



## RMP12 - Pipeline Public Awareness Plan

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### Summary

This standard outlines requirements based on the American Petroleum Institute's (API) Recommended Practice 1162 (RP 1162), First Edition, December 2003, that call for pipeline operators to develop and implement public education programs that address key stakeholder audiences including the affected public, emergency officials, public officials, and excavators. Pacific Gas and Electric Company (PG&E) has developed this Pipeline Public Awareness Program (PAP) to enhance public safety and environmental protection through regular communications with these key stakeholders. This program is designed to be a flexible framework for managing PG&E's public awareness program and for analyzing and gauging its effectiveness.

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### Target Audience

Public Safety & Integrity Management personnel, Distribution Integrity Management, Transmission Integrity Management, Emergency Preparedness & Public Safety; Land; Gas Transmission; External Relations; Government Relations

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### Safety

NA



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### REQUIREMENTS

#### 1. PROGRAM OVERVIEW

The overall goal of the PG&E PAP is to enhance public safety, emergency preparedness and environmental protection through increased public awareness and knowledge of natural gas in their community. PG&E is committed to on-going communications with the affected public and individual stakeholders to maintain public safety by raising the awareness of pipelines and reducing the likelihood and potential impact of pipeline damage through education, resources, and programs like 811 Call Before You Dig.

This standard provides guidance for PG&E to develop and actively manage a comprehensive, consistent PAP that can be regularly assessed and enhanced, while remaining in compliance with federal regulatory requirements as outlined in 49 CFR Part 192 and API RP 1162 First Edition, December 2003.

This program will utilize consistent objectives, tools and measurement components to enhance public safety while maintaining the flexibility necessary to monitor and respond to the needs of various audiences or circumstances.

##### 1.1 API RP 1162

In 2004, the US Department of Transportation's Research and Special Programs Administration (RSPA) and the Office of Pipeline Safety (OPS) proposed a rule requiring all gas and hazardous liquid pipeline operators to develop and implement public education programs that comply with American Petroleum Institute's (API) Recommended Practice 1162 (RP 1162). The recommended practice, developed as a consensus industry standard, is intended for use by natural gas pipeline operators, hazardous liquid pipeline operators, operators of gathering lines, and local distribution companies.

The final rule, implemented in June 2005, requires pipeline operators to develop and implement public education programs that address key stakeholder audiences including: affected public; local officials; emergency officials, excavators and contractors; land developers and One-Call Centers.

RP 1162 defines requirements for public awareness programs including: the message delivered to each audience, the frequency of message, the methods for delivering the message and requirements for reviewing and evaluating the PAP.

The overriding purpose of RP 1162 is to assist pipeline operators in developing an effective, yet flexible framework for managing a public awareness program and for analyzing and gauging the effectiveness of their public education efforts.

##### 1.2 PG&E's Program Objectives



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The overall goal of the PAP is to enhance public safety, emergency preparedness and environmental protection through increased public awareness and knowledge. The PAP was developed in compliance with RP 1162 and in alignment with the company's operational focus on gas pipeline safety, damage prevention and emergency response preparedness.

The primary objectives of PG&E's PAP are:

### 1) Awareness

The PAP will increase awareness of the presence of PG&E's natural gas pipelines, their role in transporting and delivering energy and the programs and activities PG&E has in place to keep pipelines safe. Increased awareness will lead to greater stakeholder engagement in pipeline safety and will help reduce the likelihood of emergencies or gas releases.

### 2) Damage Prevention

The PAP will contribute to a reduction in third-party damage to pipelines through educational outreach regarding safe excavation near pipelines and required actions prior to excavating near underground pipelines. The program will also contribute to a reduction in right-of-way encroachment through increased awareness regarding right-of-ways and right-of-way restrictions.

### 3) Emergency Response Readiness

The PAP will contribute to emergency response readiness by providing information regarding how to recognize and appropriately respond to a gas leak to protect life, property and the environment. Additionally, the PAP will enhance Emergency Official response readiness through educational outreach focused on safe handling of utility emergencies. Improved response readiness will lead to timely notification regarding a potential gas leak and a coordinated response between PG&E personnel and Emergency Officials.

PG&E will review the PAP on an annual basis to assess its implementation. Every four years, the PAP will be evaluated to determine the program's effectiveness and identify opportunities for program improvement. Both the annual review and four-year effectiveness evaluation will include a review of changing regulations to ensure their inclusion into the updated plan.

## 1.3 Applicable Regulations

The PG&E program complies with the following regulations:

- 49 C.F.R. Section 192.615(c)—Emergency Plans/Liaison requires PG&E to establish and maintain liaison with appropriate fire, police and other public officials to: 1) Learn the responsibility and resources of each government organization that may respond to a gas pipeline emergency; 2) Acquaint the officials with PG&E's ability to respond to a gas pipeline emergency; 3) Identify the types of gas pipeline emergencies PG&E notifies officials; and 4)



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Plan how PG&E and officials can engage in mutual assistance to minimize hazards to life or property.

- 49 C.F.R. Section 192.616 (a) – (i)—Public Awareness requires PG&E to: (a) Develop and implement a written public awareness program that follows the guidance provided in the American Petroleum Institute’s (API) Recommended Practice (RP) 1162; (b) The program must follow the general program recommendations of API RP 1162 and assess unique attributes and characteristics of PG&E’s pipeline and facilities; (c) PG&E must include baseline and supplemental requirements of API RP 1162, unless justification or procedures are in place as to why compliance with all or certain provisions of the RP are not practicable and not necessary for safety; and (d) PG&E’s program must include provisions to educate the public, government organizations and persons engaged in excavation related activities.

### 1.4 PG&E Company Overview

PG&E is one of the largest combined natural gas and electric utilities in the United States. Based in San Francisco, the company has approximately 20,000 employees and delivers energy to more than 15 million people in Northern and Central California. PG&E’s principal objective is the safe, reliable and affordable delivery of energy.

#### 1) Pipeline Assets included in the PAP

The pipeline assets incorporated in PG&E’s PAP include all regulated gas pipelines in California owned by the Company and Standard Pacific Pipeline Incorporated that are covered by 49 C.F.R. Part 192.

As of December 2012, the PG&E Pipeline’s assets incorporated in the PAP include:

- 4.5 miles of gathering pipelines
- 5, 743 miles of natural gas transmission pipelines
- 42,309 miles of distribution natural gas mains
- 3,351,281 natural gas services
- 8 compressor stations
- 6 storage facilities

As of December 2012, Standard Pacific’s assets included the PAP include:

- 54.6 miles of natural gas transmission pipelines

#### 2) Non-Odorized Lines

Included in the pipeline assets listed above are 246.5 miles of non-odorized natural gas pipeline from various gas well production receipt point meters where dry-processed gas is delivered to PG&E (49 CFR Section 192.3, Definitions). In addition, the transmission pipeline segments between the individual gas well receipt points and the downstream pipelines may



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not be odorized. Odorant is added at regulator stations on lines that serve customers that are upstream of odorizer stations.

### 1.5 Roles and Responsibilities

All PG&E employees are involved in communicating safety information to the public. The following table lists individual positions responsible for key activities related to overseeing, implementing and supporting the PAP. These individuals or their representative also serve on the Pipeline Public Awareness Committee. Refer to section 1.6 for more information regarding the Pipeline Public Awareness Committee.

**Table 1. PG&E Public Awareness Program Roles and Responsibilities  
 (As of December 31, 2012)**

Title	Department	Name	Responsibility
Vice President, Public Safety and Asset Integrity	Public Safety & Asset Integrity	Roland Trevino	Executive champion and approver for major changes to program.  Executive sponsor of the PAP Committee
Distribution Integrity Management Director	Distribution Integrity Management	Christine Cowser Chapman	Oversee and approve the program's budgetary and resource requirements.  Approve revisions to TD4003S.  If a new PAP Manager is assigned, ensure that the new hire is aware of their responsibilities as they apply to the implementation of this plan.
Pipeline Public Awareness Program Manager	Distribution Integrity Management	Redacted	Serve as the PAP Administrator to oversee and manage TD4003S to ensure compliance with regulatory requirements and company policies and procedures.  Responsible for implementing baseline components of the PAP.  Coordinate with personnel responsible for local implementation of the field components of the PAP and supplemental activities.  Oversee the Annual Program Review and four-year effectiveness evaluation.  Lead the Pipeline Public Awareness Committee, a cross-functional team made up of representatives from various departments  Update the list of individuals and assignments identified in this Roles and Responsibilities table as organizational changes take place.



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			<p>Maintain records of program activities to demonstrate implementation of the PAP.</p> <p>Coordinate PAP with damage prevention program activities.</p>
Public Safety Program Supervisor (PSPS)	Emergency Preparedness & Public Safety	Redacted	<p>Oversee the Public Safety Specialists and manage the Utility's Public Safety Information Program to ensure compliance with regulatory expectations. Work with PAP to ensure required PAP activities are completed and documented.</p>
Public Safety Specialists	Emergency Preparedness & Public Safety	Various Individuals	<p>Enhance public safety planning and coordinate activities to support the PAP.</p> <p>Attend community outreach meetings and conduct training for the affected public audience.</p> <p>Work to improve the safety of the affected public's communities through public outreach and education; develop partnerships with emergency officials and other public agencies in the prevention of and response preparation for gas incidents.</p> <p>Plan and conduct face-to-face outreach with emergency officials and excavators.</p> <p>Support the development of supplemental communication programs and materials.</p>
External Communication Representative	External Communications	Redacted	<p>Determine effective communication methods for outreach to the affected public prior to maintenance or construction activity, including letters, door hangers or personal contact.</p> <p>Plan and conduct community open house meetings.</p> <p>Coordinate with media relations, marketing, Customer Insight and other groups internally to include safety messages in customer newsletters and other mass media outreach.</p>
Community Relations	Community Relations	Various Individuals	<p>Conduct community outreach activities including community events and school classroom safety board</p>



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Specialists			presentations.
Local Government Relations Manager	Government Relations	Redacted	Oversee the Local Government Relations' representatives and manage communication with local public officials. Work with Public Awareness Program Administrator to ensure required PAP activities are completed and documented.

### 1.6 Pipeline Public Awareness Program Committee

The PAP Committee is comprised of a cross-functional representation of departments responsible for implementing components of the PAP or providing support for PAP activities. The following departments and functions are represented on the Committee: Damage Prevention; Distribution Integrity Management; Emergency Preparedness & Public Safety; Land; Gas Transmission; External Relations; Community Relations; Government Relations; and Gas Distribution.

The Committee will meet at least two times each year in person or by conference call to:

- Review the status of PAP activities
- Identify the need for supplemental PAP activities and determine responsibility for developing and implementing supplemental activities
- Review, discuss and approve the annual program review report
- Review and approve the four-year effectiveness evaluation report

The Executive Sponsor of the Committee is the Vice President of Public Safety and Asset Integrity. The PAP Manager serves as the Committee Chair. The Committee Co-Chairs rotate on an annual basis. Committee meeting minutes document the Committee's discussion, decisions and action items.

### 1.7 Other Resources

PG&E also utilizes outside resources, including industry organizations, third party vendors and consultants to execute the Company's PAP. Table 2 lists PG&E's core external program resources and a description of their roles. Refer to the Annual Program Review Report for a list of all third party resources utilized during a specific program year.

**Table 2 – Other Resources**

Resource	Activities
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<p>Pipeline Association for Public Awareness (PAPA)</p>	<ul style="list-style-type: none"> <li>• Produces, distributes and delivers reference materials for emergency officials, excavators and public officials.</li> <li>• Creates and verifies mailing list for distribution of direct mail materials for emergency officials, excavators and public officials.</li> <li>• Distributes a CD with training scenarios for emergency officials and provides online training scenarios and interactive learning modules.</li> <li>• Develops multi-media video resources regarding pipeline information and safety information.</li> <li>• Administers an online emergency officials capability database and reporting tool to assist operators and emergency officials with planning and preparedness activities.</li> <li>• Provides pipeline location and safety information using an application optimized for mobile and web browsing.</li> <li>• Conducts effectiveness evaluations for emergency officials, excavators and public officials.</li> </ul>
<p>California One-Call Centers (USA North and USA South)</p>	<ul style="list-style-type: none"> <li>• Provides One-Call services to excavators, homeowners and residents.</li> <li>• Distributes "Call Before You Dig" materials and other damage prevention materials using a variety of communication and multi-media methods.</li> <li>• Maintains mailing list for excavator outreach and meeting invitations</li> </ul>



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Culver Co	<ul style="list-style-type: none"> <li>• Develops supplemental materials for agriculture workers, educators/schools and contractors</li> <li>• Creates and verifies mailing lists for distribution of direct mail materials for agricultural workers, educators/schools and contractors</li> <li>• Distributes materials by mail or e-mail</li> <li>• Conducts pre- and post-surveys</li> <li>• Develops multi-media video resources regarding pipeline information and safety information</li> <li>• Maintains database of emergency officials contacts</li> <li>• Hosts web-based materials for schools</li> </ul>
API	<ul style="list-style-type: none"> <li>• Conducts message comprehension and effectiveness surveys for the affected public, excavators, emergency officials and public officials</li> </ul>
Cyera Strategies	<ul style="list-style-type: none"> <li>• Conducts public awareness third-party plan review and provides recommendations for updating the plan and procedures.</li> <li>• Assists in the development of public awareness materials and content.</li> <li>• Assists with program assessment and preparation of PAP annual review report.</li> <li>• Creates and verifies mailing lists and email lists for school administrator and homeowner association outreach</li> </ul>
Paradigm	<ul style="list-style-type: none"> <li>• Assists in the implementation of PG&amp;E's PAP direct mail outreach for the affected public</li> <li>• Creates and verifies mailing lists for distribution of direct mail materials for affected public</li> </ul>
Pipeline Operator Safety Partnership (POSP)	<ul style="list-style-type: none"> <li>• Coordinates participation in Fire Department Instructor Conference (FDIC)</li> </ul>



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### 2. COMMITMENT TO PROGRAM

The statement below illustrates how PG&E leaders are committed to RP 1162.

DATE: 12/31/2012

PG&E recognizes that increasing the public's awareness and understanding of gas pipeline operations is vital to the continued safe operation of PG&E's and Standard Pacific Pipeline's gas pipeline facilities.

PG&E employees will fulfill all the responsibilities of the Company's PAP and comply with all state and federal regulations. To ensure the PAP meets all expectations, we have instructed the Public Awareness Program Manager to periodically report program results and all significant changes to the Director of Distribution Integrity Management and have authorized the allocation of resources as needed to implement the activities outlined in this plan.

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

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

PG&E is fully committed to supporting the successful implementation of this comprehensive PAP and complying with the standards established by our regulators. Numerous PG&E employees participate directly in this effort, including our Public Safety Specialists, field staff, subject matter experts, GIS staff, and the program's cross-departmental Pipeline Public Awareness Committee. In addition, PG&E regularly seeks the advice and assistance of outside resources to implement and evaluate the program.

Vice President, Public Safety & Asset Integrity

Pacific Gas and Electric Company

### 3. STAKEHOLDER AUDIENCES

As part of this PAP, PG&E provides information to the following four stakeholder audiences:

- Affected Public
- Emergency Officials

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- Public Officials
- Excavators

These four primary stakeholder groups are further defined below in Table 3.

**Table 3 – Stakeholder Audience Definition**

Stakeholder Audience	Audience Definition	Examples
<b>Affected Public - Local Distribution Company (LDC) Gas Customers</b>	<ul style="list-style-type: none"> <li>• Residents and businesses who reside within the gas service territory and receive gas bills from PG&amp;E either by mail or electronically</li> <li>• PG&amp;E gas service Master-Metered customers including landlords who bill “sub-metered tenants” for gas service</li> <li>• Core Transport Agents who bill Core Gas Aggregation customers for gas service</li> </ul>	<ul style="list-style-type: none"> <li>• PG&amp;E gas customers</li> <li>• Master-Metered customers who bill “sub-metered tenants” for gas service</li> </ul>
<b>Affected Public – Non-gas customer residents and businesses in the gas service territory</b>	<ul style="list-style-type: none"> <li>• Residents and businesses who reside within the gas service territory who are not gas customers but who receive electric bills from PG&amp;E either by mail or electronically</li> <li>• Residents or businesses that pay their landlord directly for gas service as “sub-metered tenants” on a master-metered account</li> <li>• PG&amp;E electric service Master-Metered customers including landlords who bill directly for electric “sub-metered tenants.” Residential electric tenants are not considered PG&amp;E customers.</li> <li>• Community Choice Aggregation (CCA) allows communities to purchase and/or generate electricity while PG&amp;E continues to deliver electricity through its distribution system and provide certain functions (meter reading, billing, maintenance, outage response, etc.)</li> <li>• Core Gas Aggregation (CGAs) and Direct Access-Electricity offer gas and electric customers the ability to purchase gas and electricity from a third party supplier. PG&amp;E reads the meter and delivers gas and electric, but services may be billed through a third party depending on their</li> </ul>	<ul style="list-style-type: none"> <li>• PG&amp;E electric customers</li> <li>• Rental tenants on master meter gas or electric accounts</li> <li>• Community Choice Aggregation customers</li> <li>• Core Gas Aggregation customers</li> <li>• Direct Access Electricity customers</li> </ul>



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	specific contract	
<b>Affected Public – School Administrators and District Officials</b>	<p>School administrators and district officials for educational institutions located in PG&amp;E asset counties that meet the following criteria as outlined in the California Department of Education school definition.</p> <ol style="list-style-type: none"> <li>1) Grades kindergarten through grad 12</li> <li>2) One or more teachers to give instruction</li> <li>3) An assigned administrator</li> <li>4) Based in one or more buildings; and</li> <li>5) Enrolled or prospectively enrolled students</li> <li>6) 6 or more students enrolled (private schools)</li> </ol> <p>Facility managers at other schools including colleges, university and technical colleges</p>	<ul style="list-style-type: none"> <li>• Public Schools</li> <li>• Private Schools</li> <li>• Charter Schools</li> <li>• Colleges or Universities</li> <li>• Technical Colleges</li> </ul>
<b>Affected Public – Residents, Businesses, or Places of Congregation located adjacent to a Transmission Pipeline, Gathering Pipeline, Gas Storage Facility, or Compressor Station</b>	<p>Landowners: People who occupy residences or are tenants on land where a pipeline is buried (does not include absentee landowners)</p>	<ul style="list-style-type: none"> <li>• Occupants or residents</li> <li>• Tenants</li> <li>• Businesses</li> <li>• Farmers</li> <li>• Schools</li> </ul>
	<p>Residents, Businesses, or Places of Congregation located closer than 660' to a transmission pipeline, gathering pipeline, gas storage facility or compressor station. If the Potential Impact Radius (PIR) for a pipeline is greater than 660', the PIR will be used instead of 660'.</p>	<ul style="list-style-type: none"> <li>• Landowners/residents</li> <li>• Tenants</li> <li>• Farmers</li> <li>• Businesses</li> <li>• Schools</li> <li>• Places of worship</li> <li>• Hospitals or other medical facilities</li> <li>• Prisons</li> <li>• Parks and recreation areas</li> <li>• Day-care facilities</li> <li>• Playgrounds</li> <li>• Senior centers</li> <li>• Federal, Tribal and State lands</li> </ul>
<b>Emergency Officials</b>	<ul style="list-style-type: none"> <li>• Local, state, or regional officials, agencies and organizations with emergency response and/or public safety jurisdiction located within the gas service territory.</li> <li>• Local, state, or regional officials, agencies and organizations with emergency response and/or public safety jurisdiction located in counties that have a gas transmission pipeline, gas gathering pipeline, gas storage facility, or compressor station.</li> </ul>	<ul style="list-style-type: none"> <li>• Fire departments</li> <li>• Police/sheriff departments</li> <li>• Local Emergency Planning Commissions (LEPCs)</li> <li>• Emergency Management Agencies (EMAs)</li> <li>• 911 Centers or Public Safety Access Points (PSAP)</li> </ul>
<b>Public Officials</b>	<ul style="list-style-type: none"> <li>• Local, city, county and state officials and/or their staffs having land use and street/road jurisdiction located within the gas service territory.</li> </ul>	<ul style="list-style-type: none"> <li>• Planning boards</li> <li>• Zoning boards</li> <li>• Permit/Licensing departments</li> <li>• Building Code Enforcement departments</li> </ul>



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	<ul style="list-style-type: none"> <li>Local, city, county and state officials and/or their staffs having land use and street/road jurisdiction located in counties that have a gas transmission pipeline, gas gathering pipeline, gas storage facility or compressor station.</li> </ul>	<ul style="list-style-type: none"> <li>City and County Managers</li> <li>Public and Government officials</li> <li>Local Governing Councils</li> <li>Public Utility boards</li> <li>Public street, road and highway departments (CalTrans)</li> </ul>
<b>One Call Centers</b>	<ul style="list-style-type: none"> <li>One-Call Center: Excavation One-Call centers in the state of California.</li> </ul>	<ul style="list-style-type: none"> <li>One-Call North</li> <li>One-Call South</li> </ul>
<b>Excavators</b>	Companies that perform or direct excavation work in the state of California.	<ul style="list-style-type: none"> <li>Contractors</li> <li>Construction companies</li> <li>Excavation equipment rental companies</li> <li>Timber companies</li> <li>Fence building companies</li> <li>Drain tiling companies</li> <li>Landscapers</li> <li>Public work officials</li> </ul>
	Land Developers: Companies and private entities involved in land development and planning in the state of California	<ul style="list-style-type: none"> <li>Home builders</li> <li>Land developers</li> </ul>

### 3.1 Stakeholder Audience Identification Process

PG&E utilizes a variety of data sources and methodologies to identify individual stakeholders and to create contact lists for communication outreach. Data sources include PG&E's Customer Information System (CIS), information managed and analyzed within PG&E's Geographic Information System (GIS), Pipeline Association for Public Awareness (PAPA) contact lists, commercially available data and lists, One Call Center databases and other data and lists provided by the State of California.

Annually, the PAP Administrator will review available data sources and methodologies for creating stakeholder contact lists in conjunction with internal resources and third-party vendors to determine the best methodology for the upcoming program year. Changes made to the stakeholder identification process will be documented in the annual program assessment.

Table 4 provides a detailed overview of the process used to create contact lists for each stakeholder group.

**Table 4 – Stakeholder Identification**

Stakeholder	Identification Process
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Audience	
<b>LDC Gas Customers and non-customer residents in the gas service territory</b>	<p>1. Contact information for all active gas and electric customers is maintained in PG&amp;E's Customer Information System (CIS) (includes Master-metered accounts, new gas customers and Community Choice Aggregation customers.) Customer accounts are maintained at the account level and include a billing address, premise address and meter identification number.</p>
<b>Core Transport Agents (CTAs) and Core Gas Aggregation Customers</b>	<p>1. Third party suppliers, known as Core Transport Agents (CTAs) must complete a certification process, which entails meeting credit and technical requirements, before they are eligible to enroll customers. PG&amp;E maintains a list of all active CTAs who have entered into a Core Gas Aggregation Service Agreement with PG&amp;E. An active list is available on <a href="http://www.pge.com">www.pge.com</a>: <a href="http://www.pge.com/myhome/customerservice/energychoice/coregasaggregation/coretransportagents/index.shtml">http://www.pge.com/myhome/customerservice/energychoice/coregasaggregation/coretransportagents/index.shtml</a></p> <p>2. CTAs maintain contact information for Core Gas Aggregation customers and can provide those lists when requested.</p>
<b>Master-Metered Accounts</b>	<p>1. Sub-metered accounts are identified based on the premise address in PG&amp;E's Customer Information System (CIS).</p>
<b>School Administrators and District Officials</b>	<p>1. School Administrators and District Officials are identified using a school contact database for public and private schools provided by the California Department of Education and publically available on their website. New data lists are provided annually. Schools and districts located within PG&amp;E's pipeline asset counties are extracted from the public and private school database.</p> <p>2. The GIS department or a designated third party vendor validates the location of the school by matching address information to parcel data.</p>
<b>Residents, Businesses, or Places of Congregation located adjacent to a Transmission Pipeline, Gathering Pipeline, Gas Storage Facility, or Compressor Station</b>	<p>1. GIS department creates Shape files containing the geographic boundaries using centerline data with a minimum distance from a transmission pipeline, gathering pipeline, gas storage facility or compressor station of 660 feet or the PIR where the PIR is greater than 660 feet. Refer to RMP-08 Revision 8 section 6.3.1 for procedure.</p> <p>2. PG&amp;E contracts with a third party vendor to create a mailing list using the Shape files provided by the GIS department. The vendor utilizes parcel data and other available data sources and formats the mail list in accordance with USPS standards.</p> <p>3. Mailing addresses are verified by a third party vendor using available USPS databases before mailing to ensure accuracy and deliverability. Validation includes the identification of any currently vacant properties that should be removed from the mailing list. Documentation from the mailing list verification process includes a list of any addresses removed from the list due to vacancy status or other reasons.</p> <p>4. The third party vendor responsible for the list verification and mailing reviews documentation provided by USPS regarding any undeliverable mail and provides the Public Awareness Program Administrator with an analysis of why the mail was undeliverable. The Public Awareness Program Administrator will determine if additional communication activities are needed.</p> <p>5. Addresses identified as vacant are periodically re-assessed and if occupied a mailing is sent to that address.</p> <p>6. In addition, PAPA identifies emergency response agencies with jurisdictions in PG&amp;E asset counties and asks agency contacts to assist with the identification of places of assembly in their community by entering address information and comments into a web-based mapping application. This system is known as the Identified Site Registry application (ISR). Information entered for PG&amp;E counties can be downloaded from the ISR application and used to supplement existing lists.</p>



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<b>Farmers</b>	<ol style="list-style-type: none"> <li>1. GIS department creates Shape files containing the geographic boundaries using centerline data with a distance from a transmission pipeline, gathering pipeline, gas storage facility or compressor station of 660 feet or the PIR where the PIR is greater than 660 feet. See RMP-08 Revision 8 section 6.3.1 for procedure.</li> <li>2. PG&amp;E contracts with a third party vendor to create a mailing list for farm landowners and operators within the geographic boundaries using parcel data, Common Land Unit (CLU) data and other available data sources.</li> <li>3. Mailing addresses are verified by a third party vendor using available USPS databases before mailing to ensure accuracy and deliverability. Documentation from the mailing list verification process includes a list of any addresses removed from the list due to vacancy status or other reasons.</li> <li>4. The third party vendor responsible for list validation and mailing, reviews documentation provided by USPS regarding any undeliverable mail and provides the Public Awareness Program Administrator with an analysis of why the mail was undeliverable. The Public Awareness Program Administrator will determine if additional communication activities are needed.</li> </ol>
<b>School Administrators &amp; District Contacts located adjacent to a Transmission Pipeline, Gathering Pipeline, Gas Storage Facility, or Compressor Station</b>	<ol style="list-style-type: none"> <li>1. School Administrators and District Officials are identified using a school contact database for public and private schools provided by the California Department of Education and publically available on their website. New data lists are provided annually. Schools and districts located within PG&amp;E's transmission asset counties are extracted from the public and private school database for additional analysis.</li> <li>2. The GIS department or a designated third party vendor analyzes the location of all schools within PG&amp;E transmission asset counties and calculates the distance between the centerline and the school property line.</li> <li>3. Contact information associated with schools located within 1,000 feet from a transmission pipeline, gathering pipeline, gas storage facility or compressor station is extracted and used to create a contact list.</li> </ol>
<b>Emergency Officials:</b>	<ol style="list-style-type: none"> <li>1. PG&amp;E identifies the County where each gas asset is located</li> <li>2. PAPA identifies the Emergency Officials within each county using a classification under the applicable U.S. Government, Standard Industry (SIC) codes, and the North American Industry Classification (NAICS) codes. The applicable SIC and NAICS Codes are listed in program documentation provided by PAPA.</li> <li>3. Emergency officials are also identified using commercially available data sources obtained from the National Public Safety Information Bureau. InfoUSA is used as a second source of data for agency locations.</li> <li>4. Additionally, PG&amp;E uses internal databases located in the Emergency Preparedness &amp; Public Safety department to reach Emergency Officials for face-to-face and group meeting activities.</li> </ol>
<b>Public Officials:</b>	<ol style="list-style-type: none"> <li>1. PG&amp;E identifies the County where each asset is located.</li> <li>2. PAPA identifies the Public Official contacts within each county using classification under the applicable U.S. Government, Standard Industry Classification (SIC) codes and the North American Industry Classification System (NAICS) codes. The applicable SIC and NAICS Codes are listed in program documentation provided by PAPA.</li> <li>3. PAPA utilizes commercially available data obtained from InfoUSA</li> <li>4. Additionally, PG&amp;E uses internal databases located in the Government Relations Department to reach each Public Official for face-to-face meetings or other direct</li> </ol>





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	communications.
<b>Excavators, Land Developers</b>	<ol style="list-style-type: none"> <li>1. PG&amp;E identifies the County where each asset is located.</li> <li>2. PAPA identifies the Excavator contacts within each county using SIC and NAICS codes. The applicable SIC and NAICS Codes are listed in program documentation provided by PAPA.</li> <li>3. Culver Co. identifies the contractor and agricultural worker contacts within each county using SIC and NAICS Codes. The applicable SIC and NAICS Codes are listed in program documentation provided by Culver Co.</li> <li>4. PAPA and Culver Co. utilize a combination of commercial data sources (Info USA and USA Data), public data (licensing boards, trade associations) and One-Call Center databases to identify excavator, contractor, agriculture and land developer contacts.</li> <li>5. PG&amp;E maintains an internal database of excavators who have damaged PG&amp;E assets in the past five years. This database is included in the data set used to create mailing lists.</li> </ol>

### 4. MESSAGE CONTENT & DELIVERY METHODS

Messages and delivery methods are tailored for each targeted stakeholder audience and provide an overview of the location of pipelines and aboveground infrastructure; how to recognize and appropriately respond to a pipeline leak; pipeline purpose and reliability; emergency preparedness activities; hazards associated with a pipeline leak; integrity management activities and other damage prevention measures.

#### 4.1 Language Requirements

The messages developed for PG&E's PAP will be communicated in English. Messages for the Affected Public will also be translated into languages spoken by at least five percent of residents living in PG&E's gas service territory. The availability of information in these languages will be promoted using in-language text on materials distributed to the Affected Public. Census data will be utilized to identify languages spoken by five percent or more of residents within PG&E's gas service territory. The PAP Administrator will monitor changes in languages using Census data and will recommend any changes through the annual review or four-year effectiveness report.

##### 1) Affected Public Language Requirements

All written materials are provided in English. The information in printed materials is translated into Chinese, Spanish, Tagalog and Vietnamese, and other languages and is made available by calling a specific phone number listed in the communication material. Information regarding the availability of information in Chinese, Spanish, Tagalog and Vietnamese is printed in the specific language and included in printed materials.

##### 2) Emergency Official Language Requirements

Materials are provided in English.

##### 3) Public Official Language Requirements



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Materials are provided in English.

### 4) Excavator Language Requirements

Written materials are provided in English and Spanish. Materials are provided in Spanish due to the large percentage of Spanish-speakers working in construction and excavation jobs across the United States and the fact that construction crews often travel across the country for jobs.

### 4.2 Baseline and Supplemental Message Content

The public awareness plan guides the development of content for specific communication materials that will be utilized as part of the PAP. The baseline and supplemental messages outlined below in Table 5 are intended to meet the overall program objectives identified in Section 1, including raising the awareness of pipelines and reducing the likelihood and potential impact of pipeline damage through education, resources, and programs. Communication material will be evaluated during the annual review to determine any changes that need to be made for the following program year.

**Table 5 – Baseline and Supplemental Messages by Stakeholder Audience**

Stakeholder Audience	Baseline Message	Supplemental Message
<b>Affected Public: Residents, Businesses, and Places of Congregation located within PG&amp;E's gas service territory.</b>  <b>This includes:</b> <ul style="list-style-type: none"> <li>• <b>PG&amp;E Gas Customers</b></li> <li>• <b>Residents and businesses located in PG&amp;E's gas service territory who are not gas customers</b></li> <li>• <b>Community Choice Aggregation Customers, and Core Gas Aggregation Customers</b></li> <li>• <b>Master Meter Accounts</b></li> <li>• <b>School Administrators and District Officials</b></li> </ul>	<ul style="list-style-type: none"> <li>• Pipeline purpose and reliability</li> <li>• Awareness of hazards and prevention measures undertaken</li> <li>• Damage prevention awareness</li> <li>• Leak recognition and response</li> <li>• How to get additional information</li> </ul>	No supplemental messages.
<b>Affected Public: Residents,</b>	• Pipeline purpose and reliability	• Information and/or overview of



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<b>Businesses or Places of Congregation located adjacent to gas transmission pipelines</b>	<ul style="list-style-type: none"> <li>• Awareness of hazards and prevention measures undertaken</li> <li>• Damage prevention awareness</li> <li>• One-call Requirements</li> <li>• Leak recognition and response</li> <li>• Pipeline location information</li> <li>• How to get additional information</li> <li>• Availability of list of pipeline operators through NPMS</li> </ul>	<ul style="list-style-type: none"> <li>• operator's Integrity Management Program</li> <li>• ROW encroachment prevention</li> <li>• Any planned major maintenance/ construction activity</li> </ul>
<b>Affected Public: Residents, Businesses, or Places of Congregation located adjacent to gas storage facilities and compressor stations</b>		<ul style="list-style-type: none"> <li>• Information and/or overview of operator's Integrity Management Program</li> <li>• Special incident response notification and or evacuation measures if appropriate to product or facility</li> <li>• Facility purpose</li> </ul>
<b>Affected Public: Residents, Businesses, or Places of Congregation located adjacent to gas gathering pipelines</b>	<ul style="list-style-type: none"> <li>• Gathering pipeline purpose</li> <li>• Awareness of hazards</li> <li>• Prevention measures undertaken</li> <li>• Damage prevention awareness</li> <li>• One-Call requirements</li> <li>• Leak recognition and response</li> <li>• How to get additional information</li> </ul>	<ul style="list-style-type: none"> <li>• Planned maintenance/ construction activity</li> <li>• Special emergency procedures (related to gathering pipelines)</li> </ul>
<b>Emergency Officials:</b>	<ul style="list-style-type: none"> <li>• Pipeline purpose and reliability</li> <li>• Awareness of hazards and prevention measures undertaken</li> <li>• Emergency preparedness communications</li> <li>• How to get additional information</li> <li>• Potential hazards<sup>3</sup></li> <li>• Pipeline location information and availability of NPMS<sup>2</sup></li> <li>• Gathering pipeline location and purpose<sup>3</sup></li> <li>• Specific description of products transported and any potential special hazards<sup>3</sup></li> </ul>	<ul style="list-style-type: none"> <li>• Provide information and or overview of Integrity measures undertaken<sup>2</sup></li> <li>• Maintenance/ construction activity<sup>2,3</sup></li> <li>• Special emergency procedures if sour gas or other segment specific reason<sup>3</sup></li> </ul>
<b>Public Officials:</b>	<ul style="list-style-type: none"> <li>• Pipeline purpose and reliability</li> <li>• Awareness of hazards and prevention measures undertaken</li> <li>• Emergency preparedness communications</li> <li>• How to get additional information</li> </ul>	<ul style="list-style-type: none"> <li>• If applicable provide information about designation of a High Consequence Area (HCA) or other factor unique to segment and summary of integrity measures undertaken<sup>2</sup></li> </ul>

<sup>1</sup>Message applicable to agencies in PG&E gas service territory. Does not apply to agencies near transmission or gathering only assets.

<sup>2</sup>Message applicable to agencies near PG&E gas transmission pipelines, gas storage facilities, or compressor stations only. Does not apply to agencies in gas service territory or gathering pipeline only asset areas.

<sup>3</sup>Message applicable to agencies near PG&E gas gathering pipelines. Does not apply to agencies in gas service territory or gas transmission pipeline only asset areas.

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	<ul style="list-style-type: none"> <li>• One-call Requirements<sup>2</sup></li> <li>• Pipeline location information and availability of NPMS<sup>2</sup></li> <li>• Gathering pipeline location and purpose<sup>3</sup></li> <li>• Copies of materials provided to affected public and emergency officials<sup>3</sup></li> </ul>	<ul style="list-style-type: none"> <li>• ROW encroachment prevention<sup>2,3</sup></li> <li>• Maintenance construction activity<sup>2,3</sup></li> <li>• Special emergency procedures if sour gas or other segment specific reason<sup>3</sup></li> </ul>
<b>Excavators:</b>	<ul style="list-style-type: none"> <li>• Pipeline purpose and reliability</li> <li>• Awareness of hazards and prevention measures undertaken</li> <li>• Damage prevention awareness</li> <li>• Leak recognition and response</li> <li>• One-call requirements</li> <li>• How to get additional information</li> <li>• Gathering pipeline location and purpose<sup>3</sup></li> </ul>	<ul style="list-style-type: none"> <li>• Pipeline purpose, prevention measures and reliability<sup>2</sup></li> </ul>
<b>Excavators: One-call Centers</b>	<ul style="list-style-type: none"> <li>• Pipeline location information</li> <li>• Other requirements of the applicable One-call center</li> </ul>	<ul style="list-style-type: none"> <li>• One-Call System performance</li> <li>• Accurate line location information</li> <li>• One-Call System improvements</li> </ul>
<b>Excavators: Land Developers</b> <sup>2,3</sup>	<ul style="list-style-type: none"> <li>• Pipeline purpose and reliability</li> <li>• Awareness of hazards and prevention measures undertaken</li> <li>• Damage prevention awareness</li> <li>• One-Call requirements</li> <li>• Leak recognition and response</li> <li>• ROW encroachment prevention</li> <li>• Availability of list of pipeline operators through NPMS</li> <li>• Gathering pipeline location and purpose<sup>3</sup></li> </ul>	No supplemental messages

### 4.3 Baseline and Supplemental Program Delivery Methods

PG&E utilizes a variety of delivery methods to communicate with stakeholders. The methods used to communicate with each stakeholder group will be evaluated during the annual review to determine if the most effective methods are being utilized.

Documentation related to delivery methods and communication activities will be collected and reviewed as part of the annual program review process. PG&E's PAP includes elements designed to reach stakeholders in a variety of ways, to comprehensively reach all stakeholders in all areas, and to increase the message impact and the stakeholder's understanding and comprehension of the Message Content as required by RP 1162.

#### 4.3.1 Baseline Program Delivery Method



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Baseline PAP elements are designed to provide all required baseline messages on a consistent frequency to stakeholders using consistent communication methods. For the affected public customers, PG&E primarily utilizes company-managed customer communication methods such as bill stuffers and customer e-bills. For non-customers and other stakeholder groups, PG&E contracts with PAPA and other third-party vendors to distribute communication materials to stakeholders through the USPS and through email campaigns.

Table 6 details baseline program delivery methods and vehicles by stakeholder audience.

**Table 6 – Baseline Delivery Methods**

Stakeholder Audience	Baseline Delivery Freq.	Baseline Delivery Methods
<b>Affected Public – Gas customers, non-gas customers in gas service territory who receive PG&amp;E gas or electric bills through the mail</b>  <b>AND</b> <b>Community Choice Aggregation customers who receive bills through the mail</b>	Twice annually	Bill insert or bill onsert
<b>Affected Public – Gas customers and non-gas customers in gas service territory who receive paperless PG&amp;E gas or electric bills</b>	Twice annually	A link to view the bill insert is included in the e-mail sent to electronically billed customers and can be accessed from PG&E's website.
<b>Affected Public: Core Gas Aggregation customers and Direct Access Electricity customers</b>	Twice annually	Bill inserts are sent to Core Transport Agents (CTAs) and are inserted directly into third party energy provider bills or are mailed directly to customers by PG&E
<b>Affected Public: Master Meter</b>	Twice annually	Bill inserts are sent to premise addresses



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<b>Accounts</b>		
<b>Affected Public: Schools that are located in the gas service territory</b>	Twice annually	A targeted e-campaign is sent to school administrator contacts for distribution to faculty and staff.
<b>Affected Public – Residents, Businesses, Farmers and Places of Congregation adjacent to Gas Transmission Pipelines, Gas Gathering Pipelines, Gas Storage Facilities, and Compressor Stations</b>	Every two years	A targeted direct-mail program is sent to residents who do not receive the semi-annual bill insert or onsert
<b>Affected Public – Schools that are located adjacent to a Gas Transmission Pipeline, Gas Gathering Pipeline, Gas Storage facility, or Compressor Station</b>	Every two years	A targeted e-campaign is sent to school administrators for distribution to faculty and staff.
<b>Emergency Officials</b>	Annually	A targeted mailing of a printed packet of materials (includes letter, “Emergency Responder Guidebook”, emergency contact directory, link to online capability survey and other training and reference materials). Distributed by PAPA on behalf of the company.
<b>Public Officials: distribution, transmission and gathering (non-HCA)</b>	Annually	A targeted mailing of a multi-page newsletter. Distributed by the Pipeline for PAPA on behalf of the company.
<b>Public Officials: distribution, transmission and gathering (HCA)</b>	Annually	A targeted mailing of a public official newsletter distributed by PAPA
<b>Excavators: including land developers and</b>	Annually	A targeted mailing of the “Excavation Safety Guide” booklet. Distributed by PAPA on behalf of the company.



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<b>One-Call Centers</b>		
<b>One Call Centers: USA North and USA South</b>	Annually	A targeted mailing of the "Excavation Safety Guide" booklet. Distributed by PAPA on behalf of the company.

### 4.3.2 Supplemental Programs - Delivery Methods and Vehicles

Supplemental PAP elements are designed to expand and enhance the messages and frequency of baseline program elements. Supplemental programs may target a specific subset of a stakeholder audience or a specific geographic area. In addition, supplemental programs often leverage high-touch activities such as face-to-face meetings or group training sessions that may not be practical as a method to completely reach all stakeholders within the baseline frequency requirements.

At least twice a year, the PAP Committee reviews supplemental program activities planned for the year and discusses the need for additional activities. The Committee considers the following when developing supplemental programs:

- Potential hazards
- High Consequence Areas (HCA)
- Population density
- Land development activity
- Land farming activity
- Third-party damage incidents
- Environmental considerations
- Pipeline history in an area
- Specific local situations
- Regulatory requirements
- Public Awareness effectiveness evaluation results

Discussion regarding supplemental program activities is documented in PAP Committee meeting minutes.

Table 7 details current supplemental program delivery methods by stakeholder audience.

### Table 7 – Supplemental Delivery Methods





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Stakeholder Audience	Supplemental Delivery Freq.	Supplemental Delivery Methods and Vehicles
Affected Public-Gas Customers and non-gas customers in gas service territory who are PG&E electric customers	All year	Service Center Signage: 811 and other public awareness messages in the lobby of PG&E customer service centers. Content may change throughout the year.
	Every 90 days	New Customer bill insert: New customers receive a gas safety bill insert with information regarding customer-owned lines within 90 days of a service turn-on.
Affected Public	As needed	<p>Mass Media campaigns promoting 811, press releases and ongoing media relations.</p> <p>Community Events and Open Houses: PG&amp;E personnel communicate pipeline safety messages during community events, such as at local farm shows, community fairs or other PG&amp;E sponsored events, as well as open houses that focus on topics such as hydrostatic testing.</p> <p>Face-to-face: Personnel communicate with the affected public during leak surveys, ground patrols, mark and locate meetings, encroachment issues and other meetings as appropriate to communicate about safety related information.</p>
	All year	Website: PG&E maintains a website at <a href="http://www.pge.com">www.pge.com</a> with relevant safety and damage prevention information.
	As needed	<p>Construction Maintenance: PG&amp;E External Communications select the most effective way to contact the affected public prior to any significant maintenance or construction activity, including letters, door hangers or personal contact.</p> <p>Educational Items: Brochures, calendars, key chains, scratch 'n sniff cards, pens and other giveaway items containing PG&amp;E emergency contact information or USA information is distributed during face-to-face meetings and community events.</p>
Affected Public – ROW Landowners	As needed	ROW Notification: A letter is mailed to landowners who are adjacent to the transmission ROW with messages about encroachment, leak detection/response, 811 and pipeline markers.
Affected Public: Residents, Businesses, and Places of Congregation located adjacent to a Gas Transmission Pipeline, Gas Gathering Pipeline Gas Storage Facility, or Compressor	Twice annually	Reduced Cover Notification: Letter to notify land owners and property tenants near transmission lines with possible reduced cover on their property.
	As needed	External Corrosion Direct Assessment (ECDA): Letter to notify landowners and property tenants in HCA areas. Letter contains gas safety message, when we are performing work supporting the inspection of transmission pipelines. Notification is sent to land owners and property tenants in HCA areas where ECDA surveys are occurring. This notification is sent to properties that will have the inspection survey on their land as well as those that face the street where the survey may





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<b>Station</b>		<p>occur. Letters includes gas safety message as well as integrity inspection information.</p> <p>Standby: Provide standby personnel when contractor is digging within 5 feet of the pipeline.</p>
<b>Affected Public: Homeowner Associations (HOA)</b>	As needed	HOA Mailing/E-campaign: Send information by email or targeted mail to homeowner associations contacts near transmission lines and in gas service territory with gas pipeline safety information to share with other members.
<b>Affected Public: Farmers located adjacent to a Gas Transmission Pipeline, Gas Gathering Pipeline, Gas Storage Facility or Compressor Station</b>	As needed	<p>Standby: Provide standby personnel when digging within 5 feet of the pipeline.</p> <p>Ag Worker Materials: Ag Worker Beware safety educational materials are offered for free to farmers. Materials are promoted through targeted direct mail outreach.</p> <p>811 Awareness: Targeted direct mail promoting use of 811.</p>
<b>Affected Public: Schools located adjacent to a Gas Transmission Pipeline, Gas Gathering Pipeline, Gas Storage Facility or Compressor Station</b>	As needed	<p>Standby: Provide standby personnel when digging within 5 feet of the pipeline.</p> <p>Face-to-face meetings: Company representatives meet with school officials, teachers and students to discuss safety information.</p>
<b>Emergency Officials:</b>	Ongoing	<p>Face-to-face meetings: Public Safety coordinators meet with fire chiefs and other emergency officials to discuss key emergency preparedness information, including Community Emergency Response Teams (CERT). Includes joint meetings with other pipeline companies for emergency response officials in the High Desert area.</p> <p>PAPA Capability Assessment—Emergency Officials are prompted to input their capabilities into an online application.</p>
	As needed	Emergency Drills – When appropriate, field locations invite local emergency officials to participate in mock emergency drill exercises.
	As needed	<p>Online Emergency Official Portal – Password-protected website allows emergency officials to view gas transmission maps and to order safety related materials.</p> <p>Wallet Card – Card with emergency contact numbers when responding to a pipeline emergency.</p> <p>Conduct seminars tailored to PG&amp;E's incident command structure for emergency officials.</p>
<b>Public Officials:</b>	As needed	Face-to-face meetings: Public Safety Specialists, Government Relations representatives and company leadership meet with public officials to



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		<p>discuss pipeline safety activities or concerns.</p> <p>Crossbore Education Program for Public Works Officials.</p>
<b>Excavators: including land developers and One-Call Centers</b>	As needed	<p>Standby: Provide standby personnel when digging within 5 feet of the pipeline.</p> <p>Contractor Meetings: Some local offices supplement their baseline outreach by participating in meetings with contractors.</p> <p>Crossbore Education Program for Plumbers: Targeted direct mail program for licensed plumbers to increase awareness of crossbores and the hazards associated with crossbores</p>
	Annual	<p>Educational Materials: PG&amp;E safety video "Excavation Safety" and "Contractor Beware" safety educational materials are offered for free to excavators and contractors. Materials are promoted through targeted direct mail outreach.</p> <p>USA – One Call Events: Safety Awareness for Excavators (SAFE) events.</p> <p>Dig-in Analysis: Annually analyze and identify areas and /or audience where most dig ins occur and send additional communications.</p> <p>Repeat Offender Analysis &amp; Outreach: Damage prevention program managers identify repeat offenders and develop special communications for top offenders. Outreach may include letters, phone calls, targeted direct mail materials, training sessions, face-to-face meetings, e-mail campaigns or other communication strategies.</p>

In addition to the supplemental programs outlined in Table 7, PG&E will take additional actions to communicate with stakeholders when the triggers listed in Table 8 occur.

**Table 8: Supplemental Communications based on Triggers**

Stakeholder	Trigger	Possible Communication Enhancement
<b>Affected Public</b>	Increased third party damage	<ul style="list-style-type: none"> <li>Meetings with the affected public</li> <li>Additional ROW mailings</li> <li>An additional communication piece to sub-audiences within the affected public, such as farmers, that specifically address preventing pipeline damage</li> </ul>
	Change in Class Location	<ul style="list-style-type: none"> <li>Face-to-face meetings as necessary</li> <li>Neighborhood meetings</li> <li>Targeted meetings</li> </ul>
	Special event communication	<ul style="list-style-type: none"> <li>Participate in 811 day</li> <li>Send press releases</li> <li>Include information on website</li> </ul>



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	Significant maintenance or construction activity	<ul style="list-style-type: none"> <li>• Communication regarding maintenance or construction activity</li> <li>• Face-to-face meetings as necessary</li> </ul>
	Vacant properties identified during ROW mailing	<ul style="list-style-type: none"> <li>• Send follow-up communication six (6) months after initial mailing to any occupied properties</li> </ul>
<b>Emergency Officials</b>	Increased third party damage	<ul style="list-style-type: none"> <li>• Additional communication with local fire and police regarding key messages</li> </ul>
	Gaps in capability assessment tool	<ul style="list-style-type: none"> <li>• Meetings with those entities</li> </ul>
	Significant maintenance or construction activity	<ul style="list-style-type: none"> <li>• Communication regarding maintenance or construction activity</li> </ul>
<b>Public Officials</b>	Significant maintenance or construction activity	<ul style="list-style-type: none"> <li>• Communication regarding maintenance or construction activity</li> </ul>
<b>Excavators</b>	Increased third party damage	<ul style="list-style-type: none"> <li>• Face-to-face communication with "repeat offenders"</li> <li>• Attend and participate in local farm shows</li> </ul>

### 5. PROGRAM DOCUMENTATION

PG&E will maintain records and other documentation related to the PAP to demonstrate compliance with the requirements outlined in the First Edition of API RP-1162. Documentation must be kept for a minimum of five years.

These records include, but are not limited to, the following sources:

- The written PAP and related procedural documents (includes historical versions of the PAP)
- PAP Committee meeting notes
- Mailing lists, communication materials, sign-in sheets, USPS mailing list certification and other documentation that demonstrate compliance with the baseline and supplemental program activities outlined in the PAP
- Program feedback including survey data, survey reports, business reply cards, post-meeting feedback used to evaluate the effectiveness of program activities
- Annual review report
- Four-year effectiveness report
- 

The PAP Administrator will be responsible for managing and archiving documentation. Master documents will be located on PG&E shared drives and SharePoint.



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### 6. PROGRAM EVALUATION AND EFFECTIVENESS

PG&E will review and evaluate the effectiveness of the PAP based on whether the goals of the program are being achieved. A program review will take place annually and a program effectiveness evaluation will take place every four years.

The PAP reviews and effectiveness evaluations are intended to:

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

#### 6.1 Annual Reviews

The Company will conduct an annual review of the program and document program implementation during the previous year.

The goals of the annual review are to:

- Ensure that the PAP was executed according to the requirements defined in this plan
- Collect and review program documentation
- Confirm that communication methods are effectively reaching stakeholder audiences
- Utilize data collected throughout the year to make decisions about conducting supplemental communications or implementing program changes

The PAP Administrator or designated resource will conduct the annual review and develop a written report that summarizes the following:

- 1) **Program implementation details**—A summary of all baseline program activities and significant supplemental activities conducted during the year including: dates, delivery methods, frequency, messages contained in each delivery method and a list of any vendors who supported or executed the activities.
- 2) **Outreach summary**— Details regarding the number of individuals reached by each baseline program activity and an estimate of the percentage of stakeholders reached. The outreach summary may also include significant supplemental activities such traffic to the company website, attendance at stakeholder meetings and targeted direct mail campaigns. Any significant fluctuations (10 percent or greater) in outreach compared to previous years will be noted and additional context provided.
- 3) **Assessment of message comprehension and understanding**—A summary of stakeholder feedback collected during the year and details regarding any notable fluctuations compared to previous years.



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The following are examples of data that might be referenced in this section:

- Survey data collected at meetings from emergency responders and excavators
  - Stakeholder feedback collected through business reply cards
  - Stakeholder feedback collected through phone surveys, mail surveys, online surveys, focus groups or stakeholder interviews
  - Pre-Testing—reports from focus groups, employees interviews or online panels conducted to gauge message clarity and understandability of program materials.
- 4) **Bottom-line Results**—Document the number of third-party incidents, near misses and any additional data tracked by Damage Prevention that is helpful in understanding excavator needs, issues and trends. In addition, this section of the report will include any data collected regarding stakeholder perception of safety.
- 5) **Program Changes**—List any changes made to the program during the previous year including but not limited to: modifications to the written plan, changes to company assets that are included in the company’s PAP, new or updated communication materials, increased communication frequency or changes to the process used to create or manage stakeholder contact lists.

This section will also outline any planned program changes for the upcoming year based on recommendations provided by the PAP Committee, employees or vendors that support the program.

The PAP Committee will review and approval the annual review report during a formal committee meeting. The results of the annual review will be shared with key personnel listed in “Roles and Responsibilities,” Table 2.

### 6.2 Four-Year Effectiveness Evaluations

A more extensive program evaluation will be conducted every four years to ensure that the PAP is effectively accomplishing the program objectives. The four-year effectiveness evaluation will include analysis of annual program reviews, a full review of the PAP written plan, review and discussion of applicable operational data (particularly related to third-party excavation damage and encroachment activities) , and analysis of survey data designed to measure stakeholder awareness, understanding, behaviors and behavioral intent.

The four-year effectiveness evaluation will be conducted either internally or PG&E will hire a third-party resource to assist with all or part of the effectiveness evaluation. The four-year effectiveness evaluation will be documented in a detailed written report. The PAP Committee will review and approve the report during a formal meeting. A summary of the report will be provided to individuals listed in Table 2 (“Key Personnel”).

The goals of the four-year effectiveness evaluation are to:

- Gauge if the information is reaching the intended stakeholder audience



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- Understand if the messages are being delivered effectively and frequently enough to achieve desired behavioral intent or behavior change
- Measure whether the stakeholder audience is responding appropriately to pipeline safety messages through changes in stakeholder recall, message comprehension and behavior change
- Evaluate if PG&E's PAP is improving safety near pipelines by raising the awareness of the presence of pipelines in communities and informing stakeholders about the significant role they play in helping to prevent and respond to pipeline emergencies
- Identify areas for continuous program improvement

At a minimum, the Four-Year Effectiveness Evaluation report will include an assessment of the following:

- 1) **Program Outreach** – An assessment of the effectiveness of the delivery methods utilized to deliver messages to stakeholders. This assessment will include calculations of the percentage of each audience reached through specific communication methods or combinations of methods used within a common communication campaign and will compare stakeholder reach trends for over the four-year period. The four-year effectiveness evaluation will also document fluctuations in program outreach numbers and the percentage of stakeholders reached.
- 2) **Recall and Understandability of Message Content** – The four-year effectiveness evaluation will utilize survey data and other available operational data to assess message recall and understanding for key messages outlined in this plan. Survey data collected over the past four years related to recall and message comprehension will be compared to data analyzed during the previous four-year effectiveness evaluation to assess data trends.

Table 9 outlines acceptable assessment methods to assess recall and understandability. One or more of the following methods will be used for each audience during the four-year evaluation timeframe. The methods listed below can be conducted by PG&E or by a third-party vendor. Any outside vendors used to collect assessment data will be detailed in the four-year effectiveness evaluation report.

**Table 9: Acceptable Methods for Assessment of Recall and Understandability**

Audience	Acceptable Assessment Methods
<b>Affected Public: LDC Gas Customers and non-gas customer residents living within the gas service territory</b>	Random Sample Survey: Telephone surveys utilizing Random Digit Dialing (RDD) sampling methods to reach PG&E gas customers and non-gas customer residents living within the gas service territory. Respondents are screened to ensure that the person in the household completing the interview is responsible for reviewing/paying the utility bill and is at least 18 years old. The survey will include enough responses to yield statistically valid results. The margin of error for the aggregate results should not exceed +/-5% at the .95 confidence level.  Customer Brand Health Survey (CBHS): Telephone survey of randomly



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	<p>selected residential and business customers. CBHS is an internal customer satisfaction survey that is conducted quarterly.</p>
<p><b>Affected Public:</b></p> <p><b>Located adjacent to Gas Transmission Pipelines, Gas gathering Pipelines, Gas Storage Facilities, or Compressor Stations</b></p>	<p>Random Sample Survey: Mail survey sent to a random sample of residential and business addresses including farmers and schools located adjacent to PG&amp;E pipelines. The survey will include enough responses to yield statistically valid results. The margin of error for the aggregate results should not exceed +/-5% at the .95 confidence level.</p>
<p><b>Emergency Officials</b></p>	<p>Random Sample Survey : A telephone survey conducted with a random sample of emergency officials located within the PG&amp;E asset counties . The survey will include enough responses to yield statistically valid results. The margin of error for the aggregate results should not exceed +/-7% at the .95 confidence level.</p> <p>Participation in the PAPA National Industry Survey: In-depth telephone interviews conducted with a random sample of emergency officials who receive PAP materials distributed by PAPA. The survey will include enough responses to yield statistically valid results. The margin of error for the aggregate results should not exceed +/-5% at the .95 confidence level.</p> <p>Emergency Official Meeting Survey: Feedback is collected at meetings with groups of emergency officials. This is a census -style approach measuring feedback from all attendees.</p>
<p><b>Public Officials</b></p>	<p>Random Sample Survey: A telephone survey conducted with a random sample of local public officials within PG&amp;E asset counties . The survey will include enough responses to yield statistically valid results. The margin of error for the aggregate results should not exceed +/-7% at the .95 confidence level.</p> <p>Participation in the PAPA National Industry Survey: In-depth telephone interviews conducted with a random sample of public officials who receive PAP materials distributed by PAPA. The survey will include enough responses to yield statistically valid results. The margin of error for the aggregate results should not exceed +/-5% at the .95 confidence level.</p>
<p><b>Excavators</b></p>	<p>Random Sample Survey: A telephone survey conducted with a random sample of excavators working in PG&amp;E asset counties . The survey will include enough responses to yield statistically valid results. The margin of error for the aggregate results should not exceed +/-7% at the .95 confidence level.</p> <p>Participation in the PAPA National Industry Survey: In-depth telephone interviews conducted with a random sample of excavators who receive PAP materials distributed by PAPA. The survey will include enough responses to yield statistically valid results. The margin of error for the aggregate results</p>





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should not exceed +/-5% at the .95 confidence level.

- 3) **Behaviors and Behavioral Intent** – The four-year effectiveness evaluation will utilize survey data and other available operational data to assess the extent to which stakeholder behaviors and their behavioral intent (as expressed through surveys) aligns with desired behaviors and message content.

Table 10 outlines the types of behaviors that will be assessed and provides examples of operational data or survey questions that may be used to assess behaviors and behavioral intent. Behavioral metrics will be analyzed and compared to data included in the previous four-year evaluation report.

**Table 10: Desired Behavior by Stakeholder**

Stakeholder	Description of Desired Behaviors	Examples of Survey Questions or Operational Data
<b>Affected Public</b>	<ul style="list-style-type: none"> <li>• Actions that demonstrate that they are able to appropriately respond to a potential pipeline problem (<i>i.e. leave the areas then call 911 and PG&amp;E to report a leak, avoid using mechanical equipment or electrical devices near a possible leak</i>)</li> <li>• Demonstrate that they take/would take actions to protect pipeline infrastructure (<i>i.e. call to report unauthorized digging, call 811 before digging, maintenance or inspection to customer-owned lines</i>)</li> </ul>	<ul style="list-style-type: none"> <li>• “What would you likely do if you suspected a leak/break?”</li> <li>• Calls to PG&amp;E to report a leak</li> <li>• “What actions would you be likely to take prior to digging?”</li> <li>• How often do you call 811 before you dig</li> </ul>
<b>Emergency Officials</b>	<ul style="list-style-type: none"> <li>• Demonstrate that they are ready to appropriately respond to a potential pipeline problem (<i>i.e. have standard operating procedure in place to respond, have conducted a drill or training to practice their standard operating procedure, are confident in their ability to respond to a pipeline emergency in their jurisdiction</i>)</li> </ul>	<ul style="list-style-type: none"> <li>• “Have you conducted any practical training including drills and exercises to deal with a pipeline break or leak?”</li> <li>• “On a scale of 1-10 where 10 is totally confident and 1 is not confident: how confident are you in your ability to appropriately respond to a pipeline emergency in your jurisdiction?”</li> </ul>





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		<ul style="list-style-type: none"> <li>PG&amp;E internal incident report observations regarding emergency officials response protocol, procedures, timing and any issues identified</li> <li>Post drill report observations regarding emergency official response</li> </ul>
<b>Excavators</b>	<ul style="list-style-type: none"> <li>Demonstrate that they follow safe excavation procedures near pipelines (i.e. call 811 before digging, wait to have lines marked, use appropriate tools when digging near pipelines)</li> <li>Demonstrate that they know what to do if they damage a pipeline while excavating (i.e. leave the areas and call 911 and PG&amp;E if the pipeline is leaking, do not operate mechanical equipment, call PG&amp;E to report damage, do not operate valves)</li> </ul>	<ul style="list-style-type: none"> <li>"On a scale of 1-10 where 10 is totally confident and 1 is not confident: how confident are you in your ability to "recognize" temporary facility markings?"</li> <li>"How often do you call 811 to have lines marked before initiating excavation projects?"</li> <li>"How often do you use hand tools or vacuum tools when excavating near underground pipelines?"</li> <li>Incident report observations</li> </ul>
<b>Public Officials</b>	<ul style="list-style-type: none"> <li>Demonstrate/indicate that location of pipelines is considered during land use and permitting decision-making process (i.e. access NPMS or PG&amp;E's pipeline map, contact PG&amp;E to discuss projects and impact on pipelines)</li> <li>Demonstrate that they follow safe excavation procedures near pipelines (i.e. call 811, wait the required time to have lines marked, use appropriate equipment when digging near pipelines)</li> </ul>	<ul style="list-style-type: none"> <li>Calls to engineering or planning group</li> <li>One-Call ticket data</li> <li>Incident report observations</li> <li>"How often do you check the location of nearby pipelines or other underground utilities when reviewing applications for permits?"</li> </ul>

**4) Bottom Line Results** — The four-year effectiveness evaluation will utilize operational data to analyze trends over the previous four-year period related to incidents, near misses, excavation damages resulting in pipeline failure, excavation damages that did not result in pipeline failure, segmented data related to at-fault party and excavation activities, One-Call



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ticket data, and other relevant data as determined by the PAP Administrator necessary to assess the impact of public awareness programs in reducing the risk of third-party excavation damage to PG&E's system. In addition, the four-year effectiveness evaluation will utilize survey data to assess the current customer and non-customer perception of safety.<sup>4</sup>

Based on assessment of these four areas, the PAP Administrator will propose changes and/or modifications to the program. These may lead to changes to the written plan, communication materials, delivery frequency, and contact list creation process or data sources. Proposed program changes will focus program enhancements designed to improve program effectiveness.

### 6.3 Annual Review and Four-Year Effectiveness Evaluation Tracking

The PAP Administrator, or designated resource, tracks information related to key program metrics in the following program measurement documents:

- **Recall and Message Comprehension Charts:** Survey questions are organized by audience and message and entered into the spreadsheet for comparison with past results.
- **Outreach Charts:** Data is entered regarding the number of individuals or entities reached with a specific method
- **Behavior Chart:** Survey questions related to the percentage of intended stakeholders who understood and retained key information is tracked in the spreadsheet. Data are compared to past results.
- **Bottom-Line Result Chart:** Tracks a number of operational data and survey questions related to perception of the safety of PG&E's pipelines.

Data tracked in these documents along with survey reports and operational data reports are used for reference during the annual review and four-year effectiveness evaluation.

### END of Requirements

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<sup>4</sup> Refer to "Outcomes Chart"



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<b>Definitions</b>	NA
<b>Implementation Responsibilities</b>	<p>The Vice President of Public Safety and Asset Integrity is responsible for approving major changes to the program.</p> <p>The Distribution Integrity Management Director and the PAP Manager are responsible for overseeing and approving the program's budgetary and resource requirements as well as approving revisions to TD4003S.</p> <p>The PAP Manager is responsible to oversee and manage TD4003S to ensure compliance with company and regulatory policies and procedures.</p>
<b>Governing Document</b>	NA
<b>Compliance Requirement/Regulatory Commitment</b>	<p>49 CFR Part 192</p> <p>API RP 1162, 1<sup>st</sup> Edition, December 2003</p>
<b>Reference Documents</b>	<p><b>Developmental References:</b></p> <p>49 CFR Part 192.616</p> <p>API RP 1162, 1<sup>st</sup> Edition, December 2003</p> <p><b>Supplemental References:</b></p> <p>NA</p>
<b>Appendices</b>	NA
<b>Attachments</b>	NA



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**Document Revision** This document supersedes RMP-12 Revision 7.

**Approved By** Roland Trevino, Vice President, Public Safety and Asset Integrity  
 Christine Cowser-Chapman, Director, Distribution Integrity Management  
 [Redacted] - Sr. Manager, Distribution Integrity Management and  
 Damage Prevention  
 Sandy Hartman - Vice President and Managing Director, Law

**Document Owners** [Redacted]  
 PAP Manager

**Document Contact** [Redacted] PAP Manager

### Revision Notes

Where?	What Changed?
Revision 1 issued 10/3/06	Revised to incorporate LDC facilities prior to submittal to OPS.
Revision 2 issued 10/5/06	Revised to incorporate gas gathering facilities into plan.
Revision 3 issued 4/8/08	Revised to include Clearinghouse comments and added LDC criteria.
Revision 4 issued 7/18/08	Revised to address CPUC comments-see change form for this revision for details.
Revision 5 issued 12/20/09	Org changes.
Revision 6 issued 12/13/10	Revised to update organizational changes and add clarity and consistency. VP approval is not needed because changes were minor.
Revision 7 issued 10/31/11	Revised to clarify that not all supplemental documentation is stored electronically, and explain relationship between positions of PPAPM &


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Where?	What Changed?
	PSPM. Added language to clarify what the annual review will evaluate.
Revision 8 issued 12/31/12	Rewrote plan to address feedback from CPUC audit