

UNITED STATES OF AMERICA

DEPARTMENT OF TRANSPORTATION

PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION

IN RE:

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

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DOCKET NO. PHMSA-2014-0092

**COMMENTS OF
MIDAMERICAN ENERGY COMPANY**

COMES NOW, MidAmerican Energy Company (“MidAmerican”), and submits the following comments on the notice of public meeting and request for comments (“Notice”) issued by the Pipeline and Hazardous Materials Safety Administration (“PHMSA”), Department of Transportation (Vol. 80, No. 166, F.R. 52084; August 27, 2015).

MidAmerican is a combination gas and electric utility operating in the states of Iowa, Illinois, South Dakota and Nebraska. MidAmerican has 12,353 miles of gas distribution main, 656,078 gas services and 705 miles of transmission pipeline. MidAmerican is the 23rd largest gas distribution company in the United States.

Comments

MidAmerican provides the following comments:

1. These comments supplement comments previously submitted by MidAmerican and are not a substitution of those comments. MidAmerican’s initial comments submitted on September 29, 2014, highlighted the significant security, difficulty in keeping maps and databases current, and global positioning system accuracy concerns with PHMSA’s initial proposal for modifications to the National Pipeline Mapping System.

2. MidAmerican concurs with the comments of the American Gas Association. We are especially in agreement with the comments regarding the following:

1. No net pipeline safety benefit by adding many of the proposed attributes.
2. Exemption for some datasets for pre-1970 pipe (unless unknown is allowed).
3. Attempt to expand HCAs by requiring info related to highways.
4. Timeline should align with integrity reassessment intervals (every seven years).
5. Though this data is used to make integrity management, it is not needed, nor should be included in the National Pipeline Mapping System.
6. Vagueness of “ILI-able”. This is also on the DOT report and it is equally as vague there.
7. “Could affect and HCA” datasets. This needs to be eliminated as there is no methodology for natural gas to predict this.
8. Coated and cathodically protected questions should be limited to a yes/no answer.

3. With the data requirements, there will be a significant impact on operators for researching, collecting, storing, maintaining and providing the data in the format which PHMSA is requesting. This burden of “additional” collection of data appears to be repetitive to what operators are already reporting on the annual report and through their integrity management programs. PHMSA indicates the data requested for the National Pipeline Mapping System submission would provide a better view for them to perform risk analysis of operators’ pipelines. The effective analysis of this data is already being performed and inspected through the Integrity Management programs. The burden of redundant reporting does not match the perceived benefit of these requirements.

MidAmerican Energy Company appreciates the opportunity to provide comments on the Notice and requests its comments be given due consideration.

Dated at Davenport, Iowa, this 26th day of October, 2015.

Respectfully submitted,

MIDAMERICAN ENERGY COMPANY

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