BEFORE THE

PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION

UNITED STATES DEPARTMENT OF TRANSPORTATION

WASHINGTON, D.C.

Pipeline Safety: Information Collection Activities, Revision to Gas Distribution Annual Report	)))	Docket PHMSA–2013–0004

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. All APGA members must file distribution annual reports with the Pipeline and Hazardous Materials Safety Administration (PHMSA), therefore we are vitally interested in this rulemaking.

General Comments:

APGA supports the gathering of accurate and timely data about the natural gas distribution infrastructure. APGA and its members use PHMSA's data in a number of ways to promote pipeline safety. APGA merges the PHMSA distribution annual report data with data from the Energy Information Agency and APGA surveys to create a benchmarking program allowing members to compare their system's performance with national averages or a self-defined peer group. In addition, many APGA members rely on the Simple, Handy, Risk-based Integrity Management Plan (SHRIMP) Program to create their Distribution Integrity Management plans. The risk ranking model in SHRIMP includes an "Incident Probability" factor representing the probability that a failure due to any one of eight causes will result in death, injury or significant property loss (e.g. result in a reportable incident). This factor is calculated by dividing the number of reportable

incidents in PHMSA's Distribution Incident database due to a cause by the number of failures (leaks repaired) in PHMSA's Distribution Annual Report database due to that cause during the same time period.

This assumes that a reportable incident and the resulting leak repair are reported on the annual incident report and annual report, respectively, under the same cause category. As shown in Table 1 of these comments, this is not always the case because PHMSA's cause definitions are not consistent in the instructions for these two reports.

We believe that clarification of the leak classification descriptions is critical to pipeline safety programs. This is one of the most misunderstood and inconsistently applied aspects of Part 192. Inconsistent classification of leaks complicates and undermines the effectiveness of integrity management programs and all other uses of PHHMSA's data. Until the confusion and inconsistencies surrounding leak classifications is remedied, meaningful metrics on many of the leak categories will be difficult to develop.

APGA Recommendation: APGA strongly urges PHMSA to adopt consistent cause definitions for incident and annual reports, and anywhere else that such definitions are used within the pipeline safety program. Since only the annual report instructions are open for comment at this time, APGA has proposed changes to the annual report definitions that are, with a few exceptions noted below, consistent with the existing incident report cause definitions.

Specific Comments:

Part A, Section 7:

PHMSA proposal:

> *THIS REPORT PERTAINS TO THE FOLLOWING TYPE OF OPERATOR (Select Type of Operator based on the structure of the company included in this OPID for which this report is being submitted.):*
>
> - *Municipal*
> - *Privately Owned*
> - *Other (e.g., cooperatives, public utility districts, etc.)*

APGA Recommendation: PHMSA's proposed definitions of operator type are not consistent with standard industry practice. Public utility districts, for example, are typically considered municipal utilities. "Privately owned" usually excludes investor-owned utilities. The Energy Information Agency Form EIA-176 requires distribution operators to classify the operator type into 5 categories:

- Investor-owned,

- Municipally-owned (Including utility districts, authorities and commissions),
- Privately-owned,
- Cooperative and
- Other.

Unfortunately EIA does not provide any definitions for these categories, however distribution operators have been completing EIA Form 176 for many years and should be familiar with this classification system. APGA urges PHMSA to adopt the 5 operator types found in EIA Form 176. APGA uses PHMSA's annual report data and EIA's Form 176 data in a benchmarking program, so consistency between the EIA and PHMSA reports would be beneficial to APGA and, most likely, to other users of PHMSA's data as well.

Part B, Sections 1, 2 & 3:

PHMSA proposal:

PHMSA has added the terms "Reconditioned Cast Iron" in Section B1 and "Rehabilitated Cast Iron" in Sections B2 and B3. The Instructions define "reconditioned," but not "rehabilitated."

APGA Recommendation: APGA urges PHMSA to use the same terminology in all three sections. APGA suggests using the term "reconditioned" in all three sections since that term is defined in the instructions.

Part C Leaks Repaired By Cause

PHMSA proposal:

PHMSA is proposing minor changes to the eight leak cause categories and the definitions of leak causes in the instructions for completing the Distribution Annual Report. Under the current definitions, some leak repairs following reportable incidents would be reported under different cause categories on the Incident and Annual report forms. In general, the Incident Report instructions include much more guidance about the types of leaks that go into each cause category.

APGA Recommendation: APGA urges PHMSA to adopt more substantive changes to the leak cause definitions to make the definitions consistent with how incident cause is reported on the distribution Incident Report form. In Table 1 APGA has copied PHMSA's proposed cause definitions from this rulemaking (Column 2) and the existing Incident Report cause definitions from the Distribution Incident Report instructions (Column 3). In column 4 APGA has created new definitions for the 8 cause categories that are virtually identical to the current Incident Report Form instructions with a few exceptions noted below.

APGA urges PHMSA to replace the leak cause definitions in its proposed Distribution Annual Report form instructions with the definitions shown in Table 1, Column 4 of these comments.

TREATMENT OF VEHICULAR DAMAGE

PHMSA Proposal:

PHMSA's instructions specify that an incident caused by a vehicle striking a gas meter set would be reported on the Distribution Incident Report form as "Other Outside Force," however the repair of the leak would be reported on the Distribution Annual Report form as "Excavation."

APGA Recommendation: APGA believes that the Incident Report treatment of vehicular damage as "Other Outside Force" is preferable and encourages PHMSA to amend the instructions for the Annual Report form to be consistent with the Incident Report instructions.

NATURAL FORCE DAMAGE:

PHMSA proposal: The Incident Report instructions instruct operators to classify as "Other Outside Force" incidents in which high winds cause damage by impact from objects blown by wind, This is inconsistent with other statements in the instructions and forms that suggest the "Other Outside Force" category is intended for events in which humans are involved. That is certainly how users of the Annual and Incident report data will interpret these data.

APGA Recommendation: APGA suggests amending the Annual Report form instructions to include wind-blown object damage under the "Natural Force Damage" category as shown in Table 1, Column 4. When the Incident Report instructions are next open for comment APGA urges PHMSA to make similar changes to the Incident Report Form instructions.

EXCAVATION DAMAGE:

PHMSA proposal:

The Incident Report form instructions instruct operators to report as "Other Outside Force" " or "Natural Force Damage" any incidents caused by excavation damage that did not result in an immediate leak but rather failed sometime later. APGA believes that these incidents and leak repairs should both be reported as "Excavation Damage," unless the coating is damaged and a corrosion leak develops, in which case this should be classified as a corrosion leak.

APGA Recommendation: APGA has proposed definitions of both the excavation damage and other outside force categories to reflect this suggestion. APGA urges PHMSA to adopt the definition of excavation damage as shown in Table 1, Column 4. When the Incident Report instructions are next open for comment APGA urges PHMSA to make similar changes to the Incident Report Form instructions.

PIPE, WELD, OR JOINT FAILURE:

PHMSA proposal:

In this rulemaking PHMSA has proposed to keep the existing definition of Pipe, Weld or Joint Failure that includes leaks "resulting from failure of original sound material from force applied during construction that caused a dent, gouge, excessive stress, or other defect that eventually resulted in a leak." The current incident report instructions, however, instruct the operator to report Previous Mechanical Damage NOT Related to Excavation under Other Outside Force.

APGA Recommendation: APGA has proposed below to amend the Annual Report Form instructions for Pipe, Weld or Joint Failure to clarify that leaks resulting from failure of original sound material from force applied during construction that caused a dent, gouge, excessive stress, or other defect that eventually resulted in a leak should be reported as "Other Outside Force." APGA urges PHMSA to adopt the definition of Other Outside force as shown in Table 1, Column 4.

CORRROSION FAILURE:

PHMSA proposal:

PHMSA proposes to keep the existing definition of a corrosion-caused leak as leak resulting from a hole in the pipe or other component that was caused by galvanic, bacterial, chemical, stray current, or other corrosive action.

APGA Recommendation: APGA urges PHMSA to adopt the more detailed definition of a corrosion failure shown in Table 1, Column 4. This definition is based on the existing corrosion failure definition from the Distribution Incident Report form instructions with one exception: The instruction that "If the bonnet, packing, or other gasket has deteriorated before the end of its expected life but not due to corrosive action, it is classified as a Material Defect," "Material Defect" has been changed to "Other" to be consistent with the instruction for PIPE, WELD, OR JOINT FAILURE.

Table 1: Leak Repair and Incident Cause Definitions

Cause Category	**Annual Report Definition (from proposed rule 2/13/13)**	**Incident Report Definition**	**APGA Proposed Annual Report Leak Cause Definitions**
CORROSION FAILURE	leak resulting from a hole in the pipe or other component that was caused by galvanic, bacterial, chemical, stray current, or other corrosive action.	Corrosion includes a leak or failure caused by galvanic, atmospheric, stray current, microbiological, or other corrosive action, and, for the purposes of this reporting, includes selective seam corrosion. A corrosion leak is not limited to a hole in the pipe. If the bonnet or packing gland on a valve or flange on piping deteriorates or becomes loose and leaks due to corrosion and failure of bolts, it is classified as Corrosion. (If the bonnet, packing, or other gasket has deteriorated before the end of its expected life but not due to corrosive action, it is classified as a Material Defect.)	A leak caused by galvanic, atmospheric, stray current, microbiological, or other corrosive action, and, for the purposes of this reporting, includes selective seam corrosion. A corrosion leak is not limited to a hole in the pipe. If the bonnet or packing gland on a valve or flange on piping deteriorates or becomes loose and leaks due to corrosion and failure of bolts, it is classified as Corrosion. (If the bonnet, packing, or other gasket has deteriorated before the end of its expected life but not due to corrosive action, it is classified as a PIPE, WELD, OR JOINT FAILURE). Leaks resulting from any type of corrosion should be classified as corrosion, regardless of why the component corroded. Failure to coat or paint a pipe, poorly applied coatings, and damage from the coating that renders the coating ineffective are all to be classified as corrosion leaks if the pipe

			eventually corroded.
NATURAL FORCE DAMAGE:	leak resulting from earth movements, earthquakes, landslides, subsidence, lightning, heavy rains/floods, washouts, flotation, mudslide, scouring, temperature, frost heave, frozen components, high winds, or similar natural causes.	This category includes all outside forces attributable to causes NOT involving humans. Earth Movement NOT due to Heavy Rains/Floods refers to incidents caused by land shifts such as earthquakes, landslides, or subsidence, but not mudslides which are presumed to be initiated by heavy rains or floods. Heavy Rains/Floods refer to all water related incident. While mudslides involve earth movement, report them here since typically they are an effect of heavy rains or floods. Lightning includes both damage and/or fire caused by a direct lighting strike and damage and/or fire as a secondary effect from a lightning strike in the area. An example of such a secondary effect would be a forest fire started by lightning that results in damage to a pipeline system asset which results in an incident. Temperature refers to those causes that are related to ambient temperature effects, either heat or cold, where temperature was the initial cause. Thermal stress refers to mechanical stress	A leak caused by outside forces attributable to causes NOT involving humans, such as Earth Movement, Heavy Rains/Floods, Lightning, Temperature, Thermal stress, Frozen components, High Winds etc. Earth movement includes but is not limited to earthquakes, landslides, subsidence, washouts, mudslides, scouring. Lightning includes both damage and/or fire caused by a direct lighting strike and damage and/or fire as a secondary effect from a lightning strike in the area. Temperature refers to those causes that are related to ambient temperature effects, either heat or cold, where temperature was the initial cause. Thermal stress refers to mechanical stress induced in a pipe or component when some or all of its parts are not free to expand or contract in response to changes in temperature. Frozen components would include incidents where components are inoperable because of freezing and those due to cracking of a piece of equipment due to expansion of water during a freeze cycle.

		induced in a pipe or component when some or all of its parts are not free to expand or contract in response to changes in temperature. Frozen components would include incidents where components are inoperable because of freezing and those due to cracking of a piece of equipment due to expansion of water during a freeze cycle. High Winds includes damage caused by wind induced forces. Select this category if the damage is due to the force of the wind itself. Damage caused by impact from objects blown by wind would be reported as section G4 "Other Outside Force Damage".	High Winds includes damage caused by wind induced forces and damage caused by impact from objects blown by wind,
EXCAVATION DAMAGE:	leak resulting from damage caused by earth moving or other equipment, tools, or vehicles. Include leaks from damage by operator's personnel or contractor or people not associated with the operator.	This section covers damage inflicted by the operator, operator's contractor, or entities unrelated to the operator during excavation that results in an immediate release of gas. Damage from outside forces OTHER than excavation that results in an immediate release, use G2 "Natural Force Damage" or G4 "Other Outside Force" as appropriate. For a strike or other damage to a pipeline or facility that results in a later release,	A leak resulting from damage inflicted by the operator, operator's contractor, or entities unrelated to the operator during excavation activities that results in an immediate release of gas. Excavation activities include potholing and any type of damage related to uncovering a pipe or backfilling a trench. If a facility is damaged by the operator's crews or contractor during excavation, the leak should be classified as

		report the incident in Section G4 as “Rupture or Failure Due to Previous Mechanical Damage.”	excavation regardless of whether the operator was following policies and procedures defined by the operator. Leaks due to damage from outside forces OTHER than excavation should be included under “Natural Force Damage” or “Other Outside Force” as appropriate. If the coating is damaged and a corrosion leak develops, this should be classified as a corrosion leak.
OTHER OUTSIDE FORCE DAMAGE: .	Include leaks caused by fire or explosion and deliberate or willful acts, such as vandalism.	This section covers incidents caused by outside force damage, other than excavation damage or natural forces. Nearby Industrial, Man-made or Other Fire/Explosion as Primary Cause of Incident applies to situations where the fire occurred before and caused the release. An example of such a failure would be an explosion/fire at a neighboring facility or structure that results in a release at the location of the incident. This section should not be used if the release occurred first and then the gas ignited. If the fire is known to have been started as a result of a lightning strike, the incident’s cause should be classified under Section G2, “Natural Force Damage.” Arson	A leak resulting from outside force damage, other than excavation damage or natural forces such as • Nearby Industrial, Man-made or Other Fire/Explosion as Primary Cause of Incident (unless the fire was caused by natural forces, in which case the leak should be classified Natural Forces. Forest fires that are caused by human activity and result in a release should be reported as Other Outside Force), • Damage by Car, Truck, or Other Motorized Vehicle/Equipmen

		events directed at harming the pipeline or the operator should be reported as “Intentional Damage” in this section. Forest fires that are caused by human activity and result in a release should be reported in this section. Damage by Car, Truck, or Other Motorized Vehicle/Equipment NOT Engaged in Excavation. An example would be damage to a meter set caused by vehicle impact. Other motorized vehicles/equipment includes tractors, backhoes, bulldozers and other tracked vehicles, and heavy equipment that can move. Include under this sub-cause incidents caused by vehicles operated by the pipeline operator, the pipeline operator’s contractor, or a third party and specify the vehicle/equipment operator’s affiliation as appropriate. Pipeline incidents resulting from vehicular traffic loading or other contact should also be reported in this category. If the activity involved digging, drilling, boring, grading, cultivation or similar activities, report in Section G3 “Excavation Damage”.	t NOT Engaged in Excavation. Other motorized vehicles/equipment includes tractors, mowers, backhoes, bulldozers and other tracked vehicles, and heavy equipment that can move. Leaks resulting from vehicular traffic loading or other contact (except report as “Excavation Damage” if the activity involved digging, drilling, boring, grading, cultivation or similar activities. • Damage by Boats, Barges, Drilling Rigs, or Other Maritime Equipment or Vessels so long as those activities are not excavation activities. If those activities are excavation activities such as dredging or bank stabilization or renewal, the leak repair should be reported as “Excavation Damage”. • Previous Mechanical

		Damage by Boats, Barges, Drilling Rigs, or Other Maritime Equipment or Vessels Set Adrift or Which Have Otherwise Lost Their Mooring. This sub-cause includes impacts by maritime equipment or vessels that have lost their moorings and are carried into the pipeline by the current. This sub-cause also includes maritime equipment or vessels set adrift as a result of severe weather events and carried into the pipeline by current or high winds. In such cases, also indicate the type of severe weather event. Do not report in this sub-cause incidents which are caused by impact of maritime equipment or vessels while they are engaged in their normal or routine activities; such incidents should be reported as "Routine or Normal Fishing or Other Maritime Activity NOT Engaged in Excavation" so long as those activities are not excavation activities. If those activities are excavation activities such as dredging or bank stabilization or renewal, the accident should be reported in Section G3, "Excavation Damage". Routine or Normal Fishing or Other Maritime	Damage NOT Related to Excavation. A leak caused by damage that occurred at some time prior to the release, including prior outside force damage of an unknown nature, prior natural force damage, and prior damage from other outside forces. Leaks resulting from damage sustained during construction, installation, or fabrication of the pipe or a weld should be reported as "Pipe, Weld or Joint Failure." Leaks resulting from prior excavation damage should be reported as "Excavation Damage" unless due to corrosion in which case it should be reported as a corrosion leak. • Intentional Damage/. Vandalism means willful or malicious destruction of the operator's pipeline facility or equipment. This

		Activity NOT Engaged in Excavation. This sub-cause includes incidents due to shrimping, purseining, oil drilling, or oilfield workover rigs, including anchor strikes, and other routine or normal maritime-related activities UNLESS the movement of the maritime asset was due to a severe weather event (this type of damage should be reported under Damage by Boats, Barges, Drilling Rigs, or Other Maritime Equipment or Vessels Set Adrift or Which Have Otherwise Lost Their Mooring) or the incident was caused by excavation activity such as dredging of waterways or bodies of water (this type of incident should be reported under Section G3, "Excavation Damage."). Previous Mechanical Damage NOT Related to Excavation. This sub-cause covers incidents where damage occurred at some time prior to the release and would include prior excavation damage, prior outside force damage of an unknown nature, prior natural force damage, and prior damage from other outside forces. Incidents resulting from damage sustained during	category would include pranks, systematic damage inflicted to harass the operator, motor vehicle damage that was inflicted intentionally, and a variety of other intentional acts. • Terrorism Terrorism, per 28 C.F.R. § 0.85 General functions, includes the unlawful use of force and violence against persons or property to intimidate or coerce a government, the civilian population, or any segment thereof, in furtherance of political or social objectives. • Theft. Theft means damage by any individual or entity, by any mechanism, specifically to steal, or attempt to steal, the transported gas or pipeline equipment.

		construction, installation, or fabrication of the pipe or a weld should be reported under Section G5, “Material Failure of Pipe or Weld.” Intentional Damage Vandalism means willful or malicious destruction of the operator’s pipeline facility or equipment. This category would include pranks, systematic damage inflicted to harass the operator, motor vehicle damage that was inflicted intentionally, and a variety of other intentional acts. Terrorism, per 28 C.F.R. § 0.85 General functions, includes the unlawful use of force and violence against persons or property to intimidate or coerce a government, the civilian population, or any segment thereof, in furtherance of political or social objectives. Operators selecting this item are encouraged to also notify the FBI. Theft means damage by any individual or entity, by any mechanism, specifically to steal, or attempt to steal, the transported gas or pipeline equipment.	
PIPE, WELD, OR JOINT FAILURE :	leak resulting from failure of original sound material from force applied	This section includes leaks, ruptures or other failures from a defect within the material of the pipe, component or joint	Leaks from a defect within the material of the pipe, component or joint due to faulty manufacturing

	during construction that caused a dent, gouge, excessive stress, or other defect that eventually resulted in a leak. This includes leaks due to faulty wrinkle bends, faulty field welds, and damage sustained in transportation to the construction or fabrication site. Also include leak resulting from a defect in the pipe material, component, or the longitudinal weld or seam due to faulty manufacturing procedures. Leaks from material deterioration, other than corrosion, after exceeding the reasonable service life, are reported under Other	due to faulty manufacturing procedures, defects resulting from poor construction/installation practices, and in-service stresses such as vibration, fatigue and environmental cracking. Fitting means a device, usually metal, for joining lengths of pipe into various piping systems. It includes couplings, ells, tees, crosses, reducers, unions, caps and plugs. Material defect means an inherent flaw in the material or weld that occurred in the manufacture or at a point prior to construction, fabrication or installation. Design defect means an aspect inherent in a component to which a subsequent failure has been attributed that is not associated with errors in installation, i.e., is not a construction defect." This could include, for example, errors in engineering design.	procedures, defects resulting from poor construction/installation practices, and in-service stresses such as vibration, fatigue and environmental cracking. Material defect means an inherent flaw in the material or weld/pipe fusion that occurred in the manufacture or at a point prior to construction, fabrication or installation. Design defect means an aspect inherent in a component to which a subsequent failure has been attributed that is not associated with errors in installation, i.e., is not a construction defect." This could include, for example, errors in engineering design. Leaks resulting from failure of original sound material from force applied during construction that caused a dent, gouge, excessive stress, or other defect that eventually resulted in a leak should be reported as "Pipe, Weld, and Joint Failure." Any leak that is associated with a component or process that joins pipe such as threaded connections, flanges, mechanical couplings, welds, and pipe fusions that leak as a result from

			poor construction should be classified as “Pipe, Weld, and Joint Failure”.” This includes leaks due to faulty wrinkle bends, faulty field welds, and damage sustained in transportation to the construction or fabrication site. Leaks from material deterioration, other than corrosion, after exceeding the reasonable service life, are reported under Other
EQUIPMENT FAILURE	leak resulting from malfunction of control/relief equipment including valves, regulators, or other instrumentation; stripped threads or broken pipe couplings on nipples, valves, or mechanical couplings; or seal failures on gaskets, O-rings, seal/pump packing, or similar leaks.	This section includes malfunctions of control and relief equipment (typically the result of failed and leaking valves), failures of threaded components and broken pipe couplings, including O-Ring failures, Gasket failures, thread failures, and failures in packing. Malfunction of Control/Relief Equipment Examples of this type of failure include failures on compressors, meters, or regulator stations where the failure resulted from a crack in a component or threads of a component such as nipples, flanges, valve connections, line pipe collars, etc. Include a description of the nature of the failure and apparent cause in the narrative (PART H). Examples of this type of	Leaks caused by malfunctions of control and relief equipment including regulators, valves, meters, compressors, or other instrumentation or functional equipment, Failures may be from threaded components, Flanges, collars, couplings and broken or cracked components, or from O- Ring failures, Gasket failures, seal failures, and failures in packing or similar leaks. Leaks caused by overpressurization resulting from malfunction of control or alarm device; relief valve malfunction: and valves failing to open or close on command; or valves which opened or closed when not commanded to do so. If overpressurization or

		failure cause also include: overpressurization resulting from malfunction of control or alarm device; relief valve malfunction: and valves failing to open or close on command; or valves which opened or closed when not commanded to do so. If overpressurization or some other aspect of this incident was caused by incorrect operation, the incident should be reported under Section G7, "Incorrect Operation."	some other aspect of this incident was caused by incorrect operation, the incident should be reported under Section G7, "Incorrect Operation.".
INCORRECT OPERATION	leaks resulting from inadequate procedures or safety practices, or failure to follow correct procedures, or other operator error	These types of incidents most often occur during operating, maintenance or repair activities. Some examples of this type of failure are improper valve selection or operation, inadvertent overpressurization, or improper selection or installation of equipment. The unintentional ignition of the transported gas during a welding or maintenance activity would also be included in this sub-cause. These types of incidents often involve training or judgment errors.	Leaks resulting from inadequate procedures or safety practices, or failure to follow correct procedures, or other operator error. It includes leaks due to improper valve selection or operation, inadvertent overpressurization, or improper selection or installation of equipment.
OTHER CAUSE	leak resulting from any other cause, such as exceeding the service life, not attributable to the above	This section is provided for incident causes that do not fit in any of the main cause categories in Sections G1 through G7. Leaks resulting from materials deteriorating	Leak resulting from any other cause, such as exceeding the service life, not attributable to the above causes.

	causes.	after the expected life of the materials are classified as “Other Cause”.	

Part D

PHMSA Proposal:

PHMSA proposes to require reporting of the root cause of excavation damages as follows:

a. Number of Excavation Damages by Root Cause:

b. One-Call Notification Practices Not Sufficient: _____

c. Locating Practices Not Sufficient: _____

d. Excavation Practices Not Sufficient: _____

e. Other:

APGA Recommendation: APGA notes that “a. Number of Excavation Damages by Root Cause:” is actually the heading for the four lettered items below it rather than the first of five items, therefore it should not be labeled “a” and the following four items should be labeled “a” through “d.”

APGA also notes that the instructions do not provide examples of what types of causes go into each of these categories. APGA urges PHMSA to include in the instructions for Part D the following definitions developed by the Common Ground Alliance’s (CGA) DIRT program:

One Call notification practices not sufficient. Examples:

- *No notification made to the one-call center.*
- *Notification to the one-call center made but not sufficient: The excavator or caller who contacted the notification center did not provide sufficient information. Also includes situations where the excavator or caller did not provide sufficient advance notification time according to state law.*
- *Wrong information provided: An error occurred because an excavator or caller provided the wrong address for excavation to the one-call notification center, or there was a miscommunication between stakeholders.*

<u>Locating practices not sufficient.</u> Examples:

- *Facility could not be found/located: Type of facility, depth, or lack of records prevented locating of facility.*

- *Facility markings or location not sufficient: Includes all areas where marking was inaccurate or otherwise insufficient in designating the location of the buried facilities, but NOT covered by the following choices found elsewhere in Part I:*

- *Facility could not be found/located*

- *Incorrect facility records/maps*

- *Abandoned facility*

- *Facility was not located or marked: No locating or marking was completed prior to excavation activities.*

- *Incorrect facility records/maps: Incorrect facility records or maps led to an incorrect locate.*

<u>Excavation practices not sufficient</u>

The excavator did not use proper care or follow the correct procedures when excavating near a facility. Examples:

- *Failure to maintain clearance with powered equipment - as defined by applicable state regulations or underground facility owner.*

- *Failure to maintain the marks: The marks deteriorated or were lost and the excavator failed to request that they be restored/refreshed.*

- *Failure to support exposed facilities: Facility failed due to lack of support in accordance with generally accepted engineering practices or instructions provided by the facility operator.*

- *Failure to use hand tools where required.*

- *Failure to verify location by test hole (pot holing): Some state regulations define a "tolerance zone" around buried facilities and require that the accuracy of the facility marks be verified by exposing the facility by hand digging prior to excavation within the tolerance zone, or require hand digging or special precautions when working within the tolerance zone.*

- *Improper backfilling. Damage caused by improper materials (ex: large/sharp rocks) in the backfill or improper compaction of the backfill.*

<u>Other causes</u> Examples:

- *One-Call Center notification center error: Includes all issues related to the center such as incorrectly entered data, ticket transmission failures, stakeholder omissions (failure to transmit the ticket to a facility operator that should have received it), et al.*

- *Abandoned facility: An event caused by an abandoned facility issue. For example, a nearby abandoned facility may have been located instead of the active facility. Or, a facility may have been located as abandoned, but found active after the excavation exposed the facility.*

- *Deteriorated facility: Situations in which an excavation disrupts the soil around a facility resulting in damage, failure, or interruption of service. However, the facility was deteriorated (ex: corroded, graphitized, etc.) to the extent that the deterioration and not the excavation activity caused the facility issue.*

- *Previous damage: A significant period of time has passed from the actual damage to the failure or discovery of the damages.*

Alternatively PHMSA could provide a cross reference and link to the CGA website for the CGA definitions.

<u>Part E – Excess Flow Valve (EFV) Data</u>

PHMSA Proposal:

PHMSA proposes to leave the current instructions for reporting EFV data unchanged as follows:

> *Report the number of EFVs installed on single-family residential services during the calendar year. Report the estimated total number of EFVs in the system at the end of the calendar year. (The "Estimated Total number of EFVs in the system" should include the "Number of EFVs installed on single-family residential services during the calendar year".)*

APGA Recommendation:

It is clear from the instructions and the wording of the report form that the total number of EFV's installed during the year should only include EFVs installed on single-family residential services. It is not as clear what EFVs should be included in the count of the estimated number of EFVs in the system at the end of the calendar year. PHMSA

should clarify if it is asking for the estimated count of all EFVs on all types of services or just EFVs on single-family residential services.

Also, the parenthetical in the instructions for Part E could be made clearer. Following the format in the instructions for Unaccounted For Gas in Part G, APGA suggests revising the Part E instructions as follows:

(Estimated Number of EFVs In System At The End Of The Previous Year plus Total Number of EFVs installed during the calendar year (including EFVs installed on single-family residential services) minus Total Number of EFVs removed from service during the calendar year equals Estimated Number of EFVs In System At End Of Year.)

Conclusion:

APGA supports the collection of timely pipeline safety data and encourages PHMSA to establish a data working group comprised of PHMSA, APGA, other pipeline trade associations, the National Association of Pipeline Safety Representatives and other stakeholders to advise on future changes to PHMSA's data collection activities.

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).

Bert Kalisch, President and CEO