



Vectren Corporation
P.O. Box 209
Evansville, IN 47702-0209

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Angela Hill, Transportation Specialist
Standards & Rulemaking Division
Pipeline and Hazardous Material Safety Administration
United States Department of Transportation
1200 New Jersey Avenue SE, PHP-30
Washington, DC 20590-0001

Subject: PHMSA-2018-0109 Requested Comments

Dear Ms. Hill:

Indiana Gas Company, Ohio Valley Hub, Southern Indiana Gas & Electric Company, and Vectren Energy Delivery of Ohio (hereafter, collectively, Vectren) appreciate this opportunity to provide comments in response to PHMSA-2018-0109: Pipeline Safety - Information Collection Activities, Gas and Liquid Pipeline Safety Program Certification.

Vectren generally supports PHMSA's intention to request Office of Management and Budget (OMB) approval for the renewal, without change, of the information collection covering the Gas and Liquid Pipeline Safety Program Certifications currently approved under OMB control number 2137-0584. Vectren hereby responds below to PHMSA's Requested Comments on Information Collection and Recordkeeping Requests.

- a) The need for the proposed collection of information, including whether the information will have practical utility in helping the agency to achieve its pipeline safety goals;

Response: Vectren agrees that the proposed collection of information has practical utility.

- b) The accuracy of the agency's estimate of the burden of the proposed collection of information;

Response: Vectren agrees with PHMSA's estimate of the burden of the proposed collection of information. Vectren considers this burden reasonable for compliance with federal regulatory requirements. However, Vectren notes that the actual hours may vary widely depending on the size of the operator, records availability (digital vs. paper), and data governance models, etc.

- c) Ways to enhance the quality, utility, and clarity of the information to be collected; and

Response: Vectren supports periodic information collection, evaluation, and annual reporting. The quality, utility, and clarity of information provided in those annual reports may be improved by more detailed reporting instructions and more specific, consistent definitions for data and reporting.

Specific Example

Locate tickets: The definition for a locate ticket may vary widely from state to state. The scope of work permitted on a single locate ticket as well as the duration a locate ticket remains open also varies from state to state which impacts the volume of tickets reported. This in turn can drastically affect the benchmarking of damage rates from state to state, thus, leading to an inconsistent assessment of a state's efforts on damage reduction initiatives.

- d) Ways to minimize the burden of the collection of information on those who are to respond, including the use of appropriate automated, electronic, mechanical, or other technological collection techniques.

Response: Vectren supports the continued option of electronic submission of forms. Electronic submission empowers operators to leverage electronic data analysis and reporting functions, which further minimizes information collection burdens.

Respectfully submitted,

Jo Ellen F. Cohorst
Manager, Gas Compliance and Quality Management Program