



January 10, 2012

Jeffrey D. Wiese  
Associate Administrator for Pipeline Safety  
Pipeline and Hazardous Materials Safety Administration  
U.S. Department of Transportation  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Re: *Pipeline Safety: Expanding the Use of Excess Flow Valves in Gas Distribution Systems to Applications Other Than Single-Family Residences*, Docket No. PHMSA–2011–0009 - Request for Extension of Time to Comment

Dear Mr. Wiese:

Pursuant to 49 CFR 190.319 the American Gas Association and the American Public Gas Association jointly request an extension of at least 30 days to the comment period for the above referenced advance notice of proposed rulemaking (ANPRM). According to the notice published in the *Federal Register* on November 25, 2011, (76 Fed. Reg. 72666), comments are due by February 18, 2012. Our members will be significantly impacted by any regulatory changes that might result from this ANPRM.

A 30-day extension of the comment period is justified by the depth and scope of the issues addressed in the natural gas ANPRM. Thoughtfully and thoroughly addressing these issues will require significant effort on the part of all stakeholders. The ANPRM references the "INTERIM EVALUATION: NTSB RECOMMENDATION P-01-2 EXCESS FLOW VALVES IN APPLICATIONS OTHER THAN SERVICE LINES SERVING ONE SINGLE FAMILY RESIDENCE". This is an 83-page report that has to be analyzed as part of the comments on the ANPRM.

Timing of the referenced ANPRM and other advocacy issues also supports our requested extension. PHMSA has issued three notices of proposed rulemaking for which comments are due between January 20 and February 18. The other pending rulemakings are:

- *Pipeline Safety: Safety of Gas Transmission*, Docket: No. PHMSA 2011-0023, with a deadline for comments of January 20, 2012.
- *Pipeline Safety: Miscellaneous Changes to Pipeline Safety Regulations*, Docket No. PHMSA–2010–0026, with a deadline for comments of February 3, 2012.

The President also signed into law the *Pipeline Safety, Regulatory Certainty, and Job Creation Act of 2011* on January 3, 2012. The legislation has critical time dependent deadlines. AGA and APGA are spending resources analyzing the legislation and communicating with member companies. The legislation contains directives for considering EFVs in services other than single-family residential homes that differs from the scope presented in the ANPRM.

Given these factors, we respectfully request PHMSA grant an extension of at least 30 days for comments to be submitted on this significant ANPRM. We believe that thoughtful, thorough and well-founded responses will serve the interests of the public, the regulators and the operators better than less thorough but quicker responses. The extension will not delay implementation of regulations for EFVs, if regulations are deemed to be needed.

Thank you in advance for considering this request. Please contact us if you have any questions.

Sincerely,



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cc: Ms. Vanessa Sutherland, PHMSA  
Mr. Mike Israni, PHMSA