

**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

ON THE

RENEWAL AND REVISION TO THE NATIONAL PIPELINE MAPPING SYSTEM

SECOND PROPOSAL**

On July 30, 2014, the Pipeline and Hazardous Materials Safety Administration (PHMSA) published the above-referenced docket in the *Federal Register* (79 FR 44246), which solicited comment on proposed changes to the National Pipeline Mapping System (NPMS) data collection. In response to comments received, on August 27, 2015, PHMSA published a notice addressing many of the comments and requested additional comments on PHMSA's proposed path forward.

Southwest Gas Corporation (Southwest) herein submits comments to PHMSA for Docket No. PHMSA-2014-0092 under OMB Control Number 2137-0596. These comments supplement previous comments submitted by Southwest and are not a substitution for those comments.

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.

I. Support of the American Gas Association (AGA) Comments

Southwest has reviewed and supports the comments submitted by AGA, with clarification to the attribute *Highest percent operating SMYS* as noted in Southwest's comments below.

II. Southwest Comments

Southwest is generally supportive of PHMSA's efforts to modernize the NPMS. However, Southwest urges PHMSA to engage in further dialog with stakeholders to ensure the information collection request (ICR) provides a benefit to pipeline safety and is not unduly burdensome to Operators. As proposed by PHMSA, in the above referenced notice, the revised ICR still goes beyond a simple revision of the NPMS and more closely resembles significant rulemaking.

Although PHMSA acknowledged that a number of Operators submitted comments highlighting the expected burden of the proposed revisions to the ICR, Southwest does not believe PHMSA has adequately evaluated the actual burden imposed on Operators to comply. On the contrary, PHMSA reduced the estimated annual burden from 420,515 hours to 335,124 hours.

While PHMSA has dropped several attributes previously proposed, over twenty-four unique pipeline attributes have been retained in the revised ICR. As proposed, it will take several years and significant resources for Southwest to comply with the ICR. Southwest urges PHMSA to consider AGA's recommendation that the timeline for submission of the new positional accuracy requirements be aligned with integrity assessment intervals.

Southwest supports the submission of certain pipeline attributes, specifically; *Pipe Diameter, Commodity Detail, Pipe Material, Highest percent operating SMYS, Decade of Installation, Class Location, Gas HCA Segment, and Coated/Uncoated and Cathodic Protection*. Regarding *Highest percent operating SYMS*, Southwest is in agreement with PHMSA's definition of the attribute: the highest percent at which the pipeline is operating to Specified Minimum Yield Strength (SMYS). Although AGA, in its comments, state that Operators define percent SMYS based on the identified maximum allowable operating pressure (MAOP); this is not the case for Southwest, which utilizes maximum operating pressure (MOP) consistent with the PHMSA definition.

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 the inclusion of certain pipeline attributes that aid PHMSA in fulfilling its strategic goals to improve public safety. Southwest encourages PHMSA to also consider a long-term phased approach beyond the three-year schedule proposed for the implementation of the ICR.

Respectfully submitted,

Date: November 25, 2015

By: _____

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