

2021 – November 3 – Editorial Section

Approved additions and revisions to GM under §192.616.

**PRIMARY:** 192.616

**PURPOSE:** Review GM and consider adding guidance to 1) reach residents living in apartments, student housing, transitional housing and also to reach electronic bill customers; 2) ensure customers have continuous access to safety information through the company website; and 3) distribute safety brochures to customers during service calls.

Consider adding guidance to include informing building owners (residential and commercial) and renters of the need to call the gas company to report a gas odor. Suggestion to mirror guide material for Damage Prevention messages to the public, item 18 that states “Specific information packets designed for distribution to individual dwelling units at apartments and condominiums.” (from TR 17-19 included in TR 17-18).

**ORIGIN/RATIONALE:** March 7, 2017 - Damage Prevention/Emergency Response TG Minutes  
In the review of NTSB PAB 16-01 Birmingham Public Housing Gas Explosion, the gas company improved their Public Awareness efforts for customers that are not the building owner.

**RESPONSIBLE GROUP:** Damage Prevention / Emergency Response Task Group

**LB Processing Note:** The proposed changes from 1<sup>st</sup> LB in LB2-2019 are shown in yellow highlight. Disapproved vote from LB2-2019 provided at end.

**Section 192.616**

**1 GENERAL**

**2 API RP 1162**

2.1 *Recommended Practice (RP).*

2.2 *Stakeholder audiences.*

Guidance is provided in API RP 1162, Section 3 for identifying the four stakeholder audiences, which are the affected public, emergency officials, local public officials with land use authority, and excavators. Some additional considerations for this identification process include the following.

(a) Residents located adjacent to a transmission or regulated gathering line ROW.

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**(b) Tenants that are not direct gas customers occupying multi-family residential building/units or multi-commercial units.**

**Operators should also consider notifying those residents and business owners who may be renters or leaseholders along its pipelines that might not be direct customers of a gas distribution operator. This group might include the following.**

**(1) Working in subdivided buildings or office campuses or complexes.**

**(2) Residing in apartments, student housing, transitional housing, rental units, or other types of residential units.**

**(bc)** Emergency officials and local public officials with land use authority.

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**(ed)** Excavators.

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**(de)** Other audiences not specifically mentioned in API RP 1162

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2.3 *Message content.*

2.4 *Additional information.*

2.5 *Message delivery methods.*

**(a)**—Guidance is provided in API RP 1162, Section 5 **and Appendix D** for several delivery methods and tools available for communicating with the stakeholder audiences. See 2.4 of

the guide material under §192.614 for additional information regarding delivery methods for excavators and the affected public. However, the operator is required by §192.616(c) to justify in its program or procedural manual if it does not follow the general program recommendations of API RP 1162 regarding message delivery methods.

- ~~(b) — Operators should also consider methods of notifying those residents and business owners along its pipelines that might not be direct customers of a gas distribution operator, such as renters and leaseholders. This group of affected public might be unfamiliar with the hazards of natural gas. This group might include customers that receive their bills electronically, subdivided buildings, campuses, and residents living in apartments, student housing, transitional housing, rental units, or other types of residential units. Messages to this group should include those listed in 2.3(c) and 2.4 above and may also include information about gas safety that is available on the operator's website.~~
- ~~(c) — Operators should consider the following methods for notifying the public about the operator's safety programs:~~
- ~~(1) — Specific information packets designed for distribution to individual dwelling units at apartments and condominiums.~~
  - ~~(2) — Specific information packets designed for distribution to businesses for employee education.~~
  - ~~(3) — Handouts.~~
  - ~~(4) — Speakers supplied to local groups.~~
  - ~~(5) — Joint mailings with other utilities.~~
  - ~~(6) — School programs.~~
  - ~~(7) — Exhibits or displays at appropriate public gatherings.~~
  - ~~(8) — Electronic communications, such as web pages, email, or social media.~~
  - ~~(9) — Billboards or signs.~~
  - ~~(10) — News articles (as opposed to advertising) covering safety functions, programs, messages, or available information.~~
  - ~~(11) — Informational posters on community bulletin boards.~~

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**2019 - June 5 - Letter Ballot LB2-2019**

34 Approved, 1 Disapproved, 1 Approved with comment

Erich Trombley – Disapproved with reason:

Disapprove. Section 2.5 pertains to message delivery, however, the proposed language under 2.5(b) speaks to stakeholder audiences. Further, the code already requires residents and business owners along the pipeline be included in the affected public stakeholder group, whether a direct customer or not. Rather than include the proposed language, perhaps the guide material could simply reference Appendix D of RP1162 which provides detailed guidelines for message delivery methods and/or media.