



AMERICAN PETROLEUM INSTITUTE



April 25, 2019

The Honorable Shelley Moore Capito
The Honorable Jon Tester
Committee on Appropriations
Homeland Security Subcommittee
United States Senate
Washington, DC 20510

Dear Chairwoman Capito and Ranking Member Tester:

The American Gas Association (AGA), the American Petroleum Institute (API), the Association of Oil Pipe Lines (AOPL), and the Interstate Natural Gas Association of America (INGAA), respectfully request that you consider providing additional appropriations for the Transportation Security Administration (TSA) to carry out its responsibilities as mandated by Congress. Industry believes that additional resources at TSA to help conduct security reviews of pipeline infrastructure and manage TSA's pipeline security program will assist the agency's efforts to strengthen its overall security programming.

Background

The *Aviation and Transportation Security Act* of 2001 grants TSA jurisdiction over pipeline security, both cyber and physical. Since that time, TSA has developed a set of security practices through the government-industry developed *TSA Pipeline Security Guidelines*. TSA published a comprehensive update to these guidelines in 2018, with the support of the Department of Homeland Security's Industrial Control System, Cyber Emergency Response Team (ICS-CERT), the Department of Energy, and pipeline sector representatives — including the American Gas Association, Association of Oil Pipe Lines, Interstate Natural Gas Association of America, and the American Petroleum Institute.

In FY2013/2014, TSA's Office of Security Policy and Industry Engagement eliminated the Pipeline Security Division (PSD) — an entity exclusively charged with assessing pipeline security programs — in favor of a generalist multi-modal surface transportation security assessment regime. This restructuring reduced pipeline security resources within TSA. A recent GAO study, *Critical Infrastructure Protection: Actions Needed to Address Significant Weaknesses in TSA's Pipeline Security Program Management* (GAO-19-48: Dec. 18, 2018) underscores the challenges. Recognizing the need for increased cybersecurity expertise to assist with TSA's industry reviews, the agency has partnered with the Department of Homeland Security (DHS) through the Pipeline Cybersecurity Assessment Initiative to leverage DHS's cybersecurity resources.

Funding and Resources

In FY2013, TSA's Pipeline Security Division was budgeted at \$4.6 million, which supported a pipeline assessment program with 13 staff members. Current staffing for TSA's pipeline security programming consists of approximately six full-time employees. Industry believes that adding resources within TSA to support the pipeline program would help TSA better succeed in its mission. These resources should include individuals with security-specific subject matter expertise to assist with security reviews as well as individuals who can perform trend analysis of data collected from security reviews and assist with program management.

AGA, API, AOPL and INGAA respectfully request Congress adequately resource TSA to carry out its responsibilities as mandated by Congress. The increased focus on pipeline cybersecurity oversight activities has not been addressed by recent appropriation bills for TSA. It is critical that TSA have the staff necessary to effectively execute their mission and support pipeline operators across the nation.

Thank you for your consideration of this important cybersecurity initiative. Please direct related questions to Brian Caudill (bcaudill@aga.org) 202-824-7029 with the American Gas Association, Suzanne Lemieux (Lemieuxs@api.org) 202-251-3066 with the American Petroleum Institute, Rebecca Gagliostro (rgagliostro@ingaa.org) 202-216-5900 with the Interstate Natural Gas Association of America and John Stoody (jstoody@aopl.org) with the Association of Oil Pipe Lines.

Sincerely,



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