

2016 Public Awareness Effectiveness Program Audit

Finding Type [Internal, NOV, AOC]	Finding #	Finding	Response	Associated Attachment (File Name)
NOV	I-1	<p>Title 49 Code of Federal Regulations §192.616(d) states:</p> <p>"The operator's program must specifically include provisions to educate the public, appropriate government organizations, and persons engaged in excavation related activities on:</p> <p>(1) Use of a one-call notification system prior to excavation and other damage prevention activities;</p> <p>(2) Possible hazards associated with unintended releases from a gas pipeline facility..."</p> <p>SED reviewed different flyers PG&E uses for its Public Awareness Program. Some flyers such as 2016 flyers for the "Core Gas Mailer" and "Gas Safety Bill Insert" do not address 192.616(d)(2). Therefore, SED recommends to include this information in all PG&E documents where required.</p>	<p>Wording on all e-mail campaigns, direct mail pieces and gas safety bill inserts, beginning with the 2017 April Gas Safety Bill Insert (attached), has been updated to state: "Natural gas pipeline leaks can occur due to careless or unsafe excavation and may lead to evacuations, natural gas service outages, fire, property damage or serious injury."</p>	2017-GasSafetyInsert-April.pdf
NOV	I-2	<p>Title 49 Code of Federal Regulations §192.616(e) states:</p> <p>"The program must include activities to advise affected municipalities, school districts, businesses, and residents of pipeline facility locations."</p> <p>PG&E procedure, TD-5801P-01 sections 1.3 and 4.1 list the stakeholders but has no mention of school districts. However, Appendix B of the procedure lists the school districts as part of outreach activities. PG&E need to amend the procedure to list "school districts" as one of the recipient.</p>	<p>PG&E respectfully disagrees with this finding.</p> <p>School officials are listed as a baseline outreach audience in Appendix B of TD-5801P (Public Awareness Plan). Appendix B is referenced in sections 4.4, 5.1, 5.2, 5.3 and 9.5 of the Public Awareness Plan. Because the appendix is part of the plan, there is no need to update the document at this time.</p>	
Areas of Concern/ Observations/Rec ommendations	II-1	<p>PG&E procedure TD-5801P-01, Appendix B outlines the stakeholders who should receive the communication. These include school districts, universities/college, businesses, hospitals, daycare centers and others. On an inquiry, PG&E mentioned that in most cases flyers inserted with bills usually go to the accounting personnel or administrators. However, SED expressed concerned that this information may not be reaching the personnel such as facility managers who need to know about the risks. SED recommends that facility administrators may be added as secondary recipients as a part of stakeholders.</p>	<p>PG&E currently reviews mailing list criteria prior to list compilation for all mailings and analyzes all returned mail, in accordance with PG&E's Pipeline Public Awareness Plan (PPAP) and API RP 1162. If a significant increase in returned mail is found, opportunities for mail list efficiencies are considered, to help ensure that the correct stakeholder is reached for each specific mailing. After discussing the feasibility of this recommendation with PG&E's list vendor, the additional time and cost associated with identifying the specific facilities person to add as a recipient was found to not be an effective use of resources.</p>	
Areas of Concern/ Observations/Rec ommendations	II-2	<p>2. PG&E performs annual effectiveness surveys for its Public Awareness Program through a third party vendor. SED observed that a sample size of 400 customers is selected randomly. On an inquiry PG&E provided information that increasing the sample size will not significantly provide more information. PG&E's has approximately 4.3 million gas customers which include a variety, such as residences, places of congregation (churches and community centers), businesses (small and large), farmers (which are considered relatively higher risk regarding excavation damage) and others. If the all customers are of same nature, probably 400 sample size was a good choice. SED recommends that appropriate samples from each segment of customer base be selected separately to get feedback, and also to have good representation of geographic areas its serves.</p>	<p>PG&E regularly performs effectiveness surveys of the four baseline stakeholder groups, as required by API RP 1162 (see section 9.7 in TD-5801P) and uses questions which have been approved by a national industry committee for benchmarking purposes. Altering the questions that are asked would eliminate the ability to benchmark against ourselves year over year and against other utilities. Therefore, PG&E plans to retain its effectiveness survey questions at this time.</p>	
Areas of Concern/ Observations/Rec ommendations	II-3	<p>3. PG&E explained that a 'Working Group' of 'Distribution Public Awareness Council (DPAC)' develops questions for the 'effectiveness surveys'. The questions used for the surveys have been same since 2014, and PG&E maintained that these are kept same for the sake of comparison over years. SED suggests that after regular intervals, considering the feedback from effectiveness surveys, the questions should be revisited to determine that whether they are still useful for appropriate feedback and if there is a need for any additional questions.</p>	<p>PG&E regularly performs effectiveness surveys of the four baseline stakeholder groups, as required by API RP 1162 (see section 9.7 in TD-5801P) and uses questions which have been approved by a national industry committee for benchmarking purposes. Altering the questions that are asked would eliminate the ability to benchmark against ourselves year over year and against other utilities. Therefore, PG&E plans to retain its effectiveness survey questions at this time.</p>	
Areas of Concern/ Observations/Rec ommendations	II-4	<p>4. SED recommends that it will be helpful for PG&E's Public Awareness Program to perform the effectiveness evaluations and outreach activities during or after the large incidents, for example, Napa Valley Earthquake in 2014. It will provide an opportunity to get feedback from a number of stakeholders such as in the case of Napa earthquake, public, businesses, emergency responders, public official, master meter parks and others.</p>	<p>PG&E regularly performs effectiveness surveys of the four baseline stakeholder groups, as required by PG&E's Pipeline Public Awareness Plan (section 9.7 in TD-5801P) and API RP 1162. After discussing these opportunities with PG&E's Customer Insight Department, it was advised to not do additional surveys. PG&E already executes a high number of customer surveys and any additions would likely have a negative impact on obtaining existing customer feedback.</p>	