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GAS ASSOCIATION

July 22, 2016

Mr. Alan Mayberry
Acting Associate Administrator for Pipeline Safety
Pipeline and Hazardous Materials Safety Administration
U.S. Department of Transportation
1200 New Jersey Avenue, S.E.
Washington, DC 20590

Office of Management and Budget
Attention: Desk Officer for PHMSA
725 17th Street NW.
Washington, DC 20503

RE: Docket No. PHMSA–2014–0092; NOTICE OF INFORMATION COLLECTION REQUEST; Pipeline Safety: Request for Revision of a Previously Approved Information Collection: National Pipeline Mapping System Program

Dear Mr. Mayberry and OMB PHMSA Desk Officer:

The Northeast Gas Association (NGA) appreciates the opportunity to share its comments regarding Docket No. PHMSA-2014-0092; Notice of Information Collection Request, Pipeline Safety: Request for Revision of a Previously Approved Information Collection: National Pipeline Mapping System Program. This letter and attachment, submitted on behalf of NGA's member distribution companies, addresses issues associated with this docket.

NGA is a regional trade association that focuses on education and training, technology research and development, operations, planning, and increasing public awareness of natural gas in the Northeast U.S. NGA represents natural gas distribution companies, transmission companies, liquefied natural gas importers and associate member companies. Its member companies provide natural gas service to 12.5 million customers in 9 states (CT, ME, MA, NH, NJ, NY, PA, RI, VT).

With this notice, PHMSA is requesting a "Revision of a Previously Approved Information Collection" for its NPMS program. It is also seeking "suggestions for reducing the [information collection] burden" for review by the Office of Management and Budget (OMB).

Of particular concern to NGA is how the NPMS pipeline attribute collection requirements will impact not only interstate gas transmission pipelines but Local Distribution Companies (LDCs), who operate both significantly less miles of intrastate gas transmission pipelines and much needed distribution pipeline systems. These LDC pipeline systems ultimately supply environmentally and energy beneficial natural gas to all manner of end-users. For many LDCs, there is a significant cost investment in order to provide this NPMS attribute information. In most cases, it involves acquiring specialized geospatial programs, equipment and expertise to operate, perform and manage such an undertaking. Then there are field operations that will require attribute identification, data compilation, records verification, and final validation of all

information before submission to NPMS. Cost estimates for this data collection initiative can reach hundreds of millions of dollars to acquire these resources and perform these tasks within the limited time-frame proposed for each of the three data collection and submission phases. Therefore, as part of the burden reduction effort, and to reinforce accuracy, NGA recommends that 3 additional years should be added to each of these data element phases, and, if possible, even more time added for Phases 1 and 2.

Invariably, almost every regulatory mandate contributes to passing-on costs to already energy-cost burdened consumers for the environmentally premium fuel, natural gas. Currently, PHMSA collects a substantial amount of operator pipeline facility data, which it uses to assess whether or not changes to safety policy are needed and, where applicable, promulgate new regulatory initiatives. The new NPMS data collection initiative seems to duplicate this effort in many ways to support, for example, first responders.

NGA member companies have invested substantially in both mandated and voluntary public awareness programs that provide both education and emergency event coordination with emergency responders and public officials, as well as various other safety authorities. Moreover, LDCs are in a better position to keep their critical data secure (e.g., emergency block valves) and release it to only those that need-to-know or use. Therefore, PHMSA and OMB must remain cognizant of these facts in their commendable efforts for enhancing pipeline safety and protecting the environment.

Once again, NGA appreciates the opportunity to present comments and recommend guidance material that will promote both consistency and compliance with these proposed regulations. Moreover, as pipeline safety stakeholders with extensive field experience resources, NGA looks forward to participating and contributing, whenever possible and appropriate, towards the Commission's regulatory endeavors.

Sincerely,

Thomas M. Kiley
President & CEO

Northeast
GAS ASSOCIATION

List of NPRM Rule Changes Raising Issues

NGA is bringing the following major topics of concern list to PHMSA's attention:

1. Different projection protocols are not recognized; causing inaccuracies on NPMS maps
2. Identification of isolation valves presents a security and operational issue
3. Burdensome time-frame to supply Phase I and 2 New Data Elements and still meet Phase 3 mandate

Specific Comments:

1.0 PHMSA-NPMS Concern: **Different projection protocols are not recognized; causing inaccuracies on NPMS maps**

1.1 Issue: PHMSA-NPMS uses a different projection protocol than many Operators. To our knowledge, PHMSA-NPMS does not convert different Operator projections prior to entering the data on NPMS maps. This is evident, especially, when mileage the Operator submits is different, and sometimes, significantly inaccurately when it appears on NPMS maps.

1.1.1 Comment to Issue 1.1: As NGA understands it, PHMSA-NPMS uses NAD 1983, while other Operators may use projection protocols, such as, UTM 18 NAD 83. NGA recommends addressing this mapping inaccuracy issue by first recognizing that there are different projection protocols that Operators use and then establish conversion protocols to accurately capture an Operator's pipeline facilities data. In so doing, PHMSA-NPMS removes a data inaccuracy that could mislead any intended end-user.

2.0 PHMSA-NPMS Concern: **Identification of block or isolation valves presents a security and operational risk challenge and could worsen an emergency if operated by unauthorized persons**

2.1 Issue: PHMSA is still requiring pipeline block or isolation valves to be identified, regardless of the potential security risks and inadvertent valve operation by either unauthorized or unqualified persons

2.1.1 Comments for Issue 2.1: PHMSA continues to require collecting "mainline block valve locations and associated attributes" with the goal of sharing this information with individuals or agencies presumably vetted to receive, among other elements, SSI designated information.

First, while NGA encourages supporting First Responders and safety authorities in many ways, this sensitive information is not material that should be provided by any governmental agency because it requires substantial individual vetting and SSI secured locations. Operators develop mandated emergency plans that, among other important procedures, provide for training, communication and cooperation with safety officials. Clearly, potential public identification of any block or isolation valve presents an inherent security risk by removing the "on-the-need-to-know" privileged basis, normally administrated directly by the Operator. Moreover, the only time these valves should be identified is when there is a need to operating them. By PHMSA providing this information to any First Responder or safety authority there is this presumption that they have unconditionally authority to operate these valves, whether or not they are qualified and understand the consequences of operating an emergency valve.

Secondly, PHMSA-NPMS will mandate that public availability for access to these "Sensitive Security Information" (SSI) would be subject to 49 CFR Part 15 - PROTECTION OF SENSITIVE SECURITY INFORMATION. It is unclear to NGA as to: 1) How this standard is appropriate for SSI applications in pipeline safety, beyond oversight of Federal employees?; 2) How will this standard will be implemented and who will administer it?; 3) Who are these Part 15 qualified "covered persons" that "need-to-know," but are outside the Operator's - pipeline safety OQ qualified - "covered employees?;" 4) Who will have oversight authority and inspectional responsibility (e.g., PHMSA, DOT, DHS), over the administrators program?; and 5) Will Operator's be provided with the list of "covered persons" and have a right to question and remove the acceptability of a "covered person?"

Finally, for all the aforementioned reasons and concerns, NGA recommends removing any requirement for identifying any valve on Operator NPMS maps.

3.0 PHMSA-NPMS Concern: **Burdensome time-frame to supply Phase I and 2 New Data Elements and still meet Phase 3 mandate**

3.1 **Issue:** Compiling data collection attributes into the required "shape data" formatting in time for the first year of submission may not be feasible for all stakeholders.

3.1.1 Comment to Issue 3.1: The positional accuracy requirements represent just one of the new mandates in PHMSA's proposed NPMS revisions. Equally burdensome will be the effort that must be made by Operators to supply the Phase I and 2 New Data Elements, and then meet submittals under Phase 3. Compiling these attributes into the required "shape data" formatting in time for the first year of submission may not be feasible for all.

Consequently, NGA recommends that PHMSA reconsider the proposed timeline and accept pipeline data manually (e.g., Excel format) on a basis of at least 3 additional years to allow for full migration of data to a GIS database. This initiative is comparative to the proposed requirements associated with the Maximum Allowable Operating Pressure (MAOP) validation and material verification in regards to the NPRM "Safety of Gas Transmission and Gathering Pipelines." In order to streamline efforts, minimize burden to operators, maximize net pipeline safety benefit, modernize the NPMS is need along with required synchronization of "reliable, traceable, verifiable and complete" gas transmission records.

Finally, cost estimates for this data collection initiative can reach hundreds of millions of dollars to acquire modernization resources and perform the data collection tasks within the limited time-frame proposed for each of the three data collection and submission phases. Therefore, as part of the burden reduction effort, and to reinforce accuracy, NGA recommends that 3 additional years should be added to each of these data element phases, and, if possible, even more time added for Phases 1 and 2.