



April 13, 2007

Ms. LE Herrick
Transportation Specialist
Pipeline and Hazardous Materials Safety Administration
United States Department of Transportation
400 Seventh Street, SW, Room 2103
Washington, DC 20590-0001

Subject: Docket No. PHMSA 98-4957, Request for Public Comments and Office of Management and Budget Approval of an Existing Information Collection (2137-0522)

Dear Ms. Herrick:

Paiute Pipeline Company (Paiute) herein responds to the Pipeline and Hazardous Materials Safety Administration (PHMSA) request for public comments and Office of Management and Budget (OMB) approval for the renewal of an existing PHMSA information collection as outlined in 72 *Federal Register* (FR) 6664, published on February 12, 2007. The notice requests comments on ways to enhance the quality, utility, and clarity of the information to be collected and to minimize the burden of collection of information on respondents, including the use of automated collection techniques or other forms of information technology.

Paiute operates 856 miles of transmission pipeline in the state of Nevada. It is a wholly owned subsidiary of Southwest Gas Corporation (Southwest), which is a member of the American Gas Association. Paiute herein supports the comments submitted by Southwest for this docket. This letter focuses on minimizing the burden on respondents to collect certain information, including the use of automated techniques or other forms of information technology.

Paiute submits several types of periodic reports to PHMSA pursuant to the requirements of Title 49 *Code of Federal Regulations* (CFR), Parts 191 and 192, which include individual reports for transmission incidents (191.15); annual reports for transmission system data due on or before March 15 for the preceding year (191.17); and semi-annual reports on four overall integrity management performance measures complete through June 30 and December 31 of each year and submitted within two months after those dates (192.945).

.

Ms. LE Herrick
Docket No. PHMSA 98-4957
April 13, 2007
Page 2

Section 15 of the "Pipeline Inspection, Protection, Enforcement and Safety Act of 2006" requires PHMSA to address incident reporting issues no later than December 31, 2007. PHMSA is required to review the incident reporting requirements for operators of natural gas pipelines and modify the reporting criteria as appropriate to ensure that the incident data gathered accurately reflects incident trends over time, taking into consideration the recommendations contained within GAO-06-946, *Natural Gas Pipeline Safety* (September 2006). Paiute will be submitting comments when the Notice of Proposed Rulemaking is published that will help provide clarity and uniformity to the reporting criteria for incidents on transmission systems.

Paiute believes that the mid-year (June 30) integrity management report has little or no value since it is replaced by the December 31 semi-annual integrity management report (see 49 CFR 192.945). The June report, considered an "interim report," is essentially superseded by the December report, which includes the annual data according to PHMSA's instructions. Furthermore, the June report utilizes the annual transmission system data from the end of the previous year, which may not reflect the actual transmission data at the end of the reporting period.

The December report requests annual data as of the end of the reporting period. However, system annual report data may not be available by the filing date of the December 31 integrity management report (two months after the end of the reporting period; i.e., February 28). The integrity management report is filed 15 days before the system annual data report (due March 15 pursuant to 49 CFR 191.17) and relies upon some of the data to be submitted in that report.

Therefore, Paiute suggests that the semi-annual reports be eliminated and that the submittal date for the annual integrity management report coincide with the March 15 date for annual transmission report submittals.

Paiute appreciates the opportunity to submit its comments on this request for public comments.

If you have any questions, please contact Jeff Maples by telephone at (775) 887-2805 or by email at jeff.maples@swgas.com.

Sincerely,

A handwritten signature in dark ink, appearing to read "Edward C. McMurtrie". The signature is fluid and cursive, with the first name "Edward" and last name "McMurtrie" clearly distinguishable.

Edward C. McMurtrie
Vice President/General Manager

c: C. Sames, AGA

bc: J. Kane
G. Denio
T. Hills
D. Jacobson
J. Maples
M. Marek
J. Schmitz
J. Wunderlin