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

RE: **Docket No. PHMSA-2014-0092**
OMB Control No. 2137-0596
Pipeline Safety: Request for Revision of a Previously Approved Information Collection – National Pipeline Mapping System Program

DTE Gas Company (DTE Gas) is an intrastate natural gas transmission and distribution pipeline operator and an operating subsidiary of DTE Energy, a diversified energy company involved in the development and management of energy-related businesses and services nationwide. DTE Gas serves over 1.2 million customers in Michigan, and is pleased to have the opportunity to submit the following comments relating to the Notice and Request for Comments appearing in the Federal Register on July 30, 2014 (79FR44246):

General Comment:

DTE Gas supports the comments submitted by the American Gas Association (AGA).

Comment topic 1: Data Security and Confidentiality

DTE Gas shares the industry-wide concerns regarding data security, and in no way supports providing highly accurate position and attribute data to an external repository. DTE Gas believes gas transmission pipeline operators are in the best position to catalog and protect pipeline-specific information and to limit dissemination of this information to externals. DTE Gas incorporates strong confidentiality protections in our contract language when larger amounts of data of pipeline data are shared with outside entities. DTE Gas remains unconvinced that sensitive pipeline information can be suitably protected in some database outside DTE Gas.

Comment topic 2: "Predominant"

DTE Gas does not support the PHMSA proposal for gas transmission pipeline operator to submit data attributes based on the 'predominant' value of the feature. This term is not defined, and not only is it confusing but would require keeping multiple datasets to capture actual and 'predominant' features. Incorrect combinations of 'predominant' grade and actual wall thickness would lead to inaccurate calculations of % SMYS, of no use to anyone.

Comment topic 3: Purpose of the National Pipeline Mapping System (NPMS)

DTE Gas believes the attempt to introduce detailed and sensitive pipeline data into the NPMS seems a far cry from the original intent of the NPMS, which was to provide basic public knowledge of gas transmission pipelines near people. Operator information is provided so that the public, emergency responders and public officials with a need to know pipeline information could contact the operator for that information. Operators could then decide for themselves how best to share and transmit that data on that need-to-know basis.

Comment topic 4: Positional Accuracy

DTE Gas does not support positional accuracy within 5 feet, the level proposed by PHMSA for High Consequence Areas (HCA) and for Class 3 and 4 locations. DTE Gas believes that the 5-foot positional accuracy requirement for pipelines in HCA and in Class 3 and 4 locations is too stringent given the cumulative inherent inaccuracies in the processes used to collect the data, map the data, and to correlate the data to existing land base or aerial photography.

Through gas transmission pipeline integrity assessments and construction surveys, DTE Gas has collected Global Positioning System (GPS) data at sub-meter accuracy for more than 70 percent of the 2,130 miles of gas transmission pipelines we operate, and we have used this data to improve the NPMS submission quality from 'Good' (301-500 feet) to 'Excellent' (within 50 feet) for these pipelines. However, only about 5 percent of this data could be used without additional resurveying efforts to meet the 5-foot tolerance for lateral and longitudinal alignment.

DTE Gas estimates costs of at least $500,000, about $1,100 per mile, for additional data collection and data processing to meet the 5-foot requirement in Class 3 and 4 locations and in HCA. To meet the 50-foot requirement outside of Class 3 and 4 locations, and HCA in Class 1 and 2 locations, DTE Gas estimates costs of at least $1,000,000, about $1,950 per mile, to acquire and process GPS data.

PHMSA should require no greater than 50-foot positional accuracy, or should allow gas transmission pipeline operators at least a 10-year period to meet this requirement to spread the economic burden.

Comment topic 5: Percent Specified Minimum Yield Strength (%SMYS)

DTE Gas does not support PHMSA's proposal for gas transmission pipeline operators to report %SMYS based on the highest actual operating pressure during the year. Except for gas transmission pipelines with certain seam threats, and given the wide range of operating pressure experienced daily and from year to year, DTE Gas does not routinely collect and analyze data to determine the highest actual operating pressure during any particular year for most of our gas transmission pipeline system. DTE Gas does not agree that determining and reporting %SMYS based on the highest actual operating pressure during the year adds any value to the NPMS data set.

DTE Gas recommends that PHMSA consider instead the reporting of the 'maximum' or 'rated' %SMYS, determined at the Maximum Allowable Operating Pressure (MAOP) for gas transmission pipeline segments.

Comment topic 6: Leak Detection

DTE Gas does not support PHMSA's proposal for gas transmission pipeline operators to report the method used to detect leaks along each segment of each gas transmission pipeline. DTE Gas disagrees that knowing the leak detection method helps emergency responders in any way. DTE Gas believes that emergency responders need to know that gas transmission pipeline operators routinely perform effective leak surveys using various methods and equipment; this attribute is more properly covered during pipeline safety education interactions between the gas transmission pipeline operator and the emergency responder required under 49CFR192.616.

DTE Gas further notes that there does not appear to be provision for reporting multiple methodologies for leak detection along a particular gas transmission pipeline segment. This appears to be a general shortcoming of many of the proposed attributes where there legitimately are multiple Acceptable Values.

Comment topic 7: Inline Inspection

DTE Gas does not support PHMSA's proposal for gas transmission pipeline operators to report if each discrete gas transmission pipeline segment can accommodate an Inline Inspection tool. The term 'Piggable' would need to be much more fully defined than it is in the instructions for completing Annual Reports for gas transmission and gathering systems. DTE Gas notes that while a discrete pipeline segment may be Piggable, and the discrete pipeline segment adjacent to it may also be Piggable, the junction between the two may not be Piggable due to differences in internal diameter or connection geometry.

Comment topic 8: Seam Type

DTE Gas does not support PHMSA's proposal for gas transmission pipeline operators to definitively report the type of pipe seam for each discrete gas transmission pipeline segment. While DTE Gas endeavors to determine the Seam Type through our MAOP records reviews and integrity management work, much of this data remains unknown or unconfirmed, even for pipelines installed since 1970.
DTE Gas notes there is no provision in the Acceptable Values for reporting 'Unknown'data, which we believe is a legitimate value.

Comment topic 9: Abandoned Pipelines

DTE Gas does not support the inclusion of Abandoned Pipelines in NPMS data submissions. It is unclear what PHMSA means and intends by the statement "…abandoned pipelines need to be identified to help ensure they are maintained in the proper manner in accordance with pipeline safety regulations." Since abandoned gas transmission pipelines do not carry any commodity in transportation, PHMSA should explain how and why an abandoned gas transmission pipeline needs to be "maintained."

Comment topic 10: Throughput

DTE Gas does not support the PHMSA proposal for gas transmission pipeline operator to submit data on Throughput. Besides what should be an obvious data security concern, disclosure of non-public Throughput information would result in a competitive disadvantage to the pipeline operator. Additionally, flow through gas transmission pipeline systems can fluctuate widely based on bi-directional flow capability and operational flow displacements that is oftentimes seasonal or market driven in nature. Use of a single value for average daily Throughput along a particular gas transmission pipeline segment, or even a large group of segments, to somehow translate as potential gas transmission system supply shortages is misplaced. PHMSA has provided no technical basis for requiring the reporting of Throughput, and no methodology detailing how Throughput data would be analyzed and translated by government regulators to determine the potential for widespread service outages and to ensure an uninterrupted flow of energy supplies.

Comment topic 11: Mainline Block Valve Locations

DTE Gas does not support PHMSA's proposal for gas transmission pipeline operators to provide geospatial data for mainline block valves. DTE Gas sees no purpose whatsoever for first responders to know the locations of mainline block valves. DTE Gas knows the locations of our mainline block valves, their functions, and the consequences of operating them. First responders are not expected to know the consequences of opening or closing valves, and DTE Gas does not want them to do so.

Comment topic 12: Storage Field Locations

For the reasons stated in the comments submitted by the AGA, DTE Gas does not support PHMSA's proposal for gas transmission pipeline operators to provide geospatial data for storage field boundaries. DTE Gas is unable to determine why PHMSA should need to provide storage field boundary data to first responders; this would appear to be the responsibility of DTE Gas in fulfilling the expectations of an effective education program under 49CFR192.616 for entities that need-to-know.

DTE Gas appreciates the opportunity to submit comments in this matter.

Sincerely,

Robert Freckelton