

**BEFORE THE**  
**PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION**  
**UNITED STATES DEPARTMENT OF TRANSPORTATION**  
**WASHINGTON, D.C.**

Pipeline Safety: Request for Revision )  
of a Previously Approved Information )  
Collection—National Pipeline Mapping )  
System Program )

Docket No. PHMSA–2014–0092

**COMMENTS OF THE AMERICAN PUBLIC GAS ASSOCIATION**

The American Public Gas Association (“APGA”) is the national, non-profit association of publicly-owned natural gas distribution systems. APGA was formed in 1961 as a non-profit, non-partisan organization, and currently has approximately 700 members in 36 states. Overall, there are nearly 1,000 municipally-owned systems in the U.S. serving more than five million customers. Publicly-owned gas systems are not-for-profit retail distribution entities that are owned by, and accountable to, the citizens they serve. They include municipal gas distribution systems, public utility districts, county districts, and other public agencies that have natural gas distribution facilities.

On July 30, 2014 the Pipeline and Hazardous Materials Safety Administration (PHMSA) published a notice in the Federal Register requesting comments on a proposal to revise the information that PHMSA requires operators of hazardous liquid pipeline, natural gas transmission pipeline and liquefied natural gas facilities to provide to PHMSA’s National Pipeline Mapping System (NPMS). Among other requirements, PHMSA proposed to require operators of natural gas transmission pipelines to submit data on 24 additional attributes of the pipeline including Maximum Allowable Operating Pressure (MAOP), pipe grade, coating type, year of construction, wall thickness, seam type, throughput and more.

In addition, PHMSA proposes that for pipeline segments located within Class 3, Class 4, High Consequence Areas (HCA), or “could affect” HCAs, operators submit data to the NPMS with a positional accuracy of five feet. PHMSA further proposes that for all pipeline segments located within Class 1 or Class 2 locations, operators submit data to the NPMS with a positional accuracy of 50 feet.

On November 17, 2014 PHMSA held a public meeting to discuss the proposed revisions to NPMS reporting. Speakers included PHMSA, state pipeline safety agencies, emergency responders and industry representatives. APGA attended that public meeting.

Fifty-three APGA members operate pipe that is classified as transmission and therefore must file data on their pipelines to the NPMS. Virtually all APGA members receive natural gas delivered through transmission pipelines, however, and assuming the pipelines will pass on to customers the costs of complying with PHMSA’s revised reporting requirements, all APGA members will be affected by the proposed changes. APGA is, therefore, vitally interested in this proposal.

### **Comments:**

APGA supports PHMSA collecting information on pipelines that is necessary for PHMSA to perform its duties under the Natural Gas Pipeline Safety Act. APGA also supports providing emergency responders, local government officials and the general public with information about pipelines that are within their jurisdiction or near where they live and work, although the level of detail provided to each of these stakeholders will be different depending on their need to know.

APGA is concerned, however, that some of the data elements PHMSA is proposing to add to the NPMS will be expensive to collect and of questionable value to PHMSA and other NPMS users. In particular, APGA questions the need for data to be provided with a positional accuracy of 5 feet. According to [www.gps.gov](http://www.gps.gov), “the GPS signal in space will provide a “worst case” pseudorange accuracy of 7.8 meters (approximately 25 feet) at a 95% confidence level.” Recently installed pipelines and segments of pipelines that have been recently relocated or replaced may have the positional accuracy requested, however, other pipeline segments have generally not been surveyed or exposed to capture GPS coordinates. To do so would require an extraordinary level of effort and expense. Obtaining accuracies within 5 feet would require special surveys and equipment. At the public meeting, a representative from the Interstate Natural Gas Association of America (INGAA) stated that surveying all gas transmission pipelines in class 3 and 4 areas or that could affect HCA’s would cost over \$800 million. For purposes of the NPMS and emergency responders, knowing that a pipeline exists within a defined easement should be sufficient.

None of the government or emergency responder panelists at the November 17 meeting could state a clear need for positional accuracy within 5 feet. The volunteer fireman cited the Sissonville, WV pipeline accident where he had difficulty determining which of 2 pipelines in the right of way had ruptured. He also stated that, due to radiant heat from the fire, no one could get within 200 yards of the ruptured line. APGA fails to see the benefit of 5 foot accuracy when taking GPS measurements using a device that is accurate only to 25 feet, and the measurements are made from over 200 yards away.

He also cited a third pipeline that did not even appear in the NPMS because it was a non-jurisdictional gathering line. Even with improved accuracy for the pipelines that are in the NPMS, there still would have been no data for this pipeline or any other pipeline not required to submit data to the NPMS.

APGA supports the alternative described by representatives from INGAA and American Petroleum Institute (API) that would call for greater accuracy than the current 500 feet standard and reduce the compliance cost by allowing pipeline operators to survey the pipelines in conjunction with integrity management assessments.

Of the 25 additional data elements, APGA is particularly concerned about PHMSA's request for pipeline throughput. In the July 30 Federal Register notice PHMSA states that

“Throughput is used to denote a pipeline's capacity by stating the pipelines ability to flow a measured amount of product per unit of time. PHMSA proposes operators submit average daily throughput so States can better identify shortages and implement contingency plans for potential widespread pipeline service outages to maintain an uninterrupted flow of energy supplies.” [Emphasis added]

First, “throughput” is not the same as “capacity.” Virtually all pipelines operate at something less than 100% capacity, so throughput will be less than capacity. Second, transmission lines operated by Local Distribution Companies (LDCs) often contain unmetered branches for which average daily throughput cannot be reliably established. Finally, APGA does not believe it is within PHMSA's statutory authority to collect data to help states “identify shortages and implement contingency plans for potential widespread pipeline service outages to maintain an uninterrupted flow of energy supplies.” This is more appropriately handled by the Department of Energy and/or the Federal Energy Regulatory Commission.

## Conclusion:

APGA is concerned that PHMSA has not provided adequate justification that it needs + or – 5 foot accuracy in data submitted to the NPMS in order to accomplish PHMSA's mission. It will be very expensive for transmission pipeline operators to achieve such accuracy and undoubtedly these operators will want to pass on these costs to APGA's members and others that transport gas through interstate transmission pipelines. APGA urges PHMSA to adopt more reasonable accuracy standards such as those proposed by INGAA and API at the November 17 public meeting.

APGA appreciates the opportunity to comment on this proposal. Any questions concerning these comments should be directed to John Erickson, APGA Vice President, Operations (202-464-2742, ext 1002 or [jerickson@apga.org](mailto:jerickson@apga.org)).

A handwritten signature in black ink, appearing to read "Bert Kalisch". The signature is written in a cursive, somewhat stylized font.

Bert Kalisch, President and CEO