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PACIFIC GAS AND ELECTRIC COMPANY

ASSET INVESTMENT PLANNING GAS ASSET STRATEGY GAS SYSTEM INTEGRITY SECTION Risk Management



Procedure No. RMP-12

Pipeline Public Safety Awareness Plan

Prepared By:

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Robert T. Howard, VP – Gas Transmission and Distribution

Rev. No.	Date	Description	Prepared By	Approved By	Approved Manager, Gas System Integrity
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Pacific Gas and Electric Company Public Awareness Plan

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1.0 PROGRAM OBJECTIVES

The objective of the gas transmission Pipeline Public Awareness Program is to enhance public safety and environmental protection through increased public awareness and knowledge. This document provides guidance for Pacific Gas and Electric Company (PG&E) to develop and actively manage a comprehensive, consistent Pipeline Public Awareness Program that can be regularly assessed and enhanced, while remaining in compliance with federal regulatory requirements as outlined in 49CFR Part 192, and API RP 1162. This program will establish consistent objectives, tools and measurement components while maintaining the flexibility necessary to weigh the needs of various regions or audiences.

1.1 PG&E's Public Safety Awareness Program Has Three Main Components

Public Education –

This program should raise the affected public's and key stakeholders' awareness of the presence of PG&E's natural gas pipelines in their community and help them better understand PG&E's role in transporting and delivering energy. A more informed public will better understand pipeline safety measures and contribute to reducing the likelihood of emergencies and/or releases.

Promote Safe Work Practices –

This program will help third parties understand the steps that should be taken to prevent and respond to pipeline emergencies. Through a broad-reaching education effort, third parties, including contractors, agricultural operators and the general public, will better understand the safe and proper ways to work around pipeline facilities and the required actions prior to excavation. In addition, it will educate first response agencies (police and fire) on the safe handling of utility emergencies.

Continuous Improvement –

PG&E will annually evaluate its Pipeline Public Awareness Program to assess its effectiveness and determine what enhancements should be made. This evaluation will include a review of changing regulations to ensure their inclusion into the updated plan.



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COMMITMENT TO PROGRAM

DATE:

Pacific Gas and Electric Company recognizes that public awareness and understanding of gas pipeline operations is vital to the continued safe operation of its gas pipeline facilities.

The Company's Pipeline Public Awareness Program 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 will ultimately help to better protect people, property and the environment – thereby maintaining the reliability of the pipeline system, which our customers and communities depend upon.

PG&E is committed to fully support the successful implementation of this comprehensive Pipeline Public Awareness Program, complying with the standards established by our regulators.

Vice President, Gas Transmission & Distribution
Pacific Gas and Electric Company

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1.2 Business Units

The pipeline assets included in the PG&E's Pipeline Public Awareness Program include:

- a. All gas transmission lines in California owned by PG&E and Standard Pacific Pipeline Inc.

1.3 Personnel

The personnel identified in Table 1 are responsible for overseeing, implementing and supporting the PG&E Pipeline Public Awareness Program.

Table 1 – Key Personnel

Title	Department	Name	Responsibility
Vice President	Gas Transmission and Distribution	Robert T. Howard	Executive champion and approver for major changes to program.
Director	Gas Asset Strategy	Pamela Johnson	Oversees and approves the program's budgetary and resource requirements.
Manager	Gas System Integrity		Ensure the compliance with company and regulatory policies and procedures.
Gas Transmission Pipeline Public Awareness Program Manager			Responsible for implementing the components of the Pipeline Public Awareness Program.
			Coordinate personnel responsible for local implementation of the field components of the Pipeline Public Awareness Program.
			Lead a cross-functional committee made up of representatives from various departments, including Gas District Employees, Governmental Affairs, Building and Land Services, Communications, Operations, Maintenance and Construction. This team will support the continuous improvement of the Pipeline Public Awareness Program.
Utility Public Safety Program Manager			Oversee and manage the utility's Public Safety Program to ensure compliance with regulatory expectations.

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2.3 Organizational Changes

As organizational changes take place, the Pipeline Public Awareness Program Manager will update the list of individuals and assignments identified above in Table 1. If a new Pipeline Public Awareness Program Manager is assigned, it is the responsibility of the Manager of Gas System Integrity to ensure that the new Pipeline Public Awareness Program Manager is aware of his or her responsibilities as they apply to the implementation of this plan.

2.0 STAKEHOLDER AUDIENCES

2.1 Affected Public

Includes the following landowners, adjacent residents, businesses or places of congregation:

- Landowners: People who occupy residences or are tenants on land where the pipeline is buried (this is not meant to include absentee landowners).
 - Tenants (actual occupants, residents)
 - Farmers
 - Businesses on ROW
- Residents located adjacent to the pipeline ROW (within 660' or the HCA) or of gas storage and other operational facilities
 - Landowners (actual occupants, residents)
 - Tenants
 - Farmers
 - Identifiable homeowners associations or groups
 - Identifiable neighborhood organizations
- Places of congregation - High Consequence Areas (HCA's): Places where people assemble or work on a regular basis, on or along the ROW, unrelated to habitation, as identified by PG&E's Integrity Management Program.
 - Businesses
 - Schools
 - Places of worship
 - Hospitals and other medical facilities
 - Prisons
 - Parks and recreation areas
 - Day-care facilities
 - Senior centers
 - Federal and state lands

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3.2 Local and State Emergency Response

Local, state or regional officials, agencies and organizations with emergency response and/or public safety jurisdiction along the pipeline route including:

- Fire departments
- Police/sheriff departments
- Local Emergency Planning Committees (LEPC's)
- County and State Emergency Management Agencies (EMA's)
- Other emergency response organizations
- Other public safety organizations

3.3 Local Public Officials and Planning Agencies

Local, city, county or state officials and/or their staffs having land use and street/road jurisdiction along the pipeline route including,

- Planning boards
- Zoning boards
- Permit/Licensing departments
- Building code enforcement departments
- City and County Managers
- Elected officials
- Public Utility Boards
- Local Governing Councils
- Public work officials
- Public street, road and highway departments (CalTrans)

3.4 Excavators

Companies and local government agencies that are involved in earth excavation activities including:

- Contractors
- Construction companies
- Excavation equipment rental companies
- Timber companies
- Fence building companies
- Drain tiling companies
- Landscapers
- Well drillers

3.5 Land Developers

Companies and private entities involved in land development and planning including:

- Home builders
- Land developers

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3.6 One-Call Centers

Excavation One-Call centers relevant to the area

- Under Ground Service Alert (USA) California North and South are the organizations established to notify underground facility operators of proposed excavations.

3.0 MESSAGE CONTENT

Messages will be tailored for each targeted stakeholder audience. Messages will provide an overview of how pipelines operate and the hazards that may result from activity in close proximity to these facilities and potential hazards due to routine operations. Messages will include the utility's measures undertaken to prevent the impact to public safety, property and the environment.

3.1 Affected Public

Information to be communicated

- Pipeline purpose and reliability
- Awareness of hazards / prevention measures undertaken
- Damage prevention awareness
- One-Call requirements (USA)
- Leak recognition and response
- Pipeline location (as approved by Corporate Security) and pipeline marker info
- How to obtain additional information / Company contact info
- Availability of operator list through National Pipeline Mapping System (NPMS)
- ROW encroachment prevention
- Information about the Company's Integrity Management Program
- Summary of High Consequence Area designation, if applicable
- Planned maintenance/construction activity, if applicable
- Multi-lingual contact number for translation of brochure

3.2 Local And State Emergency Response Agencies

Information to be communicated

- Pipeline purpose and reliability
- Awareness of potential hazards and prevention measures undertaken
- PG&E's emergency preparedness
- Expectations of emergency responders
- Response for pipeline vs. compressor station emergencies
- Pipeline location information (as approved by Corporate Security) and availability of NPMS
- How to obtain additional information / company contact info
- Maintenance program summary

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- Offer to meet

3.3 Local Public Officials and Planning Agencies

Information to be communicated

- Pipeline purpose and reliability
- Awareness of hazards and prevention measures undertaken
- Emergency preparedness communications / response
- One-Call requirements (USA)
- Pipeline location information (as approved by Corporate Security) and availability of NPMS
- How to obtain additional information / company contact info
- Offer to meet
- How to obtain an overview of PG&E's Integrity Management Plan
- Summary of High Consequence Area designation, if applicable and request to review HCAs in local area
- Planned maintenance/construction activity, if applicable

3.4 Excavators

Information to be communicated to excavators & contractors

- Pipeline purpose and reliability
- Awareness of hazards and prevention measures undertaken
- Damage prevention awareness
- One-Call requirements (USA)
- Leak recognition and response
- Pipeline purpose, prevention measures and reliability

3.5 Land developers

Information to be communicated to land developers

- Pipeline purpose and reliability
- Awareness of hazards and prevention measures undertaken
- Damage prevention awareness
- One-Call requirements (USA)
- Leak recognition and response
- ROW encroachment prevention
- Availability of list of pipeline operators through NPMS

3.6 One-Call Centers

Information to be communicated to One-Call Centers

- One Call system performance
- Accurate line location information
- One Call system improvements (USA)

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4.0 MESSAGE DELIVERY METHODS AND/OR MEDIA

4.1 Affected Public

Table 2

Method	Baseline	A targeted direct-mail program. In areas where a significant number of people do not speak English, mailers will be developed in the native language of the population or a phone number will be provided for translation of the mailer.
	Supplemental	Examples of supplemental activities may include: <ul style="list-style-type: none">▪ Personal Contact – Utility personnel may communicate pipeline safety messages during face-to-face contact with members of the affected public at local fairs, shows and other community events. In addition, employees will communicate as appropriate during leakage surveys, ground patrols, mark and locate meetings, and when resolving encroachments.▪ Construction/Maintenance Alerts – Field supervisors will select the most effective way to contact the affected public prior to any significant maintenance or construction activity, including using letters, door-hangers or personal contact.▪ Website – PG&E's Public Safety website at www.PGE.com will be updated by the Utility Public Safety Program Managers to include relevant safety and damage prevention information.▪ Educational items -- Brochures, calendars, key chains, pens, and give-away items containing the company's emergency contact information or USA information may be distributed during personal contact.▪ One-Call System Participation - Work with Underground Service Alert (USA) to encourage the one-call operator to communicate safe and proper excavation methods to the public
Frequency	Baseline Supplemental	Every two years Determined by specifics of pipeline segment or environment.

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Strategy	Baseline	<p>Due to the volume of residences, businesses and places of congregation within the effected community awareness area, a targeted mailing will provide the most complete and efficient means of information distribution.</p> <ul style="list-style-type: none"> ▪ Bill Insert to all utility customers or ▪ Non-utility customers within Buffer: Direct mail based on a calculation using the C-FER model and applied to one of three buffer zones: 330, 660 or 1200 feet on either side of the pipeline centerline. ▪ Reliance for Buffer: The C-FER model is a widely accepted risk-based model for calculating the impact zone associated with a given segment of a pipeline system. The three buffer zones will ensure that complete coverage is obtained.
	Supplemental	Supplemental activities will provide field supervisors with the flexibility necessary to meet the unique public awareness needs specific to their region or area.
Documentation	Baseline & Supplemental	Primary documentation will take place utilizing PG&E's Internal Public Safety Information Program (PSIP) website at: CGT/Safety/PSIP



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4.2 Local And State Emergency Response Agencies

Table 3

Method	Baseline	To deliver its messages to the local and state emergency response agencies, PG&E will conduct a targeted mailing. <ul style="list-style-type: none">* District First Responder Program Emergency Training Program for details.* Meeting/Station Tour -- Field supervisors will conduct meetings with emergency officials to learn responsibility, resources and expectations of organizations that may respond to a pipeline emergency in the area. See FRP website and Manual at: (put web address here).* Emergency Drills – When appropriate, field locations should invite local emergency responders to participate in mock emergency drill exercises.
	Supplemental	<p>One of the following will take place annually:</p> <ul style="list-style-type: none">* Emergency Training - Offer the "Responding to Utility Emergencies" train-the-trainer program to fire and police agencies. This will be offered on annual bases to all agencies within the service area.* Joint Meeting -- Some field locations may elect to supplement their baseline outreach by participating in a single meeting held jointly with other pipeline companies for emergency response officials.* Emergency Response Organizations – PG&E field representatives may participate in local emergency response organizations where appropriate. <p>Examples of additional supplemental resources include:</p> <ul style="list-style-type: none">* Online Training -- An interactive website to allow emergency response officials to educate themselves and test their knowledge of natural gas pipeline-related emergencies.* ER Booklet – A "Responding to Natural Gas Emergencies" booklet to distribute during personal contact with emergency response officials.* Wallet Card -- Card with facts to remember when responding to a pipeline emergency.* Video – "Responding to Natural Gas Pipeline Emergencies".

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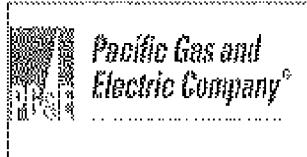
Frequency	Baseline	Annually
	Supplemental	Additional frequency determined by specifics of pipeline segment or environment.
Strategy	Baseline	While face-to-face communication is preferred, will also attempt to make contact with emergency responders through written correspondence from the local field supervisor, as well as offering a more detailed presentation or facility tour at the emergency response official's request.
	Supplemental	Face-to-face interaction between emergency response officials and PG&E personnel will help establish the trust necessary to work together during a crisis.
Documentation	Baseline & Supplemental	Primary documentation will take place utilizing the PSIP website.

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4.3 Local Public Officials and Planning Agencies

Table 4

Method	Baseline	PG&E will conduct a targeted direct mail program to deliver its messages to the local public officials, governing councils and planning agencies in cities, towns and counties in which PG&E operates.
	Supplemental	Personal Contact – These letters would include an offer to meet with that agencies' leadership.
Frequency	Baseline	Every three years.
	Supplemental	Annually in HCAs or upon request.
Strategy	Baseline	Due to the large number of public officials located in each county, the most complete and efficient means of disseminating information is through direct mail.
	Supplemental	Upon request, face-to-face meetings will be scheduled and completed utilizing support from the local operations supervisor, land and government relations, as appropriate.
Documentation		Primary documentation will take place utilizing the PSP website



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4.4 Excavators, Developers, Contractors and One-Call Centers

Table 5

Method	Baseline <i>Excavators, Developers & Contractors</i>	To deliver its messages to excavators, developers and contractors, PG&E will conduct annual targeted mailings.
	Baseline <i>One Call Centers</i>	PG&E will maintain membership in the applicable regional One Call centers (USA) where it has operations.
	Supplemental <i>Excavators, Contractors, Ag Operators</i>	In HCAs, one of the following methods of public education with excavators and contractors will take place annually: <ul style="list-style-type: none">* USA – One Call Events – Joint Meeting: Some field locations may elect to supplement their baseline outreach by participating in a single meeting for contractors, held jointly with other pipeline companies.* Offer to the Excavators and Contractors, free of charge, our PG&E safety video "Excavation Safety" (available in 2006) and "Contractor Beware".
	Supplemental <i>Land Developers</i>	Contractor Beware brochures – English and Spanish. More detailed safety guidelines will be distributed to land developers via mail or personnel contact as necessary.
	Supplemental <i>One Call Centers</i>	Personal Contact – Be an active board member of the USA One-Call Centers.
	Frequency Baseline	Annually, not to exceed 2 years.
Strategy	Supplemental	Determined by specifics of pipeline segment and environment, or as changes occur to the pipeline route.
	Baseline	Due to the large number of excavators located in each county, the most complete and efficient means of disseminating information is through direct mail.
	Supplemental	As needed, face-to-face meetings with land developers will be conducted and detailed construction guidelines will be distributed.
Documentation		Primary documentation will take place utilizing the PSIP website.

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4.5 Method, Message & Frequency Summary

Table 6 – Summary

Audience	Requirement	Method	Frequency	Coordination
Affected Public	Baseline	<ul style="list-style-type: none"> * Brochure * and or mailings 	2 years	PAPM
	Supplemental	<ul style="list-style-type: none"> * Maintenance & Construction Alerts * Personal Contact * Web site * Use items 	As needed	Field
Local and State Emergency Response & Planning Agencies	Baseline	<ul style="list-style-type: none"> * Letters * Corporate Train the Trainer Program 	Annual	Transmission SH&C
	Supplemental	<ul style="list-style-type: none"> * Meeting/ Station Tours * ER Training * Mock Drills * Joint Meeting * Emergency Response Organizations 	One option annually	Field
Local Public Officials	Baseline	<ul style="list-style-type: none"> * Letters 	3 years	Transmission SH&C
	Supplemental	<ul style="list-style-type: none"> * Personal Contact 	As needed	Field
Excavators Contractors Ag Operators Land Developers One Call Centers	Baseline	<ul style="list-style-type: none"> * Letter and or Brochure * One Call membership 	Annual	Transmission PAPM/SH&C
	Supplemental	<ul style="list-style-type: none"> * Joint Meeting * USA One-Call events 	One option annual	Field
		<ul style="list-style-type: none"> * Excavator newsletter * Farmer's letter 	As needed	Field
Land Developers	Supplemental	<ul style="list-style-type: none"> * PG&E Developer's Handbook 	Annual	Field
One Call Centers	Supplemental	<ul style="list-style-type: none"> * Personal Contact 	As needed	Field

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6.0 SUPPLEMENTAL ENHANCEMENTS OF BASELINE PROGRAM

6.1 All Audiences

The message content, delivery medium and delivery frequency will be supplemented beyond the baseline where some additional level of public awareness communication is warranted. PG&E will identify areas with elevated potential for third-party damage considering the following factors:

- Historical Incident records thru GIS
- Land development activity
- Environmental considerations
- Pipeline history in an area
- Specific local situations
- Regulatory requirements
- Results from previous Pipeline Public Awareness Program evaluations

6.0 PROGRAM DOCUMENTATION AND RECORDKEEPING

6.1 Documentation

PG&E will maintain records of key program elements to demonstrate the level of implementation of the Pipeline Public Awareness Program. Documentation will be maintained in the PSIP website. The PSIP website will be used to track, assign and document tasks related to implementation. Record keeping will include:

- Lists, records and other documentation of stakeholder audiences with whom PG&E has communicated
- Copies of all materials provided to each stakeholder audience
- All program evaluations
- Retention Period – The record retention period for all documentation listed above will be a minimum of five (5) years.
- Program changes

6.2 Responsibilities

6.2.1 Field Offices

- Collect sign-in sheets during FRP and ERD meetings.
- Document all records of mock drill participants.
- Record of invitation or attendee list for excavator or emergency official joint meetings.

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- Maintain and file lists of damage prevention group meetings attended.
- Maintain and file lists of PSIP/FRP meetings attended.
- Maintain contact list that includes names and addresses of local emergency response personnel.
- Maintain and file copies of invitation letters sent to emergency response personnel for joint meetings, emergency drills, training or FRP and ERD meetings.
- Record contact or correspondence made with landowners, public officials or excavators where appropriate safety messages are delivered.
- Record correspondence sent to landowners to advise them of upcoming maintenance / construction activities.
- Access to the PSIP website is crucial to accomplish this objective.

6.2.2 Pipeline Public Awareness Program Manager

- Obtain mailing list for the following target markets
 - Residences, businesses and places of congregation within the community awareness area using geo-spatial database and SIC codes.
 - Emergency officials in designated buffer zone using geo-spatial database and SIC codes.
 - Excavators within the counties PG&E operates.
 - Excavators who receive contractor brochures and videos.
 - All relevant public officials where PG&E operates.
- Document samples of all mailers, brochures and packet materials.
- Coordinate with District PSIP employees.
- Maintain the PSIP website.

7.0 PROGRAM EVALUATION AND EFFECTIVENESS

7.1 Purpose

The primary purpose of the evaluation of the Pipeline Public Awareness Program is:

- 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.

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7.2 Annual Review

- PG&E will complete an annual internal self-assessment of whether the program is being implemented according to the guidelines set forth in this public awareness plan. The audit will be organized by the program administrator and coordinated at the PG&E level. The results of the annual review will be documented and transmitted to the "Key Personnel," Table 1, along with action plans to address any needed changes.

7.3 Measuring Program Effectiveness

PG&E will participate in the Public Awareness Program Effectiveness Research Survey (PAPERS), a national industry-sponsored evaluation program developed and supported by the American Petroleum Institute (API), Association of Oil Pipelines (AOPL), and the Interstate Natural Gas Association of America (INGAA).

This broad, industry-wide approach provides operators with meaningful, comparable, consistent insight on communications efforts that meet the intent of the RP1162 regulatory requirements. The evaluation of program effectiveness will be performed at least once every four years.

Contractor Credentials

The PAPERS program was developed in coordination with HarrisInteractive, a large market research firm known for pioneering leadership in the online market research industry. HarrisInteractive has a reputation as a leading strategic research firm with a depth of knowledge in the energy industry. In 2005, HarrisInteractive conducted a pilot study on behalf of API to establish a robust approach to meeting the recommendations of RP1162.

Methodology

The PAPERS program methodology was designed to evaluate the effectiveness of each pipeline operator's program. The survey will measure the reception and comprehension of key messages by each of the four key stakeholder audiences. Evaluation methods will include respondents along the right-of-way for all pipeline systems a company provides. The results will be presented in aggregate for the individual company – not by pipeline system.

The PAPERS program has identified the most effective research approach for each of the stakeholder audiences identified in RP1162: the Affected Public, Local Public Officials, Emergency Responders and Excavators.

Affected Public

Analysis from the pilot study indicated that a mail survey is the most effective methodological approach to reach this audience. To provide the most accurate and robust survey results, the PAPERS program will utilize GIS data to locate addresses within a certain buffer zone (generally 600 feet or 1,000 feet) of the pipelines. With this information, a sufficient number of potential respondents



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will be randomly selected to complete the survey. This approach will account for areas of high population density and areas of high consequence by including a representative portion of these areas in the sample.

Local Public Officials

Analysis from the pilot study indicated that a telephone survey is the most effective methodological approach to reach Local Public Officials. The PAPERS program will utilize pipeline location and information purchased from an outside source to identify an appropriate sample of public officials within applicable jurisdictions. Yellowbook's Municipal Leadership Directories will be used to obtain sample information.

8.4 Annual Revisions

As a result of the annual review, a revised Pipeline Public Awareness Program procedure shall be issued annually. The Manager – Gas System Integrity shall be responsible for approving the revision but all "Key Personnel" shall receive a copy of the new revision with the key changes noted.