

A CMS ENERGY COMPANY

December 1, 2014

U.S. Department of Transportation
Docket Management System
West Building
1200 New Jersey Avenue, SE.
Washington DC 20590

Re: Docket No. PHMSA-2014-00092 - Agency Information Collection Activities; Proposals, Submissions, and Approvals: National Pipeline Mapping System Program

Dear Sir or Madam:

Consumers Energy Company appreciates the opportunity to comment on the Pipeline & Hazardous Material Safety Administration's (PHMSA) *Agency Information Collection Activities; Proposals, Submissions, and Approvals: National Pipeline Mapping System Program* (NPMS Program revisions). Consumers Energy is a combined gas and electric utility serving customers in 68 counties of Michigan's Lower Peninsula. Consumers Energy operates over 27,000 miles of transmission pipelines, distribution mains and storages fields serving over 1.6 million natural gas customers in the state of Michigan. Consumers Energy is committed to natural gas safety and continues to implement programs to improve and enhance pipeline safety throughout the State of Michigan.

Consumers Energy is a member of the American Gas Association (AGA) and actively participates with other AGA members to review and comment on proposed regulations. Consumers Energy generally supports the industry positions outlined in the AGA's comments associated with the proposed NPMS Program revisions, particularly with respect the discussions of NPMS information security and the necessity of reporting various individual pipeline attributes. While Consumers Energy understands PHMSA's desire to improve the NPMS, many elements of the proposed revisions and associated timeline outlined in the July 30, 2014 Federal Register Notice are burdensome, are not currently technically feasible, and present ongoing security concerns. Consistent with other AGA member companies, Consumers Energy supports a phased approach to improving NPMS information that facilitates an achievable level of geophysical positional accuracy, assures data integrity, provides a realistic implementation timeline for reporting, and reduces redundant pipeline attribute information required by Annual Gas Transmission Pipeline Reports. It is recognized that a phased approach would take additional time; however, it will allow natural gas operators to develop a feasible plan to collect accurate pipeline information via the most efficient methods.

Consumers Energy is committed to working with PHMSA, state regulators, emergency management officials, and other key stakeholders, to further enhance the NPMS and fully supports PHMSA bringing these stakeholders together to develop a viable plan for NPMS enhancement. Currently, Consumers Energy partners closely with emergency response officials within its entire service territory through many training and outreach programs designed to enhance pipeline safety and support emergency response efforts. It is unclear how providing many of the pipeline attributes beyond current NPMS levels would significantly benefit or improve emergency management.

Consumers Energy has reviewed the 31 elements proposed for NPMS Program revisions and considers the significant expansion of NPMS information submittals to create an unnecessary industry burden without providing a commensurate increase in pipeline safety. Many of the pipeline attributes are already required to be reported via the Annual Gas Transmission Pipeline Report and are not readily available in a geospatial format. Consumers Energy is concerned the effort to achieve the significant increase in centerline positional accuracy, accurately collect additional pipeline attributes, and revise data reporting format to meet NPMS requirements would divert valuable resources from existing, voluntary risk-reduction programs. These voluntary programs include expanded inline inspections (ILI) beyond High Consequence Areas (HCAs) and various pipeline infrastructure replacement programs. Consumers Energy further believes that efforts to accurately assess and mitigate pipeline risk can best be performed by individual operators using accepted integrity management methodologies.

Consumers Energy's pipeline facilities, programs, and mapping systems have several unique features that require consideration before the proposed NPMS Program revisions could be implemented. These system-specific considerations include:

- Consumers Energy operates over 2400 miles of transmission pipeline. Of the total transmission mileage, approximately 1800 miles is operated as traditional transmission pipeline with the remaining 600 miles is operated within the company's distribution system.
 - Consumers Energy believes the most efficient method to achieve increased centerline positional accuracy to five-feet as proposed by PHMSA would best be met through ILI tools employing GPS technology. While Consumers Energy is actively expanding ILI of its transmission system beyond HCAs, only recently have GPS-enabled ILI tools been utilized. It is estimated that it will require up to two decades to inspect the majority of its 1800 miles of transmission system miles using GPS-enabled ILI tools.
 - For the remaining 600 miles of distribution mains classified as transmission lines (many operating between 20% and 30% SMYS), it is unclear if the proposed NPMS program revision data submittal requirements would also apply to transmission lines operated within the company's distribution system.

- Within its 2400 miles of transmission pipelines, Consumers Energy estimates there are over 300,000 individual pipeline segments. While many of the proposed pipeline attributes exist for these segments, a significant expansion of data collection and reporting format revisions in a short timeframe for this quantity of pipeline segments is not feasible and may result in compromised data integrity and accuracy.
- Regarding positional accuracy requirements, multiple geospatial considerations remain undefined related to absolute accuracy and resolution, including regional geography and latitude variations, lack of a commercially available product that will provide required spatial accuracy, and a common GIS platform. Assuming that these technical issues can be addressed, Consumers Energy estimates the resources required to complete physical land surveys (and/or equivalent methodologies), GIS software revisions, and conflation to a common land-base would exceed \$20 million and require more than a decade to complete properly. It is unlikely the five-foot accuracy level proposed by PHMSA for 2016 reporting of calendar year 2015 pipeline data can be achieved.
- Consumers Energy supports the following phased timeframe shown in the table below to achieve a continuous improvement in positional centerline accuracy, while balancing completing resources needed for expanded integrity management and pipeline replacement programs. Given the individual operator GIS considerations, Consumers Energy further supports each operator develop an implementation timeline in conjunction with their state regulator.

NPMS Submission	Proposed Centerline Positional Accuracy*
2016	All Class Locations = Best available
2023	Class 3&4, HCAs = 100' Class 1 & 2 (non-HCA) = Best available
2030	All transmission pipelines = 100'

* excludes transmission lines operated within the distribution system

In light of these system-specific considerations and consistent with AGA member positions, Consumers Energy encourages PHMSA to further develop a framework for expanding NPMS Program information data submittals to include a feasible implementation timeframe, support accurate data collection, and address security concerns while allowing operators flexibility to use valuable resources to assess and mitigate risks unique to their pipeline systems. Consumers Energy continues to expand ILI capabilities throughout its transmission pipeline system and proactively address identified pipeline anomalies regardless of their Class or HCA location. Through its comprehensive integrity management and various replacement programs, Consumers Energy demonstrates its ongoing commitment to pipeline safety and risk reduction.

Consumers Energy looks forward to working in concert with PHMSA and state regulators to improve accessibility of accurate and secure pipeline information through effective NPMS enhancements.

Respectfully submitted by:



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