

**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 Paiute Pipeline Company

Paiute Pipeline Company (Paiute) herein submits comments to the Pipeline and Hazardous Materials Safety Administration (PHMSA) for Docket No. PHMSA-2014-0092 regarding the "Pipeline Safety: Request for Revision of a Previously Approved Information Collection - National Pipeline Mapping System Program".

Paiute operates 860 miles of interstate transmission pipeline in the state of Nevada. It also operates the H.G. Laub Liquified Natural Gas (LNG) Plant, located near Lovelock, Nevada. Paiute is a wholly-owned subsidiary of Southwest Gas Corporation (Southwest), which is a member of the American Gas Association (AGA) and supports the comments submitted by AGA regarding the above referenced docket.

I. Paiute General Comments

On July 30, 2013, PHMSA published the above-referenced docket in the *Federal Register* (79 FR 44246), which solicits comment on proposed changes to the National Pipeline Mapping System (NPMS) data collection. Paiute appreciates the opportunity to provide comments on the revision and renewal of the information collected under OMB Control Number 2137-0596 in support of the modernization of the NPMS.

PHMSA is proposing significant changes to the data collection currently required of Operators; substantially increasing the number of pipeline attributes collected, and increasing the positional accuracy for certain pipeline segments from 500 feet to as narrow as 5 feet. The proposed changes go beyond a simple revision of the NPMS as described by PHMSA in the above referenced notice in the Federal Register and more closely resemble significant rulemaking.

Consequently, PHMSA has not taken into consideration the substantial cost and resource burden imposed on the Operator to comply with the proposed changes. In Paiute's case, the requested attributes reside in multiple databases/platforms outside of its Geographic Information System (GIS) and would require substantial data integration to provide the information requested in the geospatial formats specified by PHMSA.

While PHMSA has estimated the annual burden to be about 350 hours per respondent, the burden on Operators extends well beyond the estimate of annual hours to comply with the submission. Even though a few of the proposed attributes that can be included in the submission with relatively minimal cost and resources, the vast majority will require substantial cost and extensive resources as described in the detailed comments below.

Paiute appreciates the Public Meeting held by PHMSA on November 17, 2014, which provided an opportunity for both government and industry to express their viewpoints on the proposed changes. However, the one-day workshop did not provide resolution to the many issues raised. Paiute urges PHMSA to consider utilizing a joint government/industry team similar to that employed in the development of the original standards for the NPMS data collection drafted in 1998 in its current modernization effort. Only through collaboration with stakeholders will PHMSA gain a full understanding of the current capabilities of the Operators, the cost for Operators to meet the proposal, the resource burden necessary to comply, and the security implications associated with the sensitivity of this data collection.

II. Detailed Comments

Positional Accuracy

PHMSA asserts that while the current NPMS standards reflected the state of geospatial data and positional accuracy at that time, these standards do not reflect the present state of geospatial data and positional accuracy. However, for Paiute the current NPMS standards do in fact reflect the state of Paiute's geospatial data and positional accuracy. As noted in AGA's comments, a significant amount of time and resources are required to achieve centerline positional accuracy beyond current capabilities. To comply with the proposed standards for positional accuracy of 5 feet for Class 3, Class 4, or High Consequence Areas (HCA), and 50 feet Class 1 or Class 2 locations, it will be necessary for Paiute to perform complete surveys for the majority of its pipeline (600 miles) as only 30% of its pipeline is internal inspection capable. Paiute estimates this activity to take several years at a cost of \$2-3 million dollars.

Paiute supports a phased approach as proposed by AGA to achieving more accurate NPMS data that is in harmony with PHMSA's stated objective. In Phase 1, Paiute will provide best current available accuracy for the 2016 NPMS submission. Phase 2 consists of a risk based approach with resources focused first on improving centerline positional accuracy for pipelines operating near the greatest concentration of the public. By the 2023 submission, Paiute will have achieved centerline positional accuracy of 50 feet or less for transmission pipelines in Class 3, Class 4, and HCAs and 100 feet or less for the remainder of the pipeline systems in Class 1 or Class 2.

Pipeline Attributes

Of the proposed thirty-one attributes, less than half reside within Paiute's GIS. The remaining attributes are resident in multiple databases across various platforms and would require substantial data integration to provide the information requested in the geospatial formats specified by PHMSA. It is estimated this data integration activity will take several years to complete at a cost upwards of \$1 million.

Paiute supports the submission of the following attributes in recognition of PHMSA's strategic goals to improve public safety, and ensure infrastructure is well-maintained: *Pipe Material, Pipe Diameter, HCAs, Class Location, Low Stress, Pipe Coating, Commodity Detail, and Seam Type.*

Security

In light of recent security breaches, within both the Government and private sector, Paiute has concerns with the security of the data residing in a single database. Paiute is also concerned with the PHMSA proposal in which all attributes, unless otherwise marked, will be linked to the geospatial pipeline file as attributes at the pipe segment level. Paiute questions whether PHMSA has given due consideration to establishing which, if any, of the proposed attributes pose a security risk and should not be linked to the geospatial pipeline file. Attributes such as *Percent Specified Minimum Yield Strength, Maximum Allowable Operating Pressure, Year of Installation, Mainline Block Valve Locations, and Throughput*, appear to present significant security risk. As noted in AGA's comments, analysis of detailed pipeline information by a malicious party can result in serious physical and/or cyber-attacks causing impactful incidents to public safety.

III. Conclusion


Paiute appreciates the opportunity to submit comments on Docket No. PHMSA-2014-0092. Paiute supports modernization of the NPMS in a timely fashion, and encourages PHMSA to consider a phased approach. It will take several years and significant resources for Paiute to integrate the requested attribute data into its GIS. The significant narrowing of positional accuracy proposed by PHMSA will take operators, such as Paiute, much longer to achieve.

Paiute urges PHMSA to utilize the successful working group model employed in the initial creation and deployment of the NPMS in 1998. At that time, the standards underwent two pilot tests to help determine: the ability of pipeline operators to submit the data that meet the standards, problems encountered while trying to meet the standards, the cost and effort required to meet the standards and lastly, the ability of the pilot repositories to process the submitted data based on the draft standards.

Finally, the security implications associated with the collection of sensitive data cannot be overstated. PHMSA should consider including the Transportation Security Administration in the working group to provide the necessary security perspectives. As noted in AGA's comments, "Forming a NPMS Working Group, GIS platform capabilities, technical feasibilities, and security concerns can be vetted and an enhanced NPMS will result."

Respectfully submitted,

Date: December 01, 2014

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