



November 25, 2015

Docket Management System:
U.S. Department of Transportation
Docket Operations, M-30, Room W12-140
1200 New Jersey SE
Washington, DC 20590-0001

VIA FEDERAL E-RULEMAKING PORTAL (www.regulations.gov)

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

To Whom It May Concern:

TransCanada Corp.'s subsidiaries operate approximately 15,500 miles of natural gas transmission pipelines and over 1,800 miles of crude oil pipelines within the United States.

TransCanada supports the U.S. Department of Transportation's Pipeline and Hazardous Materials Safety Administration's (PHMSA) desire to enhance the National Pipeline Mapping System (NPMS) and thanks PHMSA for its consideration of the comments previously submitted regarding PHMSA's intent to revise the NPMS information request (the ICR). As solicited by PHMSA, TransCanada submits additional comments to the proposed revised ICR.

Once again, TransCanada appreciates the opportunity to comment on the proposed NPMS revisions and appreciates PHMSA's careful consideration of industry and stakeholder comments to find a balanced approach to the NPMS.

Sincerely,

Vern Meier

Vern Meier
Vice President, Pipeline Safety & Compliance
TransCanada Corp.
Houston, Texas 77002

**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)	DOCKET NO. PHMSA-2014-0092
COLLECTION: NATIONAL PIPELINE)	
MAPPING SYSTEM (OMB)	NOVEMBER 25, 2015
CONTROL NO. 2137-0092)		

COMMENTS OF TRANSCANADA CORPORATION

I. INTRODUCTION

On July 30, 2014, PHMSA invited public comment on its intent to request the Office of Management and Budget's approval to revise and increase the information collected through the current National Pipeline Mapping System Program (NPMS) and detailed the proposed revisions to the information collection request (the Original ICR). By December 1, 2014, TransCanada, the pipeline industry, and other stakeholders submitted their comments to the Original ICR. TransCanada commented on the technical challenges of submitting data to the originally suggested five-foot positional accuracy and on the numerous pipeline attributes. TransCanada also expressed concern regarding the potential lack of utility of the information being collected, the diversion of resources away from more impactful pipeline safety activities, and the security risks resulting from the release of sensitive data submitted through an ICR.

After PHMSA considered the submitted comments, on August 27, 2015, PHMSA issued a revised ICR (Revised ICR) and has again solicited comments. TransCanada has reviewed the Revised ICR and, while TransCanada recognizes that PHMSA has altered the proposed ICR by reducing the number of pipeline attributes that would be collected, TransCanada has concerns regarding the overall technical difficulties of responding to the Revised ICR and the cost-benefit disparity remain. In addition to the detailed comments provided below, TransCanada supports the respective comments of the Interstate Natural Gas Association of America (INGAA) and of the American Petroleum Institute (API).

II. COMMENTS

A. Revised ICR's Elimination of Data Collection for Certain Pipeline Attributes

TransCanada supports PHMSA's decision to forego collecting eight of the 31 attributes proposed in the Original ICR. As reflected in submitted comments, this data would not improve the NPMS because it either lacks utility with respect to safety and emergency response or is duplicative of information already collected by PHMSA.

B. Summary of Previous Comments

TransCanada commented on each proposed attribute in the Original ICR and would like to re-iterate the concern around the lack of utility with respect to safety and emergency response for attributes below and thus is not in support of providing these through the annual NPMS submission:

Phase 1	Highest Percent Operating (SMYS)*
Phase 1	Pipe Joining Method
Phase 1	Class Location
Phase 1	Seam Type
Phase 1	Commodity Details
Phase 1	Pump and Compressor Stations
Phase 1	Breakout Tanks
Phase 2	Type of Coating
Phase 2	Segment could affect an HCA
Phase 2	Year of Last Inline Inspection
Phase 2	Year and Pressure of Last Hydrostatic Test
Phase 2	Mainline Block Valve Locations
Phase 2	Gas Storage Fields
Phase 3	Year and Pressure of Original Hydrostatic Test

Note: () TransCanada suggests modifying the definition of “low stress pipes” to pipelines operating at less than 30% SMYS.*

TransCanada previously commented in support of providing PHMSA with the following attributes as they will add value to users of the NPMS including PHMSA and emergency responders:

Phase 1	Pipe Diameter
Phase 1	Pipe Grade
Phase 1	Wall Thickness
Phase 1	MAOP / MOP
Phase 1	Gas HCA Segment
Phase 1	Inline Inspection
Phase 1	Onshore / Offshore
Phase 1	Pipe Material
Phase 1	Commodity Category
Phase 2	Pipe Coated/Uncoated, Cathodic Protection

C. Challenges and Proposals for the Revised Positional Accuracy Requirements

TransCanada appreciates PHMSA's careful consideration of the logistics and feasibility of submitting positional data to within a \pm five (5) foot accuracy level for pipeline segments located within Class 3 locations, Class 4 locations, High Consequence Areas (HCAs), or "could affect" HCAs as required by the Original ICR. Instead, the Revised ICR proposes reducing the accuracy requirement, but expanding the geographic coverage to which the accuracy requirement would apply. Specifically, the Revised ICR would require gas transmission pipeline operators to submit data at \pm 50-foot accuracy for pipeline segments that are within: Class 2-4 locations; an HCA or have one or more buildings intended for human occupancy; and identified sites; or a right-of-way for a designated interstate, freeway, expressway, or other principal 4-lane arterial roadway as defined in the Federal Highway Administration's "Highway Functional Classification Concepts" within its potential impact radius.¹ Gas pipeline segments outside of these areas would be mapped to a positional accuracy of \pm 100 feet.

As an initial matter, TransCanada suggests that it is premature to include these additional areas in the Revised ICR. Requiring operators to submit the higher accuracy for these locations would not be consistent with or based on any regulatory definition or requirement. Though it is anticipated that PHMSA will issue a notice of proposed rulemaking to establish an integrity verification process and that the rulemaking will create a definition for so-called "moderate consequence areas" similar to the areas described in the Revised ICR, that proposed rulemaking has not been issued. It is impossible to predict when the rulemaking will issue, its content, the final version of the regulation, or its effective date. Consequently, TransCanada suggests that PHMSA defer collecting the higher accuracy for these locations until after a corresponding regulation is enacted.

Nevertheless, for purposes of assessing the Revised ICR, TransCanada analyzed the amount of mileage that would fall within the \pm 50-foot and 100-foot accuracy requirements as proposed. TransCanada accordingly studied the mileage of gas pipeline segments in the following areas: (1) Class 2-4 locations as defined in 49 C.F.R. § 192.5; (2) HCAs as defined in section 192.903; (3) areas containing one or more buildings intended for human occupancy within the potential impact radius (PIR); or (4) that contain a right-of-way for the designated major roadways. TransCanada readily has the data for class locations and HCAs because the data is required to be collected and reported by the regulations, but gathering sample data for categories (3) and (4) required new analyses as this data is not currently required by the regulations.

Complying with the highest accuracy requirements the table below shows the mileage affected based on the Original and Revised ICRs including the estimated financial burden.

¹ The Revised ICR proposes that hazardous liquid pipeline operators submit positional data to \pm 50 feet. Because TransCanada's liquid pipeline currently meets the proposed accuracy requirements, TransCanada does not include its liquid pipeline mileage in its analysis.

Original ICR (Class 3, 4 and HCAs)

	50-FOOT	100-FOOT
Length of U.S. Gas Pipelines (in miles)	5,016*	10,660
% of Total U.S. Gas Pipelines	32%*	68%

Revised ICR (Class 2, 3, 4, HCAs and additional areas)

	50-FOOT	100-FOOT
Length of U.S. Gas Pipelines (in miles)	14,472* (7,236)	1,204 (8,450)
% of Total U.S. Gas Pipelines	92%* (46%)	8% (54%)

Note: () denotes all mileage associated with valve section that has the higher accuracy requirement.*

If TransCanada were to implement the data collection in the Revised ICR, its approach would be to correct entire valve sections to the required accuracy if any impacted pipe segments are located within that valve section. The majority of the data that would be used for this exercise would be sourced from ILI tools, which are typically run from valve-to-valve. Correcting short, dynamic segments of data within a valve section would create additional complications. Instead, it would be more efficient to reconcile the entire valve section.

TransCanada's estimated burden associated with spatial accuracy improvements is approximately \$15 million and is based on the increase in mileage subject to the highest accuracy requirement.

D. Timing of Revised Positional Accuracy Requirements

PHMSA proposes collecting the additional data elements in three phases spread over three years starting the first submission year after the effective date of the Revised ICR. However, TransCanada instead proposes that the phases extend to a minimum of seven (7) years to align with the baseline and reassessment requirements of Part 192, Subpart O – Integrity Management regulations. Additionally, PHMSA has acknowledged the operators' and industry's concerns regarding the substantial amount of time needed to research and compile the additional data required by the Revised ICR.² Not only would it be more efficient to extend the

² See 80 F.R. 52084, 52092 (Aug. 27, 2015).

implementation period consistent with current regulations, but it would also allow operators to develop a methodical and organized approach to collecting and compiling the additional data across extensive pipeline systems. Otherwise, TransCanada is concerned that the urgency resulting from an expedited implementation timeline for the data collection risks diverting resources that could be more directly utilized to maintain and enhance pipeline safety.

E. Extensive Burden to Submit All Attributes in PHMSA's Specified GIS Format

Resources will be required to gather, compile, and report the additional data the Revised ICR seeks to collect and, in addition, a substantial cost is expected to integrate current non-Geographic Information System (GIS) data into preexisting GIS platforms and to convert existing GIS data into the exact database structure as per the Revised ICR.

Even for required attributes for which operators already possess GIS data, it may not be in a format acceptable to PHMSA, in which case operators will be required prior to submission to convert data that adheres to PHMSA's proposed database structure. In other cases, operators may maintain certain attribute data in a non-GIS format and would now have to convert the data into a GIS format. TransCanada estimates that this work would result in approximately \$55 million in additional cost. The Revised ICR does not appropriately estimate the burden associated with the data conversion and integration that would be required to comply with the proposed requirements.

F. Limiting Seam Type Information to Class 3/4 Locations and HCAs

TransCanada continues to believe that including seam type information in a global risk assessment will not accurately predict risk or integrity performance. However, given PHMSA's expressed intent to collect seam type data, TransCanada supports limiting data collection to Class 3/4 locations and HCAs.

G. Clarification Required for Reporting Highest Percent Operating SMYS

TransCanada seeks clarification between the Original and Revised ICRs. The Original ICR proposed that "operators submit information pertaining to the percent at which the pipeline is operating to SMYS. Specifically, operators would submit hoop stress caused by the highest operating pressure during the year as a percentage of SMYS."³ However, the Revised ICR makes no reference to a year and simply states that "PHMSA proposes operators submit information pertaining to the percent at which the pipeline is operating to SMYS."⁴ But then after summarizing the comments received to the Original ICR's proposal, the Revised ICR goes on to state that "PHMSA intends to move forward with this attribute as originally proposed." TransCanada requests that PHMSA clarify the data requested with respect to SMYS.

³ 79 F.R. 44246, 44247 (July 30, 2014).

⁴ 80 F.R. 52084, 52088.

H. Clarification Required for Phase in Which to Report Last Pressure Test Data

Section III of the Revised ICR states that last pressure test data will be collected in Phase 1, but Section V reflects that last pressure test data will be collected in Phase 3, and the last pressure test data will be collected in Phase 2.⁵ TransCanada asks PHMSA to identify in which phase operators should submit the data.

I. Use of Predominant

TransCanada is in support of providing operators the option to submit the attribute values using the concept of predominant. However, TransCanada requests that the term be clearly defined to ensure it is correctly applied for the submitted data sets.

J. Roads Data Availability

TransCanada was able to identify the mileage of pipe segments containing human-occupancy buildings within the PIR by leveraging existing geospatial data and GIS tools. However, determining the mileage of pipe associated with roadways in the PIR was hampered by the lack of available data on major roadways and the dimensions of the right-of-ways associated with those roadways.

TransCanada encountered the following difficulties in the course of assessing the feasibility of providing data on the PIR in connection with the roadways. Though some form of aggregated federal roadway data is available to operators, the data is incomplete and does not lend itself to accurate, consistent analysis. First, the quality and completeness of the data varies significantly among different states. Second, the data is not standardized in that the attribute content varies between states. Third, the data does not identify the right-of-way width. Fourth, spatial inaccuracies were observed within the data. All of these data deficiencies would carry over and propagate to other analyses, which reduces or eliminates the resulting utility of the collected data. Thus, TransCanada suggests that accurate and complete underlying roadway data be available for operators to analyze before operators are required to submit information that is dependent on and derived from that data. Such accurate and complete road data would include the appropriate classification as to the type of road and the right-of-way width to ensure that each operator works off of a common dataset. Absent availability of a common dataset, operators will face a significant financial burden when individual operators are forced to independently locate and aggregate more accurate information.

III. Conclusion

TransCanada respects its relationship with PHMSA and looks forward to continuing our ongoing efforts to improve pipeline safety both independently and in partnership with PHMSA and the industry. As an operator, TransCanada welcomes the opportunity to provide feedback and perspective on PHMSA's proposed ICR and, though it supports PHMSA's goal of improving

⁵ Compare 80 F.R. 52084, 52090 to *id.* at 52092.

pipeline safety and emergency response, TransCanada respectfully requests that PHMSA consider the issues raised by TransCanada, industry groups, and other operators and revise the ICR as warranted.