



Enable Midstream Partners  
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Oklahoma City, Oklahoma 73118

August 13, 2013

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

RECEIVED AUG 15 2013

RE: CPF 3-2013-1009M

Dear Mr. Barrett,

This letter is written in response to the *Notice of Amendment* CPF 3-2013-1009M (NOA) date July 10, 2013, which was received by CenterPoint Energy (CenterPoint) on July 17, 2013. The NOA was issued by your office resulting from the Pipeline and Hazardous Materials Safety Administration (PHMSA) Public Awareness Program Effectiveness on CenterPoint Energy procedures on May 3-6, 2011.

The following is a list of items that have been changed to the Public Awareness Program and/or Plan.

**§ 192.616 Public Awareness.**

**(c) The operator must follow the general program recommendations, including baseline and supplemental requirements of API 1162, unless the operator provides justification in its program or procedural manual as to why compliance with all or certain provisions of the recommended practice is not practicable and not necessary for safety.**

- 1. CenterPoint's procedures are inadequate because its Public Awareness Plan does not include the line size on maps given to emergency responders. There is not statement in the Public Awareness Plan to justify why CenterPoint is not following the requirement in API RP 1162.**

**Action:** *Section 6 in the Plan has been amended to add the following: "In consideration of the security of national energy infrastructure, CenterPoint Energy directs stakeholders to the National Pipeline Mapping System (NPMS) for all map inquiries of our transmission pipelines. The NPMS provides mapping information and operator contact information. Additional requests for mapping or pipeline information will be provided on a need to know basis." In addition, operator pages are given to emergency responders during state liaison meetings and detailed maps are not used for operator pages because of information provided above.*

- 2. CenterPoint's procedures are inadequate because its Public Awareness Plan does not have a process to handle the return mail from stakeholder audience groups.**

*Action:* Section 5.1 in the Plan has been amended to add the following: "A return mail policy is a requirement of the direct mail program, and serves as part of the process when selecting a 3<sup>rd</sup> party to administrate the program. During the program year, if return mail is generated, the mail pieces will be handled first through the 3<sup>rd</sup> party's return mail policy. Subsequent to the 3<sup>rd</sup> party return mail process, the information regarding the return mail will be submitted to plan administrator. The return mail pieces will be reviewed by the P/L BU-PSAT and will determine a process/solution, if necessary."

- 3. CenterPoint's procedures are inadequate because its Public Awareness Plan does not have a process for annual review of its pipeline system referencing the supplemental elements identified in Section 6.2 of API RP 1162 that would affect each stakeholder audience group.**

*Action:* Section 9 in the Plan has been amended to add the following: "The P/L BU-PSAT will review pipeline systems on an annual basis for relevant factors and their associated actions."

- 4. CenterPoint's procedures are inadequate because its Public Awareness Plan does not have a process for an annual implementation review that covers all documents and activities. During the annual implementation review, the process does not allow for information, data, and reviews to be available to the entire team of reviewers. The procedures do not clearly delineate the difference from the Base Line and supplemental messaging to avoid misinterpretation.**

*Action:* Section 10 in the Plan has been amended to add the following: "Refer to Appendix C for yearly implementation strategies." Appendix C has been added to the Plan to outline yearly activities and delineate the difference from Baseline and supplemental messaging. See the enclosed Appendix C.

*In addition, Section 10 in the Plan has been amended to add the following: "The annual implementation review is presented in a PowerPoint presentation format evaluating Appendix C. The annual presentation is provided to all BU-PSAT members and all documentation is available and can be reviewed by BU-PSAT."*

- 5. Centerpoint's procedures are inadequate because its Public Awareness Plan does not have adequate procedures in place for: measuring the programs outreach to stakeholder audience groups, determining the percentage of stakeholder audience groups reached, and determining the level of understanding and retention of the message presented to the stakeholder audience groups. There are no procedures to measure the Bottom-Line results by the stakeholder audience groups.**

*Action:* Section 11.2 in the Plan has been amended to add the following: "An Effectiveness Measure Report will be completed at a minimum of 4 year intervals. The report will document program outreach, determining percentage of stakeholder reach through communication efforts, recall of communication, message comprehension and changes in behaviors for each stakeholder group and measure bottom-line results."

*In addition, Section 11, Table 11.3 in the Plan has been amended to add the following line item:*

<b>API RP1162 Section 8 Coverage</b>	<b>Methodology</b>	<b>Means Internal/External</b>	<b>Documentation</b>	<b>Measures Outreach Knowledge Behavior Process</b>	<b>Frequency</b>
8.4.1	3 <sup>rd</sup> Party Effectiveness Measures Assessment	External – (3 <sup>rd</sup> Party Vendor)	Report	Outreach	4 year intervals (next assessment due June 20, 2014)

- 6. CenterPoint's procedures are inadequate because its Public Awareness Plan does not document the evaluation of effectiveness changes or document when they are not following recommendations from the effectiveness report.**

*Action: Section 11 in the Plan has been amended to add the following: "Survey information and recommendations will be reviewed after completion. The review will document if changes are needed and evaluate effectiveness of changes."*

CenterPoint Energy believes in a strong safety culture and is committed to the continuous improvement and effectiveness of our Public Awareness Plan. If you have any questions concerning the actions we have taken, please feel free to give me a call.

Sincerely,

Royce Brown  
Division VP Pipeline Safety

Enclosures: CenterPoint Energy Public Awareness Pipeline & Field Services Plan

CC: Pete Kirsch                      Royce Brown                      Scott Boggan  
Chris Bullock                      Johnny Cavitt