

**BEFORE THE  
PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION  
  
UNITED STATES DEPARTMENT OF TRANSPORTATION  
WASHINGTON, D.C.**

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

**Comments of Southwest Gas Corporation**

**I.       Introduction**

Southwest Gas Corporation (Southwest) is a natural gas local distribution company (LDC) that serves over 1.9 million customers in Arizona, California and Nevada. Southwest owns and operates 640 miles of interstate and intrastate transmission pipelines and 30,673 miles of distribution mains. Southwest is a member of the American Gas Association (AGA).

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

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

**II.       General**

Southwest 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 13<sup>th</sup>, 2016.

With over 60 new data points added to the Gas Distribution System Incident Report alone Southwest 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, items such as lot number and model number of mechanical fittings (G5) – Pipe, Weld, or Joint Failure) may not be

available for existing buried fittings. The time required to gather the detailed information requested may exceed the time allotted by the reporting criteria (30 days).

### **III. Gas Distribution System Incident Report**

#### **Part A – Key Report Information**

Part A21.c. requests the operator provide “Volume of Gas consumed by fire (MCF).” Southwest 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**

D2.c. Southwest recommends the question remain unchanged. The omission of the qualifier “Operator’s”, as proposed by PHMSA, results in ambiguity as to which emergency response costs should be included. As proposed the question could be interpreted to include the costs incurred by first responders such as police, fire, and emergency medical personnel.

D2.i. Southwest recommends that “Total Cost” be revised to “Estimated Total Cost” to remain consistent with the “estimated” costs used to calculate this total.

D4 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.

D6 and D7 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. Southwest requests that it be more clearly defined in the F 7100.1 or its instructions.

### **IV. Gas Transmission & Gathering Pipelines Incident Report**

Southwest has similar concerns on the Gas Transmission & Gathering Pipelines Incident Report as the Gas Distribution System Incident Report. In the instances where the section call-outs are different from the Gas Distribution System Incident Report, they have been updated to match the 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).” Southwest 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 Southwest 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. Southwest requests that it be more clearly defined in the F 7100.2 or its instructions.

### **V. Liquefied Natural Gas (LNG) Facility Incident Report**

Southwest 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).” Southwest 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. Southwest requests that it be more clearly defined in the F 7100.3 or its instructions.

#### Part C – Additional Consequence Information

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

#### **VI. Conclusion**

Southwest 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, Southwest 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 12<sup>th</sup>, 2016

By: \_\_\_\_\_

  
Jerome T. Schmitz, P.E.

For further information, please contact:

Jerome T. Schmitz, P.E.  
Vice President/Engineering  
Southwest Gas Corporation  
5241 Spring Mountain Road  
Las Vegas, NV 89150-0002  
Phone: (702) 876-7112  
E-mail: [Jerry.Schmitz@swgas.com](mailto:Jerry.Schmitz@swgas.com)