

# TR 20-02 – State Reporting Requirements

## 2021 – May 19 – GPTC Secretary Notes *Re-ballot*

This transaction is being re-balloted due to previous membership disapprove vote on LB3-2020 Ballot. Below is the declined voting history all Main Body member who voted disapproved on TR 20-02. Every decline must be resolved with either a changed vote to approve and/or an approved vote on the subsequent ballot by the original decline voter. If the original declined voter is no longer a member or is a member but does not return the subsequent ballot, all current voters must be made aware of their reasoning for the disapproval.

Per our procedures all voting members must review a disapproved voters reasoning. This 2nd ballot is to ensure that all voters are aware of the previous disapproved reasoning.

Ballot	Lueders
LB3 - 2020	D

**John Lueders: Disapproved with comment** - GM 191.5(h): While I agree that "Intrastate operators should be aware that", this statement is unnecessary and should be removed, and the first sentence should begin with the word "State".

## 2021 – March 4 – Editorial Section

Approved additions and revisions to guide material under §191.5. **Ready for 2<sup>nd</sup> LB.**

PRIMARY: 191.5

PURPOSE: To ensure operators acknowledge state reporting incident definitions and time.

ORIGIN/RATIONALE: DP/ER TG review of state incident report.

While reviewing a state incident report [KY\\_NicholasCounty\\_08062017\\_SeePage8.pdf](#) the operator was cited for not reporting the event to the state within the state-required timeframe. Some states have different incident reporting requirements such as lower monetary or different gas loss amounts, or different timeframes. There may also be state reports required for the release of gas, and county and city requirements as well for reporting releases.

Draft Guide Revisions or new text such as following.

Add a new (b) to GM191.5, stating "Intrastate operators need to be aware of additional state reporting requirements that may differ from the Federal requirements to ensure that these requirements are addressed." Or "Some states have different incident reporting levels and time frames that may not be the same as defined in 191.5. Intrastate operators need to be aware of additional state requirements that differ from the Federal requirements. Notification to the NRC may not address the state requirements."

RESPONSIBLE GROUP: DP/ER Task Group

**Second LB Note:** Revisions to LB3-2020 are shown in **yellow highlight**.

## Section 191.5

(a) through (f)...

(g) For intrastate pipelines, it is necessary to comply with federal reporting requirements even though an "incident" has been reported to the appropriate state agency.

~~(h) Intrastate operators should be aware that State reporting obligations might differ from federal requirements and might require operators to report incidents not meeting the federal definition of an incident. States might also have shorter timeframes for reporting incidents than the timeframes in §191.5.~~ The operator should consider providing (even if not required) the appropriate state agency with the same documents and reports that are provided to PHMSA.

~~(H)~~ ...