

December 1, 2014

Docket Management Facility, U.S. Department of Transportation
West Building, Room W12-140
1200 New Jersey Avenue SE
Washington, DC 20590

VIA FEDERAL E-RULEMAKING PORTAL (www.regulations.gov)

Re: Docket No. PHMSA–2014–0092: *Pipeline Safety: Request for Revision of a Previously Approved Information Collection: National Pipeline Mapping System (NPMS) Program (OMB Control No. 2137-0596)*

TransCanada, as an operator of approximately 15,500 miles of natural gas transmission and gathering pipelines and over 1,800 miles of crude oil pipelines within the United States, welcomes the opportunity to provide comments on the Pipeline and Hazardous Materials Safety Administration (PHMSA)'s proposed Information Collection Request (ICR) revisions to the NPMS.

TransCanada understands and supports PHMSA's desire to enhance its NPMS; however this enhancement must be balanced and recognize the significant burden being applied to industry to meet PHMSA's need. As stated in our comments, the proposed NPMS revisions – in its current form – would have a tremendous burden not only on TransCanada, but on industry as a whole.

Our comments on the proposed revisions –separated into General Comments, Cost Impact, and Comments on Pipeline Accuracy and Attributes– are meant to provide constructive feedback in areas of particular interest to TransCanada where we support PHMSA's proposals or where we believe further clarity and/or modification is required. As we have also participated in the formation of industry comments through the Interstate Natural Gas Association of America (INGAA), American Petroleum Institute (API) and the Association of Oil Pipe Lines (AOPL), we have referenced the INGAA and API-AOPL proposals, where applicable, within our company comments.

Once again, TransCanada appreciates the opportunity to comment on the proposed NPMS revisions and encourages PHMSA to work collaboratively with the pipeline industry and relevant stakeholders to find a balanced approach to advancing the functionality of the NPMS.

Sincerely,



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TransCanada Comments on PHMSA NPMS Proposal

December 1, 2014

Docket # PHMSA-2014-0092

Pipeline Safety: Request for Revision of a Previously Approved Information Collection – National Pipeline Mapping System Program (OMB Control No. 2137-0596)

On July 30, 2014, the U.S. Department of Transportation's Pipeline and Hazardous Materials Safety Administration (PHMSA) issued an Information Collection Request (ICR) and encouraged the filing of comments on PHMSA's intent to request the Office of Management and Budget's approval to revise information collection through the National Pipeline Mapping System Program (NPMS) to require pipeline operators to submit additional information to the NPMS.

General Comments

TransCanada has reviewed the ICR published by PHMSA and provides the following comments with regards to gas and liquid pipelines to address concerns and to propose alternative options.

The ICR's primary rationale for expanding the NPMS with new datasets and increased accuracy is that it "will allow for more effective assistance to emergency responders by providing them with a more reliable, complete dataset of pipelines and facilities". TransCanada has always made it a priority to readily provide any data required to proactively support effective emergency planning and response efforts. However, TransCanada has concerns that providing the highly technical additional data as requested by PHMSA, and to the accuracy levels prescribed will not materially enhance emergency responder effectiveness. Providing the level of detailed engineering data contemplated to non-pipeline professionals such as emergency responders and other local government officials could lead to misinterpretation and misunderstanding, which may consequently increase the risk to the public in an emergency event rather than enhance the responding parties' effectiveness.

Further TransCanada is concerned that offering this broad field of data in a largely open access system as proposed may be contrary to the goal of the Incident Command System, the fundamental objective of which is to create an organized and structured response to an incident whereby essential, current and specific site information is shared in a controlled and deliberate fashion to those involved in unified command. An open access system could potentially break down the command structure due to responding parties taking independent action on out of date or generalized information. Additionally those assessments and actions may be flawed based on incomplete or misinterpreted information. Under the Incident Command System, an operator such as TransCanada takes the lead, with the emergency responding agencies potentially functioning as an integrated part of the structure. Further, TransCanada has Geographical Response Plan and Tactical Response Plan in place for critical receptors,

such as community water intake, sensitive areas, and species at risk. TransCanada's emergency response plans are reviewed with local agencies. In this context, TransCanada supports INGAA's Proposal (Section I.A.1) in which the point is made that the information requested in the ICR will not necessarily be useful to emergency responders or enhance their activities. This concern is shared in API-AOPL's Proposal (Section II.B).

PHMSA further states that the additional information "will strengthen the effectiveness of PHMSA's risk rankings and evaluations". TransCanada recognizes that having an effective risk assessment algorithm as a part of an integrity management program is important for maintaining pipeline safety. Therefore, TransCanada develops, implements, and maintains a process appropriate for managing TransCanada's pipelines' integrity risks. In accordance with the Code of Federal Regulations (CFR), it is the operator's and not the regulator's responsibility to manage integrity and TransCanada believes this approach is more effective for maintaining pipeline safety because an operator can use its more direct knowledge and experience about its pipelines to assess and control risk.

PHMSA states that providing "all levels of government, from Federal to municipal" with "an improved NPMS" will aid in "promoting public awareness of hazardous liquid and gas pipelines and in improving emergency responder outreach." TransCanada recognizes that an effective public awareness program is important for maintaining safety. As an additional preventive and mitigative measure, TransCanada implements a program promoting public awareness of hazardous liquid and gas pipelines and reaching out to the emergency responders, which includes assisting emergency response agencies and communities to be prepared and execute response operations during an incident. A comprehensive and accessible mapping system that includes all underground hazardous facilities and can be relied upon for basic operational information to the level of accuracy appropriate for an effective emergency response would be a beneficial enhancement to these outreach and education efforts.

PHMSA mentions that "the new data will provide better support to PHMSA's inspectors", however, TransCanada questions whether the NPMS is the best-suited database for the requested data and whether it will be able to adequately address the concerns described later in the document regarding the security of the data. Further, TransCanada would like to note that the NPMS submission occurs at a single point of time on an annual basis and, due to continuous changes to the pipeline data, the annually submitted data may not correspond to the operator's current database at a given time after the data submission is made. Therefore, the requested additional data might not be useful to PHMSA's inspectors. Regarding this concern, TransCanada supports INGAA's Proposal (Section I.A.2).

When considering the required accuracy for data used by emergency responders, TransCanada notes that the level of data accuracy and the NPMS background information (such as aerial photography or basemaps) must be in agreement in order to provide meaningful information that does not lead to any misinterpretation by the NPMS users due to spatial misalignment.¹ In addition, NPMS users may not

¹ TransCanada refers to engineering data in this context to be data sets that require appropriate background in pipeline engineering and GIS in order to interpret the data correctly.

have the knowledge to read metadata and/or analyze different sources of data to account for the accuracy differences. Regarding this concern, TransCanada supports INGAA's Proposal (Section I.C).

Currently, TransCanada provides PHMSA with up-to-date information as practicable in accordance with the federal regulations, but subject to applicable Freedom of Information Act (FOIA) exemptions and Critical Energy Infrastructure Information (CEII) protection. TransCanada recognizes that having accurate and complete input data is important for managing risk, but believes that improving the accuracy and completeness of data and that of sharing the data are separate issues that warrant different considerations. TransCanada's concern is that some of this information can cause serious safety, competitive, and security consequences when released to the wrong people. Regarding this concern, TransCanada supports INGAA's Proposal (Section II) and API-AOPL's Proposal (Section II.A).

Additional concerns that TransCanada would like to note are the following:

- Proposed changes to the NPMS will require a significant number of resources from the pipeline industry that could be more directly utilized to enhancing pipeline safety.
- The effectiveness of the One-Call scheme could be undermined if individuals were to attempt to locate underground pipeline facilities using the new NPMS system instead of adhering to the One-Call system requirements.
- The general public might misinterpret the engineering data due to lack of knowledge in regards to the technical content.
- Data quality among operators and pipeline systems likely varies and would therefore skew the risk-assessment or lead to misinterpretation of the results.
- A global risk assessment algorithm might not consider unique integrity performance of individual pipeline systems and subsystems, which would result in inaccurate risk assessment results.
- The proposal does not describe how PHMSA will take into account the quality of data for all pipelines of various vintage and owners.
- A lack of governance around copying, use, and distribution of sensitive, outdated, or corrupted data might lead to conflicting results or misrepresentation.
- A cyber-attack on the NPMS servers has the potential to have serious competitive and security consequences if the additional proposed information is released.

Cost Impact

TransCanada has developed high-level estimates of the cost, time and resources that would be required for TransCanada to comply with the ICR requirements and, based on those estimates, contends that the claimed benefits of the proposal do not justify the burden and cost.

Based on TransCanada's U.S. pipeline length of 17,560 miles, the total cost to comply with the ICR requirements is estimated to be in the range of \$100-130 million. Additionally, TransCanada estimates that the involved effort will require +/- 10 years.

In order to achieve the spatial accuracy levels described in the ICR and to integrate all requested data sets into TransCanada's GIS, TransCanada refers to and supports the tasks outlined in INGAA's Proposal (Section I.D.1).

Comments on Pipeline Accuracy and Attributes

1. Positional accuracy

"PHMSA proposes that for pipeline segments located within Class 3, Class 4, High Consequence Areas (HCA), or "could-affect" HCAs, operators submit data to the NPMS with a positional accuracy of five feet. The degree of positional accuracy needed is more stringent and important in these areas because of the potential for greater consequence in the event of a pipeline incident. PHMSA further proposes that for all pipeline segments located within Class 1 or Class 2 locations, operators submit data to the NPMS with a positional accuracy of 50 feet. PHMSA believes that a large number of operators already have access to data with this degree of accuracy within their GIS systems."

"The current accuracy requirement of 500 feet does not allow PHMSA to effectively locate a pipeline to the degree needed to respond to environmental and integrity threats. It also hinders PHMSA in identifying special features on the pipeline that may be relevant for emergency response considerations."

TransCanada recognizes the importance of relevant, accurate data for pipeline integrity; however, it is not clear from the foregoing general assertions that the proposed spatial accuracy furthers the stated purpose. TransCanada questions whether "the new degree of accuracy" is required for emergency responders, emergency planning and the response to environmental and integrity threats. TransCanada believes that the burden imposed by achieving the suggested +/-5ft accuracy substantially outweighs the commensurate value to the public or to state and local emergency response organizations and with this supports API-AOPL's Proposal (Section IV.1). Though state-of-the-art inline inspection (ILI) tools provide data at this level of accuracy, the burden of correlating the ILI data with existing data in the operator's GIS is extensive. TransCanada recommends that a benefit/cost study be performed to identify the necessity of the proposed positional accuracy.

TransCanada is in support of INGAA's proposal which makes reference to the emergency responder survey results that show that +/- 100ft is an acceptable accuracy level to emergency responders (Section I.A.1).

Notwithstanding the above concerns TransCanada supports PHMSA's efforts to improve the quality of the current NPMS including the positional accuracy and the information provided. To advance these efforts, TransCanada supports the INGAA's positional accuracy and schedule proposal. (Section IV).

2. Pipe Diameter

"PHMSA proposes to require operators to submit data on the nominal diameter of a pipe segment. Knowing the diameter of a pipeline can help emergency responders determine the impact area of a pipeline. This attribute also gives PHMSA the opportunity to gain a broader understanding of the diameters of pipe being operated in any given geographical region and to further assess potential impacts to public safety and the environment."

TransCanada is in agreement with the INGAA Proposal to provide pipe diameter data (Section IV). Further, TransCanada supports the request in the INGAA Proposal to clarify if the nominal or actual pipe diameter is to be submitted (Section III). With respect to the majority of NPMS users who are likely non-pipeline professionals, TransCanada support INGAA's Proposal (Section I.A.1) and API-AOPL Proposal (Section IV.2) and believes that the nominal pipe diameter will be more appropriate rather than the actual value which includes decimal places.

3. Maximum Allowable Operating Pressure (MAOP)

"PHMSA proposes operators submit the maximum MAOP or MOP for a pipeline segment in pounds per square inch gauge. This information is critical because it affects important risk-ranking algorithms and the potential impact radius of a pipeline, which can influence emergency response planning."

TransCanada understands that the MAOP value for gas pipelines alongside commodity type and pipe diameter will provide the emergency response with important information for proactive response planning and is in support to include this attribute in future NPMS submissions.

4. Pipe Grade

"PHMSA proposes operators submit information on the predominant pipe grade of a pipeline segment. This information is essential in issues regarding pipe integrity and is a necessary component in determining the allowable operating pressure of a pipeline."

TransCanada is concerned that using the "predominant pipe grade of a pipeline segment" to calculate MAOP will cause some segments to have incorrect MAOPs.

5. Percentage Specified Minimum Yield Strength (SMYS)

"PHMSA proposes operators submit information pertaining to the percent at which the pipeline is operating to SMYS. Specifically, operators would submit hoop stress caused by the highest operating pressure during the year as a percentage of SMYS. PHMSA uses the percentage of operating SMYS to determine low- and high-stress pipelines, class locations, test requirements, inspection intervals, and other requirements in the pipeline safety regulations."

Currently, the CFR uses the percentage of SMYS of the MAOP and not "the highest operating pressure during the year" in low- and high-stress pipelines, class locations, test requirements, inspection intervals, and other requirements in the pipeline safety regulations. This proposal therefore appears to be inconsistent with the regulations. TransCanada understands that class location is a function of population density, not the percentage of SMYS. Using the hoop stress caused by the highest operating pressure during the year as a percentage of SMYS is inappropriate for the described purpose.

TransCanada supports INGAA's Proposal (Section IV) (and as proposed by AGA) which proposes to modify the definition of "low stress pipes" to pipelines operating at less than 30% SMYS.

6. Leak Detection

“PHMSA proposes operators submit information on the type of leak detection system used. The type of leak detection used can drastically alter effective response times for operators and emergency responders. Knowing the type of leak detection system used during an incident will help emergency responders respond appropriately in the event of a release.”

TransCanada supports INGAA’s Proposal which explains that knowledge regarding the type of leak detection will not change the response time for emergency responders (Section I.A.1). In addition, TransCanada would like to note that, specifically for liquid pipelines, multiple crucial factors other than the type of leak detection utilized need to be considered as it is the combination of factors that impacts response time to a release.

7. Pipe Coating/Type of Pipe Coating

“PHMSA proposes operators indicate the level of and types of coating on a pipeline segment. The type of coating relates to the level of protection from external corrosion a pipe has while in the ground. Understanding the level of coating helps PHMSA assess pipe integrity and perform better risk assessments.”

TransCanada supports INGAA’ Proposal (Section IV) to provide information that indicates if the pipeline segments are coated and cathodically protected.

8. Pipe Material

“PHMSA proposes operators submit data on the type of pipe material. Knowing the pipe material helps PHMSA determine the level of potential risk from excavation damage and external environmental loads. These can also be factors in emergency response planning.”

TransCanada agrees with the INGAA Proposal (Section IV) and API-AOPL’s Proposal (Section IV.8) to provide pipe material information to PHMSA.

9. Pipe Joining Method

“PHMSA proposes operators submit data on the pipe joining method. PHMSA uses this information to identify high-risk joining methods and will be used in PHMSA’s risk rankings and evaluations, which are used as a factor in determining pipeline inspection priority and frequency.”

According to PHMSA’s Draft of the Operator Standards Manual, possible joining methods include welded, coupled, screwed, and flanged methods. However, a risk assessment with this level of detail of input may not adequately consider the other, equally or more important factors in the operator’s joining procedures that contribute to the quality control associated with pipe joining failures.

10. Year of Construction/Installation

“PHMSA proposes operators submit data on the predominant year of original construction (or installation). The year of construction determines which regulations apply to a pipeline for enforcement purposes. The data requested pertains to the year of construction and not the year the pipe was manufactured. On the annual report, operators have the option of selecting categories of years to report the year of installation. As a result of this revised collection, operators will be able to submit data on the specific year of construction or installation. Although this information is currently collected in the annual report, collecting this information geospatially rather than tabularly allows PHMSA to run better risk-ranking algorithms through pattern analysis and relating pipe attributes to surrounding geographical areas.”

TransCanada’s experience has been that pipe integrity can be maintained regardless of construction year, and, further, that the integrity performance of pipe segments sharing similar attributes (i.e., same manufacturer, manufacturing process, vintage, etc.) can significantly vary. For this reason, TransCanada believes that PHMSA’s proposed global risk assessment algorithm would not consider the unique integrity performance of individual systems and subsystems.

TransCanada agrees as pointed out by INGAA that the Year of Construction/Installation is already accessible to PHMSA (Section B). Also, TransCanada supports the request in the INGAA Proposal to clarify the definition of “predominant”.

11. Class Location

“PHMSA proposes operators of gas transmission pipeline segments submit information on class location at the segment level. Class location is based upon number of dwellings within 220 yards on either side of the pipeline in a one-mile segment level. This data will help PHMSA determine whether operator IM plans are adequate and complete.”

PHMSA may request the most up-to-date class locations from operators on a case-by-case basis outside of the NPMS. Such information is routinely disclosed in PHMSA’s cyclical system audits.

12. HCA “Could Affect” Areas

“PHMSA proposes hazardous liquid and gas transmission operators identify pipe segments which could affect HCAs as defined by 49 CFR 192.903 and 195.450. Pipe segments can be classified as affecting a populated area, an ecologically sensitive area, or a sole-source drinking water area. This information will increase the awareness emergency responders have of potential areas of significant impact.”

TransCanada agrees with INGAA’s Proposal (Section IV) with respect to gas pipelines to provide the beginning and ending points of existing HCAs at the commencement of the reporting year.

With regards to liquid pipelines, however, TransCanada has concerns that disclosing geospatial information on potentially spill-impacted areas creates a serious public security risk that significantly

outweighs any perceived benefit of the public disclosure. Even internally, TransCanada applies additional security measures to this data such that its dissemination and access is limited only to specific employees. Regarding this concern, TransCanada supports API-AOPL's Proposal (Section IV.11).

13. In-line Inspection

"PHMSA proposes operators indicate whether their system is capable of accommodating an inline inspection (ILI) tool. PHMSA considers inline inspections of pipelines to be better, safer, and more cost-effective than other inspection methods. Knowing this information will help PHMSA determine the percentage of the pipeline industry already employing this practice and could help PHMSA address concerns related to NTSB recommendation P-11-17."

TransCanada agrees with INGAA's Proposal (Section IV) to provide information that indicates whether a pipeline segment can accommodate ILI tools or not.

14. Year of Last In-line Inspection and Year of Last Direct Assessment

"PHMSA proposes operators submit data detailing the year of a pipeline's last corrosion, dent, crack or "other" ILI inspection. PHMSA also proposes to collect the year of the last direct assessment. This information is used to verify integrity of the pipeline and is a key metric in PHMSA's pipeline risk calculations, which are used to determine the priority and frequency of inspections."

The year of the last integrity assessment by itself cannot verify the integrity of a pipeline; rather, it is the assessment result and any resulting pipe integrity activities that verify the integrity of a pipeline. In reality, TransCanada and other operators may adjust the frequency of integrity assessments of a segment according to the result of the last integrity assessment of that same segment. Therefore, TransCanada believes the proposed data collection is not meaningful without additional information that can be made available through an audit.

15. Year and Pressure of Original and Last Hydrostatic Test

"PHMSA proposes to collect data on a pipeline's original and most recent hydrostatic test years and pressures. This information is used to verify a pipeline's integrity and is a key metric in pipeline risk calculations."

The regulations require a Subpart J test, and because a hydrostatic test assesses the integrity at any point in time, the most recent test replaces the original test for purpose of integrity assessment. Without additional information on how PHMSA intends to use the pressure test in risk assessment, TransCanada believes this proposal is not necessary.

16. Commodity Detail

“PHMSA proposes operators submit commodity details for pipelines if that commodity is crude oil, product or natural gas. The choices for crude oil will be “sweet crude” or “sour crude.” The choices for product will be refined non-ethanol blended gasoline, refined fuel oil or diesel, refined kerosene or jet fuel, other refined and/or non HVL petroleum products, ethanol blended gasoline, biodiesel blend and other biofuels. The choices for natural gas will be pipeline-quality or tariff-quality natural gas, wet but non-sour natural gas, sour but non-wet natural gas, and wet, sour natural gas. Other choices may be added as the need arises. This level of detail is required because of potential differences in leak characteristics, rupture-impacted hazardous areas and a pipeline's internal integrity. Emergency responders would also be able to better respond to and be better prepared for pipeline incidents if they knew what commodities were being transported in which locations.”

Specifically for oil pipelines, TransCanada seeks clarifications regarding how the NPMS will collect commodity information in the context of a batched hazardous liquids line. Furthermore, the term “sour” with regards to crude relates to the sulfur content in the context of refining and is not a measure of potential presence of H₂S as the ICR seems to imply.

TransCanada is in support of INGAA’s Proposal (Section I.A.1) and API-AOPL’s Proposal (Section IV.16) and agrees that the emergency responders need only basic, categorical information of the commodity transported (e.g., crude, refined, natural gas) and will, in the event of an actual emergency, be provided with the current Material Safety Data Sheets (MSDS’s) that detail the actual pipeline contents at the time of the incident.

17. Special permit

“PHMSA proposes operators denote whether a pipe segment is part of a PHMSA Special Permit and thus would have a different maximum operating pressure than would otherwise be allowed. The Special Permit number is also needed. This information allows PHMSA to more easily locate these pipe segments and could help emergency responders respond adequately in the event of an emergency.”

TransCanada supports the arguments made in INGAA’s Proposal (Section I.B) and API-AOPL’s Proposal (Section IV.17) that providing the special permits would be duplicative and unnecessary as PHMSA issues those permits and thus already readily has that information. TransCanada additionally notes that while a special permit may require an operator to enhance its public awareness and emergency response programs, an emergency responder would likely have no context or information to infer what relevance a special permit would have that could impact emergency response actions.

18. Seam Type

“PHMSA proposes operators submit data on the seam type of each pipe segment. This is a fundamental piece of information about a pipe that is used for risk rankings and evaluations, which are used as a factor in determining pipeline inspection priority and frequency.”

Although some seam types have relatively inconsistent integrity performance, not all pipe segments within a system or other operators will have the same experience with the same seam type. In the proposal, PHMSA has not identified how it will use seam type in risk assessment. As previously noted, TransCanada's experience has shown that the integrity performance of the same pipe segments sharing similar attributes (i.e., same manufacturer, manufacturing process, vintage, etc.) can significantly vary. Therefore, with respect to seam type, it is likely that PHMSA's proposed use of a global risk assessment algorithm will generate results that do not accurately predict actual risk or integrity performance.

19. Abandoned Pipelines

"PHMSA proposes that all gas transmission and hazardous liquid pipelines abandoned after the effective date of this information collection be mandatory submissions to the NPMS. Abandoned lines are not currently required to be submitted to the NPMS. Based on a recent incident in Wilmington, CA, where confusion as to whether a pipeline was abandoned or not was a factor, abandoned pipelines need to be identified to help ensure that they are maintained in the proper manner in accordance with pipeline safety regulations. Abandoned lines are at higher risk for excavation damage and are a critical integrity management issue. Operators only need to submit this data in the calendar year after the abandonment occurs."

TransCanada shares the concerns raised in INGAA's Proposal (Section I.A.3) that abandoned pipelines should not be a "critical integrity management issue" if the abandonment was performed in accordance with the 49 C.F.R. §192.727.

In TransCanada, the public awareness program and One-Call requirements apply to abandoned pipelines, so the risk for excavation damage is managed.

20. Installation Method if Pipe Crosses Body of Water >100 ft

"Due to recent incidents involving washed-out pipelines, including the incident that occurred near Laurel, MT, PHMSA proposes operators submit data on the installation methods of pipe segments that cross bodies of water greater than 100 feet in width. This information will give pipeline inspectors the ability to verify the depth of cover of pipeline segments under water. PHMSA will also use this information in risk-ranking algorithms. Operators will be able to select from options such as open cut, trenchless technologies, pipe spans, etc."

TransCanada shares the same concern described in INGAA's Proposal (Section I.A.3) that information on installation method for pipe segments crossing water bodies larger than 100ft, by itself, will not allow for depth of cover verification. Therefore, the information will not be useful. Regarding liquid pipelines, TransCanada recommends that this data be provided through the PHMSA audit process which allows the information to be presented in meaningful context. Because the width of the water body does not necessarily correlate to the potential for scour that could threaten the integrity of the pipe, TransCanada believes the audit process will allow PHMSA to gain a more complete understanding of location- and situation-specific pipelines.

21. Facility Response Plans

“PHMSA proposes operators submit the Facility Response Plan control number and sequence number for applicable liquid pipeline segments. This information will be used by PHMSA inspectors to verify compliance with PHMSA requirements and to aid in emergency response efforts.”

TransCanada believes that it would create a significant security risk if Facility Response Plan information is collected at a segment or site specific level. It would allow identifying the Worst Case Discharge segments and bring unnecessary attention to these sites in terms of their elevated emergency preparedness status thus, potentially, creating an unnecessary security risk in the event that controlled access to the data was compromised. In addition, there is currently no response plan categorization (segment by segment) established by any regulatory requirements. In this context, TransCanada supports API-AOPL’s Proposal (Section IV.22) to provide only the Facility Response Plan number.

22. Throughput

“Throughput is used to denote a pipeline's capacity by stating the pipelines ability to flow a measured amount of product per unit of time. PHMSA proposes operators submit average daily throughput so States can better identify shortages and implement contingency plans for potential widespread pipeline service outages to maintain an uninterrupted flow of energy supplies.”

TransCanada supports the concern raised in INGAA’s Proposal (Section I.3) and API-AOPL’s Proposal (Section IV.23) that the information on average daily throughput is proprietary and competitively sensitive. Such information would be exempt from public disclosure under the FOIA Exemption 4 and, additionally, does not fall within the scope of PHMSA’s mission or address the stated objectives of the ICR.

23. Mainline Block Valve locations

“PHMSA proposes operators submit a geospatial point file containing the locations of mainline block valves, the type of valves and the type of valve operators. This information is essential for first responders, as the extent and severity of property damage and life-threatening risks during high-consequence incidents can be reduced if the appropriate valves on affected segments are located and used more quickly. This information will also assist PHMSA in accurate risk assessment.”

TransCanada supports API-AOPL’s Proposal (Section IV.24) which notes that the location of mainline block valves should not be included in NPMS due to security concerns. TransCanada and its trained and qualified personnel operate mainline block valves. In fact, for safety and risk reasons, TransCanada requests that emergency responders do not operate pipeline valves. For gas pipelines, valves do not decrease the probability of a failure or the consequence of a failure. Generally, the highest consequence of a rupture is during the initial release stage – prior to automatic or manual valve operation. For liquids service, the location of valves is not a direct measure of consequences as topography and operational considerations will significantly influence the impact of the release. TransCanada believes that PHMSA’s

access to this information through audits would prove more useful where the operator can communicate all relevant considerations.

24. Pump and Compressor Stations

“PHMSA proposes operators submit a geospatial point file containing the locations of pump (for liquid operators) and compressor (for gas transmission operators) stations. Pump and compressor stations are vulnerable areas, and emergency responders need to know their locations for adequate emergency planning. Additionally, the stations are often referenced as inspection boundaries for PHMSA's inspectors.”

In the proposal, PHMSA acknowledges that “pump and compressor stations are vulnerable areas,” and TransCanada agrees with PHMSA. Because the stations are above ground and highly visible, posting their locations on the internet further increases their security vulnerability. Regarding this concern, TransCanada supports API-AOPL's Proposal (Section IV.28).