

April 23, 2019

Federal Energy Regulatory Commission
Secretary of the Commission
888 First Street, NE
Washington, DC 20426

RE: *Federal Register* notice of April 15, 2019, for FERC Form 6, Annual Report of Oil Pipeline Companies and 6-Q Quarterly Report of Oil Pipeline Companies (Docket Number: IC19-20-000; OMB Numbers: 1902-0022 & 1902-0206)

Dear Secretary of the Commission:

The Bureau of Economic Analysis (BEA) is writing in response to the *Federal Register* notice of April 15th, 2019, requesting comments to FERC Forms 6 and 6Q.

BEA uses FERC tabulations FERC forms 6 and 6Q indirectly. They are used to estimate the U.S. Census Bureau's construction value put-in place (VPIP) for oil pipeline utilities. Census VPIP serves as a major source data input to the national income and product account (NIPA) for structures investment estimates. NIPA estimates for electric, gas, and pipeline structures rely upon the VPIP source data. Estimates of utility industry structures investment for the BEA fixed assets accounts relies upon the VPIP-based NIPA structures estimates.

In addition, the FERC form 6 is used indirectly to derive annual pipeline transportation output in the industry accounts program. Data obtained by the industry accounts from the Association of Oil Pipelines "Shifts in Petroleum Transportation" report is based, in part, on this survey. BEA currently uses this FERC information indirectly through the VPIP program and the trade association, and it is considered an indispensable data source to the NIPA estimates and industry account estimates.

Please keep BEA informed about any modifications to these forms. We are particularly interested in any modifications proposed during the forms' approval process that would substantially affect our use of these data. For additional information, please contact Tiffany Burrell, Source Data Coordinator, on 301-278-9618 or by e-mail at Tiffany.Burrell@bea.gov. Should you need assistance in justifying these forms to the Office of Management and Budget, please do not hesitate to contact BEA.

Sincerely,



Dennis J. Fixler
Chief Economist