

**BEFORE THE
UNITED STATES DEPARTMENT OF TRANSPORTATION
PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION
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 THE AMERICAN GAS ASSOCIATION
TO PHMSA NOTICE AND REQUEST FOR REVISION:
NATIONAL PIPELINE MAPPING SYSTEM PROGRAM**

May 13, 2019

I. Introduction

The American Gas Association (AGA), founded in 1918, represents more than 200 state-regulated or municipal natural gas distribution companies. AGA members serve 95 percent of the 72 million natural gas customers, representing more than 160 million people in the United States. AGA and its members are committed to continuing to improve the high level of safety and the culture of safety compliance throughout the natural gas distribution industry. Numerous AGA programs and activities focus on the safe and efficient delivery of natural gas to customers. Safety is the number one priority of AGA members.

AGA supports initiatives that improve pipeline safety such as the modernization of the National Pipeline Mapping System (NPMS). AGA appreciates PHMSA's efforts to review and incorporate several of the recommended changes proposed by AGA in 2016¹, within PHMSA's NPMS proposal. The changes proposed by PHMSA allow operators to focus their efforts and resources on activities and actions that further the goals of increasing safety and reliability of the natural gas system. AGA offers the following additional changes:

II. PHMSA Should Focus on Attributes Which Enhance Pipeline Safety

AGA continues to advocate for PHMSA to reconsider the request for exclusion of proposed attributes that are not necessary for PHMSA to collect and add to the information collection burden, or are already collected in PHMSA's annual report. This includes seam type, assessment method and assessment year. As noted in AGA's earlier comments, there is no recordkeeping requirement that obligates operators to maintain records of seam type and it will be incredibly burdensome for operators to retroactively obtain this information for existing pipelines. The assessment method and assessment year are duplicative of information already submitted to PHMSA through its Annual Report information collection. PHMSA has not provided adequate justification for the burden PHMSA will impose on operators to collect seam type, assessment methods and assessment year, or how these attributes would impact or enhance PHMSA's ability to perform risk analysis. Continuing to include these proposed attributes within the NPMS program does not advance pipeline safety and is not necessary for PHMSA to perform its functions.

III. PHMSA Must Ensure Security of Sensitive Information Handling

The dramatic increase in the number of requested pipeline attributes — which are considered by pipeline operators to be aggregate sensitive information that will be made available online in a single database — creates a significant security risk that does not presently exist. PHMSA has classified the most sensitive attributes as Sensitive Security Information (SSI), with the intent of retaining these attributes in an SSI environment to ensure the attributes are only released to government agencies who can verify they maintain an SSI-compliant environment. However, SSI classification takes control out of the hands of the operators and relies solely on PHMSA to appropriately classify and handle the data once it is handed over. If the information is not appropriately classified, then there is a risk that this sensitive data will end up in the wrong hands.

PHMSA has identified six proposed attributes, which if collected, would receive SSI status. Two of these attributes are MAOP and percent SMYS. Pipe Grade, Wall Thickness, and Seam Type, which can be used to calculate MAOP or percent SMYS, should also receive the SSI status. Additionally, PHMSA should restrict access to attributes such as pipe joining method to government officials and should further enhance its active user policies

¹ Comments of the American Gas Association to PHMSA Notice and Request for Revision: National Pipeline Mapping System Program. July 22, 2016 Docket No. PHMSA-2014-0092

and processes to ensure that only verified users have access to this data. This data should not be made available in the public map viewer, as it does not contribute to public awareness of pipelines.

IV. PHMSA Should Consider Effective Date of NPMS Changes that is Compatible with Time Needed for Operator Technology Changes

AGA believes that the steps taken by PHMSA within this proposal will help improve data collection. However, the proposed changes substantially increase the attributes an operator must submit. AGA appreciates PHMSA taking into consideration the breadth of data collection required and implementing a phased-in approach for data collection. The proposed changes to data attributes in the NPMS will require operators to make significant changes to data repository technology, data management policies, and data change management procedures. For example, the NPMS reporting requirements will require operators to track changes to all attributes year-over-year. This requirement will have to be met with a combination of technology upgrades and procedural updates. Such changes will require adequate time by operators to implement and effectively deploy. The proposed implementation schedule should recognize these challenges and allow for adequate time for operators to fully implement.

AGA recommends that PHMSA set the effective date of Phase 1 of the proposed NPMS changes to **no less than** the 3rd reporting cycle after publication. For instance, if PHMSA publishes these NPMS changes in December of 2019, Phase 1 data reporting would need to be submitted with the Calendar Year 2021 data submittal on or before March 15, 2022. That will allow operators a minimum of two full calendar years to implement technologies and processes to satisfy the new attribute reporting requirements. Furthermore, AGA recommends that PHMSA set the effective date of Phase 2 of the NPMS changes to five (5) reporting cycles after the publication. Lastly AGA recommends that PHMSA clarify that the effective date of Phase 3 is seven (7) reporting cycles after publication and not a hard date of 2024 as written today.

V. PHMSA Should Consider Providing Additional Operator Guidance on Proposal Attributes

PHMSA should also clarify how operators should address assumed values where actual records may not be available. Examples of requested pipe attributes that would benefit from this clarification include wall thickness, pipe grade, pipe join method, and seam type.

For instance, if an operator has determined that the wall thickness information for a particular transmission pipeline is not traceable, verifiable, or complete pursuant to PHMSA's previous guidance materials on these terms, is the operator to list the wall thickness as "unknown" or use the prevailing wall thickness information contained within the operator's operations and maintenance records? PHMSA should provide clear guidance on these types of data resolution and data quality issues in the NPMS User's Guide to ensure that all operators consistently report these newly requested attributes.

There are no existing obligations that require operators to maintain data in a geospatial format. The proposed NPMS requires a significant number of geospatially referenced pipeline data points, in addition to increased pipeline positional accuracy. AGA recommends that PHMSA consider leveraging pipe attributes reported within PHMSA Gas Transmission & Gathering Lines Annual Report and minimize gathering duplicative data. PHMSA recognizes the duplicity of much of this information and has stated that it will seek to reduce duplication *after* data has been collected through the revised NPMS Information Collection Request. AGA continues to encourage PHMSA to reduce duplicative data *before* revising the NPMS data collection requirements.

Similarly, PHMSA should clarify its definition for “able to accommodate in-line inspection”. To ensure consistency, AGA recommends PHMSA use the definition proposed within AGA’s comments for the Gas Transmission & Gathering Lines Rulemaking²:

“A moderate consequence area as defined in § 192.3 if the pipe segment can accommodate inspection by means of free-swimming, commercially available instrumented in-line inspection tools (i.e. smart pigs) that can travel (using flow and pressure conditions encountered in normal operations) the length of the pipeline segment, inspect the entire circumference of the pipe, capture and record or transmit relevant, interpretable inspection data in sufficient detail for further evaluation of anomalies without permanent modifications to the pipe segment.”

PHMSA should also clarify pipeline data that is specific for hazardous liquid pipelines, and as appropriate, provide exemptions for natural gas pipelines, for example “Segment that could affect HCA” and “FRP Sequence number”.

Each gas system is unique, and while operators will strive to meet the intent of the NPMS program, AGA believes a series of workshops would further help to provide clarity and standardize data collection efforts amongst operators. AGA is willing to support and even host these workshops. AGA has previously mentioned that historic recordkeeping requirements, and existing regulatory language for recordkeeping differ from those outlined within PHMSA’s proposal.

Respectfully submitted,
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² Comments on Pipeline Safety: Safety of Gas Transmission Pipelines, MAOP Reconfirmation, Expansion of Assessment Requirements and Other Related Amendments filed by American Gas Association, American Petroleum Institute, American Public Gas Association, Interstate Natural Gas Association of America. May 1, 2018, Docket No. PHMSA PHMSA-2016-0136, PHMSA-2011-0023