

**BEFORE THE
PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION

UNITED STATES DEPARTMENT OF TRANSPORTATION
WASHINGTON, D.C.**

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



Docket No. PHMSA-2014-0092

Comments of Southwest Gas Corporation

Southwest Gas Corporation (Southwest) herein submits comments to the Pipeline and Hazardous Materials Safety Administration (PHMSA) for Docket No. PHMSA–2014–0092 regarding the “Pipeline Safety: Request for Revision of a Previously Approved Information Collection: National Pipeline Mapping System Program.”

Southwest is a natural gas local distribution company (LDC) that serves over 1.9 million customers in Arizona, California, and Nevada. Southwest owns and operates 10 miles of interstate transmission, 706 miles of intrastate transmission pipeline and 30,376 miles of distribution mains. In addition, Southwest owns a subsidiary, Paiute Pipeline Company (Paiute), which operates an interstate pipeline and a liquefied natural gas (LNG) peak-shaving plant in Nevada. Paiute will submit separate comments as it relates to its interstate operations.

I. Southwest General Comments

On July 30, 2013, PHMSA published the above-referenced docket in the *Federal Register* (79 FR 44246), which solicits comment on proposed changes to the National Pipeline Mapping System (NPMS) data collection. Southwest appreciates the opportunity to provide comments on the revision and renewal of the information collected under OMB Control Number 2137-0596 in support of the modernization of the NPMS.

Additionally, Southwest is a member of the American Gas Association (AGA) and supports the comments submitted by AGA regarding the above referenced docket.

PHMSA is proposing significant changes to the data collection currently required of Operators; substantially increasing the number of pipeline attributes collected, and increasing the positional accuracy for certain pipeline segments from 500 feet to as narrow as 5 feet. The proposed changes go beyond a simple revision of the NPMS as described by PHMSA in the above referenced notice in the Federal Register and more closely resemble significant rulemaking.

Consequently, PHMSA has not taken into consideration the substantial cost and resource burden imposed on the Operator to comply with the proposed changes. In Southwest's case, the requested attributes reside in multiple databases/platforms outside of its Geographic Information System (GIS) and would require substantial data integration to provide the information requested in the geospatial formats specified by PHMSA.

While PHMSA has estimated the annual burden to be about 350 hours per respondent, the burden on Operators extends well beyond the estimate of annual hours to comply with the submission. Even though a few of the proposed attributes can be included in the submission with relatively minimal cost and resources, the vast majority will require substantial cost and extensive resources as described in the detailed comments below.

Southwest appreciates the Public Meeting held by PHMSA on November 17, 2014, which provided an opportunity for both government and industry to express their viewpoints on the proposed changes. However, the one-day workshop did not provide resolution to the many issues raised. Southwest urges PHMSA to consider utilizing a joint government/industry team similar to that employed in the development of the original standards for the NPMS data collection drafted in 1998 in its current modernization effort. Only through collaboration with stakeholders will PHMSA gain a full understanding of the current capabilities of the Operators, the cost for Operators to meet the proposal, the resource burden necessary to comply, and the security implications associated with the sensitivity of this data collection.

II. Detailed Comments

Positional Accuracy

PHMSA asserts that while the current NPMS standards reflected the state of geospatial data and positional accuracy at that time, these standards do not reflect the present state of geospatial data and positional accuracy. However, for Southwest, an LDC with

relatively small diameter transmission pipelines, the majority of which are not capable of internal inspection, the current NPMS standards do in fact reflect the state of Southwest's geospatial data and positional accuracy. As noted in AGA's comments, a significant amount of time and resources are required to achieve centerline positional accuracy beyond current capabilities. To comply with the proposed standards for positional accuracy of 5 feet for Class 3, Class 4, or High Consequence Areas (HCA), and 50 feet Class 1 or Class 2 locations, it will be necessary for Southwest to perform complete surveys for the majority of its pipeline systems. Of the 716 miles of transmission pipeline, 443 miles (62%) reside in Class 3, Class 4, or High Consequence Areas (HCA), and thus would be subject to 5 feet positional accuracy, with the remainder, 273 miles (38%), subject to 50 feet positional accuracy. However, only approximately 5% of the pipelines are internal inspection capable, requiring 663 miles to undergo a complete survey to achieve compliance with the proposed standards. Southwest estimates this activity to take several years at a cost of \$2-4 million dollars.

Southwest supports a phased approach as proposed by AGA to achieving more accurate NPMS data that is in harmony with PHMSA's stated objective. In Phase 1, Southwest will provide best current available accuracy for the 2016 NPMS submission. Phase 2 consists of a risk based approach with resources focused first on improving centerline positional accuracy for pipelines operating near the greatest concentration of the public. By the 2023 submission, Southwest will have achieved centerline positional accuracy of 50 feet or less for transmission pipelines in Class 3, Class 4, and HCAs and 100 feet or less for the remainder of the pipeline systems in Class 1 or Class 2.

Pipeline Attributes

Of the proposed thirty-one attributes, less than half reside within Southwest's GIS. The remaining attributes are resident in multiple databases across various platforms and would require substantial data integration to provide the information requested in the geospatial formats specified by PHMSA. It is estimated this data integration activity will take several years to complete at a cost upwards of \$1 million.

Southwest supports the submission of the following attributes in recognition of PHMSA's strategic goals to improve public safety, and ensure infrastructure is well-maintained: *Pipe Material, Pipe Diameter, HCAs, Class Location, Low Stress, Pipe Coating, Commodity Detail, and Seam Type.*

Security

In light of recent security breaches, both within Government and private sector, Southwest has concerns with the security of the data residing in a single database. Southwest is also concerned with the PHMSA proposal in which all attributes, unless otherwise marked, will be linked to the geospatial pipeline file as attributes at the pipe segment level. Southwest questions whether PHMSA has given due consideration to establishing which, if any, of the proposed attributes pose a security risk and should not be linked to the geospatial pipeline file. Attributes such as *Percent Specified Minimum Yield Strength, Maximum Allowable Operating Pressure, Year of Installation, Mainline Block Valve Locations, and Throughput*, appear to present significant security risk. As noted in AGA's comments, analysis of detailed pipeline information by a malicious party can result in serious physical and/or cyber-attacks causing impactful incidents to public safety.

III. Conclusion

Southwest appreciates the opportunity to submit comments on Docket No. PHMSA-2014-0092. Southwest supports modernization of the NPMS in a timely fashion, and encourages PHMSA to consider a phased approach. It will take several years and significant resources for Southwest to integrate the requested attribute data into its GIS. The significant narrowing of positional accuracy proposed by PHMSA will take operators, such as Southwest, much longer to achieve.

Southwest urges PHMSA to utilize the successful working group model employed in the initial creation and deployment of the NPMS in 1998. At that time, the standards underwent two pilot tests to help determine: the ability of pipeline operators to submit the data that meet the standards, problems encountered while trying to meet the standards, the cost and effort required to meet the standards and lastly, the ability of the pilot repositories to process the submitted data based on the draft standards.

Finally, the security implications associated with the collection of sensitive data cannot be overstated. PHMSA should consider including the Transportation Security Administration in the working group to provide the necessary security perspectives. As noted in AGA's comments, "Forming a NPMS Working Group, GIS platform capabilities, technical feasibilities, and security concerns can be vetted and an enhanced NPMS will result."

Respectfully submitted,

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By: _____

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