[Insert System Name Here]

PUBLIC AWARENESS PLAN

With special thanks and acknowledgement for the base model plan to:

American Public Gas Association

Tennessee Gas Association

Effective Date: June 20, 2006

About the TGA / APGA Model Plan

The Pipeline Safety Improvement Act of 2002 requires each gas utility and pipeline operator to evaluate the effectiveness of its public awareness programs and make improvements where necessary. Operations and communications experts from the American Petroleum Institute (API), America American Public Gas Association (APGA), Interstate Natural Gas Association, Interstate Natural Gas Association of America (INGAA) and American Gas Association developed API Recommended Practice 1162 to provide guidance for what constitutes an effective public awareness program. On June 24, 2004 the Office of Pipeline Safety (OPS) proposed to incorporate RP 1162 by reference in its pipeline safety regulations (49 CFR Part 192). A final rule published in the May 19, 2005 Federal Register requires operators to create written public awareness plans following RP 1162 guidelines by no later than June 20, 2006. Copies of RP 1162 may be obtained from the American Petroleum Institute (www.api.org).

To assist their members to comply with these new requirements, APGA developed this model distribution public awareness plan. The model plan was developed by Safety and Compliance Evaluation, Inc. (SCE) and includes all the requirements in RP 1162 that address distribution public awareness issues. TGA then secured the use of this plan for its members through a partnership with APGA. The plan has been customized to Tennessee and is now ready for users to further customize it for their individual utilities. Members may use any portions of the plan or use none of it as you determine what is necessary to comply with the new regulations.

TGA has worked to make it easy for our members to meet the requirements of 1162. To comply completely with the current regulation all that a member need do is:

1. Customize and enact this plan based on the individual company, following the guidelines and requirements included.
2. Be an active, dues paying member of TGA in order to support the various methods used to relay the Public Awareness messages (currently the Vols and Titans Radio Networks). Do not forget to also include the items that your company already does or needs to add to help meet this requirement (i.e. bill stuffers or wording added to bills, newspaper ads, customer booklets, web-pages, or whatever else is applicable)
3. Participate in the PIPE Safety Programs, currently a joint project of TGA, One Call and the TRA that must be sponsored separately. They may be part of the TGA dues in the future.
4. Measure the effectiveness of your program, made easy by signing up for the APGA GOAL program. This program will survey your customers and give you all documentation needed. If 50% or more of TGA members join, all participating members will receive a 10% discount in addition to what is already a very reasonable rate.

Guidance in customizing the model plan is provided through italicized comments inserted throughout the document. All of the italicized text should be deleted or replaced with

system specific information in your final public awareness plan. For example replace ***System Name*** with your system name in each place it appears in the model plan. Where the italicized note asks for specific information such as name and title of individuals with responsibilities under the plan this is because the RP 1162 requires this specific information.

As with any other plan required by pipeline safety regulations, it is important that you follow your public awareness plan to the letter. Failure to develop and/or follow a public awareness plan may subject your system to fines of up to $100,000 per day. Please be sure to review this model carefully and delete/add/modify it until it states EXACTLY what you intend to do to comply. The final document should be reviewed by whoever in your operation is responsible for pipeline safety compliance.

NOTE: All plan references to "appropriate One Call Centers" have been changed to "Tennessee One Call." Operators who utilize more than just Tennessee's One Call Center (i.e. Alabama, Kentucky, etc.) should also add appropriate language to include those.

PUBLIC AWARENESS PROGRAM OBJECTIVES

The objectives of this Public Awareness Program are:

- To educate both our customers and non-customers who live or work near our pipelines how to recognize the odor of natural gas and how to respond if they detect possible gas odors. Early recognition of a gas odor and proper response can save lives.
- To raise the awareness of the affected public and key stakeholders of the presence of buried natural gas pipelines in the communities we serve. A more informed public will also understand that they have a significant role in helping to prevent third-party damage accidents.
- To help excavators understand the steps that they can take to prevent third party damage and respond properly if they cause damage to our pipelines.
- To help emergency response agencies that may assist System Name in an emergency understand the proper actions to take in response to a gas release or emergency.

Public Awareness Policy

Our goal is to provide safe, reliable gas service to our customers and ensure the safety of people living and/or working near our gas pipelines. Public awareness is a critical component of our overall safety program. Every employee of ***[System Name]*** must be committed to fulfilling our public awareness responsibilities as described in this Public Awareness Program.

1. Program Administration

[Insert Administrator name and title] is responsible for the overall implementation of this Public Awareness Program. The Program Administrator is responsible to ensure that:

- Target audiences are identified,
- Message(s) appropriate to each audience are identified
- Appropriate media are selected to transmit each message to each audience,
- Appropriate message delivery frequencies are identified for each message and audience,
- Messages are delivered as specified in the plan,
- The effectiveness of the program is periodically evaluated, and
- The plan is modified to reflect the findings of the effectiveness evaluation.

In addition to the Program Administrator, the following individuals are responsible for various aspects of the Public Awareness Program: [*Alternatively lists of individuals may be included as an attachment to the plan.]*

[Insert System Manager name and title] is responsible to periodically review the performance of the Public Awareness Program and the individuals responsible for its implementation. Funding and resource allocation requests for the Plan will be established at the level necessary to implement the Plan.

If you have more employees who will be responsible for various aspects of your public awareness program list them below by name and title and describe their responsibilities under this plan. A few examples are shown. Delete these if they are not applicable to your system.

[Insert name and title of the Public Information Director] is responsible for preparing public education materials and placing ads in television, radio and newspapers.

[Insert name and title of the Damage Prevention Coordinator] is responsible for coordinating our public awareness efforts with those of Tennessee One-Call.

2. Affected Facilities

All of ***System Name***'s gas pipeline facilities are included in this Public Awareness Program. *[If you operate more than one distribution system, transmission pipelines or other distinct entities you may choose to have separate plans for each entity or you can include all entities under one plan. It is required, however, that each plan clearly state which pipelines are covered under each plan and all jurisdictional piping must be covered under one of the public awareness plans.]*

3. Stakeholder Audiences

The following stakeholder audiences have been identified:

1. Affected Public In Areas Where We Operate
    - A. Our customers
    - B. Individuals living/working near our pipelines
2. Emergency Officials In Areas Where We Operate
    - A. Fire departments
    - B. Police/sheriff departments
3. Public Officials In Areas Where We Operate
    - A. Mayor(s) – city and county
    - B. City, town and/or County Managers
    - C. Planning boards
    - D. Zoning boards
    - E. Licensing departments
    - F. Permitting departments
    - G. Building Code Enforcement departments
4. Excavators In Areas Where We Operate
    - A. Construction companies
    - B. Excavation equipment rental companies
    - C. Public works officials
    - D. Public street, road and highway departments (maintenance and construction)
    - E. Timber companies
    - F. Fence building companies
    - G. Drain tiling companies
    - H. Landscapers

I. Well Drillers
J. Home builders
K. Land developers
L. Tennessee One-Call

All of the above are listed in RP 1162, however not all may apply to your particular circumstances. Add or subtractions from this list as appropriate for your system, but be sure to keep a written record of why any listed stakeholder group is removed from the list (e.g. "There are no timber companies in our service area", or "In our area zoning, planning and permitting boards are all handled by the Planning Commission").

The Program Administrator is responsible to develop and maintain a list of each of these stakeholder audiences *(possibly except for 1(b) individuals living near System Name's pipelines -- see below). Alternatively separate individuals may be assigned responsibility for different lists of stakeholders. These assignments must be spelled out in the plan or as an attachment to the plan.*

Note: API RP 1162 requires that the plan describe the method(s) that will be used to identify stakeholders in each category. The following section lists one possible way to identify each audience. If you prefer to use a different method by all means change the listed method to the one you intend to use. <u>It is critical that this plan accurately describe exactly what you do to create and maintain these lists and that you follow this plan to the letter. If the processes described in this plan do not match your actual practices you risk being cited for violation of pipeline safety regulations!</u>

- The list of our customers will be generated and maintained by *[Insert name and title or department name]*.
- The list of government and emergency response officials will be developed and maintained through the PIPE Safety Program coordinated by Tennessee One-Call
- The list of excavators will be developed and maintained through the PIPE Safety Program efforts coordinated by Tennessee One-Call
- Media other than direct mail will be used to reach non-customer individuals living or working near pipelines, as such no list of addresses for these stakeholders will be maintained.

4. Message Type, Content and Frequency

The following messages type and content will be sent to each stakeholder audience via the media listed at the frequency indicated:

NOTE: These are the recommended message type, frequency and media from API RP 116 for distribution systems. If you also include transmission pipelines under this plan please refer to Table 2-1 or RP 1162 for recommended message type, content and frequency. Each operator must consider each of these messages in its program. The rationale for any decision to deviate from the recommendations should be written down and kept on file.

NOTE ESPECIALLY THAT BILL STUFFERS ARE NOT CONSIDERED ADEQUATE FOR COMMUNICATING WITH NON-CUSTOMERS LIVING NEAR YOUR PIPELINES UNLESS YOU ARE AN ELECTRIC AND/OR WATER UTILITY THAT HAS EVERY BUILDING AS A CUSTOMER. Bill stuffers do not reach non-customers of gas-only utilities.

Stakeholder Audience	Message Type	Suggested Frequency	Suggested Delivery Method and/or Media
Residents along the Local Distribution System (LDC)	**Baseline Messages:** ▪ Pipeline purpose and reliability ▪ Awareness of hazards and prevention measures undertaken ▪ Damage prevention awareness ▪ Leak recognition and response ▪ How to get additional information	**Baseline Frequency:** Annual	**Baseline Activity:** ▪ Public service announcements OR ▪ Paid advertising OR ▪ Bill stuffers (for combination electric & gas companies)
		Supplemental Frequency: Additional frequency and supplemental efforts as determined by specifics of the pipeline segment or environment	**Supplemental Activity:** ▪ Targeted distribution of print materials ▪ Newspapers and magazines ▪ Community events or newsletters ▪
LDC Customers	**Baseline Messages:** ▪ Pipeline purpose and reliability ▪ Awareness of hazards and prevention measures undertaken ▪ Damage Prevention Awareness ▪ Leak Recognition and Response ▪ How to get additional information	**Baseline Frequency:** Twice Annually	**Baseline Activity:** Bill stuffers
		Supplemental Frequency: Additional frequency and supplemental efforts as determined by specifics of the pipeline segment or environment	**Supplemental Activity:** ▪ Targeted distribution of print materials ▪ Newspapers and magazines ▪ Community events or newsletters ▪
Emergency Officials	**Baseline Messages:** ▪ Pipeline purpose and reliability ▪ Awareness of hazards and prevention measures undertaken ▪ Emergency preparedness communications ▪ How to get additional information	**Baseline Frequency:** Annual	**Baseline Activity:** ▪ Print materials OR ▪ PIPE Safety Program
		Supplemental Frequency: Additional frequency and supplemental efforts as determined by specifics of the pipeline segment or environment	**Supplemental Activity:** ▪ Telephone calls ▪ Personal contact ▪ Videos and CDs ▪ Additional training as requested ▪
Public Officials	**Baseline Messages:** ▪ Pipeline purpose and reliability ▪ Awareness of hazards and prevention measures undertaken ▪ Emergency preparedness communications ▪ How to get additional information	**Baseline Frequency:** Every three years	**Baseline Activity:** ▪ Targeted distribution of print materials and group meetings primarily through PIPE Safety Program
		Supplemental Frequency: Additional frequency and supplemental efforts as determined by specifics of the pipeline segment or environment	**Supplemental Activity:** ▪ Group meetings ▪ Telephone calls ▪ Personal contact ▪ Videos and CDs ▪ Additional training as requested ▪
Excavators / Contractors	**Baseline Messages:** ▪ Pipeline purpose and reliability ▪ Awareness of hazards and	**Baseline Frequency:** Annual	**Baseline Activity:** ▪ One-Call Center outreach OR ▪ PIPE Safety Program

		Supplemental Frequency: Additional frequency and supplemental efforts as determined by specifics of the pipeline segment or environment	**Supplemental Activity:** ▪ Personal contact ▪ Videos and CDs ▪ Open houses ▪
One-Call Centers	**Baseline Messages:** ▪ Pipeline location information ▪ Other requirements of Tennessee One-Call	**Baseline Frequency:** As Required by Tennessee One-Call	**Baseline Activity:** ▪ Member of Tennessee One Call ▪ Requirements of Tennessee One-Call ▪ Maps and updates (as required)
	Supplemental Messages: ▪ One-Call System performance ▪ Accurate line location information ▪ One-Call System improvements	**Supplemental Frequency:** As changes in pipeline routes or contact information occur or as required by state requirements	**Supplement Activity:** ▪ Targeted distribution of print materials ▪ Personal contact ▪ Telephone calls ▪ Maps (as required) ▪

5. Development of Program Materials

The Program Administrator *[or individuals identified in the attachment]* is responsible for ensuring that appropriate materials are developed and/or acquired for each communications activity listed above. Materials should be pre-tested for clarity, understandability and retain-ability before they are widely used. The pretest should be performed using a small representative audience, for example, a small sample group of ***System Name***'s employees and/or families that are not involved in developing the public awareness program, a small sample section of the intended stakeholder audience or others. Lists, records or other documentation of stakeholder audiences with whom System Name has communicated must be kept as specified in Section 9 of this Plan.

Currently the suggested media to be used for contact would be bill stuffers and direct mail (contact), email notices and updates (where email addresses are available), targeted local TV, cable TV and radio ads and/or educational CD ROMs. If materials are purchased from 3rd parties the Program Administrator should obtain information on the vendor's pretests or else conduct a pretest as described above if the vendor's pretest is not available or deemed insufficient.

The Public Awareness Program will be conducted in English and in other languages commonly understood by a significant number of and concentration of the non-English speaking population in our service area. *One way to determine the languages that should be considered is to contact local election boards to determine what languages voting ballots are required to be provided in the communities we serve.*

6. Program Implementation

The Program Administrator *[or individuals identified in the attachment]* is responsible to ensure that each target audience identified above receives the appropriate materials via the specified media (e.g. mass mailings, emergency official meetings) at the frequency specified in the preceding table. Records of these follow-up actions must be kept as specified in Section 9 of this Plan. The Program Administrator should prepare an annual estimate of the resources required to implement the Program and request that the appropriate budget and human resources are available.

7. Management of Input/Feedback/Comments Received

It is anticipated that the implementation of this public awareness program will generate requests for further information from those in the stakeholder audiences contacted. All inquiries should be directed to the Program Administrator *[or individuals identified in the attachment]*.

Inquiries about the location of pipelines should be directed to Tennessee One-Call System at 1-800-351-1111 or 811.

Records of inquiries received as a result of public awareness efforts should be prepared and submitted to the Program Administrator for use in assessing the effectives of this Plan (see Section 8).

8. Measuring the Effectiveness of this Program

The Program Administrator is responsible to periodically measure:

- Whether the information is reaching the intended stakeholder audiences;
- If the recipient audiences are understanding the messages delivered;
- Whether the recipients are motivated to act in accordance with the information provided;
- If the implementation of the public awareness program is impacting bottom line results (such as reduction in the number of incidents caused by third-party damage).

This will include, at minimum:

- Tracking the number of calls received in response to materials,
- Reviewing the incidence of 3rd party damage to System Name's facilities *[all damage events, not just reportable incidents]*,
- Effectiveness assessments for each stakeholder group: *[These are offered as suggestions -- modify the following to match how you will actually conduct these effectiveness assessments*
    - For customers and non-customers living near our distribution lines using APGA GOAL, using an automated calling system to survey a statistical sample of customers and non-customers. We will make every effort to achieve a 95% statistical confidence level in the results of the survey, however to the extent customers and non-customers decline to answer survey questions the actual statistical confidence level may be less than 95%. *[NOTE: APGA GOAL (Gas Overall Awareness Level) is a program offered by the American Public Gas Association (APGA). As described here, it is an automated telephone polling of a statistical sample of customers and non-customers living near gas lines. Go to www.apga.org for more information]*
    - For public officials and emergency responders reviews will be conducted immediately following each meeting and documented using Form PA-1
    - For excavators, effectiveness assessments will be conducted by the Tennessee One-Call center.

If the results of these evaluations indicate that one or more target audience is not receiving and understanding one or more of the target messages the Program Administer will review the message type, content and delivery method to determine if more effective means of communications are available. Records of these effectiveness assessments and follow-up actions must be kept as specified in Section 9 of this Plan.

9. Records

The Program Administrator shall maintain the following records:

- Lists, records or other documentation of stakeholder audiences with whom System Name has communicated,
- Copies of all materials provided to each stakeholder audience, and
- Results of pre-tests and effectiveness assessments, including follow-up actions and expected results.

These records shall be maintained for five (5) years.

Form PA-1: For documenting the effectiveness of meetings with public officials and emergency responders

Meeting Date: _____Location: _____

Name of person completing this form: _____

At the conclusion of the meeting ask the participants the following questions:

1. Do the participants understand the purpose of distribution piping? _____
2. Are they aware of the potential hazards of a natural gas release? _____
3. Do they understand how to work with the utility in an emergency? _____
4. Do they know how to contact the utility for more information? _____

Attach list of other utility personnel and names of public officials and emergency responders present at this meeting.

Signed: _____

This form must be kept for 5 years from the date of the meeting

[Consider asking the most senior public official or emergency responder present to co-sign this form]