

June 14, 2012

Docket Management Facility  
U.S. Department of Transportation (DOT)  
West Building, Room W12-140  
1200 New Jersey Avenue, S.E.  
Washington, D.C. 20590

VIA ELECTRONIC FILING (<http://www.regulations.gov>)

Re: Docket No. PHMSA–2012–0024

*Pipeline Safety: Information Collection Activities, Revision to Gas Transmission and Gathering Pipeline Systems Annual Report, Gas Transmission and Gathering Pipeline Systems Incident Report, and hazardous Liquid Pipeline Systems Annual Report*

Dear Sir or Madam:

The Energy Transfer group of companies, collectively “Energy Transfer,” including interstate gas transmission companies Transwestern Pipeline Company, Panhandle Eastern Pipe Line Company, Trunkline Gas Transmission Company, Florida Gas Transmission Company, as well as several intrastate systems, operate approximately 20,000 miles of transmission pipelines that report according to the requirements and forms that are the subject of these proposed revisions. Energy Transfer appreciates the opportunity to comment on these proposals.

Energy Transfer believes that data that are accurate, consistently reported and relevant to the subjects under consideration are essential to appropriate decision making and regulation development. We are a member of the Interstate Natural Gas Association of America (“INGAA”), actively participated in the development of the INGAA comments and proposals on this matter, and support those comments and proposals. Some of the points made may be regarded as almost editorial or clarifying. However, the proposed changes to the form in the sections dealing with inspections and MAOP determination are significant, and we believe represent a marked improvement in the collection of relevant data. We urge PHMSA to accept the INGAA proposed modifications and other recommendations.

As a final note, while we understand and support the necessity of this enhanced data collection, as noted in the INGAA comments, we also believe PHMSA should have a more realistic understanding of what it is requiring of operators. We have not yet completed the system, query, data entry and forms modifications that will be required, nor have we completed the management of change process to implement these modifications and train all appropriate personnel on them, but the PHMSA estimate of a 2-hour incremental burden to accomplish this reporting is far short of the time that will actually be required. Our current estimate is that the actual time increment, at least in the first year, will be 2 to 3 orders of magnitude greater than the 2-hour estimate.

Thank you for your consideration of these comments. Should you have any questions, you may contact me at the above address, by email at [Eric.Amundsen@sug.com](mailto:Eric.Amundsen@sug.com), or by telephone at 713.989.7460.

Very truly yours,

A handwritten signature in black ink, appearing to read "Eric Amundsen". The signature is fluid and cursive, with a large loop at the end.

Eric J. Amundsen

Vice President, Technical Services