

National Grid Comments  
On  
Notice of Proposed Rulemaking Pipeline Safety: Information Collection  
Docket No. PHMSA – 2012-0024

National Grid is one of the nation's largest gas distribution companies, with over 3.5 million customers in New York, Massachusetts, Rhode Island and New Hampshire. According to the Pipeline and Gas Journal (Nov. 2011), our distribution system is the nation's largest in terms of gas volume sold. As mentioned in previous filings, to serve these distribution consumers we manage transmission lines that traverse numerous densely populated areas, including portions of New York City, Boston, their metropolitan areas, and many suburbs, smaller cities, towns and villages. While not the most extensive transmission system in the nation by any means, at barely 500 miles, it is arguably among the most complex, serving as it does, one of the nation's most complex natural gas distribution operations.

National Grid appreciates the opportunity to respond to PHMSA's Notice on the subject of information collection. We look forward to working with PHMSA and our state regulators on the mutual goal of further improving the safety and reliability of our gas transmission systems.

We strongly suggest that PHMSA add a column to Section R of the annual transmission report to collect information on the number of miles of pipeline whose records are still under review. Without this information, any data recorded on the form related to miles of pipe with or without the appropriate records will be misleading and will prevent PHMSA from performing an accurate cost/benefit analysis. PHMSA will also be unable to determine the progress made in evaluating pipeline records. By adding a placeholder for miles of pipeline still under review, PHMSA will provide surety to the data on lines with or without the records in question. A similar problem exists in Section R, and can be corrected in similar fashion. AGA provides an example of this approach in their comments.

We also note that the proposed Sections Q and R go beyond collection of data on lines operating above 30% SMYS. They also would require reporting of data on non-HCA pipelines. Collection of these additional data is important, but should be deferred until the following year's report. To do so for the 2012 report will be problematic. National Grid's review and verification of its transmission records began a year ago. A group of experienced engineers, familiar with our systems and records, have been dedicated solely to this task, with primary focus on lines in Class 3 and 4 locations and HCAs in Class 1 and 2 locations. We anticipate this work will be completed in conformance with Congress' mandated deadline in July, 2013. Accelerating the current effort or adding review of the rest of the inventory would require either more time or more resources, to the detriment of other necessary programs. We believe PHMSA should limit the current changes to those priorities specifically mandated by Congress.

PHMSA proposes to collect information on the number of miles of pipeline that is and is not piggable. National Grid recommends that a clear definition of piggable is necessary, and would support "a pipe of appropriate physical and operational characteristics to allow successful inspection via current commercially available in-line inspection tools within the specified tool requirements and tolerances."

National Grid was a very active participant in the development of the American Gas Association (AGA) comments that are being filed to the Docket. We support those comments. We encourage PHMSA to take full advantage of the input provided by AGA and suggest that PHMSA would benefit by continuing its discussions with industry.

Respectfully Submitted  
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