

UNITED STATES OF AMERICA
DEPARTMENT OF TRANSPORTATION
PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION

IN RE:	:	DOCKET NO. PHMSA-2014-0092
	:	
PIPELINE SAFETY:	:	
REQUEST FOR REVISION OF A	:	
PREVIOUSLY APPROVED	:	
INFORMATION COLLECTION:	:	
NATIONAL PIPELINE MAPPING	:	
SYSTEM PROGRAM	:	

COMMENTS OF
MIDAMERICAN ENERGY COMPANY

COMES NOW, MidAmerican Energy Company (“MidAmerican”) and submits the following comments on the National Pipeline Mapping System Program (“NPMS”), Docket No. PHMSA-2014-0092, Pipeline Safety: Request for Revision of a Previously Approved Information Collection: National Pipeline Mapping System Program, which is under consideration by the Pipeline and Hazardous Material Safety Administration (“PHMSA”).

MidAmerican is a combination gas and electric public utility providing service to the public in the states of Iowa, Illinois, South Dakota, and Nebraska. MidAmerican has 12,470 miles of natural gas distribution main, 661,540 gas services, and 705 miles of natural gas transmission pipeline. MidAmerican’s corporate offices are located at 666 Grand Avenue, P.O. Box 657, Des Moines, Iowa 50303-0657.

MidAmerican is committed to pipeline safety and supports pipeline integrity management principles such as increasing knowledge of pipeline centerlines. In general, MidAmerican supports PHMSA’s proposal and agrees with the modified and dropped attributes in this revised

proposal. MidAmerican also appreciates the allowance of “unknown” values for certain attributes.

MidAmerican offers these additional comments related to specific sections in the information collection proposal.

Part II. Modified or Dropped Attributes

A) Positional Accuracy

The background information indicates that PHMSA is proposing centerline positional accuracy. However, in the definition of positional accuracy, the centerline is not mentioned, and it needs to be added for clarity. For example, when a pipe transitions from 12” to 8”, are operators required to determine the positional accuracy within 50 feet in all directions of the transition? This is not possible through above-ground surveys. Therefore, to clarify the definition, MidAmerican respectfully requests that the word “centerline” be added to the definition.

PHMSA also proposes 50-foot positional accuracy for segments that have one structure intended for human occupancy within the segment’s PIR. If this is to mirror the moderate consequence area (“MCA”) concept that has been proposed in the gas transmission pipeline safety NPRM, PHMSA should consider using the MCA terminology in the final proposal.

D) Year of Last Corrosion, Dent, Crack, and other ILI Inspections

MidAmerican respectfully requests that PHMSA clarify if the assessment referenced in this section is defined as a full assessment or interim seven-year assessment. MidAmerican also requests PHMSA clarify if the direct assessment method (“DIR”) includes low stress reassessments as outlined in §192.941.

Part III. Retained Attributes

Q) Mainline Block Valves

PHMSA makes the statement, “Valve location can assist emergency responders when working with pipeline operators during an emergency.” MidAmerican is concerned that emergency responders may operate valves without knowledge of the system and may exacerbate an emergency. Emergency responders are provided information regarding working with an operator during an emergency, including hazards and prevention measures, in accordance with §192.616. Therefore, MidAmerican respectfully requests that mainline block valve information be removed from the data submittal requirement.

S) Additional Liquefied Natural Gas Plant Attributes and Features

PHMSA makes the statement, “the location and characteristics of LNG plants helps PHMSA and emergency responder better understand potential safety risks on a national and local level, respectively, and provides location data which is not submitted on the Annual Report.” Emergency responders are provided information regarding working with an operator during an emergency, in accordance with §193.2509. Therefore, MidAmerican respectfully requests that additional liquefied natural gas plant information be removed from the data submittal requirement.

Part IV. General Comments

D) Data Security

If the database is compromised, it may put both operator assets and public safety at risk. Therefore, MidAmerican respectfully requests that PHMSA assure operators of database security measures and notify all operators of any future data security breaches.

MidAmerican Energy Company appreciates the opportunity to provide comments on this Information Collection proposal and asks that its comments be given appropriate consideration.

Dated in Davenport, Iowa, on this 22nd day of July, 2016.

Respectfully submitted,

MIDAMERICAN ENERGY COMPANY

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One of Its Attorneys

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