



Submitted via www.reginfo.gov

July 2, 2025

Office of Management and Budget
725 17th Street, NW
Washington, DC 20503

**Re: Comments of the American Gas Association (AGA) regarding:
Extension of Agency Information Collection Activity Under OMB Review: *Pipeline Operator Security Information*, 90 Fed. Reg. 23353 (June 02, 2025), Control Number 1652-0055**

The American Gas Association (AGA) respectfully submits the following comments in response to the Transportation Security Administration (TSA), Department of Homeland Security (DHS) Information Collection Request referenced above.¹ AGA appreciates the opportunity to inform ongoing information collection activities and provide valuable industry perspectives.

AGA, founded in 1918, represents more than 200 local energy companies that deliver clean natural gas throughout the United States. There are more than 77 million residential, commercial, and industrial natural gas customers in the U.S., of which 95 percent — more than 74 million customers — receive their gas from AGA members. AGA is an advocate for natural gas utility companies and their customers and provides a broad range of programs and services for member natural gas pipelines, marketers, gatherers, international natural gas companies, and industry associates. Today, natural gas meets more than one-third of the United States' energy needs.²

AGA member companies (owner/operators) recognize the importance of incident reporting and ensuring that government partners are well informed. In addition to multiple reporting requirements, owner/operators voluntarily report security incidents and provide detailed, real-time cybersecurity information to the U.S. government through various automated systems.³ Owner/operators have developed efficient practices and policies to address regulatory and operational requirements while prioritizing safety and security. With that said, incident reporting still conveys a burden, especially when considered across various agencies and with follow-up activity by the owner/operator to keep government partners informed. These activities do not appear to be fully captured in TSA's estimates.

TSA's burden estimate does not appear to account for owner/operator's analysis, validation, or review prior to submission or any associated follow-up activities. The TSA's estimated burden seems to only account for the time to complete and submit the actual report. Based on previous experience, one owner/operator anticipates spending an additional 200 – 300 hours per reported cybersecurity incident responding to inquiries from TSA staff. Similarly, physical security incidents voluntarily reported to the

¹ Extension of Agency Information Collection Activity Under OMB Review: *Pipeline Operator Security Information*, 90 Fed. Reg. 23353 (June 2, 2025). Retrieved from <https://www.regulations.gov/comment/TSA-2022-0001-0070>.

² For more information, visit www.aga.org.

³ Harmonization of Cyber Incident Reporting to the Federal Government, Dep't. of Homeland Sec. (Sept. 19, 2023) at <https://www.dhs.gov/sites/default/files/2023-09/Harmonization%20of%20Cyber%20Incident%20Reporting%20to%20the%20Federal%20Government.pdf>.



Transportation Security Operations Center (TSOC) require minimal time to actually report but several additional hours for calls and follow-up visits with regional TSA staff.

As consistently emphasized, response and recovery in the service of public and pipeline safety are paramount concerns in the throes and aftermath of an incident.⁴ Security professionals maintain significant safety and operational responsibilities, and short-term incident reporting requirements convey an opportunity cost.⁵ Owner/operators affected by an incident must prioritize time and resources to understand whether the incident is reportable, while also triaging impacts and protecting people, facilities, and systems.

AGA appreciates the importance of timely incident reporting but encourages coordination between different agencies and consideration of the cumulative burden of reporting and follow-up activities across various government channels.

Should you have any questions, please do not hesitate to contact Kimberly Denbow at 202-824-7334 or kdenbow@aga.org.

Sincerely,

A handwritten signature in black ink, appearing to read "K. Denbow", written over a horizontal line.

Kimberly Denbow
Vice President, Security & Operations
American Gas Association

⁴ American Gas Association. (February 5, 2025). *Comment on Enhancing Surface Cyber Risk Management Notice of Proposed Rulemaking* (Comment ID: TSA-2022-0001-0040), Retrieved from <https://www.regulations.gov/comment/TSA-2022-0001-0070>; American Gas Association. (July 2, 2024). *Comment on Cyber Incident Reporting for Critical Infrastructure Act (CIRCA) Reporting Requirements* (Comment ID: CISA-2022-0010-0300), Retrieved from <https://www.regulations.gov/comment/CISA-2022-0010-0300>.

⁵ *Summary of the 2023 Cybersecurity Regulatory Harmonization Request for Information*, OFF. OF THE NAT'L CYBER DIR. (June 2024), ("many sector chief information security officers report spending 30 to upwards of 50 percent of their time on regulatory compliance"), <https://bidenwhitehouse.archives.gov/wp-content/uploads/2024/06/Cybersecurity-Regulatory-Harmonization-RFI-Summary-ONCD.pdf>