



August 15, 2022

U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration
Docket No: PHMSA–2022–0009

Pipeline Safety: Agency Request for Emergency Approval of an Information Collection Associated With the Natural Gas Distribution Infrastructure Safety and Modernization Grant Program

Background

The Plastics Pipe Institute (PPI) is the leading trade association representing more than 150 companies involved in the use of plastic pipe in our nation’s infrastructure. PPI members produce plastic pipe, composite pipe, fittings, and components used in our nation’s network of energy infrastructure. Proven polyethylene (PE), polyamide (PA) and advanced spoolable composite piping represent the vast majority of piping used in gas distribution and a large portion oil & gas gathering markets.

Polyethylene (PE), polyamide and advanced spoolable composite piping represent the vast majority of piping used in gas distribution and a significant portion of the gas gathering market. America’s move to increased use of renewable energy sources has led to some shortsighted perceptions about clean burning natural gas and the value of pipeline transportation of current and future sources of American energy.

PPI fully supports the Natural Gas Distribution Infrastructure Safety and Modernization (NGDISM) program, which will provide needed resources to municipality- or community-owned utilities to repair, rehabilitate, or replace their natural gas distribution pipeline systems.

Public Gas Distribution Systems

On November 15, 2021, the Infrastructure Investment and Jobs Act (IIJA) was signed into law. The IIJA included federal resources to establish NGDISM grant program. The legislation authorized \$200 annually with a total of \$1 billion over the next five years for municipal gas distribution replacement.

PHMSA has clearly indicated that funding will be made available to publicly-owned utilities and not to for-profit entities. Funding to repair, rehabilitate, or replace its natural gas distribution pipeline systems or portions thereof or to acquire equipment to reduce incidents and fatalities and avoid economic losses.



Pipeline operators continue to accelerate replacement of cast iron, bare steel, and antiquated plastic pipeline, and PPI members continue to perform the necessary construction. While these efforts will undoubtedly increase safety, they will also help reduce emissions.

The Importance of Natural Gas

The natural gas industry has publicly supported the goal of achieving net-zero emissions by 2050 and clean-burning natural gas *enables* the use of renewable fuels, while the often-unpredictable nature of renewables such as solar and wind demonstrates that these energy sources alone will not be able to meet current and future demand. The bottom line is that America will simply not be able to achieve its clean energy ambitions without substantial growth of natural gas production and a large expansion of natural gas distribution pipeline networks.

As America updates our energy infrastructure, municipal and/or other community-owned gas utilities cannot be overlooked, and any federal resources provided toward improving these systems. PPI encourages policymakers to recognize the benefits of traditional natural gas and to recognize the safest and most efficient way to transport American energy, which is ensuring a vast network of pipeline infrastructure.

PPI fully supports the NGDISM, and we appreciate the opportunity to provide comment to this important new program.