

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

Pipeline Safety: Request for Revision
of a Previously Approved Information
Collection – National Pipeline Mapping
System Program

Docket No. PHMSA-2014-0092

**COMMENTS OF LACLEDE GAS COMPANY ON THE
RENEWAL AND REVISION TO THE NATIONAL PIPELINE MAPPING SYSTEM**

Laclede Gas Company appreciates the opportunity to comment on the revision and renewal of the information collected under OMB Control Number 2137-0596 titled “National Pipeline Mapping System (NPMS) Program”.

Laclede Gas Company (Laclede) is the largest natural gas distribution utility in Missouri. Laclede and its predecessors have been distributing gas, in one form or another since 1857. Today, Laclede serves approximately 1.1 million residential, commercial and industrial customers throughout Missouri through approximately 30,600 miles of main and service pipelines, of which, 278 miles are defined as gas transmission line.

Laclede Gas Company is supportive of efforts to improve pipeline safety through the modernization of the NPMS. Laclede Gas Company acknowledges that narrowing the centerline positional accuracy of pipeline segments and adding appropriate pipeline attributes to the current NPMS are important components of the modernization effort. However, PHMSA’s current proposed revisions are a complete overhaul of the NPMS, including a dramatic increase in the number of pipeline attributes requested and a significant narrowing of positional accuracy. Such an overhaul warrants significant further exchange between industry, emergency responders, and Federal and State Regulators. Stakeholders should

participate in a dialogue to ensure that the modernization of the NPMS enhances pipeline safety while avoiding duplicative reporting requirements that do not provide additional pipeline safety value.

Laclede Gas Company respectfully reminds PHMSA that there are numerous pipeline safety initiatives currently underway. From integrity assessments, to modernization of aging infrastructure, to installation of remote and automated valves to increased patrolling and excavation damage prevention programs, operators are focusing their limited resources on the issues that impact pipeline, personnel and public safety. The financial resources associated with these initiatives are realized both within the operating companies as well as by the rate paying public. A continuation of true pipeline safety initiatives is paramount.

Laclede Gas Company expresses its support for the comments filed by the American Gas Association (AGA) regarding the phased approach proposed by AGA that would create a more effective and sustainable NPMS modernization effort and create a manageable path forward for PHMSA, the public, emergency responders and industry. Although this proposal would take additional time, the approach will allow stakeholders to develop a realistic plan to collect the pipeline information via the most effective methods and assure the information is protected from unauthorized users. Laclede Gas Company is committed to working with PHMSA, and other key stakeholders, on modernizing the NPMS and fully supports PHMSA bringing these stakeholders together to develop a viable path forward.

Laclede Gas Company thanks PHMSA for the opportunity to provide comments. Laclede Gas Company believes AGA's proposal includes the collection and submittal of attributes that will meet the goals identified by PHMSA in its Information Collection Request in a way that will minimize the burden on the industry, the cost impact to customers, and keep resources focused on efforts that will improve pipeline safety.

Respectfully submitted,

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By: 

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