



ENERGY TRANSFER

July 31, 2013

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

RECEIVED AUG 1 2013

PHMSA reference **CPF 3-2013-1011M**

Dear Mr. Barrett,

Energy Transfer Company acknowledges receipt of the PHMSA Notice of Amendment mailed July 1, 2013. We have reviewed the Procedures for Responding to a NOTICE OF AMENDMENT and choose option A:

If you are not contesting the Notice, notify the Regional Director of your plans to address the inadequacies identified in the Notice;

Subsequent to the PHMSA inspection of May 24-26, 2011, Energy Transfer Company acquired the former Panhandle Energy Company and undertook a project to integrate the Standard Operating Procedures (SOPs) used by the two entities into a single and unified set of SOPs. Energy Transfer believes our revised *SOP A.17 Public Awareness Plan* along with our new *SOP I.40 Public Awareness Plan— Communication with API RP1162-defined Stakeholders*, now adequately address the issues detailed in the PHMSA Notice of Amendment.

We have included a second separate document titled “Response to Notice of Amendment Items” in which Energy Transfer specifically responds to each issue identified in the Notice of Amendment. The referenced SOPs and Forms in the “Notice of Amendment Response” are also included.

Energy Transfer believes the detailed responses address and resolve any inadequacies identified in the Notice of Amendment.

Sincerely,

Jeff Whippo

VP – Operations Support

Energy Transfer Partners



Item 1

Panhandle’s procedures are inadequate because its Public Awareness Plan does not include a process that clearly defines how to establish proper notification areas and distance on each side of their pipeline system that affects the public stakeholder audience including other appropriate factors such as the potential impact radius (PIR) and the alternate maximum allowable operating pressure (AMAOP) conditions.

Response using A.17, Section 7.2 and I.40, Section 7.0

A.17 Section 7.2 Procedure Used to Populate the Stakeholder Groups

Communications will be provided to stakeholders to within a minimum coverage area distance of 660 feet on each side of the pipeline. Areas of consequence and appropriate factors, such as alternative maximum operating pressure will be considered. Where specific circumstances suggest a wider coverage area for a certain pipeline location, the coverage area could be expanded accordingly to fit a particular pipeline and location.

Per 192.620, in areas where pipeline segments are operated at the alternative maximum allowable operating pressure, the public will be notified about integrity management activities. Persons occupying property within 660 feet of the centerline or within the potential impact circle, whichever is greater, will be included.

I.40 Section 7.0 Communication with API RP1162-defined Stakeholders

Communications will be provided to stakeholders to within a minimum coverage area distance of 660 feet on each side of the pipeline. Areas of consequence and appropriate factors, such as alternative maximum operating pressure will be considered. Where specific circumstances suggest a wider coverage area for a certain pipeline location, the coverage area could be expanded accordingly to fit a particular pipeline and location.

Per 192.620, in areas where pipeline segments are operated at the alternative maximum allowable operating pressure, the public will be notified about integrity management activities. Persons occupying property within 660 feet of the centerline or within the potential impact circle, whichever is greater, will be included.

Item 2

Panhandle’s procedures are inadequate because its Public Awareness Plan does not have a comprehensive definition of an emergency official. The definition of an emergency official should include 911 operators and emergency dispatch centers as part of the emergency official audience list of stakeholders.

Response using A.17, Section 7.1 and I.40, Section 6.0

- **A.17, Section 7.1** Emergency Response Officials in areas where the company operates are defined as the following:
 - Fire departments and other state & local emergency management personnel
 - Law enforcement agencies (city, county and state police)
 - Emergency medical personnel
 - Hazardous materials response teams
 - 911 operators and emergency dispatch centers



I.40 Section 6.0 Terms associated with this SOP and their definitions follow in the table below. For general terms, refer to *A.01 Glossary and Terms*.

Terms	Definitions
Emergency Officials	State and local law enforcement departments, emergency medical services, fire departments, 911 operators/emergency dispatch centers or others that can benefit from communication of pipeline safety, incident response and related public awareness messages, and interaction.

Item 3

Panhandle’s procedures are inadequate because its Public Awareness Plan does not contain a process for the annual review of each pipeline system for relevant factors and does not include guidance when supplemental enhancements are required.

Response using A.17, Section 7.5 and A.17A Annual Self-Assessment form, Question 5

7.5 Supplemental Plan Enhancement and Materials

Special conditions, changing circumstances and other factors may necessitate additional communications or increased frequency of communications to stakeholders. Responsibility for determining whether such measures are necessary lies with the Public Awareness Manager. Required changes to the Public Awareness Plan are implemented according to the processes described in the *SOP A.03 Management of Change*.

The need for supplemental plan enhancement or the development of new or additional communications materials will be evaluated on an on-going basis and annually during the self-assessment of implementation, the following factors are considered:

- Results from previous Public Awareness Plan evaluations
- Potential hazards
- High Consequence Areas
- Population density
- Increased land development activity
- Increased land farming activity
- Elevated incidents of damage from outside forces
- Known environmental considerations
- Pipeline history in the area
- Specific local considerations or heightened public sensitivity
- Regulatory requirements
- Issues not mentioned above that reveal the need for supplemental messages

If supplemental plan enhancement is warranted, then the following primary forms of enhancement are considered:

- Increased frequency of communications or communications at a shorter interval than the baseline requirement
- Additional message content or delivery/media efforts beyond those identified in the baseline plan
- Extending or broadening the coverage area beyond the parameters of the baseline plan

All supplemental enhancements to the Plan are identified and documented in Public Awareness Database.



A.17A Annual Self-Assessment form, Question 5

Have the following relevant factors been considered along the pipeline routes to determine which components, if any, of the public awareness program could be enhanced? *Please describe and/or attach supporting examples for reference.*

Potential hazards	Yes <input type="checkbox"/>	No <input type="checkbox"/>
High Consequence Areas	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Population density	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Land development activity	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Land farming activity	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Third-party damage incidents	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Environmental considerations	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Pipeline history in an area	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Specific local situations	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Regulatory requirements	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Results from previous Public Awareness Program evaluations	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Issues not mentioned above that reveal the need for supplemental Messages	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Item 4

Panhandle’s procedures are inadequate because its Public Awareness Plan does not include a process to ensure that their liaison relationship with appropriate emergency response officials includes an equipment and capabilities assessment.

Response using I.40, Section 7.2

I.40 Section 7.2 Communicate Message and Interact with Emergency Officials steps 6, 7 & 13

6	REVIEW local area emergency plan.
7	DETERMINE their ability to provide emergency assistance.
13	DOCUMENT communication in public awareness database

Item 5

Panhandle Energy did not follow its procedures for Public Awareness annual implementation audits as discussed in Section 7.1 of Procedure J.21- *Evaluating Effectiveness of the Public Awareness Plan*. The annual implementation audits were completed by the Public Awareness Program Manager (PAPM) and not the Manager of Operational Audits as stated in the procedures specified above. Panhandle must follow the procedures specified in Section 7.1 of Procedure J.21 - *Evaluating Effectiveness of Public Awareness Plan* or consider revising the procedure to reflect how the annual implementation audits are performed.



Response using A.17, Sections 7.6.2

A.17, Section 7.6.2 Self-Assessment of Implementation

Going forward Energy Transfer will use the newly adopted guidance detailed in Section 7.6.2 of the Standard Operating Procedure A.17.

Using the questions listed in *A.17A Annual Self-Assessment Public Awareness Program* the following steps are completed annually for assessment of implementation. (See A.17A Annual Self-Assessment Form)

Step	Task	Done By
1	Review the questions listed in <i>A.17A Annual Self-Assessment Public Awareness Program</i>	Public Awareness Manager
2	Perform audit.	Public Awareness Manager
3	Document audit findings.	Public Awareness Manager
4	Report audit findings.	Public Awareness Manager
5	Evaluate audit report and propose changes as needed.	Public Awareness Manager

Item 6

Panhandle’s procedures are inadequate because its Public Awareness Plan does not include a process that addresses field information and does not track action items, changes or completion of changes based on findings of the annual implementation review.

Response using A.17A Annual Self-Assessment form, Question 6

6. Recommendations for altering, editing or revising the public awareness procedures can be made by any field operations personnel. Was input solicited and documented?

Yes No

Please describe recommendations and/or attach supporting examples for reference.

Item 7

Panhandle’s procedures are inadequate because its Public Awareness Plan does not include a process for confirming that brochures were mailed to all stakeholders.

Response using I.40 Section 7.6 steps 3 – 4

Energy Transfer uses the following procedures for confirming that brochures were mailed to all stakeholders. Included below from SOP I.40, details the procedures to insure mailing quality.

I.40 Section 7.6 Targeted Distribution of Print Materials to API RP1162-defined Stakeholders steps 3-4



Step	Task	Done By
3	Work with vendor to acquire data to identify addresses. Apply mailing buffer, classify addresses and conduct mailing.	Public Awareness Manager
4	Receive documentation and proof of mailing from USPS. Review mail receipts.	Public Awareness Manager

Item 8

Panhandle’s procedures are inadequate because its Public Awareness Plan did not include a database for trending damages and near misses until 2010. Therefore, data and information was not available for the 2010 effectiveness evaluation which would have included track action items identifying what was reviewed and the results.

Response using A.17 Section 7.6.6 steps 1 – 4

A.17 Section 6.6 Evaluation of Bottom-Line Results

The company uses statistical data tracking to evaluate changes in bottom-line results, as well as other supplemental data that may be useful in evaluating the effectiveness of the Public Awareness Plan. The initial data tracking consists of:

- The number of calls received in response to materials.
- The incidence of damage from excavation to our facilities. This includes not just “reportable incidents” but all damage events.
- The number of “near hit” instances.
- Requests for line locations.
- Periodically reviewing similar analysis and effectiveness evaluations performed by applicable One-Call systems, industry groups, or other outside damage prevention groups.
- Analyzing and reviewing feedback following meetings with various identified stakeholders (public officials, emergency officials, etc.).

The evaluation of bottom-line results follows the process listed below.

Step	Activity
1	DEVELOP and MAINTAIN a spreadsheet tracking model.
2	COMPILE monthly data from the various sources for: <ul style="list-style-type: none"> • Calls received in response to materials • Excavation damages • Near hits • Line locate requests
3	COMPARE the data to the trends for each data set.
4	EVALUATE the impact of clear changes in the trends for further action.

The Public Awareness Manager and Manager of One Call/Damage Prevention should review the similar analysis of at least one outside group or One-Call system each year and determine what can be used to supplement the Public Awareness Plan.



Item 9

Panhandle's procedures are inadequate because its Public Awareness Plan does not include a process to review the return mail from stakeholder audience groups and take action as appropriate.

Response using I.40, Section 7.6 step 5

I.40 Section 7.6 Targeted Distribution of Print Materials to API RP1162- defined Stakeholders step 5

Step	Task	Done By
5	Receive returned mail, document and send addresses to vendor for further analysis to ascertain why an address was undeliverable.	Public Awareness Manager



Standard Operating Procedures

Applicable to Natural Gas Pipelines and Related Facilities

Code Reference :	Procedure No.: A.17	
49 CFR 192.616, 192.620; RRC 8.235, 8.310, 8.315	Effective Date: 06/01/13	Page 1 of 26

1.0 Purpose

The objectives of the Public Awareness Plan are to:

- Raise the awareness of the affected public and key stakeholders to the presence of buried natural gas pipelines and associated facilities in the communities where the company operates natural gas pipelines and related facilities.
- Better educate those who live or work near the company’s pipelines on recognizing and reacting to a natural gas release or emergency and how to respond if they detect possible gas odors.
- Help excavators understand the steps they can take to prevent damage from outside forces and to help them respond safely and promptly should their actions cause damage to the company’s pipelines.
- Better educate the public, emergency officials, local officials, municipalities, school districts and other key groups about the company’s emergency response and key safety procedures in the unlikely event of an operating problem or emergency.
- Allow emergency response agencies that might respond to an emergency incident on one of the company’s pipelines or facilities to better understand the safe and proper actions to take in response to a release or pipeline emergency.
- Educate the public on the company’s ongoing pipeline integrity management activities.

Energy Transfer fully supports the goals and objectives set forth in the *American Petroleum Institute’s Recommended Practice 1162 (RP 1162)*. As an organization, we are committed to provide safe, reliable transportation of natural gas and pipeline safety information to people living and working near the company’s pipelines. We allocate resources and funding as necessary to support our public awareness activities. Management’s expectation is that each of our employees is committed to fulfilling our public awareness responsibilities as described in this plan. (See *Appendix A for Management Commitment to Public Awareness*).

2.0 Scope

The Public Awareness Plan provides a framework that guides the company’s goal of continuous improvement in communications with a variety of key audiences in the communities where the company operates pipelines. The steps detailed in this document are designed to accomplish this goal and meet the requirements of applicable federal, state, and local regulations.

Code Reference :	Procedure No.: A.17	
49 CFR 192.616, 192.620; RRC 8.235, 8.310, 8.315	<i>Effective Date:</i> 06/01/13	Page 2 of 26

3.0 Applicability The Public Awareness Plan applies to all of the company’s natural gas transmission pipelines and related facilities.

The following Operations groups and individuals within the company are impacted:

- Executive Vice President Operations
- Division Vice Presidents
- Area Directors
- Operations Managers
- Operations Personnel, Asset Management Teams or Work Crews
- Vice President Operations Support
- Integrity Management Representatives
- GIS and Engineering Records Representatives
- Public Awareness Manager
- One Call Manager
- Director, Right-of-Way
- Right-of-Way Representatives

4.0 Frequency The Public Awareness Plan shall be reviewed annually and updated as required at intervals not to exceed fifteen months, but at least once every calendar year. The annual review is documented on *Form A.17A Annual Self-Assessment Public Awareness Program* and stored in the central storage location for all public awareness information.

The company is committed to communicating with targeted stakeholders based on the following frequency table as stated in RP 1162. Procedure-specific frequencies are identified below.

Audience Type	Frequency
Affected public	2 years, not to exceed 30 months
Emergency officials	Annually, not to exceed 18 months
Public officials	3 years, not to exceed 42 months; if HCA then annually to appropriate public safety official
Excavators/contractors	Annually, not to exceed 18 months

5.0 Governance The following table describes the responsibility, accountability, and authority for the Public Awareness Plan.



Standard Operating Procedures

Applicable to Natural Gas Pipelines and Related Facilities

Code Reference :	Procedure No.: A.17	
49 CFR 192.616, 192.620; RRC 8.235, 8.310, 8.315	Effective Date: 06/01/13	Page 3 of 26

Function	Responsibility	Accountability	Authority
Maintain	Public Awareness Manager	Public Awareness Manager	Vice President Operations Support

The responsibility, accountability and authority for specific activities required by the Public Awareness Plan are detailed in *SOP I.40 Public Awareness Plan—Communication with the API RP1162-defined Stakeholders*

The responsibilities of management are defined in *Sections 5.1 through 5.4.*

**5.1
Vice President
of Operations
Support**

The responsibilities of the Vice President of Operations Support in relation to the Public Awareness Plan include:

- Allocate funds to complete Public Awareness Plan tasks as required.
- Provide resources to complete Public Awareness Plan tasks as required.

**5.2
Director –
Damage
Prevention**

The responsibilities of the Director – Damage Prevention in relation to the Public Awareness Plan include:

- Oversee the implementation of the Public Awareness Plan.
- Approve the Public Awareness Plan and related SOPs.
- Approve changes to the Public Awareness Plan and related SOP’s as required by *SOP A.03 Management of Change.*

**5.3
Public
Awareness
Manager**

The responsibilities of the Public Awareness Manager include:

- Verify that all contact information for the affected public, public officials, emergency officials, and excavators is correctly entered into the Public Awareness Database, as detailed in *SOP I.40 Public Awareness Plan-Communication with API RP1162-defines stakeholders with the API RP1162-defined Stakeholders.*
- Develop relationships with other companies, associations or organizations to reduce redundancies and optimize common efforts.

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49 CFR 192.616, 192.620; RRC 8.235, 8.310, 8.315	<i>Effective Date:</i> 06/01/13	Page 4 of 26

- Coordinate the review of the messages, methods and media used to deliver the communications to the intended stakeholders, as detailed in SOP I.40 Public Awareness Plan—Communication with the API RP1162-defined Stakeholders.
- Document feedback received from stakeholder audiences and coordinate responses as needed.
- Coordinate the periodic review of the effectiveness of the Public Awareness Plan and recommend changes to the plan.
- Maintain the company’s Public Awareness Plan so that it meets all regulatory requirements.

**5.4
Area
Management**

The responsibilities of the Area Management include:

- Communicate with Stakeholder groups as required in SOP I.40 *Public Awareness Plan-Communication with API RP1162-defines stakeholders.*
- Document communications with Stakeholder groups and maintain current status for contacts in the Public Awareness Database.

**6.0
Terms and
Definitions**

Terms associated with this SOP and their definitions follow in the table below. For general terms, refer to *SOP A.01 Glossary and Terms.*

Terms	Definitions
Baseline Messages	The minimum standard program recommendations set forth in RP 1162.
Call Centers	Also known as “One-Call Centers,” this term refers to the clearinghouse for excavation notifications that are planned near pipelines and other underground utilities. One-Call Centers around the country handle between 15 and 20 million calls a year from excavators and direct those calls to the affected pipeline operators to help ensure that underground utilities are located and properly marked. The company is a member of all One-Call Centers in the states in which it operates.
Central Storage Location	A storage area on the company’s data servers that holds the Public Awareness related records, such as master mail pieces and communication information.
Dig Safely	A nationally recognized campaign to reduce underground facility damage through damage prevention education. Used by pipeline companies, one-call centers and other groups throughout the country, the program was developed through the joint efforts of the Office of Pipeline Safety and various damage prevention organizations. Dig Safely is a centerpiece

Code Reference :	Procedure No.: A.17	
49 CFR 192.616, 192.620; RRC 8.235, 8.310, 8.315	Effective Date: 06/01/13	Page 5 of 26

Terms	Definitions
	of the Common Ground Alliance (CGA).
Excavation Damage	Sometimes referred to as “third-party damage,” this type of damage often occurs when required One-Call notifications are not made prior to beginning excavation, digging or plowing activities. When the location of underground facilities is not properly determined, the excavator may inadvertently—and sometimes unknowingly—damage the pipeline and its protective coating.
Media	For purposes of this Plan, “media” refers to the vehicle (print, video, advertising, etc.) utilized to communicate to the targeted stakeholders.
Public Awareness Database	The master database that holds the individual electronic records of the Public Awareness Plan and related communications information.
Rights-of-Way (ROW)	Long, continuous stretches of land on which an operator has the rights to construct, operate and/or maintain a pipeline. The operator may own ROW outright, or an easement may be acquired for specific use of the ROW.
RP 1162	Recommended Practice 1162, adopted from standards developed by the American Petroleum Institute (API) that calls for pipeline operators to develop and maintain a public awareness program with specific guidelines on audiences, messages, and frequency of message.
Stakeholder	Also known as “target audience,” this term encompasses the various groups or constituencies that the company communicates with as part of this Plan. Examples of stakeholders include the affected public, emergency officials, public officials, excavators, etc.
Supplemental Messages	The concept developed in RP 1162 for assessing particular situations where it is appropriate to enhance or supplement the baseline messages.
Outreach	Efforts to determine if the public awareness communications reach the intended stakeholder groups.
Level of knowledge	Efforts to determine if the intended stakeholder groups understand the key messages from the public awareness communications.
Changes in behavior	Efforts to determine if the intended stakeholder groups learn the appropriate damage prevention behaviors from the public awareness communications.
Bottom-line results	Efforts to determine if the public awareness communications are effective in preventing damage to the pipelines.

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49 CFR 192.616, 192.620; RRC 8.235, 8.310, 8.315	Effective Date: 06/01/13	Page 6 of 26

**7.0
Public
Awareness Plan**

The Public Awareness Plan contains the following sections:

- Targeting Audiences for Public Awareness Education: Describes the methodology for identifying target audiences (or stakeholders) for public awareness communications.
- Procedure Used to Populate Stakeholder Groups: Describes how to determine Stakeholder Group members.
- Content of Message: Describes the content of public awareness communications to each stakeholder group.
- Communications Actions: Describes the vehicles/materials used to communicate with each stakeholder group.
- Supplemental Plan Enhancement and Materials: Describes what factors to consider when evaluating the need for supplemental plan enhancement, and the primary forms of enhancement employed when needed.
- Plan Assessment and Evaluation: Describes the process of assessment for effectiveness in communicating with the various stakeholder groups of the Public Awareness Plan.
- Documentation Requirements: Describes the administration of the Public Awareness Plan and procedures for updating the Public Awareness Plan.

**7.1
Targeting
Audiences for
Public
Awareness
Education**

The company evaluates the various stakeholders groups for the Public Awareness Plan in an effort to ensure that the chosen communications vehicles are appropriate for each targeted audience. For purposes of this plan, and based on the company's operations and the requirements of RP 1162, the following core groups have been identified as stakeholders:

- The Affected Public in areas where the company operates are defined as the following:
 - Residents living near the pipelines
 - Individuals working near the pipelines
 - Places of congregation such as businesses, schools, hospitals, prisons, etc.
- Emergency Response Officials in areas where the company operates are defined as the following:
 - Fire departments and other state & local emergency management personnel
 - Law enforcement agencies (city, county and state police)
 - Emergency medical personnel
 - Hazardous materials response teams
 - 911 operators and emergency dispatch centers

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- Public Officials in areas where the company operates are defined as the following:
 - Mayors
 - City, town or county managers or commissioners
 - Planning boards or committees
 - Zoning boards or committees
 - Licensing departments
 - Permitting bodies
 - Building code inspection or code enforcement departments
- Excavators in areas where the company operates are defined as the following:
 - Construction companies
 - Excavation equipment rental companies
 - Public works officials
 - Highway departments or other road construction or maintenance bodies
 - Landscaping firms
 - Fence building companies
 - Timber companies
 - Well drilling operations
 - Home builders
 - Land developers
 - One-Call centers

**7.2
Procedure Used
to Populate the
Stakeholder
Groups**

The company uses a combination of internal and external sources to create the lists for each of the four stakeholder groups. The company has maintained an ongoing Public Awareness Liaison Program that has identified the stakeholder groups using the guidelines in *Section 7.1*. As a result, the company already has various lists for the four stakeholder groups as well as the methodology to maintain and update those lists. Under the Public Awareness Plan, those records are collected and maintained in one Public Awareness Database.

A majority of the records are obtained from outside mail list vendors with specialized skills, processes, and data collection and cleansing tools that ensure the highest quality data is provided to the company for each stakeholder group. These records are obtained along a pipeline corridor specific to the company’s pipelines.

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Additional records for excavators may be obtained from the company's One Call database used for one call data consolidation.

The remaining records may be gathered from the various sources at the local level. Under this Plan, those records are incorporated into the Public Awareness Database and updated as new information is available.

Outside vendors providing lists for public awareness communication shall be evaluated as necessary, when significant changes occur in their data sources or data evaluation methods. Many vendors use a large variety of sources and tools to compile the best possible stakeholder lists.

As the communications with the various stakeholder groups are performed, the lists used to establish the recipient of the communications are evaluated to determine if any enhancements are necessary for adequate coverage of each stakeholder group.

Communications will be provided to stakeholders to within a minimum coverage area distance of 660 feet on each side of the pipeline. Areas of consequence and appropriate factors, such as alternative maximum allowable operating pressure will be considered. Where specific circumstances suggest a wider coverage area for a certain pipeline location, the coverage area could be expanded accordingly to fit a particular pipeline and location.

Per 192.620, in areas where pipeline segments are operated at the alternative maximum allowable operating pressure, the public will be notified about integrity management activities. Persons occupying property within 660 feet of the centerline or within the potential impact circle, whichever is greater, will be included.

**7.2.1
Internal
Identification
Sources**

Internal methods that may be used to identify updates to the appropriate stakeholder audiences include:

- Operations personnel
- Right-of-Way (ROW) records and contacts
- Existing emergency response plans
- Mock emergency exercises
- Personnel that routinely work with governmental and regulatory bodies
- Past rehabilitation and maintenance notifications and records

**7.2.2
External
Identification**

External sources that may be used to identify updates to the appropriate stakeholder audiences include:

- Nine digit zip codes

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Sources

- Geo-spatial databases
- One-Call organizations
- Identified local emergency officials
- Information provided by the public
- Local Emergency Planning Committee (LEPC) databases
- State and emergency management agencies
- Outside vendor with capability for providing information on excavators
- Contractor licensing boards
- Excavation equipment rental companies
- Utility coordinating committees
- Standard Industrial Codes (SIC)

**7.2.3
Identification
Sources for the
Affected Public**

Sources that may be used to identify updates to the affected public stakeholder group include:

- Affected public along pipeline ROW
- Nine digit zip code
- Geo-spatial database
- Customer database
- HCAs in accordance with federal regulations
- Information provided by the public

**7.2.4
Identification
Sources for
Local Public
Officials**

Sources that may be used to identify updates to the local public officials stakeholder group include:

- Personnel who routinely work with governmental and regulatory bodies
- One-Call organizations
- Field operations personnel

**7.2.5
Identification
Sources for
Emergency
Officials**

Sources that may be used to identify updates to the emergency officials stakeholder group include:

- Discussions with identified local emergency officials
- Existing emergency response plans
- Mock emergency exercises
- Public Officials Emergency Responder website
- Local Emergency Planning Committee (LEPC) databases
- State and emergency management agencies

Code Reference :	Procedure No.: A.17	
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- 7.2.6 Identification Sources for Excavators**
- Sources that may be used to identify updates to the excavators stakeholder group include:
- One-Call system databases
 - Outside vendor with capability for providing information on excavators
 - Contractor licensing boards
 - Excavation equipment rental companies
 - Utility coordinating committees
 - Standard Industrial Codes (SIC)

- 7.3 Content of Message**
- The content of the messages to each respective stakeholder group is evaluated and fine-tuned based on changing circumstances and need.
The message to all stakeholders includes:
- Pipeline purpose and reliability
 - Hazards or risks associated with pipeline operations
 - Measures that the company takes to prevent negative impacts to public safety, property and the environment
 - Use of a One-Call notification system prior to excavation and other damage prevention activities
 - Steps that should be taken for public safety in the event of a pipeline release or incident at a facility
 - Physical indications that a release or incident may have occurred
 - Procedures to report a release or incident

- 7.3.1 Content of Message to the Affected Public**
- The message to the Affected Public includes:
- Pipeline purpose and reliability
 - Awareness of hazards and prevention measures undertaken
 - Leak recognition and response
 - Damage prevention awareness
 - One-call requirements
 - Pipeline location information
 - How to get additional information
 - Availability of list of pipeline operators through NPMS
 - Alternative MAOP Pipe Segments- per 192.620, in areas where pipeline segments are operated at the alternative maximum allowable operating pressure, the public will be notified about integrity management activities. Persons occupying property within 220 yards (or 660 feet) of the centerline and within the potential impact circle will be included.

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- 7.3.2**
Content of Message to Emergency Response Official
- The message to Emergency Response Officials includes:
- Pipeline purpose and reliability
 - Awareness of hazards and prevention measures undertaken
 - Leak recognition and response
 - Emergency preparedness communications
 - Potential hazards
 - Pipeline location information
 - Availability of NPMS
-

- 7.3.3**
Content of Message to Local Public Officials
- The message to Local Public Officials includes:
- Pipeline purpose and reliability
 - Awareness of hazards and prevention measures undertaken
 - Leak recognition and response
 - Emergency preparedness communications
 - One-call requirements
 - Pipeline location information
 - How to get additional information
 - Availability of NPMS
-

- 7.3.4**
Content of Message to Excavators
- The message to excavators includes:
- Pipeline purpose and reliability
 - Awareness of hazards and prevention measures undertaken
 - Leak recognition and response
 - Damage prevention awareness
 - One-call requirements
 - Leak recognition and response
 - How to get additional information
-

7.4
Communication Actions

The Public Awareness Plan utilizes communication materials produced both by the company and by other parties. All the materials are evaluated for clarity, thoroughness, and applicability by the Public Awareness Manager.

The primary language used in communications materials for the Public Awareness Plan is English. Materials in other languages are made available based on community need.

- 7.4.1**
Communication Actions for the Affected Public
- Communication actions for the affected public are detailed in SOP I.40 Public Awareness Plan—Communication with the API RP1162-defined Stakeholders.
 - Vehicles/materials for communications with the Affected Public may include:
 - Personal contact

Code Reference :	Procedure No.: A.17	
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- Targeted distribution of print materials:
 - Brochures
 - Pamphlets
 - Letters
 - Pipeline markers
 - Community meetings, open houses, etc. (supplemental as needed)
-

**7.4.2
Communication
Actions for
Emergency
Officials**

Communication actions for emergency officials are detailed in *SOP I.40 Public Awareness Plan—Communication with the API RP1162-defined Stakeholders*. Vehicles/materials for communications with Emergency Officials may include:

- Scheduled meetings with county or multiple county officials
 - Personal contact
 - Group meetings
 - Targeted distribution of print materials
 - Telephone calls
 - E-mail
 - Pipeline Markers
 - Emergency exercises (supplemental as needed)
 - Facility tours or open houses (supplemental as needed)
 - National Association of State Fire Marshals/OPS emergency response training program
-

**7.4.3
Communication
Actions for
Public Officials**

- Communication actions for public officials are detailed in *SOP I.40 Public Awareness Plan—Communication with the API RP1162-defined Stakeholders*.
 - Vehicles/materials for communications with Public Officials may include:
 - Targeted distribution of print materials:
 - Brochures
 - Pamphlets
 - Letters
 - Telephone calls (supplemental as needed)
 - Group meetings (supplemental as needed)
 - Personal contact (supplemental as needed)
 - E-mail (supplemental as needed)
-

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**7.4.4
Communication
Actions for
Excavators**

- Communication actions for excavators are detailed in SOP I.40 Public Awareness Plan—Communication with the API RP1162-defined Stakeholders.
- . Vehicles/materials for communications with excavators may include:
- Targeted distribution of print materials:
 - Brochures
 - Pamphlets
 - Letters
- One-Call Center outreach
- Pipeline markers
- Group meetings (supplemental as needed)
- Personal contact (supplemental as needed)
- E-mail (supplemental as needed)

**7.4.5
Public
Awareness
Communications
Summaries**

Public awareness communications procedures with the affected public, emergency officials, public officials and excavators are detailed in *SOPs I.40 Public Awareness Plan—Communication with the API RP1162-defined Stakeholders.*

The following tables summarize Public Awareness Communications.

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Table 1 Public Awareness Communications for the Affected Public

Stakeholder Audience	Message Type	Delivery Frequency	Delivery Method and/or Media
Residents located along pipeline ROW and places of congregation	Baseline Messages: <ul style="list-style-type: none"> • Pipeline purpose and reliability • Awareness of hazards and prevention measures undertaken • Damage Prevention Awareness • One-Call Requirements • Leak Recognition and Response • Pipeline Location Information • How to get additional information • Availability of list of pipeline operators through NPMS 	Baseline Frequency: 2 years	Baseline Activity: <ul style="list-style-type: none"> • Targeted distribution of print materials and Pipeline Markers
	Supplemental Message: <ul style="list-style-type: none"> • Information and/or overview of operator’s Integrity Management Plan • ROW encroachment prevention • Any planned major maintenance/construction activity 	Supplemental Frequency: Additional frequency and supplemental efforts as determined by specifics of the pipeline segment or environment	Supplemental Activity: <ul style="list-style-type: none"> • Print Materials • Personal Contact • Telephone Calls • Group Meetings • Open Houses

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Public Awareness Communications for Emergency Officials			
Stakeholder Audience	Message Type	Delivery Frequency	Delivery Method and/or Media
Emergency Officials	Baseline Messages: <ul style="list-style-type: none"> • Pipeline purpose and reliability • Awareness of hazards and prevention measures undertaken • Emergency Preparedness Communications • Potential hazards • Pipeline Location Information and availability of NPMS • How to get additional information 	Baseline Frequency: Annual	Baseline Activity: <ul style="list-style-type: none"> • Personal Contact (generally preferred) OR <ul style="list-style-type: none"> • Targeted Distribution of Print Materials OR <ul style="list-style-type: none"> • Group Meetings OR <ul style="list-style-type: none"> • Telephone Calls with Targeted Distribution of Print Materials
	Supplemental Message: <ul style="list-style-type: none"> • Provide information and/or overview of Integrity measures undertaken • Maintenance construction activity 	Supplemental Frequency: Additional frequency and supplemental efforts as determined by specifics of the pipeline segment or environment	Supplemental Activity: <ul style="list-style-type: none"> • Emergency Tabletop, Deployment Exercises • Facility Tour • Open House

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Public Awareness Communications for Public Officials			
Stakeholder Audience	Message Type	Delivery Frequency	Delivery Method and/or Media
Local Public Officials	<p>Baseline Messages:</p> <ul style="list-style-type: none"> • Pipeline purpose and reliability • Awareness of hazards and prevention measures undertaken • Emergency Preparedness Communications • One Call Requirements • Pipeline Location Info and availability of NPMS • How to get additional information <p>Supplemental Message:</p> <ul style="list-style-type: none"> • If applicable, provide information about designation of HCA (or other factors unique to segment) and summary of integrity measures undertaken • ROW encroachment prevention • Maintenance Construction activity 	<p>Baseline Frequency: 3 years</p> <p>Supplemental Frequency:</p> <ul style="list-style-type: none"> • If in HCA, then annual contact to appropriate public safety officials • Otherwise, as appropriate to level of activity or upon request 	<p>Baseline Activity:</p> <ul style="list-style-type: none"> • Targeted Distribution of Print Materials <p>Supplemental Activity:</p> <ul style="list-style-type: none"> • Personal Contact • Telephone Calls • Videos and CDs

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Public Awareness Communications for Excavators			
Stakeholder Audience	Message Type	Delivery Frequency	Delivery Method and/or Media
Excavators	<p>Baseline Messages:</p> <ul style="list-style-type: none"> • Pipeline purpose and reliability • Awareness of hazards and prevention measures undertaken • Damage Prevention Awareness • One-Call Requirements • Leak Recognition and Response • How to get additional information <p>Supplemental Messages:</p> <ul style="list-style-type: none"> • Pipeline purpose, prevention measures and reliability 	<p>Baseline Frequency: Annual</p> <p>Supplemental Frequency: Additional frequency and supplemental efforts as determined by specifics of the pipeline segment or environment</p>	<p>Baseline Activity:</p> <ul style="list-style-type: none"> • Targeted Distribution of Print Materials • One-Call Center Outreach <p>AND</p> <ul style="list-style-type: none"> • Pipeline Markers <p>Supplemental Activity:</p> <ul style="list-style-type: none"> • Personal Contact • Group Meetings

7.5 Supplemental Plan Enhancement and Materials

Special conditions, changing circumstances and other factors may necessitate additional communications or increased frequency of communications to stakeholders. Responsibility for determining whether such measures are necessary lies with the Public Awareness Manager. Required changes to the Public Awareness Plan are implemented according to the processes described in the *SOP A.03*.

The need for supplemental plan enhancement or the development of new or additional communications materials will be evaluated on an on-going basis and annually during the self-assessment of implementation, following factors are considered:

- Results from previous Public Awareness Plan evaluations
- Potential hazards
- High Consequence Areas
- Population density
- Increased land development activity
- Increased land farming activity
- Elevated incidents of damage from outside forces
- Known environmental considerations

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- Pipeline history in the area
- Specific local considerations or heightened public sensitivity
- Regulatory requirements
- Issues not mentioned above that reveal the need for supplemental messages

If supplemental plan enhancement is warranted, then the following primary forms of enhancement are considered:

- Increased frequency of communications or communications at a shorter interval than the baseline requirement
- Additional message content or delivery/media efforts beyond those identified in the baseline plan
- Extending or broadening the coverage area beyond the parameters of the baseline plan

All supplemental enhancements to the Plan are identified and documented in Public Awareness Database.

**7.6
 Plan
 Assessment and
 Evaluation**

Guidelines established for evaluating the effectiveness of the Public Awareness Plan are described below.

The company is guided by the following:

- Is the information reaching the intended stakeholder audience?
- Do these audiences understand the messages?
- Are the messages provided frequently enough to achieve the desired result?
- Do the materials motivate recipients to respond appropriately in alignment with the information provided?
- Is the company’s public awareness initiative resulting in improved understanding of safe pipeline practices?

**7.6.1
 Assessment and
 Evaluation
 Techniques**

The company conducts the effectiveness of the Public Awareness Plan, using a variety of techniques including internal audits, surveys, focus groups, feedback from stakeholders and statistical data tracking. They should be conducted as described in the table below.

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Approach	Technique	Frequency
Self-assessment of implementation	Review <ul style="list-style-type: none"> • Internal review • Regulatory Inspection 	Initial review within 18 months of implementation. Annually thereafter, not to exceed 18 months. Regulatory inspection as scheduled.
Pre-test effectiveness of materials	Focus groups with internal (company) participants	Upon initial implementation or major re-design of materials, or development of new messages
Effectiveness of implementation <ul style="list-style-type: none"> • Outreach • Level of knowledge • Changes in behaviors • Bottom-line results 	<ol style="list-style-type: none"> 1. Surveys that assess outreach efforts, audience knowledge & changes in behaviors <ul style="list-style-type: none"> • Operator designed • Third-party designed • Industry Association designed 2. Assess notifications & incidents to determine anecdotal changes in behavior 3. Documented records and industry comparison of incidents to evaluate bottom-line results 	No more than four years apart, or upon a major re-design of the plan
Implement changes to the Public Awareness Plan as assessment methods suggest	SOP A.03 Management of Change	As required by findings of evaluations

The table below identifies the responsibility, accountability, and authority for the effectiveness evaluation.

Function	Responsibility	Accountability	Authority
Self-assessment of implementation	Public Awareness Manager	Public Awareness Manager	Vice President of Operations Support
Pre-test effectiveness of materials	Public Awareness Manager	Public Awareness Manager	Vice President of Operations Support

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Evaluate effectiveness of implementation	Public Awareness Manager	Public Awareness Manager	Vice President of Operations Support
Implement Public Awareness Plan changes	Public Awareness Manager	Public Awareness Manager	Vice President of Operations Support

**7.6.2
Self-Assessment
of
Implementation**

Using the questions listed in *A.17A Annual Self-Assessment Public Awareness Program* the following steps are completed annually to assessment of implementation.

Step	Task
1	Review the questions listed in <i>A.17A Annual Self-Assessment Public Awareness Program</i> .
2	Perform audit.
3	Document audit findings.
4	Report audit findings
5	Evaluate audit report and propose changes as needed.

**7.6.3
Pre-test
Effectiveness of
Materials**

Communication materials are pre-tested with an internal focus group. Focus group participants are selected to reasonably represent the stakeholder groups identified in *SOP A.17 Public Awareness Plan*, and are capable of articulating their reactions to the materials. Focus groups are typically comprised of 2-10 employee participants. The focus group process is as follows:

Step	Task
1	Establish focus group.
2	Describe the focus group objectives.
3	Review materials with focus group.
4	Document focus group feedback.
5	Report focus group findings.
6	Evaluate focus group findings and propose changes to the communications materials.

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**7.6.4
Evaluate
effectiveness of
implementation**

The company evaluates the effectiveness of the implementation of the Public Awareness Plan using the following measures:

- Outreach: Are the messages reaching the intended stakeholders?
- Level of knowledge: Are the messages being understood by the stakeholders?
- Changes in behavior: Have the stakeholders learned the appropriate damage prevention behaviors?
- Bottom-line results: Are the messages having an impact on the number of damages and the consequences of the damages?

The evaluation of each of these measures is accomplished according to the following table.

Table 1: Evaluation of Implementation Measure

Measure	Primary Survey Material	Primary Survey Method	Supplemental Methods
Outreach	Written	Mail	Telephone Internet Email In-person Meeting Feedback
Level of Knowledge	Written	Mail	Telephone Internet Email In-person Meeting Feedback
Changes in Behavior	Written	Mail	Telephone Internet Email In-person Meeting Feedback
Bottom-line Results	Statistical Data Tracking	Spreadsheet Tracking Model	Review of outside One-Call or other damage prevention group similar analysis

The primary method of survey is mailing to a random sample of each stakeholder group. If the minimum number of completed surveys is not received, additional surveys are obtained by mail, telephone, internet, email, or in person using the current survey forms. The method and implementation are determined by the Public Awareness Manager.

Stakeholder Group	Minimum Number of Completed
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	Surveys
Affected Public	150
Emergency Officials	50
Public Officials	50
Excavators	150

The Public Awareness Manager can perform additional surveys or other evaluation methods as necessary to obtain supplemental data or more targeted results to best meet the overall plan objectives.

**7.6.5
Evaluation and
Survey Results**

The results of the surveys are used to evaluate Outreach, Level of Knowledge, and Changes in Behavior following the completion of the data gathering.

The Public Awareness Manager reviews the results and determines if any further action is required. If further action is required, please refer to the appropriate stakeholder SOP in the sections titled Determine the Message for the (Stakeholder Group), or Determine Supplemental Messages, Frequencies and Activities.

Further evaluation of Outreach, Level of Knowledge, and Changes in Behavior can be done by evaluating meeting feedback forms from meetings performed by company employees or outside vendors such as One-Call systems or damage prevention companies. This additional evaluation is conducted when necessary, as determined by the Public Awareness Manager.

The evaluation of the survey results follows the procedure listed below.

Step	Activity
1	ESTABLISH evaluation criteria (for the initial evaluation, the threshold of acceptable responses should be 60%, by each of the main measures)
2	STORE data by stakeholder group in central storage location.
3	CREATE and UPDATE an electronic spreadsheet (tabulated by knowledge, outreach, and behavior for each of the four stakeholder groups) that is populated with survey answers and provides statistics of answer percentages (such as yes, no, other) for each question.
4	CHECK the spreadsheet results for deficiencies against the established criteria. If less than the established percentage of answers is “correct”, that area of communication should be evaluated for improvement.
5	DETERMINE further action, based on the evaluation, if any.

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**7.6.6
Evaluation of
Bottom-Line
Results**

The company uses statistical data tracking to evaluate changes in bottom-line results, as well as other supplemental data that may be useful in evaluating the effectiveness of the Public Awareness Plan. The initial data tracking consists of:

- The number of calls received in response to materials.
- The incidence of damage from excavation to our facilities. This includes not just “reportable incidents” but all damage events.
- The number of “near hit” instances.
- Requests for line locations.
- Periodically reviewing similar analysis and effectiveness evaluations performed by applicable One-Call systems, industry groups, or other outside damage prevention groups.
- Analyzing and reviewing feedback following meetings with various identified stakeholders (public officials, emergency officials, etc).

The evaluation of bottom-line results follows the process listed below.

Step	Activity
1	DEVELOP and MAINTAIN a spreadsheet tracking model.
2	COMPILE monthly data from the various sources for: <ul style="list-style-type: none"> • Calls received in response to materials • Excavation damages • Near hits • Line locate requests
3	COMPARE the data to the trends for each data set.
4	EVALUATE the impact of clear changes in the trends for further action.

The Public Awareness Manager and Manager of One Call/Damage Prevention should review the similar analysis of at least one outside group or One-Call system each year and determine what can be used to supplement the Public Awareness Plan.

**7.6.7
Implement
Public
Awareness Plan
Changes**

The implementation of any changes in the Public Awareness Plan or related SOPs is made under *SOP A.03 Management of Change*.

The implementation of any other minor changes is made by the Public Awareness Manager, as necessary.

**8.0
Documentation
Requirements**

The Public Awareness Plan is administered and maintained through proper record maintenance and the periodic review and update of the communication materials for the targeted stakeholder audiences.

The Public Awareness Plan is overseen by the Vice President of Operations Support.

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Day-to-day responsibility for implementing and administering the Public Awareness Plan resides with the Public Awareness Manager. The company is guided by the following objectives to ensure that:

- Stakeholder audiences are properly identified
- Messages appropriate to each stakeholder are identified
- Appropriate media and communication vehicles are selected to reach each stakeholder audience
- Messages are delivered as specified in the Plan
- The effectiveness of the Plan is periodically evaluated
- The Plan is modified to reflect changing situations or in response to stakeholder feedback or recommendations resulting from periodic effectiveness evaluations
- Complete *Form A.17A Annual Self-Assessment Public Awareness Program*.

8.1 Recordkeeping Requirements

The responsibility for maintaining appropriate records and materials resides with the Public Awareness Manager.

Records and other documentation that reflect communications to stakeholder audiences are retained for a minimum of five years within the Public Awareness database and central storage location in electronic format. Records that cannot be readily converted to electronic format are kept by the Public Awareness Manager with copies existing in the source location as necessary.

Documented activities that are retained include:

- Samples of the materials used to communicate messages
- Copies of any survey results, focus groups or interviews conducted
- Routine assessments of plan implementation
- Copies of evaluations of effectiveness efforts
- Copies of any independent evaluations made
- Determinations made concerning any supplemental enhancements
- Recommendations for improvements to the Plan

8.2 Plan Updating Procedures

Based on changing circumstances and/or the results of Plan evaluations, the Plan, and associated Public Awareness SOPs are updated according to *SOP A.03*.

The following standards are applied to the administration and maintenance of this Plan in order to implement continuous improvement:

- The Public Awareness Plan shall be reviewed annually at intervals not to exceed fifteen months, but at least once every calendar year and updated as required to reflect stakeholder feedback, effectiveness evaluations, regulatory requirements, or changes in operating status.
- Responsibility for coordinating the periodic review of the Plan lies with the Public Awareness Manager.

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- The annual review is documented on the applicable form(s) for *Public Awareness Plan Annual Review* and stored in the central storage location for all public awareness information.
- Recommendations for altering, editing or revising the Plan and the associated public awareness procedures can be made by any Operations employee, as detailed in the *SOP A.03 Management of Change*.
- The Vice President of Operations Support approves necessary changes and any expenditure for development of new initiatives or materials, as detailed in *SOP A.03 Management of Change*.
- Revised sections, pages, or procedures are re-issued in accordance with *SOP A.03 Management of Change*.

**9.0
References**

-
- A.03 Management of Change
 - I.30 Third Party Damage
 - I.40 Public Awareness Plan—Communication with API RP1162-defined Stakeholders
 - I.40A Public Awareness Contact Data Form
 - A.17A Annual Self-Assessment Public Awareness Program
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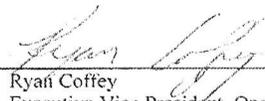
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Appendix A:

Management Commitment to Public Awareness

ETC and its management are committed to operating a safe and reliable pipeline system. ETC is also committed to providing educational material to key stakeholders in order to develop stronger relationships with the communities in which it operates. Providing materials with messages about the role of pipelines, safety and damage prevention and emergency response will improve the safety and security of the pipelines ETC operates and the communities in which they operate.

The ETC Public Awareness Program is consistent with, and reinforces the practices and policies of the Company. ETC Management, employees and contractors are committed to supporting public awareness efforts. Further, ETC management will provide adequate financial and employee resources in order to promote pipeline public awareness that will result in positive outcomes, while also achieving regulatory compliance and industry standards.



Ryan Coffey
Executive Vice President, Operations



ENERGY TRANSFER

Public Awareness Plan— Communication with API RP1162- defined Stakeholders

Standard Operating Procedures

Applicable to Natural Gas Pipelines and Related Facilities

Code Reference :	Procedure No.: I.40	
49 CFR: 192.616; RRC 8.235, 8.310, 8.315	Effective Date: 06/01/13	Page 1 of 8

1.0 Procedure Description API RP 1162 requires pipeline operators to communicate with specific stakeholders. This Standard Operating Procedure (SOP) establishes the guidelines for the communication with the following four audience groups -- Affected Public, Emergency Officials, Public Officials and Excavators -- under the Public Awareness Plan.

2.0 Scope This SOP describes the requirements of the Public Awareness Plan to communicate with the API RP1162 defined stakeholders on a regular frequency and records the results of these communications.

3.0 Applicability This SOP applies to all pipelines under the requirements of the company's Public Awareness Plan.

4.0 Frequency As specified in *SOP A.17 Public Awareness Plan*, the baseline frequency for communicating and documenting communication with each stakeholder audience is defined below.

- Affected Public are 2 years, not to exceed 30 months.
- Emergency Officials are annual, not to exceed 18 months.
- Public Officials are 3 years, not to exceed 42 months.
- Excavators are annual, not to exceed 18 months.

Supplemental frequency for a specified area, pipeline, or other designation, determined under the Public Awareness Plan and this SOP: Documented by the Public Awareness Manager.

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**5.0
Governance**

The following table identifies the responsibility, accountability, and authority for communication with the API RP112-defined stakeholder audiences.

Function	Responsibility	Accountability	Authority
Communicate messages about pipeline safety and interact with Affected Public, Emergency Officials, Public Officials and Excavators	Area Management/Operations Personnel	Public Awareness Manager	Vice President of Operations Support
Determine the Message	Public Awareness Manager	Public Awareness Manager	Vice President of Operations Support
Distribute communication messages via targeted mail	Public Awareness Manager	Public Awareness Manager	Vice President of Operations Support
Determine Supplemental Messages, Frequencies, and Activities	Public Awareness Manager	Public Awareness Manager	Vice President of Operations Support
Develop and Maintain the Public Awareness Database	Public Awareness Coordinator	Public Awareness Manager	Vice President of Operations Support

**6.0
Terms and
Definitions**

Terms associated with this SOP and their definitions follow in the table below. For general terms, refer to *SOP A.01 Glossary and Terms*.

Terms	Definitions
Affected Public	The Affected Public includes people who occupy structures on land on which the pipeline is buried. A partial list includes homeowners, homeowners associations, farmers, tenants, landowners, businesses, and industrial facilities.
Emergency Officials	State and local law enforcement departments, emergency medical services, fire departments, 911 operators/emergency dispatch centers or others that can benefit from communication of pipeline safety, incident response and

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	related public awareness messages, and interaction.
Public Officials	Mayors, city, town, or county managers, planning boards or committees that serve the public in a capacity that can benefit from communication of planning or pipeline safety and related public awareness messages.
Excavator	Anyone who may dig in the vicinity of pipelines with manual or mechanized equipment with the potential to cause damage or create an incident on the pipeline or related facilities. For the purpose of this SOP, residents are not considered excavators, since public awareness communications with residents occurs under <i>SOP A.17 Public Awareness Plan</i> .

**7.0
Public Awareness
Plan—
Communication
with API RP112-
defined
Stakeholders**

This procedure contains the following sections:

- Communicate Message and Interact with Affected Public
- Communicate Message and Interact with Emergency Officials
- Communicate Message and Interact with Public Officials
- Communicate Message and Interact with Excavators
- Targeted Distribution of Print Materials to API RP-1162 defined Stakeholders
- Determine the Message for the Affected Public
- Develop and Maintain the Public Awareness Database
- Determine Supplemental Messages, Frequencies and Activities
- Documentation Requirements



NOTE: Communications will be provided to stakeholders to within a minimum coverage area distance of 660 feet on each side of the pipeline. Areas of consequence and appropriate factors, such as alternative maximum allowable operating pressure will be considered. Where specific circumstances suggest a wider coverage area for a certain pipeline location, the coverage area could be expanded accordingly to fit a particular pipeline and location.

Per 192.620, in areas where pipeline segments are operated at the alternative maximum allowable operating pressure, the public will be notified about integrity management activities. Persons occupying property within 660 feet of the centerline or within the potential impact circle, whichever is greater, will be included.

**7.1
Communicate
Message and
Interact with
the Affected
Public**

Area Management is responsible for maintaining contact and communications with the Affected Public in their areas. Communications focused on pipeline safety with a particular stakeholder that occur during the normal course of business are considered per occurrence contact. Area Management is responsible for documenting the per occurrence contact within the public awareness database.

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The Public Awareness Manager is responsible communicating with the Affected Public on a recurring basis via targeted distribution of print materials. .

The Public Awareness Manager is responsible for documenting targeted distribution of print materials within the public awareness database.

**7.2
Communicate
Message and
Interact with
Emergency
Officials**

Area Management is responsible for maintaining contact and communications with Emergency Officials in their areas. Area Management may communicate and interact with emergency officials through formal and informal interactions. Communications focused on pipeline safety with a particular stakeholder that occur during the normal course of business are considered per occurrence contact. Area Management will also communicate and interact with emergency officials via a formalized group meeting hosted by an association/third party.

Area Management is responsible for documenting the per occurrence contact within the public awareness database. The Public Awareness Manager is responsible for documenting the group meetings with emergency officials within the public awareness database.

Area Management can perform the communication with company employees, with a contractor, a third party (such as an area damage prevention group), or a combination. The use of a contractor or a third party should include the evaluation of the contractor's programs to verify that they meet the requirements of API RP-1162 and the company. The general guideline for conducting Emergency Official meetings is listed below.

Step	Activity
1	PREPARE meeting materials.
2	INCLUDE an overview of normal operations and emergency procedures.
3	FOCUS discussions on mutual concerns related to emergency response and pipeline safety.
4	EXCHANGE emergency contact lists.
5	ACQUAINT the Emergency Officials with company facilities and ability to respond to emergency situations.
6	REVIEW local area emergency plan.
7	DETERMINE their ability to provide emergency assistance.
8	DISCUSS mutual assistance for leaks, ruptures, fires, or other emergency situations.
9	SEND meeting materials to those that cannot attend the meeting.
10	FOLLOW-UP on requests for additional information or training.
11	PLAN for and CONDUCT emergency simulations as required.
12	DOCUMENT attendees so they can be added to the Public Awareness

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	Database.
13	DOCUMENT communication in public awareness database.

**7.3
Communicate
Message and
Interact with
Public Officials**

Area Management is responsible for maintaining contact and communications with Public Officials in their areas and for documenting the contact and communication.

The Public Awareness Manager is responsible for maintaining a current schedule of mailings to Public Officials. The schedule makes efficient use of company resources while maintaining the frequency necessary for effective communication.

The following steps detail the process for the mass mailings to Public Officials.

Step	Task
1	Notify Director, GIS of readiness to mail to Public Officials.
2	Send centerline shape files of pipeline assets and facilities to mail vendor.
3	Work with vendor to acquire data to identify addresses. Apply mailing buffer, classify addresses and conduct mailing.
4	Receive documentation and proof of mailing from USPS. Review mail receipts.
5	Receive returned mail, document and send addresses to vendor for further analysis to ascertain why an address was undeliverable.
6	Retrieve documentation from vendor and load documentation of mailing into company's the Public Awareness Database.

**7.4
Communicate
Message and
Interact with
Excavators**

Area Management is responsible for maintaining contact and communications with Excavators in their areas. Area Management may communicate and interact with emergency officials through formal and informal interactions. Communications focused on pipeline safety with a particular stakeholder that occur during the normal course of business are considered per occurrence contact. Area Management will also communicate and interact with emergency officials via a formalized group meeting hosted by an association/third party.

Area Management is responsible for documenting the per occurrence contact within the public awareness database. The Public Awareness Manager is responsible for documenting the group meetings with emergency officials within the public awareness database.

Area Management can perform the communication with company employees, with a contractor, a third party (such as an area damage prevention group or a state one call center) or a combination. The use of a contractor or a third party should include the evaluation of the contractor's programs to verify that they meet the requirements of API

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RP-1162 and the company. The general guideline for conducting excavator meetings is listed below.

Step	Activity
1	PREPARE meeting materials.
2	DESCRIBE the company's Damage Prevention Program per <i>SOP I.30 Third Party Damage</i> .
3	DISCUSS the company's use of One-Call Notification System.
4	EXPLAIN the requirements for notification prior to any excavation regardless of the presence of established markers.
5	EXPLAIN the requirements for a company representative to locate the pipeline before any excavation begins.
6	DESCRIBE the potential consequences of damages and incidents.
7	PROVIDE information on reporting damages and incidents.
8	SEND meeting materials to those that don't attend the meeting.
9	FOLLOW-UP on requests for additional information.
10	DOCUMENT attendees so they can be added to the Public Awareness Database.
11	DOCUMENT communication in the Public Awareness Database.

**7.5
Determine the
Message for
Targeted
Distribution of
Print Materials**

The Public Awareness Manager is responsible for determining the message content of print materials. Baseline messages, by audience and type of pipeline system, should be determined using API RP 1162. Updates to the initial baseline message follow the process identified below and include supplemental content or contact frequencies as necessary.

**7.6
Targeted
Distribution of
Print Materials
to API RP-1162
defined
Stakeholders**

The Public Awareness Manager is responsible for maintaining a current schedule of mailings to API RP1162-defined stakeholders. The schedule makes efficient use of company resources while maintaining the frequency necessary for effective communication. The Public Awareness Manager can develop a sub-process for smaller mail outs. The following steps detail the process for the targeted distribution of print materials.

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Step	Task
1	Notify Director, GIS of readiness to mail to stakeholders.
2	Send centerline shape files of pipeline assets and facilities to mail vendor.
3	Work with vendor to acquire data to identify addresses. Apply mailing buffer, classify addresses and conduct mailing.
4	Receive and review mail receipt from mail vendor for proper coverage and proof of mail to the stakeholders.
5	Receive returned mail, document and send addresses to vendor for further analysis to ascertain why an address was undeliverable.
6	Retrieve documentation from vendor and load documentation of mailing into company's the Public Awareness Database.

**7.7
Develop and
Maintain the
Public
Awareness
Database**

The Public Awareness Plan master database resides within a web-based application. All information that is available in electronic format or that can reasonably be converted to electronic format is stored in the Public Awareness Database. In addition to the master database, the remaining Public Awareness materials are stored in a common area on the data servers.

These following steps are completed on a regular basis to maintain a current status in the Public Awareness Database.

Step	Task
1	Incorporate Field Data into the Public Awareness Database, per contact occurrence.
2	Verify contact information is in the Public Awareness Database
3	Coordinate the correction of any discrepancies.
4	Verify that messages are attached to the database records following the mail out.

**7.8
Determine
Supplementa
l Messages,
Frequencies,
and
Activities**

Supplemental techniques such as increased message frequency, supplemental messages, or the deployment of different communication methods may be necessary for the development of effective public awareness communication with each stakeholder audience. Following the evaluation of the Public Awareness Plan effectiveness in *SOP A.17 Public Awareness Plan*, the resulting recommendations regarding supplemental messages, frequencies and activities should be incorporated into the methods used for communicating with stakeholders.

**Public Awareness Plan—
Communication with API
RP112-defined
Stakeholders**

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**8.0
Documentation
Requirements**

Records and other documentation that reflect communications to stakeholder audiences are retained for a minimum of five years within the Public Awareness Database and central storage location in electronic format. Records that cannot be readily converted to electronic format are kept by the Public Awareness Manager with copies existing in the source location as necessary for a minimum of five years.

Documentation of the following is required under this SOP:

- Document contact (per occurrence) with RP1162-defined stakeholders in public awareness database. Utilize the applicable form(s) for Public Awareness Plan Personal Contact or data can be entered directly into public awareness database.
- Contact data for the in the Public Awareness Database.
- Documentation related to targeted distribution of print materials – schedules, brochures, postal certificates, mail lists -- in the Public Awareness Database.
- Documentation related to formalized meetings with stakeholders -- meeting sign-in sheets, invitations, contact lists in the Public Awareness Database.
- Supplemental activities in the Public Awareness Database.

**9.0
References**

A.03 Management of Change
A.17 Public Awareness Plan
I.40A – Public Contact Data Form

**Appendix A:
OQ Task Table**

There are no OQ tasks required for this procedure.



Type of Contact – Check Appropriate Box			
<input type="checkbox"/> Affected Public	<input type="checkbox"/> Emergency Official	<input type="checkbox"/> Excavator	<input type="checkbox"/> Public Official
Contact Information			
Name: _____	Title: _____		
Organization: _____	Phone: _____		
Address: _____	E-mail address: _____		
City, State, Zip: _____	Event Location: _____		
County _____	Date of Contact: _____		
Type of Contact – Check Appropriate Box			
<input type="checkbox"/> Personal Contact	<input type="checkbox"/> Phone	<input type="checkbox"/> Letter/Mail	<input type="checkbox"/> E-mail
<input type="checkbox"/> Mock Drill/Exercise	<input type="checkbox"/> Training	<input type="checkbox"/> Other _____	
Comments – Summarize what was discussed			
Materials/Handouts – List materials given and quantities			
Rep:			
Area:			
Division:			