

Riviera Utilities

Public Awareness Plan

For Gas Distribution



About Riviera Utilities Public Awareness Program

The Pipeline Safety Improvement Act of 2002 requires each pipeline and gas distribution utility operator to evaluate the effectiveness of its public awareness programs and make improvements where necessary. Operations and communications experts from many Nationally recognized organizations developed API RP 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 a written public awareness plan which follows RP 1162 guidelines by no later than June 20, 2006.

Riviera Utilities is a sponsor company participating in the Alabama Public Awareness Cooperative Training (APACT) program. The APACT program is a program developed by the Alabama One Call Center. In an effort to assist members in complying with RP 1162 Alabama One Call has developed a written plan to meet some of the requirements of the public awareness rule. Their plan is based on the model provided by the American Public Gas Association and Safety and Compliance Evaluation, Inc. and includes the requirements in RP 1162 that address pipelines and gas distribution system public awareness issues. This program will be known as the Alabama Public Awareness Cooperative Training (APACT).

An APACT oversight committee has been established from representatives of sponsoring companies who are participating in this program. This oversight committee has reviewed and approved the APACT plan.

Riviera Utilities written public awareness will be based upon the APACT model, the American Public Gas Association model, and the Safety and Compliance Evaluation, Inc. model.

PUBLIC AWARENESS PROGRAM OBJECTIVES

The objectives of this Public Awareness Program are:

- To educate both customers and non-customers who live or work near distribution systems and transmission pipelines on 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 distribution systems and transmission pipelines in the communities they live and work in. 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 they can take to prevent third party damage and respond properly if they cause damage to distribution systems or transmission pipelines.
- To help emergency response agencies that may assist Riviera Utilities in an emergency understand the proper actions to take in response to a gas release or emergency.
- To educate the public about the protection of gas meters from damage.

Public Awareness Program Policy

Management Statement of Support

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 Riviera Utilities Gas Department must be committed to fulfilling our public awareness responsibilities as described in this Public Awareness Program. Riviera Utilities management is committed to provide the resources necessary to accomplish this goal.

1. Program Administration

The Gas Supervisor of the Eastern Division is named as the Program Administrator and is responsible for the overall conduct 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.
- An annual review of the plan is completed to ensure compliance according to RP 1162 guidelines

In addition to the Program Administrator, the following individuals from Alabama One Call are responsible for various aspects of the AFACT Public Awareness Program:

- Damage Prevention Manager
- Executive Director

Executive Director is responsible for a periodic 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.

Damage Prevention Manager, is responsible for preparing public education materials and placing ads in television, radio and newspapers as part of RP 1162 as well as general public awareness activities.

2. Affected Facilities

Unless otherwise noted, Riviera Utilities and Alabama One Call has designated its program to include coverage for Riviera Utilities entire service area to be included in this Public Awareness Program.

3. Stakeholder Audiences

The following stakeholder audiences have been identified by AFACT for each sponsoring company to be included in the educational programs:

1. Affected Public In Areas Where Distribution or Transmission Pipeline System Operates
 - A. Individuals living/working near distribution systems or transmission pipelines
 - B. Riviera Utilities Customers
2. Emergency Officials In Areas Where Distribution or Transmission Pipeline System Operates
 - A. Fire Departments
 - B. Police/Sheriff Departments
 - C. Emergency Management Agencies
3. Public Officials In Areas Where Distribution or Transmission Pipeline System Operates
 - A. Mayor(s)
 - 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 Distribution or Transmission Pipeline System Operates

- A. Concrete work
- B. Construction Companies/Excavation
- C. Electric, Gas and Sanitary Services
- D. Electrical Work
- E. Engineering Services
- F. Excavation equipment rental companies
- G. Fence building companies
- H. Forestry/Timber/Logging companies
- I. Landscaping/Nursery companies
- J. Mining
- K. Oil and Gas Extraction companies
- L. Outdoor Advertising
- M. Pest Control/Termite Bonding companies
- N. Pipelines
- O. Public works officials
- P. Public street, road and highway departments (maintenance and construction)
- Q. Railroad companies
- R. Subdivider/Development companies
- S. Survey
- T. Well Drilling
- U. Wrecking and Demolition

The Program Administrator is responsible to develop and maintain a list of each of these stakeholder audiences. Various sources for this contact list may be used to ensure the listing is all-inclusive. All outside source lists will be compared against one another and verified to ensure minimal to no duplication of contact is made.

- The list of government and emergency response officials will be obtained by utilizing data providers specializing in this industry. The major data provider used in this category verifies the actual emergency official facility. This list will be maintained by APACT in accordance with Riviera Utilities service area.
- The names, addresses and telephone numbers of excavators will be obtained through various sources. The in-house list of excavators utilizing the one call system will be downloaded and compared to various lists of excavator community mail list available for designated areas. The SIC code listing for excavator type entities will be used and verified against all excavator lists to reduce redundancy in mailing lists. These lists are updated on a quarterly basis to ensure accuracy of mail list is up to date with the

USPS records. Riviera Utilities will also provide their internal contractor/excavator listing to be included in this record as well, if so approved by the oversight committee.

- The list of individuals living or working near Riviera Utilities distribution system will be developed by matching nine-digit zip code numbers to areas which are traversed by Riviera Utilities underground facilities using GIS data.

4. *Message Type, Content and Frequency*

The required messages type and content will be delivered to each stakeholder audience via the media listed and at the frequency indicated on Section 4 Table. The program conducted by Alabama One Call will meet all of the Baseline Frequency requirements. Additional or supplemental frequency programs may be conducted by Riviera Utilities on their own or by Alabama One Call on behalf of Riviera Utilities at the approval of the oversight committee.

5. *Development of Program Materials*

The ARACT Program Administrator 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 individuals that are not involved in developing the public awareness program. This sample section may include employees of Alabama One Call as well as employees or family members of the oversight committee. This group will be designed to be a sampling of the intended stakeholder audience or others. Lists, records or other documentation of stakeholder audiences with whom Alabama One Calls has communicated will be kept as specified in Section 9 of this Plan.

Currently the suggested media to be used for contact will be public education meetings, direct mail (contact), targeted local TV, cable TV and radio ads and/or educational presentations in CD/DVD format. If materials are purchased from a third party entity, 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.

6. Program Implementation

The APACT Program Administrator is responsible to ensure that each target audience identified receives the appropriate materials via the specified media (e.g. mass mailings, emergency official and excavator meetings) at the frequency specified in the Section 4 Table. Records of these follow-up actions will 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.

Records of inquiries received as a result of public awareness efforts should be prepared by the Program Administrator for use in assessing the effectiveness of this Plan as part of the requirements of Section 8.

8. Measuring The Effectiveness Of This Program

The APACT 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 where this information is made available).

This will include, at minimum:

- Tracking the number of calls received in response to materials,
- Reviewing the incidence of 3rd party damage as reported to Alabama One Calls' Damage Information Reporting Tool (DIRT).
- Reviews/Surveys following the contact with stakeholders (e.g. meetings with public officials, emergency responders, etc.),
- Contacting a random sample of each stakeholder audience, confirming their receipt of

the materials and assessing their understanding of the target message(s) (through direct mail, email survey or telephone surveys).

- Annual report information provided by Alabama One Call.

If the results of these evaluations indicate that one or more target audience is not effectively receiving one or more of the target messages, the APACT Program Administrator, under the direction of the oversight committee, 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.

Each individual education event will be measured for effectiveness and this information will be provided to each participating sponsoring company. The overall program will be evaluated every four (4) years to ensure the program itself is effective and meeting the required elements properly. The overall program evaluation will consist of an initial baseline measurement of awareness of the designated target groups in a designated service area. It will also include periodic evaluations and a final evaluation to determine the effectiveness of the overall program.

9. Records

The Program Administrator shall maintain the following records:

- Lists, records or other documentation of stakeholder audiences with whom the program 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.

Section 4 Table: Summary of Public Awareness Communication Requirements

<i>Stakeholder Audience</i>	<i>Message Type</i>	<i>Suggested Frequency</i>	<i>Suggested Delivery Method and/or Media</i>
AFFECTED PUBLIC			
Residents along Riviera Utilities Distribution system and places of Congregation Riviera Utilities Customers	<ul style="list-style-type: none"> - Baseline Messages: - Pipelines Purpose and Reliability - Awareness of hazards and prevention measures undertaken - Damage prevention awareness - Leak recognition and response - How to get additional information - Facility location and information - Alabama One Call Requirements 	<p>Baseline Frequency: Annual</p> <p>Supplemental Frequency: Additional frequency and supplemental efforts as determined by specifics of the pipeline segment or environment</p>	<p>Baseline Activity:</p> <ul style="list-style-type: none"> - Public Service Announcements - Paid Advertisements - Direct Mailings - Supplemental Activity <p>Supplemental Activity:</p> <ul style="list-style-type: none"> - Targeted distribution of printed material (Bill Stuffer) to Riviera Utilities customers - Newspaper and magazines - Web page information
EMERGENCY OFFICIALS			
Emergency Officials	<p>Baseline Message:</p> <ul style="list-style-type: none"> - Systems purpose and reliability - Awareness of hazards and prevention measures undertaken - Emergency preparedness communications - How to get additional information 	<p>Baseline Frequency: Annual</p> <p>Supplemental Frequency: Additional frequency and supplemental efforts as determined by specifics of the pipeline segment or environment</p>	<p>Baseline Activity:</p> <ul style="list-style-type: none"> - Print materials - Group meetings - Sponsor Annual meeting held by APACT - Self-Educational Programs <p>Supplemental Activity:</p> <ul style="list-style-type: none"> - Telephone calls - Personal contact - Videos and CD's

<i>Stakeholder Audience</i>	<i>Message Type</i>	<i>Suggested Frequency</i>	<i>Suggested Delivery Method and/or Media</i>
PUBLIC OFFICIALS			
Public officials	Baseline Message: <ul style="list-style-type: none"> - Systems purpose and reliability - Awareness of hazards and prevention measures undertaken - Emergency preparedness communications - How to get additional information 	Baseline Frequency: Three (3) Years Supplemental Frequency: Additional frequency and supplemental efforts as determined by specifics of the pipeline segment or environment	Baseline Activity: <ul style="list-style-type: none"> - Targeted distribution of print material, or - Group meetings
EXCAVATORS			
Excavators/Contractors	Baseline Message: <ul style="list-style-type: none"> - Pipeline purpose and reliability - Awareness of hazards and prevention measures undertaken - Damage prevention awareness - Leak recognition and response - One-Call requirements - How to get additional information 	Baseline Frequency: Annual Supplemental Frequency: Additional frequency and supplemental efforts as determined by specifics of the pipeline segment or environment	Baseline Activity: <ul style="list-style-type: none"> - One-Call Center outreach programs - Group meetings Supplemental Activity: <ul style="list-style-type: none"> - Personal contact - Association meetings - Videos and CD's - Annual contractor informational letter