



December 27, 2013

**VIA ELECTRONIC FILING**

Office of Information and Regulatory Affairs  
Records Management Center  
Attn: Desk Officer for  
DOT/PHMSA  
NEOB, Room 10102  
725 17<sup>TH</sup> Street, NW  
Washington, DC 20503

Re: Docket No. PHMSA-2013-0084, *Pipeline Safety: Information Collection Activities, Revisions to Incident and Annual Reports for Gas Pipeline Operators*

Dear Sir or Madam:

The Interstate Natural Gas Association of America (INGAA) submits this letter in response to the request for comments by the Pipeline and Hazardous Materials Safety Administration (PHMSA) in the above-referenced docket. INGAA is a non-profit trade association that represents interstate natural gas pipeline operators in North America. INGAA's members represent approximately two-thirds of the natural gas transmission pipelines and over 65 percent of the mileage comprising the U.S. natural gas transmission pipeline system.

On June 27, 2013, PHMSA requested comments on its proposed revisions to six forms including the PHMSA F 7100.2 (Incident Report-Natural and Other Gas Transmission and Gathering Pipeline Systems) and the PHMSA F 7100.2-1 (Annual Report for Natural and Other Gas Transmission and Gathering Pipeline Systems).<sup>1</sup> On August 26, 2013, INGAA filed extensive comments summarizing its concerns.<sup>2</sup> On November 27, 2013, PHMSA responded to the comments, issued revised forms, and alerted the public that it was seeking Office of Management and Budget (OMB) approval of the revised forms (the Notice).<sup>3</sup> In the Notice, PHMSA requested comments on the need for the proposed information collection, the accuracy of the collection burden estimate, and ways to clarify and minimize the burden.

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<sup>1</sup> "Pipeline Safety: Information Collection Activities, Revisions to Incident and Annual Reports for Gas Pipeline Operators," 78 Fed. Reg. 38803 (June 27, 2013).

<sup>2</sup> PHMSA-2013-0084-0010 (August 26, 2013).

<sup>3</sup> "Pipeline Safety: Information Collection Activities, Revisions to Incident and Annual Reports for Gas Pipeline Operators," 78 Fed. Reg. 71033 (November 27, 2013).

INGAA appreciates PHMSA's efforts to revise the Annual and Incident Reports. PHMSA addressed many of INGAA's concerns in the November 27 version of these reports. In response to the Notice, INGAA offers the following additional comments and clarifications:

***Annual Report: Part C***  
***Volume Transported by Transmission Lines***

INGAA recommends the elimination of Part C-Volume Transported by Transmission Lines. In its November 27 filing, PHMSA stated that it is requiring all gas transmission operators to submit volume data as part of the Annual Report form because the information is not readily available from FERC. INGAA would like to point out that this information *is* publicly available and is already collected by the Federal government. The U.S. Energy Information Administration (EIA) collects this information through an OMB-approved form, the EIA-176. The volume data is also available on the EIA's website.<sup>4</sup> Therefore, INGAA supports the elimination of this section of the PHMSA form to avoid a duplicative data collection.

***Annual Report Instructions: Part Q***  
***Gas Transmission Miles by §192.619 MAOP Determination Method***

PHMSA should consider modifying the instructions for Part Q to provide clarity to the reporting requirement. These instructions should emphasize that operators should only report miles for the MAOP determination method they used, rather than *each* possible MAOP determination method available under 49 C.F.R. § 192.619. Specifically, on page 17 of the Annual Report Instructions, PHMSA should change the reference from "**each** MAOP determination method" to "**the** MAOP determination method". This clarification will eliminate any confusion in reporting the required miles. The new language is consistent with the other Part Q instructions.

In addition, INGAA continues to support the elimination of "traceable, verifiable, and complete" to describe MAOP records (see page 18 of the instructions). In response to INGAA's concerns, PHMSA stated that this phrase provides guidance to operators to meet the requirements of 49 U.S.C. § 60139. However, INGAA disagrees. This term is not explicitly included in Section 60139 and the introduction of it in the Annual Report instructions, even as a permissive requirement, creates a new standard for records. INGAA recognizes that all operators should have records that reflect the operating characteristics of their pipelines; however, PHMSA should not introduce a new standard for records in the Annual Report that is not part of the pipeline safety regulations or the governing statute.

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<sup>4</sup> See U.S. Energy Information Administration's Natural Gas Annual Respondent Query System at [http://www.eia.gov/cfapps/ngqs/ngqs.cfm?f\\_report=RP3&f\\_sortby=&f\\_items=&f\\_year\\_start=&f\\_year\\_end=&f\\_show\\_compids=&f\\_fullscreen=](http://www.eia.gov/cfapps/ngqs/ngqs.cfm?f_report=RP3&f_sortby=&f_items=&f_year_start=&f_year_end=&f_show_compids=&f_fullscreen=)

***Incident Report Form: Part C  
Additional Facility Information-Item 3(a)-(h)***

In its comments on the Incident Report form in 2012, INGAA requested that PHMSA apply the girth weld data requirements to all pipe and joint welds (girth, butt, and fillet).<sup>5</sup> While girth welds are the predominant weld failure type, collecting additional data on other weld types could be valuable. In response to these comments, PHMSA declined to make this change, noting the additional resources involved to modify its Incident Report Form. PHMSA tabled INGAA's suggestion for the 2013 review.

In its 2013 comments, INGAA again raised this point. In response, PHMSA stated that it did not have the resources to expand the form and accommodate the additional data. PHMSA also stated that they did not see "a compelling reason" to collect this type of data.

INGAA acknowledges PHMSA's resource constraints but encourages the agency to consider collecting this type of data in future reporting forms.

Thank you for considering our comments. Please contact me if you have any questions.

Respectfully submitted,

/s/

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<sup>5</sup> PHMSA-2012-0024-0020 (June 12, 2012).