

PUBLIC SUBMISSION

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Docket: [PHMSA-2012-0024](#)

Notice of Information Collection Activities

Comment On: [PHMSA-2012-0024-0025](#)

Pipeline Safety: Revision to Gas Transmission and Gathering Pipeline Systems Annual Report, Gas Transmission and Gathering Pipeline Systems Incident Report, and Hazardous Liquid Pipeline Systems Accident Report

Document: [PHMSA-2012-0024-0030](#)

Arthur A. Shapiro - Comments

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General Comment

National Grid is one of the nation's largest Natural Gas utilities, serving major cities such as New York, Boston, and Albany and their extended metropolitan areas. We support the comments of the American Gas Association and wish to add the following.

National Grid operates approximately 500 mi of gas transmission line that is directly associated with our distribution network. A large portion of our operating area is treated as Class 4 under 49 CFR Part 192. Because of the complexity of our transmission piping arrangements and the large amount of data on hand, we are experiencing a workload of ~150 hours/mi of pipe being reviewed. This is orders of magnitude greater than suggested in the analysis, and has required addition of substantial experienced staff (mostly recently retired engineers) to conduct the reviews. This work has been in progress since shortly after the NTSB recommended such reviews in their reports on the San Bruno tragedy. Consideration should be given to the difficulty of properly conducting these reviews in the time allotted and the expertise needed to do so.