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Dockets Management Facility
U.S. Department of Transportation
Room PL-401, Nassif Building
400 Seventh Street, SW
Washington, D.C. 20590-0001

Subject: Comments by Southern California Gas Company and San Diego Gas & Electric
Concerning Request for Public Comments and Office of Management and Budget
Approval of an Existing Information Collection (Docket No. PHMSA-98-4957)

Dear Pipeline and Hazardous Materials Safety Administration:

In reference to the February 12, 2007 notice that was published in the Federal Register by the Pipeline and Hazardous Materials Safety Administration (PHMSA) / Office of Pipeline Safety (OPS) that invites comments, "... on ways to minimize the burden associated with collection of information related to natural gas pipelines operator's reports ...", Southern California Gas Company and San Diego Gas & Electric offer the following comments for your consideration.

Southern California Gas Company (SoCalGas) is a regulated natural gas distribution utility serving most of central and southern California through more than five million meters. As the nation's largest natural gas distributor, we serve residential, commercial and industrial customers as well as electric generation and wholesale customers in a service territory that covers 20,000 square miles. San Diego Gas & Electric (SDG&E) is a regulated electric and natural gas distribution utility that spans 4,100 square miles and provides natural gas service to San Diego County through more than 800,000 meters. Together, we operate over 4,000 miles of gas transmission pipeline and have an integrity management program in accordance with the requirements contained in 49 CFR Part 192, Subpart O.

Southern California Gas Company and San Diego Gas & Electric support the need for PHMSA/OPS to collect information necessary to ensure compliance with various requirements. However, with regard to the reports required in 49 CFR Part 191 and 49 CFR Part 192 Subpart O, we believe there is an opportunity to minimize the burden of the collection of this information on respondents as well as to enhance the quality, utility and clarity of the information collected.

With regard to the incident reports, we believe that the reporting criteria should be modified to ensure that the data gathered accurately reflects incident trends over time and specifically, we believe the linkage to the cost of gas should be removed from the criteria for reporting an incident. Currently, the definition of an incident in 49 CFR 191.3 includes, in part, an event where natural gas is released and "... estimated property damage, including cost of gas lost, of the operator or others, or both, ..." is \$50,000 or more. The "cost of gas" can vary dramatically over time, as well as costs of property, etc. As a result, over time, trends tied to numbers of "reportable incidents" may become less meaningful as changes in the number of incidents reported are impacted by cost factors rather than a change in

operating conditions and/or the severity of the incidents. In fact, operators may be reporting more or fewer incidents, and filing the related reports, simply because the costs have changed. Ideally, we believe the reporting criteria should not be tied to the "cost of gas lost" and suggest that perhaps, a measure related to the "volume of gas lost" would be a more consistent measure across time, along with a property damage threshold that is adjusted periodically, perhaps every five years, to reflect cost inflation and other related factors.

In reference to the annual reports containing system information, we recommend that a consistent definition of terms be adopted for the Annual Report for Gas Distribution Systems (7100.1-1), the Annual Report for Gas Transmission & Gathering Systems (7100.2-1) and the transmission integrity management reports (as required under 49 CFR Part 192, Subpart O). Doing so would greatly minimize confusion and facilitate data analysis. In addition, we suggest that the filing date of the annual transmission integrity management report coincide with, or follow, the filing date of the Annual Report for Gas Transmission & Gathering Systems (7100.2-1) as data from this report (7100.2-1) is required to complete the integrity management report. On a related matter, with regard to the transmission integrity management (IMP) reports, where the annual reports are operator specific, we strongly encourage PHMSA/OPS to continue to allow related operators to file together with one set of performance measures should they so choose. Lastly, we suggest that consideration be given to eliminating the "semi-annual" reporting requirement contained in 49 CFR 192.945 and thus reducing the burden associated with filing the "interim" IMP performance report covering the period January 1 through June 30, as the same data would be included in the annual report.

Thank you for the opportunity to submit comments concerning this collection of information related to natural gas pipelines operator's reports. We look forward to continuing our work with the Pipeline and Hazardous Materials Safety Administration and other key stakeholders in addressing the best ways to address the overall collection of key information.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Doug M. Schneider", is written over a light blue horizontal line.

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