

**UNITED STATES OF AMERICA  
DEPARTMENT OF TRANSPORTATION  
PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION**

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**IN RE:**

**PIPELINE SAFETY: REQUEST FOR  
REVISION OF A PREVIOUSLY  
APPROVED INFORMATION  
COLLECTION – NATIONAL PIPELINE  
MAPPING SYSTEM**

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**DOCKET NO. PHMSA - 2014-0092**

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**COMMENTS OF  
MIDAMERICAN ENERGY COMPANY**

COMES NOW, MidAmerican Energy Company (MidAmerican), and submits the following comments on the Pipeline and Hazardous Materials Safety Administration's (PHMSA's) intent to revise and renew an information collection currently under OMB Control Number 2137 -0596 titled: "National Pipeline Mapping System Program".

MidAmerican is a combination gas and electric public utility providing service to the public in the States of Iowa, Illinois, South Dakota, and Nebraska. MidAmerican has 12,200 miles of natural gas distribution main, 651,000 gas services, and 714 miles of natural gas transmission pipeline. MidAmerican's corporate offices are located at 666 Grand Avenue, P.O. Box 657, Des Moines, Iowa 50303-0657.

**General Comments**

In the Federal Register notice, PHMSA outlines numerous pipeline attributes that operators will be required to submit in a geospatial format. The requirement to submit more

accurate and complete attribute mapping is extensive and seems to go beyond a simple revision of the National Pipeline Mapping System (NPMS) as described by PHMSA, but a major expansion of data collection that should be carefully considered in a rulemaking proceeding.

PHMSA's proposal also appears to run counter to efforts to improve security against terrorist threats. As pipeline operators proceed with efforts to improve the security of their critical infrastructure, there may be reasons to disclose less information about the exact location of facilities as a protective mode against those who would use the information in a harmful manner.

MidAmerican is concerned about the need to update information to reflect facility changes. Operators modify their facilities on a regular basis. Mapping these changes is currently a time-consuming onerous task. Likewise, updating databases of positional information held by PHMSA to reflect facility changes would exponentially increase the difficulties for operators. The time and costs involved with these updates would be best placed in additional assessments and reducing risks.

MidAmerican is able to provide the additional attribute information requested by PHMSA with the exception of pipe joining method attributes.

MidAmerican is currently not able to prove positional accuracy for most of the attributes as described in the notice. MidAmerican strives to continually improve positional accuracy of its pipelines and segments by obtaining global positioning system (GPS) coordinates through integrity assessments, project work, and implementation of preventive and mitigative measures. However, even as mapping is adjusted to reflect these coordinates, proof of alignment cannot be confirmed unless the pipe is physically exposed. For pipelines constructed prior to GPS capabilities, the recorded location of the pipeline was often based upon as-built measurements

taken during construction and/or operation and maintenance activities. Even if lateral alignment were verifiable, longitudinal start and end points within a pipeline are nearly impossible to know. As an example, it would be unreasonable to expect an operator to know exact start and end points of existing coating changes without exposing those locations.

MidAmerican is committed to pipeline safety and providing information to PHMSA that would further those efforts. However, MidAmerican suggests further clarification be provided on positional accuracy requirements.

Dated at Sioux City, Iowa this 29<sup>th</sup> day of September, 2014.

Respectfully submitted,

**MIDAMERICAN ENERGY COMPANY**

By           /s/ Suzan M. Stewart          

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