



United States Department of Transportation

Pipeline Safety And Hazardous Materials Safety Administration

RE: Docket PHMSA-20114-0092

Pipeline Safety: Request for Revision of a Previously Approved Information Collection:
National Pipeline Mapping System Program

Comments on behalf of CenterPoint Energy

CenterPoint Energy gas distribution operations (CNP) serves over 3.5 million customers through 72,000 miles of mains in six states. The conditions encountered in our operating areas range from ice, snow and the bitter cold of northern Minnesota to the hot, humid and salty air of the gulf coast. Our activities must comply with the Federal pipeline safety regulations under 49 CFR Part 192, as adopted and administered through the various State regulatory agencies, so we are directly affected by any changes to these regulations. Our collective knowledge and experience enables us to carefully analyze related proposed rulemakings and compile and submit meaningful comments. We appreciate the opportunity to do so and hope that PHMSA will find them to be helpful and consider them when making the final decisions on this rulemaking.

CNP is a member of the American Gas Association (AGA), which has also prepared and submitted comments to this docket. We agree with and support the positions taken by AGA. We particularly want to stress the concerns related to the additional attributes being requested.

CNP supports the continued development of the National Pipeline Mapping System (NPMS). This can be a very useful tool for PHMSA and others to be able to see the physical locations of all the jurisdictional pipeline facilities. The NPMS, however, should not be used as a complete database of all there is to know about a pipeline. Some of the attributes sought do not relate directly to pipeline safety. Some of them raise concerns about pipeline security by providing third parties too much sensitive information about the pipe. Others can potentially affect competition by providing competitors with information that could be used against an operator in the marketplace.

PHMSA should review the attributes and address them not on the cost or burden to include them in the electronic submission to the NPMS, but on the true necessity to include them in this database to improve overall pipeline safety. The process should be



performed through a rulemaking to allow affected parties a more effective vehicle to assist PHMSA with the development of a NPMS that is most useful for them without infringing on the concerns of operators.

Respectfully submitted,

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