

1:00 – 1:15 p.m.	Alan Mayberry, Associate Administrator	Welcome – Opening Remarks
1:15 – 2:45 p.m.	Lee Travis, Senior Safety Advisor, TC Energy Chris Williams, Vice President, Pipeline Operations, Cheniere Josie Long, Consultant, P-PIC Consultants	"Integrating Pipeline Organizational Culture and Management Systems"
2:45 – 3:15 p.m.	Erin Kurilla, Vice President, American Pipeline Gas Association	"APGA Members – On the Journey"
3:15 – 3:30 p.m.	(Break)	
3:30 – 4:00 p.m.	Meredith Wilson, Director, Buckeye Partners	"Implementation of RP 1173"
4:00 – 4:30 p.m.	Jim Francis, Vice President, Safety and Training, CenterPoint Energy	"The Effects of Integration on SMS and its Effect on Safety Culture"
4:30 – 5:00 p.m.	Alan Mayberry, Associate Administrator	Closing Remarks







Pipeline Safety Management Systems 5 Years of API RP 1173

PHMSA PSMS/Safety Culture Workshop February 26, 2020

Alan K. Mayberry, P.E.

Associate Administrator
Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration





PHMSA's Mission

To protect people and the environment by advancing the safe transportation of energy and other hazardous materials that are essential to our daily lives.



Safety Administration

Pipeline and Hazardous Materials



Secretary Chao's Goals

- 1. Safety
- 2. Infrastructure
- 3. Innovation
- 4. Accountability





"Safety Must Always Be #1."

- Secretary Chao





PHMSA's Role

- Establish national minimum safety regulations
- Provide oversight of compliance through riskbased inspections
- Educate stakeholders regarding pipeline safety
- Encourage research into and implementation of new technologies





Inspection and Compliance

Regulations represent the

BARE MINIMUM.

It is the responsibility of the industry to understand and manage pipeline safety risks





Compliance-based Approach to Safety

- Reactive
- Driven by rules
- We do what we have to do
- Focused on conditions, not behavior





The Scope of Our Mission

The scope and complexity of our mission continues to grow.

Therefore, we must regularly assess the ways in which we work to keep pipelines operating safely,

AND reach ZERO incidents.





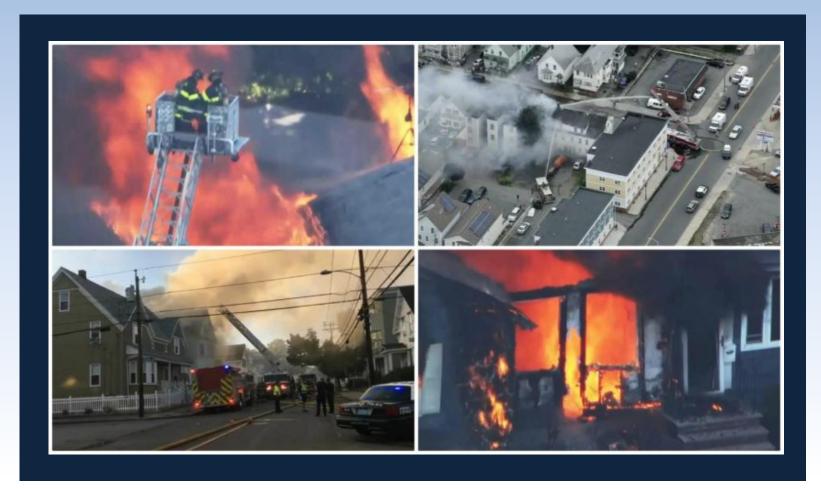
PSMS Current Expectations

- NTSB: Expectation of adoption by the industry
- PHMSA: Expectation of adoption by the industry; no plans to incorporate in regulation
- Congress/Public Stakeholders: Looking for follow-through in absence of regulation





And...



Merrimack, Valley, MA



U.S. Department of Transportation



Will PSMS become adopted into code?

- No, PHMSA does not intend to incorporate API RP 1173 by reference into the federal regulations
- Why? SMS centers around safety culture, behavior change and the way we make decisions that have safety impacts. Efforts to force behavior change usually fail and may have unintended consequences
- However, we have said, we are one bad accident away from Congress mandating SMS





PSMS Related NTSB Recommendations to the Operator

- Management of Change (RP 1173 Section 8.3.1)
 - "Apply MOC process to all changes to adequately identify system threats that could result in a common mode failure"
- Pipeline System Records (RP 1173 Section 14.1)
 - "Review and ensure all records and documentation of...gas systems are traceable, reliable, and complete"





Safety Gaps

PSMS is the key to closing the safety gaps that cause these infrequent yet catastrophic accidents





PSMS

- Conduct Gap Analysis
- Design plans to address gaps based on risk
- Conduct safety culture baseline assessments





Reasons for PSMS Implementation

- 1. It makes good business sense
- 2. Laws require companies to provide safe and reliable service at a reasonable cost
- 3. Companies are obligated to provide safe service





Positive Safety Culture Is Necessary to Ensure PSMS Works in Practice

PSMS = Competence

Safety Culture = Commitment





Culture influences what people see, hear, feel, say, and do





Most importantly, culture influences behavior which impacts decisions and actions in an organization

Ultimately, it is this behavior that drives safety performance





Positive Culture

Positive safety culture starts at the top and permeates the entire organization





Safety Culture

Safety culture must not be restricted to the operational aspects of pipeline safety, but must span all organizational areas





Roadmap to a Strong Safety Culture

- Demonstrate commitment and accountability to safety
- Promote questioning attitudes
- Promote open communication and reporting
- Promote a culture of justice and trust
- Avoid normalization of deviance
- Eliminate production pressures
- Reduce workplace complacency
- View safety as an investment, not a cost
- Empower employees to find and fix problems
- Make bold changes when necessary
- Make safety the highest priority





Culture-based Approach to Safety

- Driven by individual values/accountability
- Do what is right, no matter what
- Positive and engaging
- Proactive
- Driven by safety for all (employees, assets, public, environment)



Safety Administration

Pipeline and Hazardous Materials



Measuring Safety...

We all must change the way we measure safety from
Injuries, deaths, and violations to
the presence of safety in our culture.





Where Will SMS Take Us?



Reactive → **Proactive** → **Predictive**





Perfection is not attainable...

...but if we chase perfection, we can catch excellence!

- Vince Lombardy





Pipeline Safety Leadership

As leaders, our job is to use our influence to ensure this does not happen on our watch.







Upcoming SMS/SC Events

- February 26, 2020 PHMSA Workshop Sugar Land, TX
- March 9, 2020 NTSB Roundtable Washington, DC
- March 10-12, 2020 AGA Workshop Crystal City, VA







Thank You!

















Integrating Pipeline Organizational Culture and Management Systems

February 26, 2020

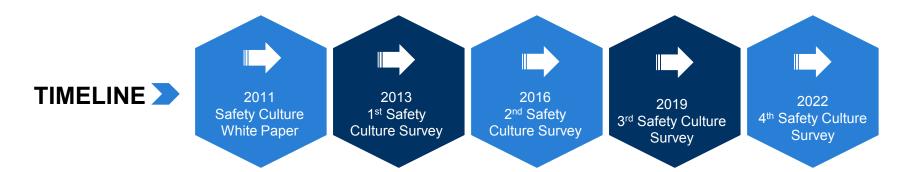
Josie Long, P-PIC Lee Travis, TC Energy Chris Williams, Cheniere

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What is Safety Culture

- Shared views within a company of how important and valued safety is in daily organizational execution of jobs and routines
- Many definitions of safety culture
- Evolving construct
- Industry has developed a common model to identify safety culture indicators that align with PSMS

The INGAA Journey



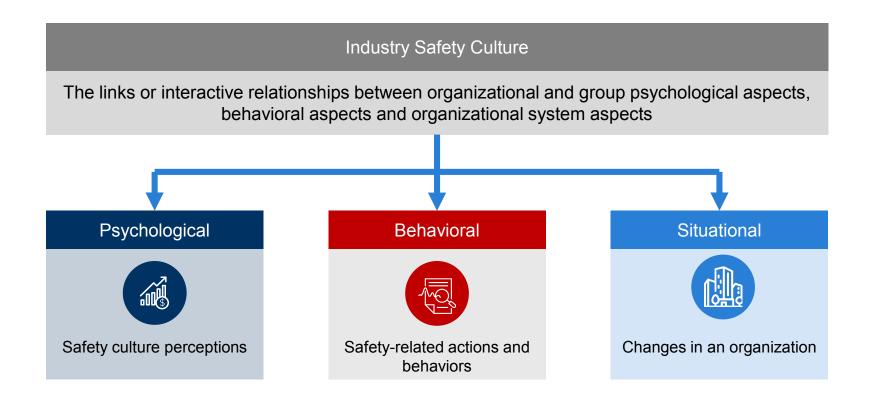
KEY PARTNERSHIPS



- INGAA EH&S Subcommittee
- Dr. Christiane Spitzmueller PhD, University of Houston Industrial Psychology Dept.
- Dr. Dov Zohar PhD, Australia (developed 1st safety climate survey in 1980)
- Dr. Ben Schneider PhD, Fellow, Society for Industrial and Organizational Psychology

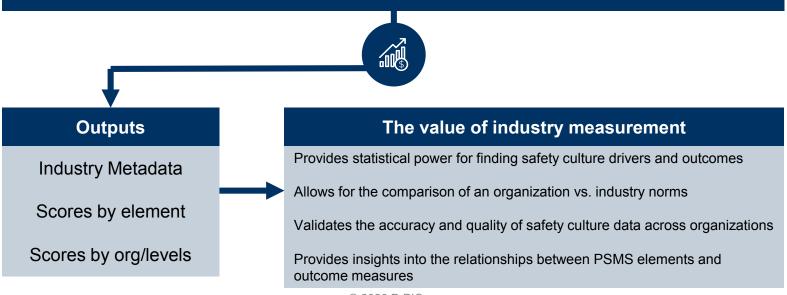
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Safety Culture Working Framework



Safety Culture Perception Surveys

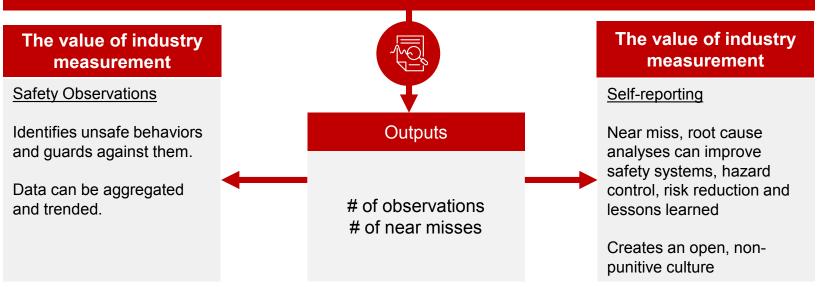
84 survey items that measure employee's safety perceptions along dimensions that reinforce PSMS. Scores aggregated at a workgroup, supervisor, organizational and trade level.



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Safety Behavior Measurement

Safety observations and self-reporting that are monitored in an organization or could be consistently aggregated at an industry level



Situational Changes

Changes in an organization may impact safety culture. This could be process changes, PSMS implementation and maturity changes, restructuring changes, etc.



The 'reciprocal' relationship and linkage

The survey identifies indications of strength of the culture at the group, organization and trade level.

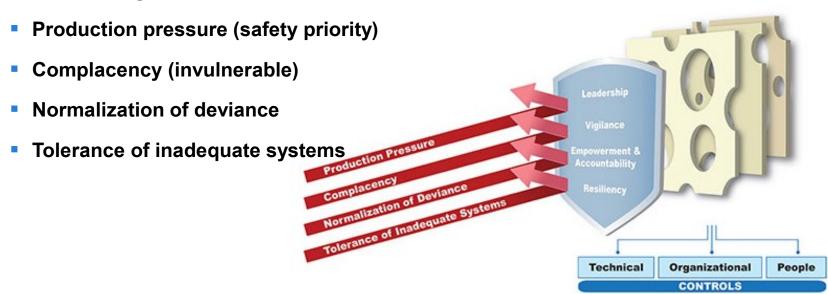
Changes in the system may have a downstream effect on safety culture. The impact may be positive, negative or non-existent. Opportunities to anticipate potential side-effects.

Sample Survey Item and SMS Connection

10 m	Company Many	SMS Catalogue
1. Ek	Survey Item	SMS Category
	My direct supervisor emphasizes safety procedures when we are working under pressure.	Operational Controls
	My direct supervisor values safety as much or more than schedule and cost	Leadership Commitment, Risk Management
	Top management reacts quickly to solve problems when told about safety hazards	Leadership Commitment, Risk Management
	Top management ensures that processes/procedures are routinely assessed for accuracy, completeness and effectiveness	Operational Controls, Safety Assurance
	In my workgroup, we freely discuss any errors/mistakes/near accidents so we can learn from each other	Investigations and Learnings
	In my workgroup, people feel comfortable to voice concerns to our supervisor around any safety issues	Safety Assurance, Internal Engagement
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Building Cultural Defenses

Linkages between perception surveys, safety behaviors and safety systems lead to better processes and safeguards that defend against:

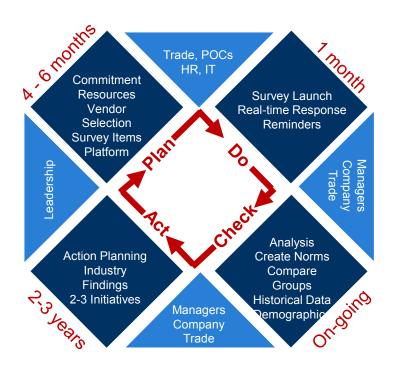


2019 INGAA Safety Culture Survey

- 13 INGAA members 7 participating CEPA members = 20 Total Companies, with over 31,000 participants (76% response rate).
- 84 total questions (survey items),
 broken into different SMS categories.
 Avg ~15-20 minutes to complete
- Survey Launch: May 1-June 9th 2019



Safety Culture Survey Process



Three Survey Takeaways

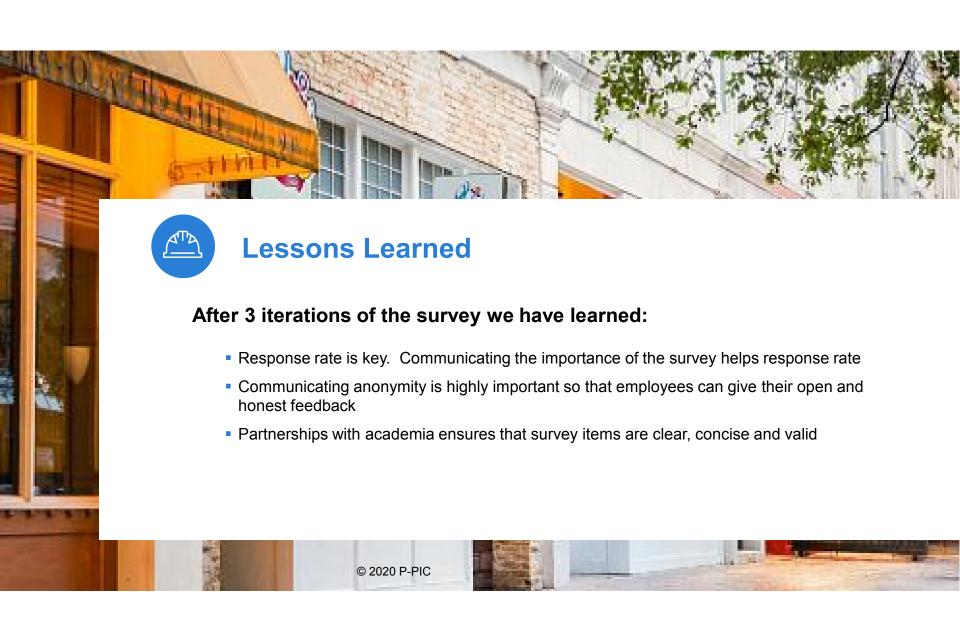
The focus on safety at the Workgroup level is very positive

The attention paid to safety at the field and technical levels was very positive and can be leveraged to improve safety behaviors at all levels of member companies.

Increasing the attention and recognition paid to those who speak-up about safety and attend to safety on their jobs The results for recognizing people who pay special attention to safety issues and those who achieve their safety targets are both low, at 72%. This may be part of the reason the results for the willingness of people to speak up about safety concerns and whether leaders listen to safety improvement ideas are both below 80%.

Having closer connections and communicating with the public about safety

Perception scores were relatively high for public safety considerations during planning for construction projects. However the perceptions were lower for engaging and working with the public.









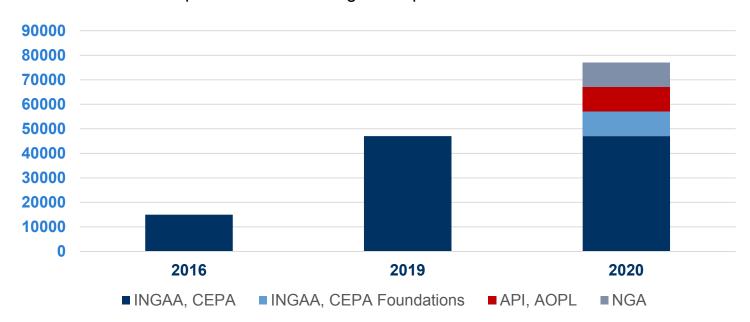




Upcoming 2020 Industry Initiatives

Cumulative # of Employee Participation

Potential to add 80+ new companies. Firm commitments from 36 operators and contractors to date. In the process of confirming LDC operators and contractors





Safety Maturity Rating

BURDEN

Safety is viewed as a hindrance to running the business. Accidents are viewed as "inevitable" by leaders. NECESSITY

Safety is viewed as an externally enforced requirement that must be managed. PRIORITY

Safety is viewed as important and leaders focus on improvement however the organization is still predominantly reactive. **GOAL**

Safety improvement is an explicit goal and is part of executive leadership oversight responsibilities. VALUE

Worker wellbeing and health are recognized as having intrinsic worth. Decisions and activities are oriented to pursing safety for its own sake. **WORLD-CLASS**

Safety is internalized and part of the identity of the organization. The organization is highly sensitive to subtle changes in exposure.

Overall **3.5**



CULTURE

WORKING INTERFACE

EXPOSURE CONTROL SYSTEMS

PERFORMANCE MANAGEMENT

SAFETY NETWORK

DATA MANAGEMENT AND REPORTING



Action Plans

2019 Safety Culture Action	Status	Update
 Safety Culture Maturity Implement INGAA / CEPA safety culture survey and update Safety Culture Maturity rating 	✓ In Progress	 Survey completed on June 7 with a corporate wide participation rate of 82%. Survey results will be available in Q3 with updated Safety Culture Maturity rating in Q4.
 Leadership & Governance Continue leadership training and develop supplemental resources to enhance Safety Leadership Model Best Practices and Transformational Styles 	✓ In Progress	 Ongoing Leading With Safety sustainment sessions are scheduled throughout 2019 in Calgary and Houston for new leaders. Currently at 75% of leaders trained. Safety Leader's Toolkit with H&S resources distributed monthly.
CultureImplement Living Safety at TransCanada training for employees	✓ In Progress ✓ Complete	 Sessions scheduled throughout 2019 in Calgary, Charleston and Houston with 14% of employees trained to date. BU roll out has begun in some regions and continue through 2019 and into 2020.

Key to a Successful Survey

Pre-Survey

- Start planning early
- Who is going to do the work
- Collaboration
 - INGAA, CEPA PM's
 - Leadership, IS, Communications
 - HR, Privacy officer, Interpreters
- Establish a communications plan
- How to increase participation
- Development of a post-survey plan

Post-Survey

- Communicating the results
- The numbers are the numbers
- Look for opportunities to help people understand the results and next steps
- Leverage and recognize early adopters
- Action plan development
- Provide consistent and reoccurring reminders and feedback



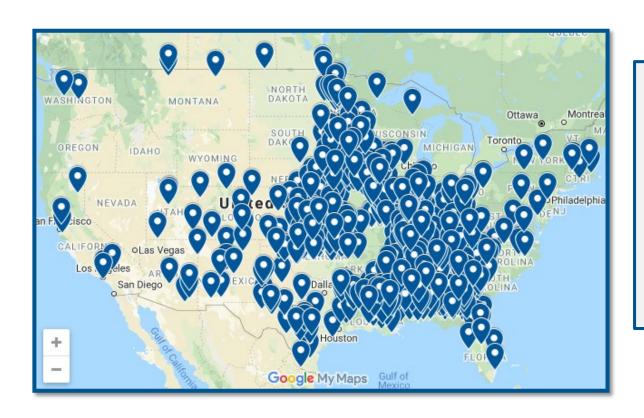


Pipeline Safety Management Systems On the Journey

Erin Kurilla, APGA February 26, 2020



American Public Gas Association



Customers

Smallest: 19

Average: 5,617

Largest: 478,267

Employees

Smallest: 1

Average: 27

Largest: 1,650



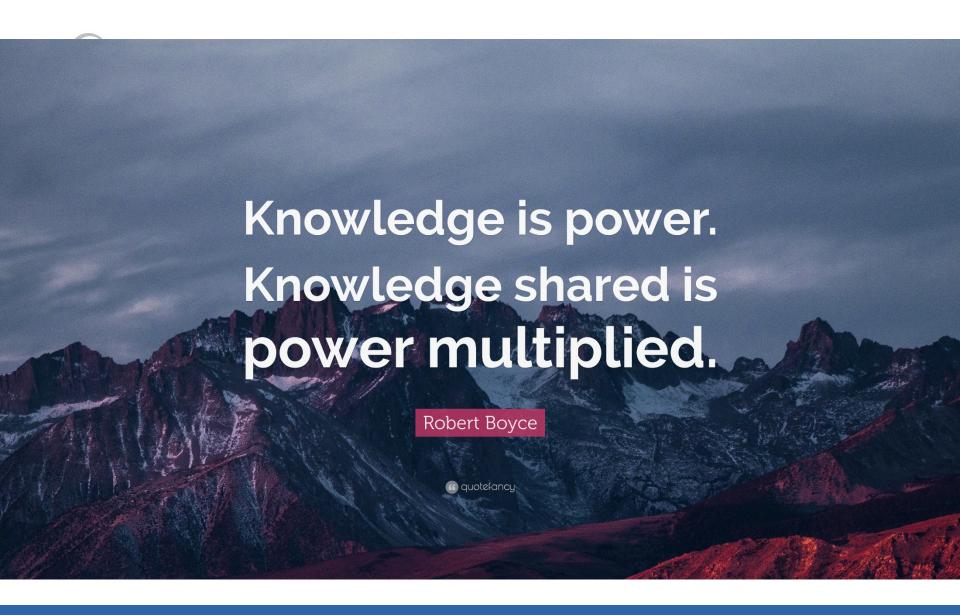
not sure what pipeline sms means

Lack of knowledge on how to go about it.

Never heard of it.

We are just getting acquainted with PSMS; therefore, it is a lack of knowledge that is keeping us from full implementation







Increasing Awareness

Webinar Series

Pipeline Safety Management Systems	December 13, 2019
Management of Change	February 7, 2020
Safety Culture	April 2020
Operational Controls	June 2020
Incident Investigation	August 2020

Workshop

Pipeline Safety Management System	october 28, 2020
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Member Visits
Publication Articles
Virtual Roundtables
Tools & Resources



not sure what pipeline sms means

Lack of knowledge on how to go about it.

No barriers, but other regulatory requirements have placed a lower priority on completing this

We are simply understaffed and have had to prioritize elsewhere right now. I think a gap analysis and PSMS would be a good thing for us, but I haven't figured out how/who to make that happen.

Not enough man power and time

Never heard of it.

We are just getting acquainted with PSMS; therefore, it is a lack of knowledge that is keeping us from full implementation



Action expresses priorities.

Mahatma Gandhi







System Operational Achievement Recognition







Raising the Bar

Has your system **demonstrated commitment** to pipeline safety continuous improvement by using the framework provided in API RP 1173: Pipeline Safety Management Systems?

Has your system **compared** its existing practices against those recommended in API RP 1173: Pipeline Safety Management Systems (For example: the APGA Small Operator Gap Assessment or an equivalent)

Does your system encourage employees to "stop the job" when they observe an unsafe practice or work environment?

Does your system have a **process** in place **to ensure changes** that could impact the safe operations of your system have been **reviewed by necessary employees**?

Does your system have a **process** in place **to ensure changes** that impact the safe operations of your system have been **communicated to** necessary employees?



Another complicated, resource intensive program on top of DIMP, Drug & Alcohol, Damage Prevention, Public Awareness, Emergency Management, Operator Qualification, daily business activities, personnel management.....

Reasons for implementing a PSMS appear to only be for appearance's sake, and provide no actual tangible safety benefit.

not sure what pipeline sms means

Lack of knowledge on how to go about it.

No barriers, but other regulatory requirements have placed a lower priority on completing this

We are simply understaffed and have had to prioritize elsewhere right now. I think a gap analysis and PSMS would be a good thing for us, but I haven't figured out how/who to make that happen.

We are always working on safety, whether it is implementing something new, comparing to things outside of the company, or just fine tuning what we have

Not enough man power and time

Never heard of it.

We are just getting acquainted with PSMS; therefore, it is a lack of knowledge that is keeping us from full implementation

To my knowledge we are doing everything that would be included in a Safety Management System but need another written plan in a 3 ring binder to maintain annually like a hole in the head. I believe all is covered by: O & M, Drug and Alcohol, Employee handbook, Emergency Manual, OQ, Public Awareness, and DIMP.



Knowledge without understanding is useless.

Thucydides





The early stages of SMS implementation have already displayed clear benefits to ensuring the safety of our community and the integrity of our system.

From the collaboration involved with planning to the MOC process, our organization has witnessed healthy discussion across all areas of operations aimed at mitigating risks associated with all projects.

It is evident that as this system grows so will our positive safety culture.



THANK YOU



FACEBOOK.COM/
PUBLICGAS

TWITTER.COM/APGA



Erin Kurilla

Vice President, Operations & Safety ekurilla@apga.org 202-905-2904





Safety & Operations Management System API RP 1173 Implementation Journey

February 26, 2020

Who We Are

Buckeye Partners, L.P., the oldest independent liquid petroleum pipeline operator in the United States, operates a diversified network of integrated assets providing midstream logistic solutions.



6,000 miles of pipeline connected to 100+ delivery locations



110 domestic terminals with 56 million barrels of storage capacity



2,000+ jobs worldwide



7 Global Marine Terminals in Caribbean, NY Harbor & Gulf Coast with 62 million barrels of storage capacity



Buckeye Merchant Services markets refined petroleum & fuel oil





Buckeye's Safety Culture

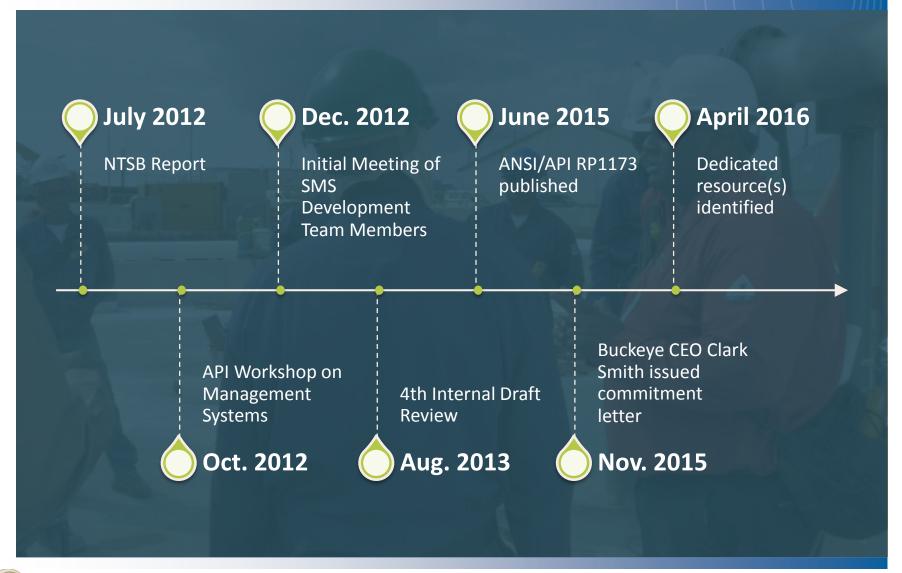
At Buckeye, **Think Safe**, **Work Safe**, **Leave Safe** isn't just a slogan or tagline – it's what influences our decisions.

Our work everyday is underscored by a commitment to safety, environmental stewardship, operational excellence and best-in-class customer service. This work is reflected by our company's mission, guiding principles, and best-in-class programs, risk controls, and management systems.





Early Participation & Commitment to RP 1173





SOMS: Buckeye's Way to Operational Excellence

Safety & Operations Management System - SOMS



- Reinforce the culture of continuous improvement with increased focus on check and act
- Enhance risk management, regulatory compliance and operational excellence
- Provide demonstrable efficiencies and consistency
- Be growth oriented, allowing the safe and reliable integration of new assets and platforms

Categories of SOMS Standards

- Leadership & Management Commitment
- Risk Management
- Stakeholder Engagement
- Operational Controls
- Competence, Awareness & Training

- Documentation & Recordkeeping
- Emergency Preparedness & Response
- Incident Reporting & Investigation
- Performance Assurance
- Leadership Review & Continuous Improvement



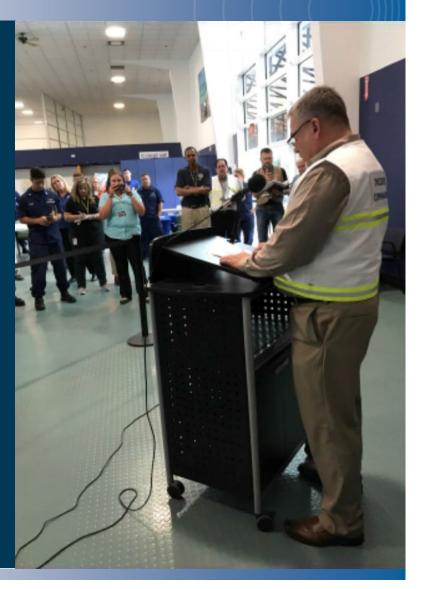
Ongoing Implementation Across Operations

SOMS Planning Phase

- ✓ 10 elements and 25 standards developed 2017-18
- More than 90 employees across the company formed cross-functional/multidisciplined teams for development
- Aimed at setting expectations & identifying efficiencies

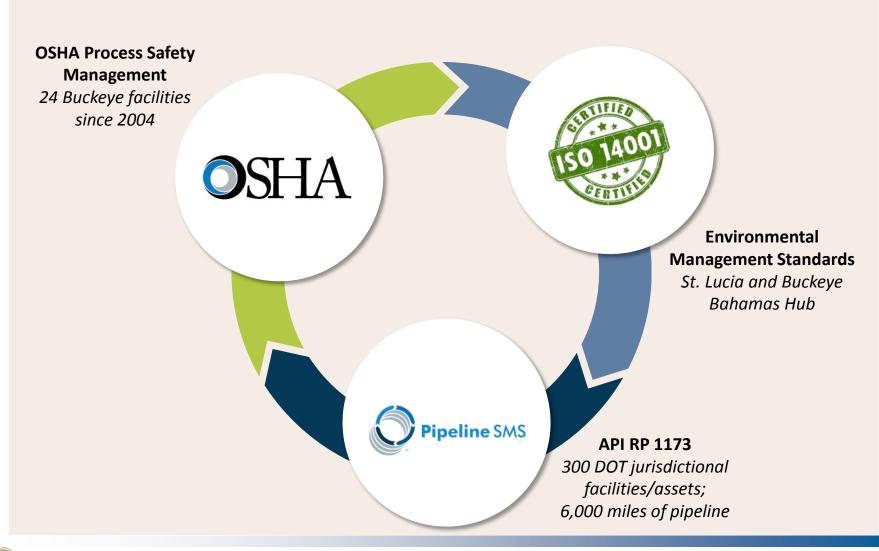
SOMS Gap Assessment Phase

- ✓ January 2019 present
- ✓ Tiered launch of standards for assessment
- ✓ Increased engagement to 200+ employees
- Assessments led by standard owners, 6 months per standard





Keys to Success: Integrated Approach





Keys to Ongoing Success

- ✓ Buckeye's strong safety culture
- **✓** Early involvement in planning and commitment to RPI 1173
- ✓ Implementation of SOMS across operations
- Seamless integration with existing safety management programs
- ✓ Employee engagement through development teams & outreach



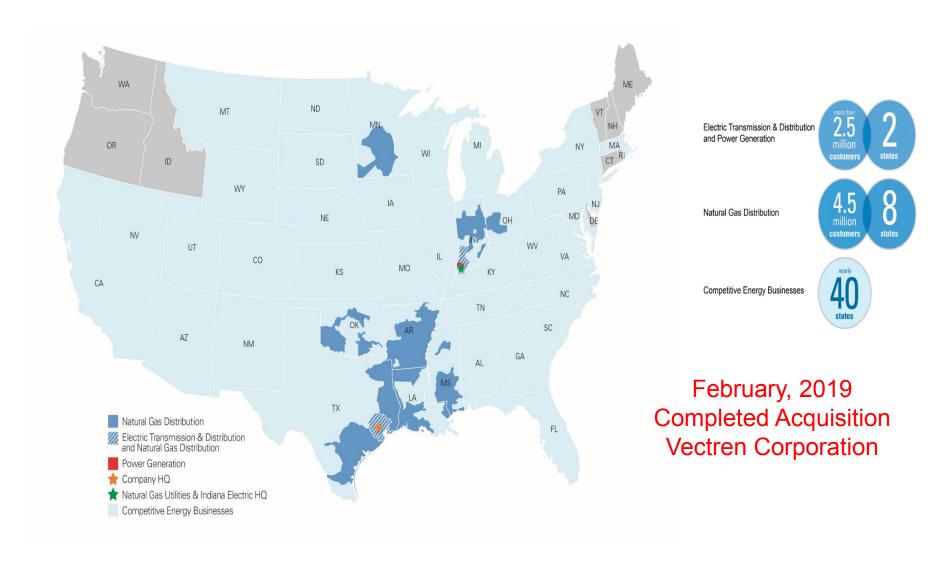


THE EFFECTS OF INTEGRATION ON A SAFETY MANAGEMENT SYSTEM AND ITS EFFECT ON SAFETY CULTURE



CENTERPOINT ENERGY





OUR SMS JOURNEY



Assessment

2015

Baseline Assessment
Gap Analysis
Organizational Structure
Role Definition – QA/QC/Audit
Implementation Plan

Organizational Structure Competency Assessment MOC Program Development

Implementation

Progress Assessment
Contractor Engagement
Risk Mitigation
Continuous Improvement Process
Implementation Auditing

CNP - Vectren Merger

Growth

Socialization
Role Definition
Organizational Structure
Implementation Plan
Program Merger

2016

Communication
Process Development
Governance Structure
Risk Management
Employee Engagement

Socialization

Gap Analysis Implementation Plan 2018

Progress Assessment Control Testing Competency, Awareness & Training Expansion to Electric

Maturation

MOC Implementation Socialization Competency Development

OUR CHALLENGE



- Organizational Size & Structure
 - Many more Stakeholders Employees,
 Contractors, Public, Regulators, Etc
 - Benefits Business, Process & Culture
- Cultural Norms & Differences
 - Best of Both
- Awareness & Socialization
 - Leveraging the Connected, Mavens& Sales People
- Engagement
 - Risk Identification and Assessment
 - Risk Mitigation

- Procedural Control & Execution
- Interdependencies & Departmental Relationships
 - Process Ownership & Handoffs
- Continuous Improvement Process
 - Empowerment of Employees
 - Structure Problem Solving
 - Leadership Support
- Recognition & Reward
 - Personalized vs Corporate
- Resources
 - Quality Assurance & Quality Control

INTEGRATED SAFETY MANAGEMENT SYSTEM

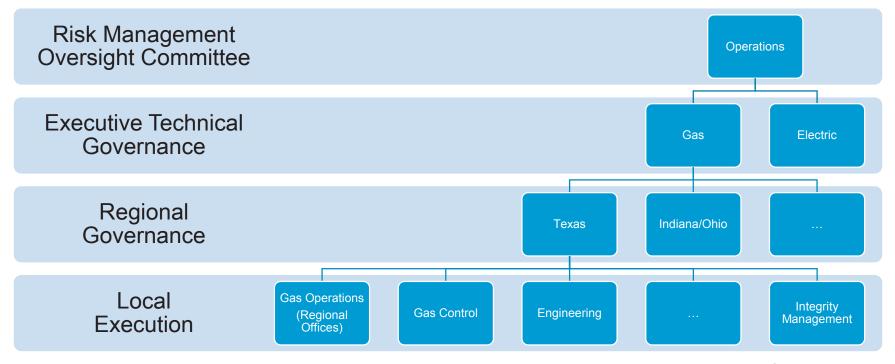




INTENTIONALITY, ENGAGEMENT & GOVERNANCE



- Intentional and re-occurring localized risk management processes
- Supported by a tiered governance process



- Drives greater visibility into risk mitigation activities and better identifies safety goals and objectives.
- Provides a model of what is possible at an industry level.

EFFECT ON SAFETY CULTURE



BEFORE SMS

- Operator Qualification
- Compliance Focused
- Localized Root Cause Analysis
- Isolated Solutions
- Hero
- Authoritative
- Reactive

AFTER SMS

- Performance Evaluations
- Quality Focused
- Root Cause Analysis & Lessons Learned
- Culture of Collaboration & Accountability
- Champions of Safety
- Engagement and Accountability
- Preventive

Continuous Improvement Enabled

QUESTIONS & CONTACT INFORMATION



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