

**BEFORE THE
PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION

UNITED STATES DEPARTMENT OF TRANSPORTATION
WASHINGTON, D.C.**

Pipeline Safety: Information Collection) Docket No. PHMSA – 2015 – 0205
Activities)

Comments of Paiute Pipeline Company

I. Introduction

Paiute Pipeline Company (Paiute) is a natural gas interstate transmission company that serves customers in California and Nevada. Paiute owns and operates 894 miles of interstate transmission pipelines. Paiute's parent company, Southwest Gas Corporation, is a member of the American Gas Association (AGA).

Paiute herein submits comments to the Pipeline and Hazardous Materials Safety Administration (PHMSA) in Docket No. PHMSA – 2015 – 0205 for the notice and request for comments pertaining to Information Collection Activities.

Paiute has reviewed and supports comments submitted by AGA on this notice and request for comments. This letter provides Paiute's general concerns with the notice and more details on the impacts of the proposed changes specific to Paiute.

II. General

Paiute appreciates the opportunity to comment on the notice and request for comments regarding PHMSA's Information Collection Activities. This notice and request for comments on Gas Distribution, Gas Transmission & Gathering Lines, and Liquefied Natural Gas (LNG) Facilities Incident Report Forms was published on May 13th, 2016.

With over 60 new data points added to the Gas Transmission & Gathering Lines Incident Report alone Paiute would like to express concern over the granularity of the information requested, particularly the time and resources required to gather the proposed information. While some of the newly requested information is readily available, there are many items which are not readily available for existing facilities. The time required to

gather the detailed information requested may exceed the time allotted by the reporting criteria (30 days).

III. Gas Transmission & Gathering Pipelines Incident Report

Part A – Key Report Information

Part A21.c. requests the operator provide "Volume of Gas consumed by fire (MCF)." Paiute recommends this be changed to "Estimated volume of Gas consumed by fire" as the actual volume cannot accurately be determined.

Part D – Additional Consequence Information

D7.i. Paiute recommends that "Total Cost" be revised to "Estimated Total Cost" to remain consistent with the "estimated" costs used to calculate this total.

D8. requires the Operator to report the "number of persons with injuries requiring treatment in a medical facility but not requiring overnight in-patient hospitalization." The Operator will be unable to account for persons seeking outpatient care the day after or days after an incident.

D10. and D11. requests information on the number of buildings "affected." Does this mean structural damage or the paint was blackened due to soot? It is not clear from the form or instructions what information is being requested. Paiute requests that it be more clearly defined in the F 7100.2 or its instructions.

IV. Liquefied Natural Gas (LNG) Facility Incident Report

Paiute has similar concerns on the Liquefied Natural Gas Facility Incident Report as the Gas Transmission & Gathering Pipelines Incident Report. In the instances where the section call-outs are different from the Gas Transmission & Gathering Pipelines Incident Report, they have been updated to match the Liquefied Natural Gas Facility Incident Report.

Part A – Key Report Information

Part A15a. requests the operator provide "Volume of Gas consumed by fire (MCF)." Paiute recommends this be changed to "Estimated volume of Gas consumed by fire" as the actual volume cannot accurately be determined.

A19. requires the Operator to report the "number of persons with injuries requiring treatment in a medical facility but not requiring overnight in-patient hospitalization." The Operator will be unable to account for persons seeking outpatient care the day after or days after an incident.

A21. and A22. requests information on the number of buildings "affected." Does this mean structural damage or the paint was blackened due to soot? It is not clear from the form or instructions what information is being requested. Paiute requests that it be more clearly defined in the F 7100.3 or its instructions.

Part C – Additional Consequence Information

C1.i. Paiute recommends that "Total Cost" be revised to "Estimated Total Cost" to remain consistent with the "estimated" costs used to calculate this total.

V. Conclusion

Paiute appreciates the opportunity to submit comments to the above referenced notice and request for comments with respect to PHMSA's plans to revise the incident and accident report forms and corresponding instructions. Additionally, Paiute supports AGA's comments on this notice. We respectfully request that PHMSA closely review the comments provided and consider the alternate language suggested. We believe our recommendations will add clarity and increase regulatory certainty to the industry.

Respectfully submitted:

Date: July 12th, 2016

By: _____

Jeffrey L. Maples

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