

1.0 Administration and Development of Public Awareness Program

1.01 Written Public Education Program - Satisfactory.

*Action: No action necessary.*

1.02 Management Support – Satisfactory.

*Action: No action necessary.*

1.03 Unique Attributes and Characteristics – Unsatisfactory. Inspector comments: More detail needs to be added to the description of assets.

*Action: Added more asset description detail to the MDU Public Awareness Plan Section 4: Assets Included in Program to include; natural gas facilities constructed from steel and plastic pipe, sizes range from ¼" to 16" in diameter with pressure ranges from ounces to pounds pressure as well as wall thickness range from 0.154" to 0.219". Assets include below ground and above ground jurisdictional facilities.*

1.04 Stakeholder Audience Identification – Unsatisfactory. Inspector comments: Customer lists used for distribution. Distribution non-customer residents intended to be covered by mass media and no list exists. Buffer zones not identified. Superintendents verify lists. Operator is working on heat zone ID for residents along transmission lines. PAPA lists in use for public officials, excavators, and emergency responders.

*MDU has provided and continues to provide the required Public Awareness information to non-customer affected public in the form of bill stuffers in the combination areas. In mature service areas where gas has been available for some time, there is a very small non-customer affected public or all electric customer base.*

*Action: MDU will develop a non-customer list for residents and owners along the natural gas transmission lines. Additionally, MDU will develop an additional pipeline safety message method to communicate to affected public non-customers. This message will include pipeline purpose and reliability, leak recognition and response, hazard awareness and prevention measures, utility marker education as well as damage prevention information. MDU will continue to develop a public awareness layer in GIS to identify transmission line non-customers that may be impacted.*

1.05 Message Frequency and Message Delivery – Unsatisfactory. Inspector comments: Add to Table 6 in Plan: Transmission affected public message missing required NPMS message. Add to Table 8 in Plan: Emergency officials – add printed materials as a delivery method since used by PAPA.

*Action: MDU's Plan was changed to include required NPMS message for transmission line affected public. In the Plan Table 8 for Emergency Officials an addition of "printed materials" will be added to include the delivery method that is currently used by PAPA.*

- 1.06 Written Evaluation Plan – Unsatisfactory. Inspector comments: Sample size and methodology not described in plan or affected public survey. Operator has requested from vendor and will send to inspector. PAPA surveys have this information.

*Action: MDU requested sample size and methodology rational from Central Surveys. This information was sent via e-mail to Nathan Solem on December 23, 2011.*

## 2.0 Program Implementation

- 2.01 English and other Languages – Unsatisfactory. Inspector comments: Operator must justify the use of English only by reviewing Census data or other data to determine the level of non-English speaking people in their area.

*Action: MDU reviewed 2000 census data by county and identified that there are not any non-English speaking people that meet the 10% threshold.*

- 2.02 Message Type and Content – Unsatisfactory. Inspector comments: Bill insert covering affected public required messages missing MDU phone # for obtaining more information. Transmission affected public brochure missing NPMS required message. 2007, 2008, 2011 checked. Non-customer residents not being covered with all required messages for affected public. Mass media message for 811 is only message they are receiving.

*Action: MDU will revise bill insert to include 1-800-638-3278 and the MDU website address to obtain more information. Additionally, the affected public brochure will be revised to include NPMS as a source for additional pipeline information. These changes will take place prior to next scheduled communication. Non-customer residents will receive required affected public messages as identified in the Plan.*

- 2.03 Messages on Pipeline Facility Locations – Not applicable. Inspector comments: Not schools or businesses on transmission pipeline route in SD. MDU is still looking at a school program even though not required.

*Action: Not applicable.*

- 2.04 Baseline Message Delivery Frequency-Unsatisfactory. Inspector comments: All required messages to non-customer residents along pipeline not being delivered.

*Action: See 1.04 above. MDU will deliver messages as identified in Plan Section 7: Stakeholder Delivery Frequency.*



- 2.05 Considerations for Supplemental Program Enhancements-Satisfactory. Inspector comments: MDU is providing a supplemental booklet to emergency responders with MDU specific information in addition to PAPA materials. This is just to enhance the one-on-one meetings not due to any issue. Excavator follow up letters sent for One-Call violations.

*Action: No action necessary.*

- 2.06 Maintaining Liaison with Emergency Response Officials-Unsatisfactory. Inspector comments: No documentation provided on MDU specific information provided. No documentation that emergency response plan was discussed/made available to emergency responders. MDU is using a Paradigm form for discussing response capabilities with emergency responders. This form is excellent documentation.

*Action: MDU will meet face-to-face with local emergency responders to review MDU emergency response capabilities and actions as identified in the MDU/GPNG Gas Emergency Response Plan. Meeting dates, contacts, and a summary of discussion will be documented and records will be sent to the General Office Gas Distribution Department.*

### 3.0 Program Evaluation & Continuous Improvement (Annual Audits)

- 3.01 Measuring Program Implementation –Satisfactory. Inspector comments: Annual review conducted and documentation stored in 3 ring binders for each year for each state.

*Action: No action necessary.*

- 3.02 Acceptable Methods for Program Implementation Audits – Satisfactory. Inspector comments: Using internal panel to conduct annual review. Operator may want to note in plan that regulatory audits also count for review.

*Action: No action necessary. Plan identifies and allows for state inspection reviews as stated in Section 10: Plan Evaluation.*

- 3.03 Program Changes and Improvements- Unsatisfactory. Inspector comments: Operator is planning on centralizing control of the PA program within the Distribution Engineering group. Recommend that summary sheet be added to binder containing documentation that summarizes findings for the year and improvements to be implemented.

*Action: Documentation of annual review of PA program along with identified changes will be summarized at each review. Summary will be maintained in binder.*

### 4.0 Program Evaluation & Continuous Improvements (Effectiveness)

- 4.01 Evaluating Program Effectiveness – Unsatisfactory. Inspector comments: PAPA surveys reviewed but not documented as part of evaluation. Third party survey done in April-May 2010 of affected public. Sample size methodology not described. Operator will send to

inspector when received from vendor. As a result of survey; employee training in public awareness was added, target audience of 18-34 was identified and school program to reach the children of this target group is planned, operator also started advertising in SD Ag News and ramped up the frequency of 811 ads, also place public awareness messages on website. No formal documentation of affected public survey results/conclusions and the changes planned.

*Action: MDU will document effectiveness survey findings along with identified improvements. MDU provided inspector sample size and methodology via e-mail December 23, 2011.*

- 4.02. Measure Program Outreach-Unsatisfactory. Inspector comments: Affected public survey was mail questionnaires. All customers received all required messages for affected public via bill insert. No method to measure out-reach to non-customer residents along pipeline system. Currently mass media is used but only message is 811. Actual counts for each audience were not made. No method in place to check returns of bills to determine exact reach to customers.

*Action: MDU will place pipeline safety messages in communities where company owns and/or operates natural gas facilities to target and education affected public including customers and non-customers. The non-customer affected public will be included in the next survey process to establish a program methodology for this affected group.*

- 4.03 Measure Percentage Stakeholder Reached-Unsatisfactory. Inspector comments: PAPA survey information reviewed but not documented. Percentages not estimated. No method in place to check return of bills to determine exact outreach to customers. No method to measure percentage of non-customer residents along pipeline system reached. Currently mass media is used but only message in 811.

*Action: A process is established to identify the number of bills sent out and then returned monthly. As part of an already established process all returned customer bills are sent to the company call center for investigation of customer information validation and update and then resent. Additionally, see 4.02.*

- 4.04 Measure Understandability of Message Content-Unsatisfactory. Inspector comments: Bill inserts shown to be effective in conveying message. Survey showed that 18-34 age group needs to be targeted. School program to reach their children being developed. Poor documentation on interpretation of survey results. Messages not pre-tested.

*Action: See section 4.01.*

- 4.05 Measure Desired Stakeholder Behavior-Unsatisfactory. Inspector comments: Evaluation done but documentation on interpretation of results no done. Operator felt behaviors were fine and not changes needed.



*Action: See section 4.01.*

- 4.06 Measure Bottom-Line Results- Unsatisfactory. Inspector comments: Operator had not chosen bottom-line measurement but plans to develop review of damages per 1000 call tickets and document using DIRT data.

*Action: Annually company will review prior years DIRT data to measure public awareness effectiveness. Ratio of damages per 1,000 locate tickets will be established and trended.*

- 4.07 Program Changes-Unsatisfactory. Inspector comments: Changes identified include: target 18-34 year olds with school program for their kids, training all employees in public awareness, field personae co-host SDPA emergency responder meetings, DIRT for bottom line results, Public Awareness layer to GIS. None of these changes are formally documented as part of the evaluation.

*Action: See sections 4.01 and 4.06.*

## 5.0 Inspection Summary & Findings

- 5.01 Summary –Inspector comments: MDU is a multi-state operator and one of South Dakota’s largest operators. Their public awareness program could benefit from better attention to documentation and centralized control of the public awareness program. The major issue found was that non-customer residents along MDU’s pipeline system are not receiving any of the required messages except 811.

*Action: MDU will take inspector comments under consideration to improve the company public awareness program.*