



MidAmerican Energy
106 East Second Street
P.O. Box 4350
Davenport, Iowa 52808
563 333-8005 Telephone
563 333-8021 Fax
rpjared@midamerican.com

Robert P. Jared
Senior Attorney

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Ginger LeMay
Office of Information Technology
TSA-11
Transportation Security Administration
601 South 12th Street
Arlington, Virginia 20598-6011

Re: Intent to Request Approval from OMB of One New Public Collection
of Information: Pipeline Operator Security Information.

Dear Ms. LeMay:

In accordance with the 60-day notice published in the Federal Register [Volume 74, Number 144; July 29, 2009], MidAmerican Energy Company ("MidAmerican") provides its comments on the proposed Information Collection Request concerning pipeline operator security information.

MidAmerican is a natural gas and electric public utility operating natural gas transmission and distribution systems in the states of Iowa, Illinois, South Dakota, and Nebraska. MidAmerican has approximately 704,000 gas customers and operates 11,660 miles of gas distribution and 796 miles of gas transmission pipeline.

MidAmerican supports the voluntary process to establish security-related communications with the Transportation Security Operations Center ("TSOC"). MidAmerican notes that the Pipeline Hazardous Material Safety Agency has a mechanism in place to report information electronically. A similar system may be helpful to the TSOC to manage its workload and improve the accuracy of the information provided. If an electronic filing option was implemented, a telephonic option should also be available so that an operator could provide information in a timely manner when electronic filing is not practical.

To minimize the number of required calls, MidAmerican recommends that the Transportation Security Administration make the following changes to the reportable incident descriptions:

1. *Explosions or fires of a suspicious nature affecting pipeline systems, facilities, or assets.*

Change to read: "Explosion or fire that affects pipeline systems, facilities or assets that are suspected to have resulted from an act of terrorism."

Comment: The use of the word "suspicious" is too general. A material failure could be "suspicious in nature", but have no connection to a perceived act of terrorism.

2. *Theft of pipeline company vehicles, uniforms, or employee credentials.*

Change to read: Delete "employee credentials."

Comment: The proposed requirement would generate an excessive number of reports since employees may lose cards that are later found or lose cards in situations that are unlikely to pose a security risk. For example, a company identification card lost as a result of a stolen billfold or purse should not necessarily be assumed to have been the reason for the theft or constitute a security risk to the company's operation. In some cases, it may be days before a credential is determined to be missing.

3. *Suspicious individuals applying for security-sensitive positions in the pipeline company.*

Change: Delete.

Comment: The proposed requirement is too vague. If this requirement is retained, then the terms "suspicious individuals" and "security-sensitive positions" need to be defined. In particular, the term "suspicious individual" needs to be defined with sufficient specificity so that a reporting utility will not be accused of unfair employment practices. In addition, the word "applying" should be changed to "interviewed." The cost to do a background check on everyone who applies for a job would be very costly, time consuming and unnecessary since hundreds may apply and only a few may be interviewed.

MidAmerican Energy Company appreciates this opportunity to submit comments on the proposed Information Collection Request and respectfully requests its comments be given due consideration.

Sincerely,

