### 4.1 Message Understandability

APL will deliver the message content in English but will annually evaluate if there is a significant non-English speaking population. If ten percent of primary a stakeholder audience is determined to be "non-English" speaking, the message(s) will be conveyed in a manner appropriate for comprehension. As emergency responders and public officials are expected to communicate in English, no additional language versions are deemed necessary for these audiences. Only the following primary stakeholder categories will be analyzed:

- Affected public who are also tract parties
- Excavators