

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)	Docket No. PHMSA–2014–0092
Collection—National Pipeline Mapping)	
System Program)	

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 proposed 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.

APGA provided written comments on this proposal supporting PHMSA collecting information on pipelines that is necessary for PHMSA to perform its duties under the Natural Gas Pipeline Safety Act. APGA's comments also supported 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. APGA's comments expressed concern, however, that some of the data elements PHMSA was proposing to add to the NPMS would be expensive to collect and of questionable value to PHMSA and other NPMS users. In particular, APGA questioned the need for data to be provided with a positional accuracy of 5 feet.

On August 27, 2015 PHMSA published a revised proposal that would require that gas transmission operators submit data at ± 50 feet accuracy for all segments which are in a Class 2, Class 3, or Class 4 area; are within a HCA or have one or more buildings intended for human occupancy; an identified site; a right-of-way for a designated interstate; freeway, expressway, or other principal 4-lane arterial roadway within its potential impact radius. All other gas pipeline segments would be mapped to a positional accuracy of ± 100 feet.

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 commends PHMSA for addressing APGA's concerns in the latest proposed revisions to the NPMS. We still question the need for PHMSA to know the location of pipelines within 50 feet however such a standard will be much less costly than PHMSA's original proposal to require accuracy within 5 feet.

APGA does request that PHMSA clarify that nothing in this proposal would require operators of transmission lines to perform any tests or make modifications to these pipelines to accommodate inline inspections (ILI) tools. PHMSA is requesting information about whether the pipeline is capable of being inspected with ILI tools -- and the date of the last ILI inspection. The proposal asks for "data detailing the year of a pipeline's last corrosion, dent, crack or "other" ILI assessment."

A large portion of the gas transmission lines operated by APGA members are 4 inches or less in diameter and not designed to accommodate ILI tools, therefore many of these lines have never been inspected with any type of ILI tool. APGA seeks confirmation that nothing in this proposal requires operators to modify transmission lines to accommodate ILI tools nor to conduct ILI inspections if not required by another provision in the pipeline safety regulations.

In addition the proposal asks for the year and pressure of last and original pressure test: APGA seeks confirmation that nothing in this proposal would require operators to conduct additional pressure tests on existing transmission lines.

APGA appreciates the opportunity to comment on this proposal. Any questions concerning these comments should be directed to John Erickson, APGA Vice President, Operations (202-464-0834) or jerickson@apga.org.

A handwritten signature in black ink, appearing to read "Bert Kalisch". The signature is fluid and cursive, with the first name "Bert" and last name "Kalisch" clearly distinguishable.

Bert Kalisch, President and CEO