BEFORE THE
UNITED STATES DEPARTMENT OF TRANSPORTATION
PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION
WASHINGTON, D.C.

Pipeline Safety: Safety of Gas Distribution Pipelines	}	Docket No. PHMSA-2021-0046 RIN: 2137-AF53

COMMENTS ON PIPELINE SAFETY: MEETING OF THE GAS PIPELINE ADVISORY COMMITTEE (SAFETY OF GAS DISTRIBUTION PIPELINES)

FILED BY
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I. Introduction

The American Gas Association (AGA)[1], American Public Gas Association (APGA)[2], and Northeast Gas Association (NGA)[3] (jointly the Associations) submit these comments for consideration by the Pipeline and Hazardous Materials Safety Administration (PHMSA or the Agency) concerning the Gas Pipeline Advisory Committee (GPAC or the Committee) meetings held to review and discuss PHMSA's proposed rule, "Safety of Gas Distribution Pipelines" (NPRM)[4], as well as the Agency's associated regulatory analyses (including, but not limited to, the cost-benefit and risk assessment analyses within the NPRM and the regulatory impact analyses; the environmental assessments; and other materials pertaining to the NPRM provided in the public docket for this rulemaking.

PHMSA convened the GPAC in Washington, DC, on May 28, 2026[5] to review the NPRM and to receive input from Committee members and stakeholders on the technical feasibility, reasonableness, cost-effectiveness, and practicability of the proposed requirements. Given the breadth and complexity of the rulemaking – including provisions addressing overpressurization of natural gas distribution pipelines, distribution integrity management, operations and maintenance procedures, management of change, emergency response, and recordkeeping – the Committee's review necessarily involved detailed discussion of interrelated topics across a wide range of highly technical subject areas. The Associations submit these comments to respond to the discussions, recommendations, and outcomes of the May 2026 GPAC meeting.

The GPAC, PHMSA's statutorily mandated advisory body for natural gas pipeline safety, plays a critical role in evaluating the technical feasibility, reasonableness, cost-effectiveness, and practicability of proposed regulations[6]. The Associations believe the Committee's input is particularly important for this rulemaking, which seeks to implement multiple Congressional mandates from the Protecting Our Infrastructure of Pipelines and Enhancing Safety (PIPES) Act of 2020[7] and introduces significant new requirements affecting gas distribution operators, including capital-intensive infrastructure modifications and substantial programmatic updates.

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[1] Founded in 1918, AGA represents more than 200 local energy companies committed to the safe and reliable delivery of clean natural gas to more than 180 million Americans. AGA is an advocate for natural gas utility companies and their customers and provides a broad range of programs and services for member natural gas pipelines, marketers, gatherers, international natural gas companies, and industry associates. Today, natural gas meets more than one third of the United States' energy needs.

[2] APGA is the national trade association representing more than 730 communities across the U.S. that own and operate their retail gas distribution entities. These include not-for-profit gas distribution systems owned by municipalities and other local government entities, all accountable to the citizens they serve. Overall, there are nearly 1,000 community-owned systems in the U.S. serving more than five million customers.

[3] NGA is a regional trade association that focuses on education and training, technology research and development, operations, pipeline safety, energy reliability and affordability and environmental initiatives in the Northeast U.S. It represents natural gas distribution companies, transmission companies, liquefied natural gas importers, and associate member companies that provide natural gas to over 13 million customers in eleven states.

[4] Pipeline Safety: Safety of Gas Distribution Pipelines and Other Pipeline Safety Initiatives, 88 Fed. Reg. 61746 (Sept. 7, 2023).

[5] Pipeline Safety: Meeting of the Gas Pipeline Advisory Committee, 91 Fed. Reg. 25755 (May 11, 2026).

[6] Gas Pipeline Advisory Committee (GPAC) Charter – October 2024 to October 2026, https://www.phmsa.dot.gov/standards-rulemaking/pipeline/gas-pipeline-advisory-committee-gpac-charter-october-2024-october-2026.

[7] Public Law No. 116-260, available here: govinfo.gov/content/pkg/PLAW-116publ260/html/PLAW-116publ260.htm

The deliberations of the GPAC reflect both the technical complexity of the issues presented and the importance of achieving a balanced and durable regulatory outcome that is consistent with Congress' mandate.

During the GPAC meeting, the Committee voted on a range of concepts and policy approaches reflected in the NPRM, while also identifying areas where additional clarity, flexibility, or refinement is required. Consistent with the Committee's recommendations, the Associations are providing several recommended modifications to the proposed regulatory text published in the NPRM for the Agency's consideration. The redlined language included in these comments reflects: (1) revisions consistent with the principles and positions endorsed by the GPAC, and (2) additional refinements necessary to ensure the final rule is clear, technically feasible, reasonable, cost-effective, and practicable. Additionally, the Associations also identify several issues that were discussed during the GPAC process but not resolved through formal votes and provide recommendations to respond to or address those concerns.

These comments are intended to supplement the comments previously submitted by the Associations on November 6, 2023[8]. As discussed in those earlier comments, pipeline safety remains the top priority for the Associations and our members. The Associations support PHMSA's efforts to implement the PIPES Act of 2020 and to enhance protections against overpressurization and other risks on gas distribution systems. At the same time, the Associations emphasize that the final rule must preserve the performance-based framework that has long characterized Part 192, particularly with respect to Distribution Integrity Management Programs (DIMP), and must provide operators with the flexibility necessary to implement risk-informed, system-specific solutions. Additionally, the Associations strongly urge PHMSA to ensure that any final rule is properly bounded by Congress' mandate in the PIPES Act of 2020.

The Associations continue to encourage PHMSA to carefully consider the recommendations of the GPAC, as well as the technical and practical considerations outlined in these comments, as the Agency continues to work through the rulemaking process. A final rule that appropriately incorporates GPAC input and stakeholder experience will better ensure that the resulting requirements achieve meaningful safety improvements while remaining technically feasible, operationally practicable, and cost-effective for operators and the customers they serve.

II. Timing of Final Rule Provisions

The Associations recommend that all compliance timelines associated with a final rule be measured from the rule's effective date, rather than the date of publication in the Federal Register. This approach is consistent with the Administrative Procedure Act framework, which contemplates a period between publication and effectiveness to allow regulated entities to review and assimilate final requirements, and to prepare for implementation. Given the breadth and technical complexity

[8] Comments On Pipeline Safety: Safety of Gas Distribution Pipelines; Filed by American Gas Association, American Public Gas Association, and Northeast Gas Association; November 6, 2023 (Docket No. PHMSA-2021-0046).

of this rulemaking – including significant changes to district regulator station configurations, amendments to operations and maintenance procedures, and implementation of Management of Change requirements – this transition period is particularly important in the case of this rulemaking. Measuring compliance timelines from the effective date provides operators with a reasonable opportunity to fully evaluate the final regulatory text, align internal programs and capital planning processes, and identify appropriate compliance pathways. It can also accommodate operator understanding of any guidance or clarifications that PHMSA may issue following publication. Finally, anchoring compliance timelines to the effective date of the final rule helps foster compliance with new, technically complex regulatory requirements by providing an orderly, predictable, and practicable implementation framework.

III. Overpressurization

A. Discussion

1) PHMSA must implement Section 206 of the PIPES Act of 2020 in a manner that preserves flexibility and makes alternative measures broadly available.

The Associations support PHMSA's efforts to implement Section 206 of the PIPES Act of 2020 and to reduce the risk of overpressurization on low-pressure (LP) distribution systems. The Associations likewise agree that the Merrimack Valley incident demonstrated the need for additional safeguards and practices to help protect customers served by of low-pressure distribution systems. However, the Associations are concerned that PHMSA's proposed approach to § 192.1007(d)(2)(ii) would effectively treat alternative measures to minimize the risk of overpressurization as a narrow exception or prescribed and least-preferred option requiring approval, rather than a broadly available compliance pathway that Congress expressly made allowances for in Section 206. That approach would not fully reflect either the statutory text or the performance-based regulatory framework PHMSA has itself selected for implementation of these requirements to improve pipeline safety outcomes.

Section 206 of the PIPES Act of 2020 is not written as a rigid retrofit mandate[9]. Congress directed PHMSA to promulgate regulations requiring operators to assess and upgrade district regulator stations (DRS) serving low-pressure distribution systems *"as appropriate"* to ensure, among other things, that low-pressure systems have secondary or backup pressure-relieving or overpressure-protection technology (emphasis added). Congress then went further and provided that, if the Secretary determines it is *"not operationally*

[9] (3) DISTRICT REGULATOR STATIONS.— ''(A) IN GENERAL.—Not later than 1 year after the date of enactment of this subsection, the Secretary shall promulgate regulations to require that each operator of a distribution system assesses and upgrades, *as appropriate*, each district regulator station….(iv) if the Secretary determines that *it is not operationally possible for an operator to implement the requirements* under clause (iii), the Secretary shall require such operator to identify actions in their plan that minimize the risk of an overpressurization event.'' Protecting our Infrastructure of Pipelines and Enhancing Safety (PIPES) Act of 2020, Pub. L. No. 116-260, Div. R, § 206, 134 Stat. 1182 (2020).

possible" for an operator to implement those requirements, the operator must identify actions in its plan that minimize the risk of an overpressurization event. The phrase "as appropriate" is important as it clearly indicates that Congress expected the final rule to preserve a measure of engineering judgment and system-specific decision-making. The phrase "not operationally possible" is equally important. It confirms that Congress recognized there would be circumstances in which literal station-level implementation of the preferred approach would not be reasonable or feasible as a means of achieving the statutory objective. Read together, these clauses explicitly demonstrate Congress' intent to develop conditional framework – not a universal station-rebuild mandate.

PHMSA's choice to place these requirements in Subpart P of 49 CFR 192, pertaining to Gas Distribution Pipeline Integrity Management, reinforces this interpretation. Distribution Integrity Management Program (DIMP) requirements provide a performance-based approach to identifying and mitigating risk on gas distribution systems and were adopted as a result of the diversity of distribution systems and the particular threats those systems face, making a tailored, operator-specific approach risk mitigation more effective than a set of one "one-size-fits-all" prescriptive requirements. In Advisory Bulletin ADB-2020-02[10], PHMSA likewise explained that low-pressure system overpressure risks may be best managed through a combination of design elements and engineering practices tailored to the unique attributes and operating conditions of specific systems, and that operators are best positioned to identify and implement those tailored approaches. In the Associations' view, it follows that if PHMSA chooses to implement Section 206 through Subpart P, then the final rule should function in a manner consistent with the *performance-based spirit of Subpart P*. PHMSA should not use DIMP as the vehicle for what is, in practice, a broadly prescriptive retrofit requirement, coupled with an onerous regime of requesting agency permission to utilize alternative measures (i.e., through § 192.18) on a case-by-case basis.

The Associations further note that the GPAC slide[11] on this topic expressly reflects an understanding that the mandate in Section 206 can be implemented more flexibly than the proposed rule allows. PHMSA's slide states that the agency is considering requiring secondary protection on all low-pressure systems while also "articulating where it would be appropriate" to allow an existing system to use an alternative to the secondary protection requirement, such as where design is impracticable or where the operator has plans to replace the low-pressure system. That framing is notably broader than a station-by-station exception process and is more consistent with the statutory structure discussed above. The final rule should embrace that broader understanding.

For these reasons, the Associations recommend that PHMSA revise proposed § 192.1007(d)(2)(ii) so that alternative measures are treated as a *widely available compliance pathway*, not as a limited mechanism available only on a case-by-case basis

[10] Pipeline Safety: Overpressure Protection on Low-Pressure Natural Gas Distribution Systems. 85 Fed. Reg. 61097 (September 29, 2020).
[11] PHMSA GPAC Voting Slides. Slide 10. "Secondary Overpressure Protection, Monitoring, and Risk of Overpressurization §§ 192.195, 192.741, and 192.1007(d). Final Motion."

requiring PHMSA approval. This approach would be better aligned with Congress' mandate in Section 206, more consistent with PHMSA's own prior DIMP and advisory bulletin reasoning, and more likely to improve pipeline safety outcomes by producing earlier, more practical, and more effective risk reduction on low-pressure systems.

2) Alternative measures should be broadly available in at least three categories of circumstances.

The Associations' position is that the final rule should expressly provide that alternative measures are broadly available in at least three categories of circumstances. The categories described below reflect scenarios which acknowledge the qualifiers in the PIPES Act of 2020 language as well as practical realities in which a broad alternative pathway is necessary to make the final rule workable.

First, alternative measures should be broadly available where compliance with a second-level overpressure protection (OPP) requirement would require a *full rebuild of the district regulator station*. As the Associations' November 6, 2023, comments[12] explained, many district regulator stations serving low-pressure systems may not have the required space or configuration to accommodate a second level of overpressure protection, and in many cases would need to be replaced or relocated. Those prior comments further explained that station rebuild scenarios can cost orders of magnitude more than the narrow retrofit (e.g., installing a single slam-shut device) that the NPRM assumes. In the Associations' view, where station-level compliance requires full reconstruction rather than a genuine retrofit, it is entirely consistent with Section 206 to treat alternatives as broadly available.

Second, alternative measures should be allowed where compliance would require a *partial rebuild or major reconfiguration of the district regulator station involving excavation*, including material work on pressure-control piping, controls, or sense lines. Such stations require substantial rework far beyond simply adding a device to the existing station configuration – including excavation, redesign of piping, or significant sense-line work – that materially changes the scale, cost, and scope of commissioning these stations with second-level overpressure protection devices. In the Associations' view, the final rule should recognize that major reconfiguration projects belong in the same general category as full rebuilds for purposes of alternative-measures availability.

Third, alternative measures should be allowed where the low-pressure system is already subject to a *planned replacement, uprating, retirement, or conversion program*. In many cases, low-pressure systems are already included in long-term asset-management strategies, and will require capital-intensive station work (e.g., rebuild or retirement) as part of replacement or retirement of low-pressure systems. Imposing near-term requirements to modify these stations could create stranded assets and divert resources from broader modernization projects that provide greater safety benefits. PHMSA's GPAC[13] slide expressly identifies "where the operator has plans to replace the low-pressure system" as one circumstance in which the agency is considering allowing an

[12] The Associations' Comments On Pipeline Safety: Safety of Gas Distribution Pipelines (November 6, 2023).
[13] PHMSA GPAC Voting Slides. Slide 10.

alternative to the secondary-protection requirement. In the Associations' view, that concept should be embedded clearly in the final rule's implementation approach.

The Associations emphasize that these three categories are not intended to be an exhaustive or rigid taxonomy. Rather, they identify the principal classes of circumstances under which alternative measures should be *broadly available*, without requiring operators to seek regulatory approval through § 192.18 notification on a station-by-station basis. Broad allowance for the implementation of alternative measures under these scenarios provides PHMSA with a workable way to give meaningful effect to the "as appropriate" and "not operationally possible" clauses in Section 206.

3) The PRIA materially understates the number of affected stations, the cost of compliance, and the scope of required work.

The Associations remain concerned that the PRIA does not adequately characterize the scale, cost, or complexity of retrofitting existing district regulator stations serving low-pressure systems. The Associations' November 6, 2023, comments[14] noted PHMSA's estimate of 10,199 district regulator stations serving low-pressure distribution systems, of which PHMSA estimated that 40 percent already had at least two methods of overpressure protection. In fact, the number of district regulator stations serving low-pressure systems across the United States is materially larger and the number of stations requiring additional action is correspondingly greater. The Association's comments also explained that PHMSA's estimate of *$7,500* per station substantially understated the actual cost of upgrading many existing stations, noting that surveyed operators estimated per-station costs closer to *$50,000 (median)* and *$176,000 (mean)*, with some station rebuild scenarios reaching *as much as $2 million*.

	# DRS Serving LP	# DRS Serving LP *without* 2nd-level OPP	Cost to upgrade DRS with 2nd-level OPP
PHMSA estimate (NPRM)	10,199	6,119	$7,500
AGA/APGA/ NGA estimate	57,250	50,265	$50,000 (median) $176,000 (mean) $2,000,000 (max)

AGA member companies alone estimate that at least *4,026 district regulator stations* serving low-pressure systems would require a full or partial rebuild to comply with a blanket requirement to require second-level overpressure protection, each costing orders of

[14] The Associations' Comments on Pipeline Safety: Safety of Gas Distribution Pipelines. (November 6, 2023).

magnitude more than PHMSA's $7,500 estimate. One gas distribution operator estimates costs of $150 million to upgrade more than 1,000 district regulator stations requiring a full or partial rebuild.

Rebuild scenarios are common in highly urban or suburban locations where station footprints are small, simple retrofit is impractical, and real estate is at a premium. Indeed, the 2023 cost estimates (especially at the high end, which reflect the cost to rebuild a district regulator station in a highly urban area) now likely underestimates those costs in light of persistent inflation, as well as the potential for bottlenecks in sourcing materials and construction resources as operators ramp up rebuild efforts in response to this final rule.

These discrepancies matter because the question before PHMSA is not simply whether second-level overpressure protection is desirable in the abstract. The question is how to craft a final rule that is technically feasible, operationally prudent, and provides meaningful improvements to safety outcomes for the actual population of low-pressure distribution systems. While the PRIA assumes a narrow, relatively inexpensive retrofit scenario, a significant share of the real population requires partial or full reconstruction, the agency cannot reasonably structure the final rule around the assumption that alternatives are exceptional. To do so would create a misalignment between the compliance framework and the actual engineering realities of the affected assets.

The PRIA critique is not limited to direct capital costs. The Associations' November 6, 2023, comments[15] also noted that PHMSA failed to account adequately for ongoing O&M costs associated with inspecting and testing additional overpressure protection devices. Those comments further explained that operators would absorb additional costs for training and qualifying personnel to install, inspect, and test these devices. PHMSA's PRIA therefore underestimates the cost of the entire compliance lifecycle, including labor, planning, inspection, testing, and program governance. A final rule that constrains alternatives too heavily would bake these PRIA deficiencies directly into implementation.

Put plainly, the cost effectiveness of this rulemaking is largely dependent on the broad availability of alternative measures to minimize the risk of overpressurization. PHMSA should revisit the economic framing of these provisions and ensure that any final rule reflects the actual station population, as well as more realistic estimate of the cost required to outfit each one with second-level overpressure protection. Including a broader availability of alternatives is an important part of that correction because it better aligns the compliance mechanism with the true scope and nature of the work that operators will be required to undertake.

[15] The Associations' Comments on Pipeline Safety: Safety of Gas Distribution Pipelines. (November 6, 2023).

4) Alternative measures provide layered, system-specific protection that can often reduce risk more efficiently and more quickly than station reconstruction.

The Associations also emphasize that broader availability of alternatives is not simply necessary for regulatory flexibility and cost effectiveness, but it is also integral to driving the pipeline safety outcomes that PHMSA intends to realize with this rulemaking.

Operators have already identified, and in many cases deployed, a broad suite of measures that minimize the risk of overpressurization on low-pressure systems in ways that are tailored to system design, known failure modes, and consequence pathways. These measures include:

- *System-level Controls:* remotely-operated or automated shutoff devices, remote isolation, system-integrated/distributed relief capacity, and seal-pot configurations designed to limit pressure under failure conditions.
- *Station-level Enhancements:* monitor regulators with integrated relief or slam-shut capability, override pilots, warning relief devices, improved sense-line integrity and protection, and monitoring of (and response to) pressure-control exceptions;
- *Customer-level Protections:* service regulators, excess-flow overpressure protection at meters, and advanced metering infrastructure with alarm or remote shutoff capabilities when abnormal pressures are detected.
- *Detection, Automation, and Programmatic Measures:* SCADA deployment, real-time analytics, records verification, and system replacement or uprating programs.

The Associations emphasize that such measures can be used discretely or in combination, and that the availability of layered protection strategies is especially valuable because the dominant risk drivers and failure modes vary from system to system.

A layered approach is particularly appropriate for low-pressure systems because the relevant risk is not confined solely to whether a district regulator station contains a second device. The risk also depends on how pressure anomalies can arise, how they can be detected, whether pressure excursions can be isolated or relieved before reaching customer equipment, and what protections exist nearer to the customer interface. A flexible rule that allows operators to build a package of system-level, station-level, customer-level, and operational measures is therefore more aligned with mitigating actual overpressurization risk than a rule that presumes reconstruction of the district regulator station is always the preferred answer.

The record also supports the proposition that many alternatives can be implemented *faster* than major station retrofits or rebuilds. Broad availability of alternatives in a final rule means that steps can be reasonably taken to minimize the risk of overpressurization sooner than the longer compliance runway (no less than fifteen years under certain scenarios, per the Associations' November 6, 2023 comments) necessary to rebuild thousands of district regulator stations.

Under a compliance regime that provides more flexibility and in which alternative measures are more broadly available, the Associations posit that operators that choose station retirement or retrofitting with second-level overpressure protection as the compliance pathway can reasonably do so within *ten years* of the effective date of the final rule. On the other hand, where operators select alternative measures, those measures should generally be implemented within *five years* of the effective date of the final rule. The justification is straightforward: many alternatives can be deployed more quickly and with less system reconfiguration than a full or partial station rebuild, while still materially reducing the likelihood or consequences of an overpressurization event. A shorter implementation period for alternatives is therefore both credible and safety-enhancing, achieving more practical risk reduction sooner in appropriate scenarios.

Where retrofitting district regulator stations with a second level of overpressure protection is determined by the operator to be the most appropriate means of reducing the risk of overpressurization, the final rule must recognize the complexity and scope of that work, and resist folding the two compliance pathways into a uniform timeline based on what they imagine to be the fastest deployable timeline for minimizing the risk (e.g., alternatives), given that alternatives *may not be deployable* in those scenarios. Moreover, even the ten-year timeline for retrofitting district regulator stations is realistic only as part of an integrated framework in which alternative measures are *genuinely and broadly available*. If PHMSA constrains alternatives and makes alternative measures a narrow, prescriptive pathway backstopped by § 192.18 notification, then longer compliance timelines (e.g., fifteen years or more, as described in the Associations' November 6, 2023 comments[16]) would be necessary.

The Associations' recommended approach introduces a structured set of compliance pathways that reflects both the engineering realities of distribution systems and the need for regulatory accountability. Specifically, the framework recognizes that operators may elect to (a) retire the district regulator station, (b) upgrade the district regulator station to meet the requirements of § 192.195(c)(1) through (3), or (c) implement alternative measures to minimize risk of overpressurization. Where an operator elects to retire or replace the system, the requirement to complete such action within ten years ensures that mitigation of overpressurization risk is not deferred indefinitely, while avoiding the need to impose potentially unnecessary interim measures. Similarly, where an operator initially elects to upgrade a district regulator station as the compliance pathway, but subsequently determines that such upgrade is not feasible (e.g., unforeseen engineering, constructability, permitting, or other system-specific constraints) within the ten-year period, the Associations recommend requiring the implementation of alternative measures to minimize risk of overpressurization within that same ten-year window. This construct would allow operators to avoid retroactive non-compliance (i.e., between years five and ten) on stations intended for upgrade, provide sufficient time to evaluate and deploy alternatives

[16] The Associations' Comments on Pipeline Safety: Safety of Gas Distribution Pipelines. (November 6, 2023).

that *may not be immediately evident or practicable within five years*, and ensure that risk mitigation is not deferred beyond a reasonable period.

5) PHMSA Advisory Bulletin ADB-2020-02 and the NTSB's Merrimack Valley report support a broader, consequence-focused understanding of acceptable protective measures.

The Associations' proposed approach is fully consistent with both PHMSA's own advisory guidance and the NTSB's Merrimack Valley findings.

In Advisory Bulletin ADB-2020-02[17], PHMSA explained that low-pressure natural gas distribution systems are uniquely vulnerable because they typically lack regulators at customer meter sets, meaning that an overpressure condition on the low-pressure main can affect customers directly at the point of delivery. PHMSA contrasted this with high-pressure systems, where service regulators and, for new or replaced services, excess flow valves reduce the likelihood that abnormal conditions in the main will overpressurize customer-owned facilities. PHMSA then explained that the diversity of low-pressure system designs and operating conditions means that overpressure risk "may be best managed by a combination of design elements and engineering practices tailored to the unique attributes and conditions" of the individual system.

The NTSB's Merrimack Valley final investigation report makes a similar observation, noting that "an overpressure condition in a natural gas distribution system could affect all customers served by the system. This is an inherent weakness of a low-pressure natural gas distribution system."[18]

These sources support two points that are central to the Associations' position. First, they underscore the seriousness of the potential consequences of overpressurization and the safety benefits of enhanced protective measures on low-pressure systems. Second, they show that the relevant public safety consequence pathway is the delivery of elevated gas pressure to customer equipment and structures. For that reason, measures at or near the customer interface – such as service regulators, meter-based shutoff technologies, or other customer-level protections – can directly address the consequences that matter most, even if they do not eliminate every possible upstream pressure excursion in the low-pressure system itself. In the Associations' view, that consequence-focused perspective should inform PHMSA's implementation of Section 206. The final rule should recognize that qualifying alternative measures may satisfy the statute when they reduce the likelihood that elevated pressures reach customer facilities or materially limit the resulting consequences if such a pressure excursion occurs. Indeed, low pressure systems with a means of protecting customer equipment from pressure excursions *at the point of delivery*

[17] Pipeline Safety: Overpressure Protection on Low-Pressure Natural Gas Distribution Systems. 85 Fed. Reg. 61097. (September 29, 2020).
[18] Overpressurization of Natural Gas Distribution System, Explosions, and Fires in Merrimack Valley, Massachusetts. pp. 5. NTSB. (September 13, 2018).

should be explicitly recognized as falling outside of the "as appropriate" qualifier in the Congressional mandate, and should be fully exempted from any requirement to upgrade the upstream district regulator station(s) or deploying supplemental alternative measures to minimize the risk of overpressurization.

6) Large-scale station reconstruction introduces safety risk that is mitigated – but not eliminated – by other NPRM provisions.

The Associations further submit that PHMSA must account not only for the safety outcomes of retrofitting tens of thousands of district regulator stations with second-level overpressure protection, but also for the safety of the compliance pathway used to get there. The NPRM contains several important proposals intended to reduce the risk of overpressurization during design, construction, and modification activities, including Management of Change (MOC), review and approval processes for construction plans, and the presence of qualified personnel during certain construction activities. The Associations support those objectives and agree that, if properly scoped and implemented, they should help reduce the risk associated with work on pressure-control systems. The Associations' November 6, 2023 comments[19] also recognized the importance of these safeguards and recommended several targeted revisions intended to make them practical and effective.

However, even the implementation of robust controls like those discussed above cannot eliminate the overall safety risks associated with thousands of *large-scale station rebuilds and major station reconfigurations*, especially where work entails excavation, changes to pressure control and overpressure protection configurations, and relocation and reconfiguration of sense lines. The Merrimack Valley accident itself arose primarily from a failure to properly plan and control such a change. The NTSB attributed[20] the accident to inadequate planning, review, sequencing, and oversight of a project that abandoned a main without first relocating regulator sense lines. PHMSA's advisory bulletin ADB-2020-02[21] later emphasized that structured risk analysis and tailored protective measures are necessary precisely because human error and equipment failure can defeat overpressure protection if those risks are not identified and controlled.

If a final rule requires thousands of district regulator stations serving low-pressure systems to undergo partial or full rebuilds in order to install second-level overpressure protection, then a substantial amount of that work will involve some level of station-piping redesign, pressure limiting and overpressure protection reconfiguration, excavation around station appurtenances, and, in many cases, *sense-line reconfiguration or relocation*. Although the controls related to construction and design proposed in the NPRM should meaningfully

[19] The Associations' Comments on Pipeline Safety: Safety of Gas Distribution Pipelines. (November 6, 2023).
[20] Overpressurization of Natural Gas Distribution System, Explosions, and Fires in Merrimack Valley, Massachusetts. NTSB. (September 13, 2018).
[21] Pipeline Safety: Overpressure Protection on Low-Pressure Natural Gas Distribution Systems. 85 Fed. Reg. 61097. (September 29, 2020).

and substantially reduce the risk associated with that work, a certain degree of cumulative safety risk remains associated with rebuilding thousands of district regulator stations is non-zero.[22] Moreover, substantial capital costs associated with station rebuilds may also require operators to slow the execution of other capital-intensive work (such as replacement of cast iron and other leak-prone pipe) that is meaningfully improving pipeline safety. PHMSA should not structure the final rule in a way that drives operators unnecessarily toward disruptive and complex station reconstruction unless that reconstruction is determined to be the most prudent and best safety-enhancing option, particularly when alternative measures can be effectively deployed with less station disruption, less excavation, less pressure control reconfiguration, less capital cost, and earlier implementation,

7) The proposed § 192.18 notification framework is not workable for broad, routine implementation of alternatives.

The Associations are also concerned that the NPRM's proposed use of § 192.18 to govern alternative measures would create an impracticable and burdensome administrative regime. Section 192.18 generally requires operators, in certain circumstances, to submit advance notification – at least 90 days in advance – when proposing to use a different method, approach, compliance timeline, or technique than otherwise prescribed, and allows the operator to proceed only if PHMSA does not object or request more time or more information.

That kind of mechanism may be appropriate for isolated departures or genuinely novel approaches in limited circumstances. It is not, however, an appropriate default framework for the routine implementation of alternative overpressurization measures across a large population of district regulator stations serving low-pressure systems, especially (as described previously) those alternatives that are diverse, complex, overlapping, likely to evolve with new technologies and practices, and cannot be exhaustively specified in the regulatory text. If the record demonstrates that alternative measures are broadly needed because thousands of stations require full rebuilds, major partial rebuilds, or are already subject to planned system replacement, then use of § 192.18 as the primary gateway for alternatives would function as an impractical chokepoint for operators seeking to implement workable alternatives to minimize the risk of overpressurization. This chokepoint would be even more acutely felt where climate and system configurations rule out taking stations out of service for an extended period of time, wherein losing 90 days or more for § 192.18 approval would be intolerable. Finally, it does not appear that PHMSA adequately considered the costs associated with submitting, reviewing, and approving thousands of § 192.18 notifications in its PRIA.

[22] PHMSA GPAC Transcript. May 28, 2026. Page 38. Mr. Zamarin: "My understanding is that we have potentially more than 50,000 locations across the country that if you read the NPRM to its kind of exact language, might likely require significant physical work, even full replacement at up to potentially over 50,000 locations….that introduces risk. That is significant construction activity."

In a final rule, the Associations strongly urge PHMSA to expressly define scenarios in which it is not operationally possible for an operator to implement retrofit requirements[23] in the rule text, rather than relying on a station-by-station evaluation via § 192.18. Additionally, a de facto approval regime of alternatives through § 192.18 notifications would be inconsistent with the basic model of Subpart P, which relies on operator-led identification and implementation of protective measures ("*identify actions in their plan*"), subject to oversight through inspection and enforcement.

Consistent with the GPAC's recommendations[24], the Associations advise that PHMSA describe the circumstances in which alternatives are broadly available in a final rule. While prescribing available alternatives in the regulatory text is not consistent with the performance-based nature of Subpart P requirements, PHMSA is encouraged to describe examples in the preamble of the final rule, and then allow operators to identify and implement those measures through their DIMP plans without routine § 192.18 notifications.

8) Broad availability of alternatives will complement – not displace – the continued use of second-level overpressure protection where appropriate.

Finally, the Associations emphasize that making alternatives broadly available will not discourage operators from deploying second-level overpressure protection where that protection is technically feasible and appropriate. Industry data compiled by the Associations indicates that approximately 7,000 district regulator stations serving low-pressure systems already have second-level overpressure protection installed. This demonstrates that operators have already been implementing these additional overpressure safeguards where they can be reasonably and appropriately deployed.

Broad availability of alternatives to minimize risk of overpressurization will help ensure that resources are appropriately directed toward the measures that deliver the greatest safety benefit by applying the most meaningful risk reduction methods on particular systems, rather than forcing operators into a one-size-all approach in cases where the engineering and construction realities point to a different approach.

9) Conclusion

For these reasons, the Associations respectfully submit that PHMSA should revise the overpressurization provisions so that alternative measures are treated as a *widely available compliance pathway*, not a narrow exception. Section 206 of the PIPES Act of 2020[25] does not establish a retrofit-only regime. It directs PHMSA to require upgrades *"as appropriate"* and to allow operators to identify alternative actions where the station-level

[23] PIPES Act of 2020, Pub. L. No. 116-260, Div. R, § 206, 134 Stat. 1182 (2020).
[24] PHMSA GPAC Transcript. May 28, 2026. Page 73. Mr. Taylor: "PHMSA review the mandate and consider allowing performance-based alternatives to replacement as appropriate"
[25] PIPES Act of 2020, Pub. L. No. 116-260, Div. R, § 206, 134 Stat. 1182 (2020).

requirements are *"not operationally possible."* Moreover, PHMSA Advisory Bulletin ADB-2020-02[26] as well as the NTSB's Merrimack Valley investigation report[27] acknowledge that overpressurization risks on low-pressure systems may be managed through combinations of engineering practices, technologies, and other operational controls tailored to the unique attributes of those systems.

It is evident that the low-pressure district regulator stations cannot be addressed through the simple retrofit scenario imagined by PHMSA in the NPRM. Many require rebuilds or significant reconfiguration of station piping and sense lines, at costs far above those assumed in the PRIA. At the same time, operators have identified a broad range of alternative measures – spanning system-level, station-level, customer-level, operational, and programmatic approaches – that can materially reduce risk and, in many cases, can be deployed more quickly, efficiently, and safely than station reconstruction. The Associations support GPAC's recommendation[28] that PHMSA should make those alternatives more broadly available, limit or remove the proposed § 192.18 notification burden, and preserve the flexibility necessary to account for evolving technologies and system-specific conditions.

The Associations recommend that alternative measures should be broadly available in at least three categories of circumstances: (1) where a *full district regulator station rebuild* would be required; (2) where a *partial rebuild or major station reconfiguration*, including material sense-line work, would be required; and (3) where the low-pressure system is already subject to a *planned retirement, replacement, or uprating program*. Within that framework, the Associations urge PHMSA to adopt a final rule that generally allows *ten years* for station retrofit where second-level overpressure protection is appropriate and *five years* for implementation of alternative measures to minimize the risks associated with overpressurization.

The record clearly demonstrates that a flexible framework and use of broadly available, risk-informed alternative measures is not only permissible under Section 206 of the PIPES Act of 2020, but necessary to ensuring a durable final rule that is technically feasible, reasonable, cost-effective, practicable, and fully consistent with PHMSA's performance-based framework.

[26] Pipeline Safety: Overpressure Protection on Low-Pressure Natural Gas Distribution Systems. 85 Fed. Reg. 61097. (September 29, 2020).
[27] Overpressurization of Natural Gas Distribution System, Explosions, and Fires in Merrimack Valley, Massachusetts. NTSB. (September 13, 2018).
[28] Pipeline Safety: Meeting of the Gas Pipeline Advisory Committee, 91 Fed. Reg. 25755 (May 28, 2026).

B. Updated regulatory text redline

The language below represents the changes proposed by the Associations in light of the GPAC recommendations and the additional regulatory clarity discussed in these comments. The edits shown in blue represent changes that the Associations believe are necessary for the Final Rule to be clear and technically feasible, reasonable, cost-effective, and practicable.

§ 192.1007 What are the required elements of an integrity management plan?.
* * * * *

(d) Identify and implement measures to address risks.

(1) *General.* An operator must identify and implement, as appropriate, measures to reduce the risks of failure of its distribution pipeline system, consistent with the evaluation required by § 192.1007(c). ~~The measures identified and implemented must address, at a minimum, risks associated with the age of pipeline components, the overall age of the system and components, the presence of pipes with known issues, and overpressurization of low-pressure distribution systems.~~ The measures must also include an effective leak management program (unless all leaks are repaired when found).

(2) *Minimization of Overpressurization of Low-Pressure Distribution Systems.* An operator must, no later than [ONE YEAR AFTER THE EFFECTIVE ~~PUBLICATION~~ DATE OF THE RULE], implement the following ~~preventive and mitigative~~ measures to minimize the risk of overpressurization of a low-pressure distribution system that could be the result of any single event or failure:

~~(i) Identify, maintain, and obtain, if necessary, pressure control records in accordance with §§ 192.638 and 192.1007(a)(3).~~

~~(ii)~~ Confirm and document that each district regulator station serving a low-pressure distribution system meets the requirements of § 192.195(c)(1) through (3), or that customer equipment on the low-pressure system is otherwise protected from overpressurization at the point of delivery, by [ONE YEAR AFTER THE EFFECTIVE DATE OF THE RULE]. If an operator determines that a district regulator station serving a low-pressure distribution system does not meet the requirements of § 192.195(c)(1) through (3), and that customer equipment on the low-pressure system is not otherwise protected from overpressurization at the point of delivery, then ~~by [ONE YEAR AFTER THE PUBLICATION DATE OF THE RULE]~~, the operator must take either of the following actions:

(i) By [TEN YEARS AFTER THE EFFECTIVE DATE OF THE RULE], retire the district regulator station,

~~(A)~~(ii) By [TEN YEARS AFTER THE EFFECTIVE DATE OF THE RULE], ~~U~~upgrade the district regulator station to meet the requirements of § 192.195(c)(1) through (3), or

~~(B)~~(iii) By [FIVE YEARS AFTER THE EFFECTIVE DATE OF THE RULE], ~~i~~identify and implement alternative ~~preventive and mitigative~~ measures ~~based on the unique characteristics of its system~~ to minimize the risk

of overpressurization of ~~a~~ the low-pressure distribution system being served by the district regulator station confirmed in § 192.1007(d)(2). Alternatives shall be available where:

(A) Upgrading the district regulator station would require full rebuild or replacement of the district regulator station

(B) Upgrading the district regulator station would require partial rebuild or major reconfiguration of the district regulator station involving excavation, including but not limited to reconfiguration or relocation of pressure-control piping, regulators, or sense lines, or

(C) The low-pressure distribution system served by the district regulator station is subject to a planned retirement or replacement program.

If an operator elects to upgrade a district regulator station pursuant to paragraph (ii), and such upgrade is not completed within [TEN YEARS AFTER THE EFFECTIVE DATE OF THE RULE], or the operator determines that such upgrade is no longer feasible due to engineering, constructability, permitting, or other system-specific constraints, the operator must implement alternative preventive and mitigative measures pursuant to paragraph (iii) within the same [TEN YEARS AFTER THE EFFECTIVE DATE OF THE RULE] period.

~~The operator must notify PHMSA and State or local pipeline safety authorities, as applicable, no later than 90 days in advance of implementing any alternative measures. The notification must be made in accordance with § 192.18(c) and must include a description of proposed alternative measures, identification and location of facilities to which the measures would be applied, and a description of how the measures would ensure the safety of the public, affected facilities, and environment.~~

IV. Distribution Integrity Management (DIMP)

A. Discussion

The Associations support PHMSA's efforts to implement Section 202 of the PIPES Act of 2020 and agree that the final rule should appropriately address the specific requirements directed by Congress following the Merrimack Valley incident. As enacted, Section 202 contains both broadly applicable requirements, such as consideration of risks associated with cast iron facilities, and requirements specifically directed toward operators of low-pressure distribution systems, including evaluation of risks associated with overpressurization and low-probability events.

PHMSA should implement these statutory directives in a manner that remains closely aligned with the language adopted by Congress while preserving the operator-led, performance-based structure that has long characterized DIMP. Congress directed

PHMSA to address specific safety concerns associated with cast iron facilities and low-pressure distribution systems but did not fundamentally alter the structure of DIMP or replace its performance-based framework with a prescriptive regulatory regime. Accordingly, PHMSA should specifically tailor the final rule to meet the requirements mandated by Congress and avoid imposing additional prescriptive requirements unless necessary to achieve the express statutory objectives.

Below are several areas where the Associations believe the final rule can effectively implement the requirements of Section 202 in a manner that is consistent with established DIMP principles, preserves regulatory flexibility, improves pipeline safety outcomes, and mitigates the potential risks Congress specifically directed PHMSA to address.

1) PHMSA Should Avoid Prescriptive Modifications to the Established DIMP Framework Beyond Those Necessary to Implement Congress' Mandate.

The Associations believe PHMSA can fully implement Section 202 without creating additional threat categories or prescribing material-specific evaluations beyond those necessary to satisfy Congress' mandate.

Overpressurization of Low-Pressure Distribution Systems

PHMSA can most effectively implement the low-pressure distribution system provisions of Section 202 by addressing overpressurization through the risk evaluation requirements in § 192.1007(c)(3), as opposed to including "overpressurization of low-pressure distribution systems" within the threat list in § 192.1007(b).

As highlighted during the GPAC discussion, the Associations believe overpressurization is more appropriately addressed as a risk scenario or consequence pathway than as a standalone threat category. An overpressurization event may result from threats such as equipment failure or incorrect operations that are already considered within the DIMP framework; overpressurization is therefore best addressed through evaluation of the risks associated with those threats and the potential consequences that may result if preventive and mitigative measures are unsuccessful.

This approach is consistent with both Congress' specific mandate and the GPAC's recommendations. Section 202 directs PHMSA to ensure operators of low-pressure distribution systems evaluate risks that could lead to or result from operation of those systems at an elevated pressure, while the GPAC recommended that PHMSA ensure any amendments remain consistent with established DIMP principles and terminology. Addressing overpressurization through the risk evaluation requirements in § 192.1007(c)(3) fully achieves these objectives without creating a new threat category in § 192.1007(b). Operators would remain responsible for evaluating overpressurization risks, considering low-probability events, evaluating potential consequences, and implementing appropriate preventive and mitigative measures through the existing DIMP framework.

Material-Specific References

Section 202 specifically directs PHMSA to ensure operators evaluate risks resulting from the presence of cast iron pipes and mains in the distribution system. The Associations agree that the final rule must address this statutory requirement. However, it is not necessary to include additional material-specific references, such as historic plastics with known issues, to effectively implement the mandate.

DIMP has historically relied upon operator evaluation of threats and risks based on the characteristics of individual systems rather than prescriptive lists of materials requiring separate consideration. Operators already evaluate material-related risks through consideration of material type, operating history, leak history, environmental conditions, and other system-specific factors. Although Section 202 explicitly states the risks posed by cast iron must be evaluated, the Associations are concerned that prescribing specific requirements for specific materials would have the unintended effect of diminishing an operator's duty to evaluate the potential risks associated with all pipe materials utilized for the purposes of transporting natural gas. The Associations believe PHMSA and Congress would agree that an operator must weigh the unique risks presented by any pipe material to successfully execute DIMP requirements. The Associations do not find any indication that PHMSA, or Congress, intended to limit the pipe materials which operators must consider in their risk analysis to only those which PHMSA prescribes – however, prescribing any pipe material while omitting others in this final rule would have such an effect. To ensure operators fully consider their unique material-related risks, the Associations suggest that PHMSA avoid prescribing requirements for specific pipe material types in a final rule.

The Associations believe that specifying which pipe material types an operator must evaluate is consistent with the performance-based nature of the DIMP framework, and more closely aligns with the intent of the statute.

2) PHMSA Should Remove the Notification Requirement Associated with Low-Probability Events in § 192.1007(c)(3)(ii).

The Associations are concerned that proposed § 192.1007(c)(3)(ii) imposes a notification requirement that is neither required by the PIPES Act nor justified by any identified deficiency in the existing DIMP framework.

Section 202 provides that an operator of a low-pressure distribution system may not determine that there are no potential consequences associated with a low-probability event unless that determination is supported by engineering analysis or operational knowledge. While Congress established the basis upon which an operator may make such a determination, it did not require notification to PHMSA or State pipeline safety authorities, nor did it establish a review, concurrence, or no-objection process.

The Associations are also concerned that the proposal creates uncertainty regarding the role of PHMSA and State pipeline safety authorities following submission of a notification. The proposed regulatory text does not specify whether notifications are informational only, whether either agency is expected to review the submission, whether either agency may object to an operator's determination, or what effect such an objection would have. Absent additional clarification, operators may reasonably question whether the notification process is intended to function as a de facto review or no-objection mechanism despite the absence of any such requirement in the statute.

This uncertainty is particularly problematic because the NPRM does not explain why existing DIMP documentation, inspection, and enforcement processes are insufficient to verify compliance with this requirement. Operators of low-pressure distribution systems are already required to identify threats, evaluate risks, document analyses, maintain records, periodically re-evaluate risks, and demonstrate compliance during inspections. In addition, DIMP programs are routinely inspected by State pipeline safety authorities through existing inspection programs. PHMSA has also previously addressed operator determinations regarding threat applicability through its 2017 Advisory Bulletin, "Pipeline Safety: Deactivation of Threats," which emphasizes documentation, technical justification, and inspection oversight rather than submission of operator determinations to regulators.

During the GPAC discussion, multiple members questioned both the purpose of the notification and the role of regulators once a notification is submitted, and PHMSA staff specifically questioned “is it really necessary to be notifying the regulator on how [you’re] addressing every threat or risk in DIMP.”[29] Those concerns were ultimately reflected in the GPAC recommendation that PHMSA "clarify and limit the scope of notification and no-objection requirements." The Associations agree with this recommendation and believe it reflects the need to ensure that implementation of Section 202 remains consistent with established DIMP oversight practices.

Accordingly, PHMSA should remove the notification requirement in proposed § 192.1007(c)(3)(ii). Operators should instead maintain documentation supporting determinations regarding low-probability events and make that documentation available during inspections conducted by PHMSA or its State pipeline safety partners. This approach would fully satisfy the statutory requirement while relying on the existing DIMP framework for documentation, inspection, and enforcement.

At a minimum, if PHMSA elects to retain a notification requirement in the final rule, the agency should clearly explain the purpose of the notification, confirm that it does not constitute a request for agency approval or a no-objection determination, and substantially reduce the information required to be submitted.

[29] PHMSA GPAC Meeting Transcript. May 28, 2026. Page 84.

3) PHMSA Should Clarify in the Final Rule Preamble That the DIMP Amendments Are Being Adopted Pursuant to a Specific Congressional Mandate

PHMSA has the authority to implement Section 202 of the PIPES Act through amendments to the DIMP regulations, including Congress's direction regarding evaluation of risks associated with cast iron facilities and low-pressure distribution systems. However, PHMSA should clearly explain in the final rule preamble that these amendments are being adopted in response to a unique Congressional directive and should not be interpreted as establishing a broader precedent for using integrity management regulations to impose retroactive design, installation, construction, or facility upgrade expectations on existing pipeline facilities.

Congress did not amend or repeal the non-application clause contained in 49 U.S.C. § 60104(b), which provides that design, installation, construction, initial inspection, and initial testing standards do not apply to pipeline facilities existing when the standard is adopted.

This distinction remains important because integrity management programs are intended to be performance-based and risk-informed. Historically, operators have been responsible for evaluating risks on their systems and selecting preventive and mitigative measures appropriate to those risks. The Associations are concerned that, absent clear discussion in the final rule preamble, future stakeholders could misconstrue this rulemaking as support for the proposition that integrity management regulations may generally be used to impose new design expectations on existing facilities outside the context of a specific Congressional mandate.

Accordingly, PHMSA should explain in the final rule preamble that the DIMP amendments adopted in response to Section 202 of the PIPES Act are based upon the unique statutory direction provided by Congress following the Merrimack Valley incident and should not be interpreted as modifying the longstanding limitations reflected in 49 U.S.C. § 60104(b).

4) PHMSA Should Update the Regulatory Impact Analysis to Reflect the Requirements of the Final Rule

The Associations appreciate PHMSA's efforts to evaluate the costs and benefits associated with the proposed amendments to the DIMP regulations. However, the Associations encourage PHMSA to revisit several assumptions underlying the Preliminary Regulatory Impact Analysis (PRIA) and ensure that the Final Regulatory Impact Analysis reflects the requirements ultimately adopted in the final rule.

The PRIA assumes that the proposed amendments will result in largely de minimis costs because operators already evaluate material-related risks and risks associated with overpressurization of low-pressure distribution systems. However, the PRIA does not demonstrate that existing operator practices correspond to all of the compliance activities contemplated by the proposed rule.

The Associations are particularly concerned that the PRIA may not fully account for the costs associated with provisions that extend beyond existing DIMP practices, including evaluation of low-probability events, development of supporting engineering analyses, preparation and maintenance of additional documentation, and any notification requirements ultimately retained in the final rule. To the extent PHMSA elects to retain such requirements, PHMSA should reassess whether the assumptions supporting the PRIA remain valid.

This consideration is particularly important because several of the proposed requirements, including those related to low-probability events and associated notifications, apply only to operators of low-pressure distribution systems rather than the broader population of gas distribution operators. Accordingly, the Final Regulatory Impact Analysis should clearly identify the affected universe of operators and ensure that any associated burden estimates accurately reflect the operators subject to those requirements.

In addition, PHMSA assumes that small operators would incur no incremental costs associated with certain DIMP amendments because compliance assistance tools available on the market, such as the Security & Integrity Foundation's SHRIMP program, could be updated to reflect final rule requirements and incorporated during normal DIMP reevaluation activities. SHRIMP and similar tools provide significant value to small operators and can help facilitate implementation of regulatory requirements. However, the availability of a third-party compliance assistance resource does not, by itself, demonstrate that implementation costs are zero. Operators may still incur costs associated with updating procedures, records, documentation, analyses, training, and other compliance activities necessary to implement new regulatory requirements.

Accordingly, PHMSA should ensure that the Final Regulatory Impact Analysis reflects the specific implementation approaches adopted in the final rule and accurately accounts for the compliance activities required of affected operators. This is particularly important where the final rule includes requirements beyond those currently addressed through existing DIMP processes and practices.

B. Updated regulatory text redline

The language below represents the changes proposed by the Associations in light of the GPAC recommendations and the additional regulatory clarity discussed in these comments. The edits shown in blue represent changes that the Associations believe are necessary for the Final Rule to be clear and technically feasible, reasonable, cost-effective, and practicable.

§ 192.1007 What are the required elements of an integrity management plan?.

* * * * *

(b) *Identify threats.* The operator must consider the following categories of threats to each gas distribution pipeline: corrosion (including atmospheric corrosion); natural forces ~~(including extreme weather, land movement, and other geological hazards)~~, excavation damage, other outside force damage, material ~~(including the presence and age of pipes such as cast iron, bare steel, unprotected steel, wrought iron, and historic plastics with known issues)~~ or welds, equipment failure, incorrect operations, ~~overpressurization of low-pressure distribution systems~~; and other issues ~~threats~~ that could pose a risk to the integrity of a pipeline. ~~An operator must also consider the age of the system, pipe, and components in identifying threats.~~ An operator must consider reasonably available information when considering existing and potential threats. Sources of data may include, but are not limited to, incident and leak history, corrosion control records (including atmospheric corrosion records), continuing surveillance records, patrolling records, maintenance history, and excavation damage experience.

(c) *Evaluate and rank risk.*

(1) *General.* An operator must evaluate the risks associated with its distribution pipeline. In this evaluation, the operator must determine the relative importance of each threat and estimate and rank the risks posed to its pipeline. This evaluation must consider each applicable current and potential threat, the likelihood of failure associated with each threat, and the potential consequences of such a failure. An operator may subdivide its pipeline into regions with similar characteristics (e.g., contiguous areas within a distribution pipeline consisting of mains, services and other appurtenances; areas with common materials or environmental factors), and for which similar actions likely would be effective in reducing risk.

(2) *Certain pipe with known issues.* An operator must, no later than **[INSERT ONE YEAR AFTER THE EFFECTIVE ~~PUBLICATION~~ DATE OF THE RULE]**, evaluate the risks in the distribution system resulting from pipelines with known issues based on the material ~~(including, cast iron, bare steel, unprotected steel, wrought iron, and historic plastics with known issues)~~, design, age, or past operating and maintenance history.

(3) *Low-pressure Distribution Systems.* An operator must, no later than **[INSERT ONE YEAR AFTER THE EFFECTIVE ~~PUBLICATION~~ DATE OF THE RULE],** evaluate the risks that could lead to or result in overpressurization ~~from the operation of a low-pressure distribution system at a pressure that makes the operation of any connected and properly adjusted low-pressure gas burning equipment unsafe.~~ In the evaluation of risks, an operator must:

(i) Evaluate factors other than past observed abnormal operating conditions (as defined in § 192.803) in ranking risks, including any known industry threats, risks, or hazards to public safety that could occur on its system based on knowledge gained from available sources;

(ii) ~~Evaluate potential consequences associated with low-probability events unless a determination, supported and documented by an engineering analysis, or an equivalent analysis incorporating operational knowledge, demonstrates that the event results in no potential consequences, and therefore no potential risk. An operator must notify PHMSA and State or local pipeline safety authorities, as applicable, in accordance with § 192.18 within 30 days of making such a determination. The notification must include the following:~~

(A) ~~Date the determination was made;~~

(B) ~~Description of the low-probability event being considered;~~

(C) ~~Logic Justification supporting the determination, including information from an engineering analysis, or an equivalent analysis incorporating operational knowledge;~~

(D) ~~Description of any preventive and mitigative measures actions taken, including any measures considered but not taken;~~

(E) ~~Details of the low-pressure system applicable to the event that results in no potential consequence and risk, including, at a minimum, the miles of pipe, number of customers, number of district regulators supplying the system, and other relevant information; and~~

(F) ~~Written statement summarizing the documentation provided in the notification.~~

(iii) Evaluation of the configuration of ~~primary and any secondary~~ overpressure protection installed at district regulator stations (such as a relief valves, monitoring regulators, or automatic shutoff valves), the availability of gas pressure monitoring at or near overpressure protection equipment, and the likelihood of any single event (such as excavation damage, natural forces, equipment failure, or incorrect operations), that ~~either immediately or over time,~~ could result in an overpressurization of the low-pressure distribution system ~~Identify and implement measures to address risks.~~

(d) *Identify and implement measures to address risk*

(1) General. An operator must identify and implement, as appropriate, measures to reduce the risks ~~from~~ of failure of its ~~gas~~ distribution pipeline system, consistent with the evaluation required by (b) and (c) of this section. ~~The measures identified and implemented must address, at a minimum, risks associated with the age of pipeline components, the overall age of the system and components, the presence of pipes with known issues, and overpressurization of low-pressure distribution systems.~~ These measures must include an effective leak management program (unless all leaks are repaired when found).

(2) Minimization of Overpressurization of Low-Pressure Distribution Systems. *[See comments on Overpressurization]*

V. O&M Procedures for Overpressurization Response & MOC

A. Discussion

1) Overpressurization Response Procedures (§ 192.605(f)) – PHMSA must align regulatory text with the statutory "if necessary" standard and preserve operator judgment.

The Associations support PHMSA's proposal to revise § 192.605 to require operators to establish and maintain procedures for responding to indications of potential overpressurization on gas distribution systems. This requirement is consistent with Section 204 of the PIPES Act of 2020, which directs PHMSA to ensure that operator O&M manuals include written procedures for responding to overpressurization indications. The Associations also support the inclusion of specific actions within those procedures, as this improves clarity, consistency, and preparedness.

However, it is essential that the final rule faithfully reflects the statutory language and intent. Section 204 expressly provides that operator procedures must develop written procedures for "immediately reducing pressure in or shutting down portions of the gas distribution system, *if necessary*." The "if necessary" qualifier reflects Congress' recognition that not all indications of overpressurization warrant immediate system shutdown or pressure reduction, and that operators must retain the ability to exercise judgment in determining when such actions are appropriate.

The NPRM, as proposed, does not adequately account for this qualifier and instead suggests that operators must immediately reduce pressure or shut down portions of the system upon receiving an overpressurization indication, without regard to necessity. The Associations strongly recommend that PHMSA include the statutory "if necessary" qualifier in any final rule to properly align the final rule with Congress' clear and unambiguous intent.

This clarification is critical for both operational integrity and public safety. Overpressurization indications may arise from a variety of causes, including instrumentation anomalies, transient pressure fluctuations, SCADA alarms, or other system conditions that do not reflect an actual overpressure event. Operators must be able to evaluate such indications before initiating potentially disruptive actions. Immediate system shutdown or pressure reduction, if applied indiscriminately, can introduce safety risks of its own, including:

- Unnecessary interruption of gas service to large customer populations, particularly during extreme weather conditions;
- Potential for freezing of residential piping and associated property damage where service interruptions are prolonged or re-lighting is delayed;

- Water infiltration into low-pressure systems during depressurization, leading to operational integrity issues such as freeze-offs; and
- Requiring significant, difficult, and unnecessary service restoration, particularly for systems with large numbers of indoor meter sets requiring customer access.

For these reasons, mandating immediate shutdown or pressure reduction without allowing operators to verify and assess the indication is both inconsistent with the statute and also counterproductive to the objective of maintaining safe and reliable gas service. A final rule should be written to ensure operators maintain clear, actionable procedures while retaining the flexibility needed to respond safely and effectively to the wide range of scenarios involving overpressurization indications.

Finally, the Associations support the removal of the requirement to prescribe a rigid "order of operations" for response procedures. As the Associations noted in November 2023[30], overpressurization scenarios vary significantly depending on system design, operating conditions, and the nature of the indication. A final rule that is overly prescriptive about a fixed sequence of actions for all scenarios is neither feasible nor desirable. Operators must retain the ability to determine the appropriate response sequence based on real-time system conditions, available information, and the need to balance safety, reliability, and system integrity.

2) Management of Change (§ 192.605(g)) – PHMSA must align scope with Section 204 and focus on overpressurization-relevant risks.

The Associations recognize that Section 204 of the PIPES Act of 2020 requires PHMSA to promulgate a rule requiring operators to include a detailed Management of Change (MOC) process in their O&M manuals. The Associations support this requirement and agree that a well-designed MOC framework, commensurate with the complexity and consequence of change, is an important tool for managing risks associated with system modifications related to overpressurization.

Section 204 requires MOC procedures to be applied to "significant technology, equipment, procedural, and organizational changes" to the distribution system. While this language is broad, the legislative history and statutory structure make it clear that the primary focus of Section 204 is to address risks similar to those that contributed to the Merrimack Valley incident – namely, failures to properly plan, review, and execute changes affecting pressure-control systems.

Accordingly, the Associations assert that the phrase "significant…changes to the distribution system" is intended to apply to those changes that materially affect overpressurization risk. PHMSA's own NPRM reflects this understanding by effectively

[30] The Associations' Comments on Pipeline Safety: Safety of Gas Distribution Pipelines. (November 6, 2023).

focusing the scope of MOC procedures to "upgrades to regulators, pressure monitoring locations, or overpressure protection devices."[31]

The Associations recommend that the scope of MOC requirements be limited to significant and permanent changes to physical assets and operational practices related to pressure regulation, pressure monitoring, and overpressure protection:

- Planned installations, modifications, or abandonments involving district regulator stations or associated pressure-control infrastructure;
- Permanent changes to alarm setpoints or monitoring equipment that are not otherwise governed by Control Room Management requirements;
- Introduction of new technologies affecting overpressure protection systems; and
- Procedural or operational changes affecting pressure regulation, pressure monitoring, or overpressure protection.

This scope is consistent with the statutory mandate and directly targets the types of changes that can introduce or mitigate overpressurization risk.

3) Limiting MOC scope is essential to preserving its effectiveness as a risk management tool.

The Associations moreover emphasize that an overly broad or prescriptive MOC requirement would undermine, rather than enhance, its effectiveness. MOC is inherently a structured, resource-intensive process requiring planning, documentation, review, communication, and approval. If applied indiscriminately across all distribution activities, it would generate an overwhelming volume of change actions, many of which would have little or no relevance to pipeline safety.

A broad-brush approach to Management of Change would dilute the focus of MOC and make it more difficult for operators to identify, communicate, and manage those changes that truly present elevated risk. In other words, excessive application of MOC would reduce its signal-to-noise ratio, obscuring the very risks it is intended to highlight.

The Associations recommend that PHMSA address this concern by:

- Limiting MOC to significant changes demonstrably related to overpressurization risk, consistent with the statute;
- Exempting emergency response activities, which by definition require immediate action and cannot be subjected to formal pre-approval processes;
- Exempting changes already governed under Control Room Management requirements; and

[31] Pipeline Safety: Safety of Gas Distribution Pipelines and Other Pipeline Safety Initiatives, 88 Fed. Reg. 61746 (Sept. 7, 2023).

- Explicitly excluding routine and in-kind work that does not introduce increased risks of overpressurization.

This approach ensures that MOC remains a targeted and effective risk management tool, rather than a generalized administrative process applied to all operational distribution pipeline activities.

4) PHMSA should preserve necessary flexibility in construction plan review and certification (§ 192.605(g)(2)).

Section 204 also directs PHMSA to require that qualified personnel review and certify construction plans for accuracy, completeness, and correctness. The Associations support this requirement and agree that appropriate review and approval of construction plans is an important control to prevent errors that could lead to overpressurization events.

The Associations recommend that PHMSA appropriately implement this mandate while providing the flexibility necessary to ensure the review and approval process is completed by suitable personnel. Specifically, a final rule should:

- Apply plan review and approval requirements commensurate with the complexity and consequences of work associated with risk of system overpressurization, rather than all construction activities; and
- Retain flexibility in determining who is qualified to perform such reviews and approvals, consistent with the statutory language allowing professional engineers, subject matter experts, or other knowledgeable personnel.

This approach ensures that the requirement is focused on higher-risk work where such review is most meaningful, while avoiding administrative burden for routine or low-risk activities.

Importantly, the Associations believe the intent of Section 204 is to ensure competent individuals conduct the review and approval process. As such, the Associations continue to emphasize that review and approval of construction plans does not constitute a "covered task" under Subpart N, and should not be subject to Operator Qualification requirements. The competencies required to evaluate engineering designs and system modifications differ fundamentally from those required to perform field tasks, and the regulatory framework should reflect that distinction.

5) Conclusion

The Associations support PHMSA's efforts to implement Section 204 of the PIPES Act of 2020 and to enhance operator procedures for managing overpressurization risks. However, the final rule must be appropriately tailored to reflect the intent of the statutory language, preserve operational flexibility, and maintain focus on the highest-risk activities.

The Associations recommend that PHMSA write § 192.605(f) and (g) to:

- Restore the statutory "if necessary" qualifier for overpressurization response actions;
- Preserve operator discretion to evaluate indications and respond appropriately;
- Focus MOC requirements on significant changes affecting overpressurization risk, to exclude routine and emergency activities; and
- Implement construction plan review and approval requirements in a targeted and practical manner.

Collectively, these considerations align the rule with Congressional intent, enhance safety, and ensure that the regulatory framework remains effective, practicable, and performance-based.

B. Updated regulatory text redline

The language below represents the changes proposed by the Associations in light of the GPAC recommendations and the additional regulatory clarity discussed in these comments. The edits shown in blue represent changes that the Associations believe are necessary for the Final Rule to be clear and technically feasible, reasonable, cost-effective, and practicable.

§ 192.605 Procedural manual for operations, maintenance, and emergencies.

* * * * *

(f) *Overpressurization.* For distribution lines, the manual required by paragraph (a) of this section must, no later than [ONE YEAR AFTER THE EFFECTIVE ~~PUBLICATION~~ DATE OF THE RULE], include procedures for responding to, investigating, and correcting, as soon as practicable, the cause of overpressurization indications. The procedures must include the specific actions ~~and an order of operations~~ for responding to overpressurization indications, and, if necessary, immediately reducing pressure in or shutting down affected portions of the distribution system ~~affected by an overpressurization~~.

(g) *Management of Change (MOC) Process.* For distribution pipelines, the manual required by paragraph (a) of this section must, no later than [~~ONE~~ TWO YEARS AFTER THE EFFECTIVE ~~PUBLICATION~~ DATE OF THE RULE], include a detailed MOC process for the following:

(1) Significant ~~T~~technology, equipment, procedural, and organizational changes excluding emergency work, routine operating adjustments, like-kind replacements, and any work that does not pose a known risk of overpressurization, but including:

(i) Planned ~~i~~installations, modifications, replacements, or abandonments involving physical changes ~~upgrades~~ to district regulator~~s~~ stations, pressure monitoring locations, or overpressure protection devices on mains;

(ii) Permanent changes made to alarm set points or monitoring equipment that are not covered by Subpart L ~~Modifications to alarm set points or upper/lower trigger limits on monitoring equipment~~;

(iii) The introduction of new technologies for overpressure protection into the system;

(iv) Revisions, changes, or the introduction of new standard operating procedures for planned design, construction, installation, and maintenance work where pressure regulation, pressure monitoring, or overpressure protection is impacted~~, and emergency response~~;

~~(v) Other changes that may impact the integrity or safety of the gas distribution system.~~

(2) Ensuring that personnel—such as an engineer with a professional engineer license, a subject matter expert, or another person who possesses the necessary knowledge, experience, and competencies ~~skills~~ regarding gas distribution systems—review and approve ~~certify~~ construction plans for accuracy and completeness before the work begins on complex work with risk of system overpressurization associated with installations, ~~modifications,~~ replacements, or ~~system upgrades~~ abandonments of district regulator stations, pressure monitoring locations, or overpressure protection devices on mains. ~~for accuracy and completeness before the work begins. These personnel must be qualified to perform these tasks under subpart N of this part.~~

(3) Ensuring that any hazards introduced by a change are identified, analyzed, and controlled before resuming operations.

VI. Emergency Response

A. Detailed Comments

1) PHMSA Should Implement Section 203 Consistent with the Scope and Structure of the Congressional Mandate

The Associations support PHMSA's efforts to implement Section 203 of the PIPES Act of 2020 and appreciate the agency's willingness during the GPAC meeting to reconsider several aspects of the proposed amendments to § 192.615. As PHMSA finalizes these requirements, the agency should ensure that the final rule remains closely aligned with the language and structure mandated by Congress.

Congress directed PHMSA to update Emergency Response Plan requirements for distribution operators by establishing procedures following specific gas pipeline emergencies. Those procedures include communications with first responders and public officials, communications with the affected public, and development of voluntary opt-in customer notification systems. Congress identified four triggering events for gas pipeline emergencies involving a release of gas from a distribution system: (1) a fire related to an unintended release of gas, (2) an explosion, (3) one or more fatalities, or (4) the unintended release of gas and shutdown of service to a significant number of customers, as determined by the Secretary.

Congress did not create a broad new emergency response framework. Instead, Congress directed PHMSA to establish communication procedures for a defined set of emergency events following releases of gas from distribution systems. During the GPAC meeting, Committee members observed that incorporating those requirements into existing 192.615 language may unintentionally broaden their applicability beyond what Congress intended. As Chad Zamarin noted, the statutory language was "very clear" that these were additional communication requirements tied to releases from distribution systems and that PHMSA should ensure the rule is not "picking up more activity" simply because they new requirements are being incorporated into an existing section of the code.[32] PHMSA should therefore ensure that the final rule remains focused on those events and does not expand the scope of the statutory requirements beyond what is necessary to implement the Section 203.

The GPAC recognized the importance of maintaining this focus and unanimously recommended that PHMSA revise the scope of gas distribution emergency notifications consistent with the statutory mandate and public comments. The Associations agree with this recommendation and believe it provides an appropriate framework for evaluating the remaining provisions of the rulemaking.

PHMSA Should Better Align the Service Interruption Trigger with Congressional Intent

Section 203 identifies four categories of events that trigger the enhanced communication requirements adopted by Congress. Unlike the fire, explosion, and fatality triggers, the service interruption provision appears intended to address significant disruptions in gas service associated with an unintended release of gas and resulting loss of pressure that may not otherwise fall within the other statutory categories.

For purposes of implementing this requirement, the Associations believe it is appropriate for PHMSA to utilize affected service lines rather than customers as the basis for any significance threshold established in the final rule. Affected service lines provide a more clear and consistently measurable metric than "customers", a term that is not defined in Part 192, and more closely aligns with current PHMSA guidance. For example, distribution incident reporting instructions, directs operators to report the number of affected services involved in an incident.[33]

PHMSA indicated during the GPAC discussion that it intends to conduct additional analysis to determine an appropriate threshold for this provision. As the Associations explained in our 2023 comments on the NPRM, 270 affected service lines remains a reasonable benchmark for evaluating what constitutes a significant service disruption. Based on PHMSA distribution incident data, incidents involving service interruptions affect

[32] PHMSA GPAC Transcript. May 28, 2026. Pages 186-188.
[33] PHMSA Instructions for Form PHMSA F7100.1. Incident Report – Gas Distribution Systems. Page 15. "D3. Estimated number of customers out of service: Count number of individual services in each category that were affected, not number of persons served."

an average of approximately 270 service lines when incidents affecting only zero or one service are excluded. While PHMSA may ultimately determine that a different threshold is appropriate, the Associations encourage the agency to ensure that any threshold adopted reflects a truly significant interruption of service rather than routine or localized outage events.

In conducting its analysis, PHMSA should carefully consider the consequences of establishing a threshold that is too low. Distribution operators should not be discouraged from using emergency valves or taking other actions intended to quickly isolate portions of the system and protect public safety, due to concerns about crossing a notification threshold. Any threshold adopted should encourage prompt emergency response actions and reflect the significant service disruptions Congress intended to address.

PHMSA Should Condense the Fire Related Emergency Types

The Associations encourage PHMSA to incorporate "a fire related to an unintended release of gas", as mandated by Congress, into the existing fire-related emergency category in § 192.615(a)(3). Existing regulations identify a "fire located near or directly involving a pipeline facility" as an emergency event. However, the regulation provides no objective criteria for determining when a fire is sufficiently "near" a facility and operators may not have immediate knowledge of nearby fires.

Congress instead tied the trigger to a specific emergency condition involving the operator's distribution system—an unintended release of gas that results in a fire. This standard is more objective because it is tied to a specific condition involving the operator's distribution system rather than the proximity of a fire to a pipeline facility. It also ensures that the communication requirements are triggered by emergency events involving releases of gas from the distribution system rather than structure fires or other fire events that may occur independently of the operator's facilities. The Associations therefore encourage PHMSA to revise the existing fire-related emergency to incorporate a trigger based on an unintended release of gas that results in a fire, rather than creating a separately defined event related to unintended releases.

PHMSA Should Eliminate the Proposed Open-Ended Emergency Type

The Associations are particularly concerned with proposed § 192.615(a)(3)(viii), which would apply the new communication requirements to "any other emergency deemed significant by the operator." Unlike the specific triggering events identified by Congress, this provision lacks objective boundaries and creates substantial uncertainty regarding when the requirements would apply. Because virtually any emergency event could later be characterized as significant, the provision creates the potential for inconsistent interpretations during implementation, inspection, and enforcement.

Congress already established a framework for identifying specific emergency events that warrant enhanced communications with first responders, public officials, customers, and the public. PHMSA also retains discretion to define what constitutes a significant number of service interruptions for purposes of the outage-related trigger. Given this framework, the Associations do not believe it is necessary to supplement the statutory triggers with an open-ended catch-all provision that expands the scope of the notification requirements beyond the emergency events identified by Congress. The NPRM does not explain why the specific triggering events established by Congress are insufficient to identify the emergencies that warrant application of these requirements.

The GPAC recognized the importance of maintaining an appropriate scope for these provisions and unanimously recommended that PHMSA revise the scope of gas distribution emergency notifications consistent with the statutory mandate and public comments. The Associations agree with this recommendation and PHMSA should remove the catch-all provision in § 192.615(a)(3)(viii) and ensure that the final rule clearly identifies the emergency events that trigger the communication requirements adopted pursuant to Section 203.

2) PHMSA Should Better Align Public Communication Requirements with the Text of Section 203

Section 203 established requirements for communications with the general public following specified gas pipeline emergencies. The Associations support Congress's intent of ensuring that the public receives timely and accurate information during emergency events. However, several aspects of proposed § 192.615(a)(13) expand both the timing and content of the communications contemplated by Congress. PHMSA should revise these provisions to better align any final regulatory text with the clear and unambiguous statutory language and existing emergency response practices.

PHMSA Must Focus the Scope of Information Operators Are Required to Communicate to the Public

Congress identified two focused categories of information for public communication: information regarding the emergency and the status of public safety. However, proposed § 192.615(a)(13) expands the categories of information operators must communicate beyond those required by Congress and, in doing so, effectively requires operators to serve as the primary source of public communications during an emergency response. PHMSA should also recognize that operators are not always the appropriate entity to communicate all information related to public safety during an emergency response scenario.

Many distribution operators coordinate emergency response activities using National Incident Management System (NIMS) and Incident Command (ICS) principles. Within those frameworks, public communications are generally coordinated and disseminated

through a designated Public Information Officer (PIO). Depending on the nature of the incident and the responding agencies involved, the PIO may be a representative of the operator, a local fire department, an emergency management agency, or another public official. Congress did not require operators to directly disseminate all information to the public. Rather, Congress directed that communications occur through an "appropriate channel." In many emergency response situations, the appropriate channel may be a designated PIO operating within an established incident command structure rather than the operator acting independently.

Operators are uniquely positioned to provide information regarding the status of the gas system, affected service areas, restoration activities, and other technical aspects of an incident. Information regarding evacuations, public protective actions, and broader public safety conditions is often communicated by designated incident commanders, emergency responders, and public officials. PHMSA should therefore revise § 192.615(a)(13) to focus on the information Congress identified and avoid imposing communication obligations more appropriately fulfilled by designated PIOs or other responding public officials.

PHMSA Should Align Public Communication Timing Requirements with Section 203

Section 203 directs operators to establish procedures for public communications "as soon as practicable" after a gas pipeline emergency. The Associations are concerned that PHMSA's proposed § 192.615(a)(13) expands this requirement by requiring communications during a gas pipeline emergency.

During an emergency, operators must remain focused on protecting life and property, coordinating with emergency responders, isolating facilities, and stabilizing operating conditions. Requiring public communications during an emergency could divert attention from these critical response activities and may result in the dissemination of incomplete or inaccurate information while the situation is still developing. In some circumstances, the emergency itself may be resolved within a relatively short period of time, making communications during the event impracticable and reinforcing Congress's decision to require communications as soon as practicable after the emergency.

Congress recognized these realities and directed that communications occur as soon as practicable after the emergency. PHMSA should revise § 192.615(a)(13) to align with the statutory language and avoid imposing communication requirements during an active emergency response.

3) PHMSA Should Maintain a Performance-Based Approach to Voluntary Opt-In Customer Notification Systems

Congress directed PHMSA to require operators of distribution systems to develop and implement a voluntary, opt-in system that would allow operators to rapidly communicate with customers in the event of an emergency. The Associations appreciate PHMSA's

willingness during the GPAC process to move toward a more performance-based approach. As PHMSA stated in the GPAC meeting, “we’re looking at this holistically to generally write the regulation well. Here, the opt-in system had a lot of additional requirements for how that would be tested and maintained and operated. So I’m trying to cut down the extensiveness to what’s necessary in regulatory standard.”[34]

Overly prescriptive requirements could discourage innovation and limit operators' ability to implement communication systems that are most effective for their customers and communities. Distribution operators vary significantly in size, service territory characteristics, available resources, and existing communication capabilities. Operators use a variety of communication tools, including text messaging, email, automated telephone notifications, customer portals, mobile applications, and social media platforms. This concept was supported by PHMSA staff during the GPAC discussion.[35] A communication method that works well for a large urban utility with millions of customers may not be the most effective approach for a small municipal system with a few hundred customers.

Communication technologies and customer preferences change far more quickly than pipeline safety regulations. Requirements that prescribe specific communication practices today may be less effective a decade from now. Operators should be able to tailor their programs to the needs of their customers while still meeting the statutory intent of rapidly communicating with customers who voluntarily elect to participate in such systems.

The final rule should establish the performance objective and provide operators with flexibility in how they meet that objective.

4) PHMSA Should Update the Regulatory Impact Analysis

The Associations recognize that PHMSA is likely to make substantive revisions to several provisions of the NPRM based on the GPAC recommendations and stakeholder comments. Revisions to the triggering events, public communication requirements, voluntary opt-in notification systems, and other implementation requirements may materially affect the costs and operational impacts associated with the final rule. To the extent the agency modifies the scope, applicability, or implementation requirements associated with the emergency response provisions, PHMSA should ensure that the final cost-benefit analysis reflects those changes.

B. Updated regulatory text redline

[34] PHMSA GPAC Transcript. May 28, 2026. Page 175.
[35] PHMSA GPAC Transcript. May 28, 2026. Page 176. “Off the cuff, I think it contemplated a little bit more – the mandate seemed to contemplate a little bit more direct to a customer. But I think even the proposal had flexibility for how that would be conveyed. And also, I think Bobby noted earlier, we would like to make clear than an operator, specifically a small operator, can use someone else’s communication system and not have to develop their own and can leverage those resources.”

The language below represents the changes proposed by the Associations in light of the GPAC recommendations and the additional regulatory clarity discussed in these comments. The edits shown in blue represent changes that the Associations believe are necessary for the Final Rule to be clear and technically feasible, reasonable, cost-effective, and practicable.

§ 192.615 Emergency plans.

(a) Each operator shall establish written procedures to minimize the hazard resulting from a gas pipeline emergency. At a minimum, the procedures must provide for the following:
* * * * *

(3) Prompt and effective response to a notice of each type of emergency, including the following:

(i) Gas detected inside or near a building that could result in a hazardous condition.

(ii) An unintended release of gas that results in a fire ~~located near or directly involving a pipeline facility.~~

(iii) Explosion occurring near or directly involving a pipeline facility.

(iv) Natural disaster

(v) ~~Notification of potential rupture (see § 192.635).~~

(vi) Beginning no later than [INSERT ONE YEAR AFTER THE ~~PUBLICATION~~ EFFECTIVE DATE OF THE FINAL RULE], release of gas from a natural gas distribution system that results in one or more fatalities.

(vii) Beginning no later than [INSERT ONE YEAR AFTER THE ~~PUBLICATION~~ EFFECTIVE DATE OF THE FINAL RULE], for distribution line operators only, unintentional release of gas ~~and~~ that results in a shutdown of available gas service for more than 24 hours to 270 ~~50~~ or more ~~customers~~ service lines or, if the operator has fewer than 100 customers, 50 percent or more of its total customers.

(viii) ~~Beginning no later than [ONE YEAR AFTER THE PUBLICATION DATE OF THE FINAL RULE], any other emergency deemed significant by the operator.~~

…

(8) Notifying the appropriate public safety answering point (i.e., 9–1–1 emergency call center) where direct access to a 9–1–1 emergency call center is available from the location of the pipeline, and fire, police, and other public officials, of gas pipeline emergencies to coordinate and share information to determine the location of the emergency, including both planned responses and actual responses during an emergency. The operator must immediately and directly notify the appropriate public safety answering point or other coordinating agency for the communities and jurisdictions in which the pipeline is located after ~~receiving notice~~ confirming discovery of a gas pipeline emergency under paragraph (a)(3)(ii), (iii), (vi) and (vii).~~a notification of potential rupture, as defined in § 192.3, to~~ The operator must coordinate and share information to determine the location of any release, regardless of whether the segment is subject to the requirements of § 192.179, § 192.634, or § 192.636.

…

(13) For distribution line operators, beginning no later than [ONE YEAR AFTER THE ~~PUBLICATION~~ EFFECTIVE DATE OF THE FINAL RULE], identify an appropriate

channel to establish~~ing~~ and maintain~~ing~~ communication with the ~~general~~ affected public ~~in the operator's service area~~ as soon as practicable, beginning from the time of confirmed discovery of an ~~during a gas pipeline~~ emergency on a distribution line, as defined in paragraph (a)(3)(ii), (iii), (vi) and (vii). The communication(s) must be in English, and any other languages commonly understood by a significant number ~~and concentration~~ of the non-English speaking population in the operator's service area; ~~be in one or more formats or media accessible to the population in the operator's service area;~~ continue through service restoration and recovery efforts; and provide the following:

(i) Information regarding the gas pipeline emergency; and

(ii) ~~The status of the emergency (e.g., have the condition causing the emergency or the resulting public safety risks been resolved);~~

(iii) Status of pipeline operations affected by the gas pipeline emergency, ~~and when possible, a timeline for expected service restoration; and~~

~~(iv)~~ ~~Directions for the public to receive assistance. The operator must provide updates when the information in § 192.615(a)(13)(i) through (iv) changes.~~

…

(d) No later than [INSERT DATE 18 MONTHS AFTER THE ~~PUBLICATION~~ EFFECTIVE DATE OF THE RULE], each distribution line operator must ~~develop and~~ implement a system, ~~including written procedures,~~ that allows operators to rapidly communicate with affected customers after the confirmed discovery ~~in the event~~ of a gas pipeline emergency ~~under this section~~, as specified in paragraph (a)(3)(ii), (iii), (vi), and (vii). The notification system must be voluntary ~~for the public~~, allowing customers to opt-in ~~(or opt-out)~~ to receiving notifications from the operator ~~system~~. ~~The written procedures must provide for the following:~~

~~(1) A description of the notification system and how it will be used to notify customers of a gas pipeline emergency;~~

~~(2) Who is responsible for the development, operation, and maintenance of the system;~~

~~(3) How information on the system is delivered to customers, ensuring that all customers are notified of the existence of the system and necessary steps if they wish to opt-in (or opt-out);~~

~~(4) Description of the system-wide testing protocol, including the testing interval (which must not be less than once per calendar year), to ensure the system is functioning properly and performing notifications as designed;~~

~~(5) Maintenance of the results of testing and operations history for at least 5 years;~~

~~(6) Details regarding how the operator ensures messages are accessible in other languages commonly understood by a significant number and concentration of the non-English speaking population in the operator's area;~~

~~(7) Message content, including updates as emergency conditions change;~~

~~(8) A process to initiate, conduct, and complete notifications; and~~

~~(9) Cybersecurity measures to protect the system and customer information.~~

VII. Presence of Qualified Personnel

A. Discussion

The Associations are supportive of PHMSA's proposal set forth in § 192.640 to address Congress's mandate pertaining to the presence of qualified personnel to prevent overpressurization during construction activities. The Associations recommend additional clarification on the scope and reach of this new requirement, as previously addressed in the Associations' comments to the NPRM. Additionally, during the GPAC meeting, PHMSA proposed to withdraw the requirement of stop-work authority; the Associations are supportive of this proposal[36].

1) PHMSA Should Clarify That Only Construction Projects Performed by the Operator Trigger Evaluation, Not Those Performed by Third Parties.

In § 192.640(a), PHMSA proposed that operators perform an evaluation for all construction projects within the vicinity of a district regulator station. As supported by the GPAC discussion, PHMSA should clarify that the evaluation is limited to construction on pipelines and pipeline facilities performed by the operator[37]. For excavation projects not related to pipelines or pipeline facilities, there are already governing actions, depending on the nature of the project.

2) PHMSA Should Clarify That the Required Evaluation Should Only be on Construction Projects on Main Lines and in the Vicinity of a District Regulator Station.

The distinction is necessary in § 192.640, that the evaluations are only required for construction projects *within the vicinity of a district regulator station*. As written, one may interpret it necessary to perform an evaluation for every project, which would necessitate a documented review of every project that does not need onsite personnel, which is well beyond the intent of this requirement. This type of burden could take time and resources away from more pertinent work. The language of "within the vicinity of" is meant to be left intentionally broad, such that the operator is the one who can determine whether a construction project would require an evaluation that is being proposed under § 192.640.

[36] PHMSA GPAC Transcript. May 28, 2026. Page 128. Mr Paajanen, "So based off comments and consistent with the mandate, we are considering removing the specific requirement for that personnel to have stop work authority."
[37] PHMSA GPAC Transcript. May 28, 2026. Page 128. Mr Paajanen, "So we would look to consider limiting the requirement to construction activity, excluding third-party work not related to the pipeline."

3) PHMSA Should Remove the Stop-Work Authority Requirement.

The Associations are supportive of PHMSA's suggestion to remove the requirement of stop-work authority under § 192.640(c).

Section 206 of the PIPES Act specifies that individuals are to "have the capability to promptly shut down the flow of gas or control over pressurization." The proposed rule took this a step further when requiring stop-work authority. The Associations highlight that capability to perform an action is distinct from the authority to do such action.

Under 49 CFR Part 192 Subpart N, the Operator Qualification requirement already makes it such that these "Qualified Personnel" are individuals who possess this capability.

Given the above, a stop-work authority requirement imposes a prescriptive rule that would result in a box checking exercise. Whereas, if the proposed rule was reflective of the mandate's specification that "Qualified Personnel" are individuals that have the capability to shut down the flow of gas or control over pressurization, then it would align with the Subpart N requirements that operator qualified personnel be able to recognize and react to abnormal operating conditions.

During the GPAC Meeting, Ms. Zanter discussed the flexibility operators need to make a situation safe, which can be to act or "adapt work" versus stopping work.[38] This furthers the point that it should be a situation where qualified personnel would be individuals who could evaluate the situation and make the determination on what would be the best course of action.

Accordingly, PHMSA should remove stop-work authority and have the final rule reflect the language set by Congress in Section 206 of the PIPES Act of 2020.

B. Updated regulatory text redline

The language below represents the changes proposed by the Associations in light of the GPAC recommendations and the additional regulatory clarity discussed in these comments. The edits shown in blue represent changes that the Associations believe are necessary for the Final Rule to be clear and technically feasible, reasonable, cost-effective, and practicable.

[38] PHMSA GPAC Transcript. May 28, 2026. Page 131.

§ 192.640 Distribution lines: Presence of qualified personnel.

(a) An operator of a distribution system must conduct a documented evaluation of each operator's gas main construction project in the vicinity of a district regulator station that begins after [INSERT ONE YEAR AFTER THE EFFECTIVE ~~PUBLICATION~~ OF THE RULE] to identify any potential operator project activities during which an overpressurization could occur at a district regulator station. This evaluation must occur before such activities begin. Activities that may present a potential for overpressurization include, but are not limited to, tie-ins, and abandonment of distribution lines~~, and equipment replacement~~.

(b) If the evaluation in paragraph (a) of this section results in a determination that a potential for overpressurization exists during construction project activity, the operator must:

(1) Ensure that at least one person qualified according to subpart N of this part is present at that district regulator station, or at an alternative site, during the construction project activity that could cause an overpressurization;

(2) Monitor gas pressure with equipment capable of ~~ensuring~~ observing proper pressure controls; and

(3) Have the capability to promptly shut off the flow of gas or control ~~overpressurization~~ pressure at a district regulator station or at an alternative site.

(c) When monitoring the system as described in this section, the qualified personnel must be provided, at a minimum: information regarding the location of all valves necessary for isolation the pipeline system; pressure control records (see § 192.638); ~~the authority to stop work (unless prohibited by operator procedures);~~ operations procedures under § 192.605; and emergency response procedures under § 192.615.

(d) Exception. Distribution systems with a remote monitoring system in effect with the capability for remote or automatic shutoff need not comply with the requirements in paragraphs (a) through (c) of this section.

VIII. Pressure Control Records

A. Discussion

1) PHMSA Should Clarify the Structure and Scope of the Pressure Control Records Requirements

The Associations support PHMSA's efforts to implement Section 206(t)(1) of the PIPES Act of 2020 and appreciate the agency's willingness during the GPAC process to focus the proposed requirements on records necessary to ensure proper pressure control. Congress directed PHMSA to require operators to identify and manage records critical to ensuring proper pressure controls and to ensure those records are accessible to personnel responsible for performing or overseeing relevant work. Consistent with this mandate, and the GPAC's recommendation that PHMSA clarify both the scope of the

records covered by this section and the associated availability requirements[39], the final rule should focus on identifying the pressure control records necessary to ensure the safe operation of pressure regulating and overpressure protection equipment and establish requirements governing those records.

The Merrimack Valley incident illustrates the importance of clearly identifying pressure control records and ensuring that such information is incorporated into operational and engineering processes. In its investigation, the NTSB found that information regarding regulator sense lines existed in multiple locations and that information regarding those sense lines was not effectively incorporated into the planning and execution of the project that led to the overpressurization event. Merrimack Valley did not result from the absence of a particular record quality standard. Instead, the incident highlighted the importance of identifying and maintaining pressure control records, and ensuring those records are available to personnel working on the natural gas distribution system.

PHMSA can improve the clarity of § 192.638 by first identifying the records required for compliance and then establishing expectations regarding their availability. To meet the Congressional mandate and maintain consistency with the GPAC recommendation[40], the final rule should clearly identify the pressure control records operators are required to maintain and then establish appropriate requirements regarding the availability, maintenance, and retention of those records.

2) PHMSA Should Focus on Required Records Rather Than Record Quality Terminology

The Associations appreciate PHMSA's efforts during the GPAC process to address concerns regarding the terminology used to describe those records. During the GPAC discussion, PHMSA acknowledged that Congress specifically used the term “reliable” and indicated that the statutory language should guide the agency’s approach.[41] However, the Associations believe the more important compliance question is not whether records satisfy a particular adjective-based standard, but whether operators maintain the records necessary to ensure proper pressure control and make those records available to personnel performing relevant work.

Accordingly, the Associations suggest PHMSA focus § 192.638 on clearly prescribing the pressure control records required for compliance and establishing appropriate requirements regarding the availability, maintenance, and retention of those records and remove the adjective qualifiers for those records. Operators and inspectors should be able to determine compliance by looking at whether the required records exist, not by debating whether those records satisfy a particular adjective-based standard. In the recommended

[39] PHMSA GPAC Voting Slides. Slide 30. “Clarify records availability requirements consistent with mandate, and clarify the rule applies to pressure control – rather than material property – records.”
[40] PHMSA GPAC Voting Slides. Slide 30.
[41] PHMSA GPAC Transcript. May 28, 2026. Page 149.

regulatory language at the end of this section, the Associations have offered an option for ensuring clarity in which records must be maintained.

3) PHMSA Should Clarify Record Availability Requirements

Section 206(t)(1) requires pressure control records to be accessible to personnel responsible for performing or overseeing relevant work. GPAC supported keeping the requirements close to the mandate and recommended that PHMSA clarify the record availability requirements contained in § 192.638.

As proposed, § 192.638(d) could be interpreted more broadly than intended. During the GPAC discussion, Committee members noted that pressure control records serve different operational purposes, and that personnel, including contractors, performing different functions within an organization do not necessarily require constant access to every pressure control record. Rather, operators should ensure that personnel performing or overseeing relevant work have access to the records necessary to carry out those responsibilities.

The final rule should focus on the accessibility of records to appropriate personnel rather than on universal availability of all records to all employees. Such an approach is consistent with the Congressional mandate, reflects how operators manage records in practice, and ensures that personnel responsible for pressure control activities can readily obtain the information necessary to perform their work.

4) PHMSA Should Align Record Retention Requirements with the Purpose of the Rule

PHMSA can improve the organization of § 192.638 by first identifying the records required for compliance and then establishing expectations regarding their availability and retention. The records contemplated by this section are operational in nature and may change over time as equipment is replaced, modified, reconfigured, or otherwise updated. As a result, the Associations are concerned that references to maintaining records "for the life of the pipeline" could create unnecessary confusion regarding the records that must be retained and the information necessary to demonstrate compliance.

Rather than establishing a standalone lifetime recordkeeping obligation, the final rule should focus on ensuring that operators maintain the records necessary to comply with § 192.638. By requiring operators to identify, manage, and make available records critical to ensuring proper pressure controls, the regulation inherently requires retention of those records. Such an approach is more consistent with the operational purpose of the rule and Congress's mandate to identify and manage records critical to ensuring proper pressure controls.

5) PHMSA Should More Clearly Articulate the Benefits Associated with § 192.638

The Associations recognize that Congress directed PHMSA to promulgate regulations addressing pressure control records. However, the PRIA provides limited discussion regarding the safety benefits associated with the specific regulatory approach proposed by PHMSA. While the Congressional mandate establishes the need for regulation in this area, the agency retains discretion regarding how those requirements are implemented.

As PHMSA finalizes § 192.638, the agency should explain how the specific requirements adopted in the final rule—including the identification of required pressure control records, record availability requirements, and any record retention provisions—are expected to improve safety and how those benefits relate to the lessons learned from the Merrimack Valley incident. Such discussion would help stakeholders better understand the purpose of the individual provisions contained in the rule and the basis for the agency's chosen regulatory approach.

B. Updated regulatory text redline

The language below represents the changes proposed by the Associations in light of the GPAC recommendations and the additional regulatory clarity discussed in these comments. The edits shown in blue represent changes that the Associations believe are necessary for the Final Rule to be clear and technically feasible, reasonable, cost-effective, and practicable.

§ 192.638 Distribution lines: Records for pressure controls.

(a) ~~An Operator~~s ~~of distribution systems, except those identified in paragraph (f), must no later than~~ Beginning [INSERT ONE YEAR AFTER THE EFFECTIVE ~~PUBLICATION~~ DATE OF THE RULE],~~-~~operators of distribution systems, except those identified in paragraph (e), must ~~identify and~~ maintain available ~~traceable, verifiable, and complete~~ records that document the characteristics of its pipeline system that are critical to ensuring proper pressure control at district regulator stations. These records must include:
   (1) ~~Current~~ Location information (including maps and schematics) for district regulators, isolation and station bypass valves, and underground station and control piping (including control lines);
   (2) District regulator set point ranges;
   (3) Regulator or control valve failure positions (open/closed);
   (4) The design (flow/volume) capacity of the district regulator station; and
   ~~(5) Attributes of the regulator(s), such as set points, design capacity, and the valve failure position (open/closed);~~
   (6) The overpressure protection configuration; ~~and~~.
   ~~(7) Other records deemed critical.~~

(b) If an operator does not have ~~traceable, verifiable, and complete~~ records as required by paragraph (a) of this section, the operator must, no later than [INSERT EIGHTEEN MONTHS

~~ONE YEAR~~ AFTER THE ~~PUBLICATION~~ EFFECTIVE DATE OF THE RULE] ~~the operator must~~ identify and document those records needed and develop and begin implementing procedures for collecting those records ~~The records identified in paragraph (a) of this section must be collected, generated, or updated~~ on an opportunistic basis, ~~as specified in~~ consistent with § 192.1007(a)(3).[42]

(c) An operator must ensure the relevant pressure control records, as ~~required~~ defined by this section and appropriate for the job being performed, are accessible made available to ~~all~~ personnel responsible for performing or supervising design, construction, operations, and maintenance activities.

(d) ~~An operator must retain the records required in paragraph (a) of this section for the life of the pipeline.~~

(e) Exception. This section does not apply to master meter systems, liquefied petroleum gas (LPG) distribution pipeline systems that serve fewer than 100 customers from a single source, or any individual service line directly connected to a transmission, gathering, or production pipeline that is not operated as part of a distribution system.

IX. Proposed Revisions to the Gas Distribution Annual Report (PHMSA F 7100.1-1)

A. Discussion

1) The proposed revisions would increase reporting burden without a demonstrated and commensurate safety benefit.

PHMSA's proposed revisions to the Gas Distribution Annual Report (PHMSA F 7100.1)[43] should not be adopted. As proposed, PHMSA would expand annual reporting requirements to include additional system-level data for low-pressure distribution systems, including aggregated counts of system characteristics and overpressure protection configurations. Although these additions may appear incremental in isolation, they would materially increase the effort, complexity, and burden associated with preparation of an already detailed annual filing.

The existing distribution annual report already represents a substantial compliance obligation requiring time-intensive data gathering, validation, and reconciliation across systems. Expanding the scope to include additional aggregation and categorization of system attributes would add further layers of administrative effort without a corresponding demonstration of pipeline safety value.

[42] The Associations are recommending that PHMSA merge §192.638(b) and (c) from the NPRM.
[43] Pipeline Safety: Safety of Gas Distribution Pipelines and Other Pipeline Safety Initiatives, 88 Fed. Reg. 61746 (Sept. 7, 2023).

In the absence of clear evidence that these new data elements would meaningfully improve pipeline safety outcomes or regulatory decision-making, the additional proposed reporting requirements should be withdrawn.

2) Recent PHMSA, DOT, and Executive Order actions establish a clear expectation that low-value reporting requirements should be reduced rather than expanded.

The proposed revisions are inconsistent with a broader and well-established policy direction reflected in recent PHMSA actions, Department of Transportation initiatives, and applicable Executive Orders. In its 2025 Mandatory Regulatory Reviews Advance Notice of Proposed Rulemaking (ANPRM)[44], PHMSA explicitly sought stakeholder input on whether existing regulatory requirements – including reporting obligations – should be amended or repealed where they impose undue burdens or where their safety value is limited relative to their cost.

This effort reflected an agency recognition that regulatory requirements must be evaluated not only on their intent but also on their actual utility and cost-effectiveness. PHMSA specifically asked whether reporting and notification requirements impose burdens that are disproportionate to their safety benefit and whether certain requirements are inefficient because of their limited contribution to safety outcomes.

This ANPRM followed a Department of Transportation Request for Information (RFI)[45] which asked whether reporting obligations are unnecessary, ineffective, overly complex, or not meaningfully used, and sought input on how such requirements can be streamlined.

Both the aforementioned PHMSA ANPRM and DOT RFI followed Executive Order 14192[46], which emphasized prudent financial management and the reduction of unnecessary regulatory burdens, as well as Executive Order 14219[47], which directed agencies to identify requirements that impose costs not justified by corresponding public benefits.

Taken together, these prudent and safety-prioritized initiatives establish a clear expectation that agencies should carefully scrutinize – and where appropriate reduce – reporting requirements that do not produce meaningful, demonstrable value. The proposed revisions to PHMSA F 7100.1-1 are inconsistent with these efforts.

[44] Pipeline Safety: Mandatory Regulatory Reviews To Unleash American Energy and Improve Government Efficiency, 90 Fed. Reg. 23660 (June 4, 2025).
[45] Ensuring Lawful Regulation; Reducing Regulation and Controlling Regulatory Costs, 90 Fed. Reg. 14593 (Apr. 3, 2025).
[46] Unleashing Prosperity Through Deregulation, 90 Fed. Reg. 9065 (Jan. 31, 2025).
[47] Ensuring Lawful Governance and Implementing the President's "Department of Government Efficiency" Deregulatory Initiative, 90 Fed. Reg. 10583 (Feb. 25, 2025).

3) PHMSA's September 2025 Pipeline Data Public Meeting confirms that the agency is prioritizing data that meaningfully supports safety decisions and stakeholder use.

PHMSA's September 2025 Pipeline Data Public Meeting[48] examined how data collected from pipeline operators is used to improve pipeline and public safety, including its role in inspection planning, rulemaking, and development of safety performance measures.

The meeting specifically focused on understanding how data is used by stakeholders – including regulators, industry, and the public – and identifying opportunities to improve the usefulness, relevance, and effectiveness of that data. It also emphasized improving performance measures, enhancing publicly available data, and ensuring that information collected supports meaningful evaluation of safety trends and system integrity.

This framing reflects a clear and deliberate shift by PHMSA toward a more disciplined data strategy that prioritizes data which is:

- actively used by stakeholders,
- relevant to inspection planning and regulatory oversight, and
- capable of supporting actionable safety performance measures.

The Associations applaud PHMSA for its thoughtful reconsideration of how data is collected and used. However, the proposed expansion of the Gas Distribution Annual Report does not align with this approach. The NPRM does not explain how the proposed new data elements would be used by PHMSA or stakeholders, nor does it demonstrate that the data would meaningfully contribute to improved safety outcomes or decision-making.

4) The NPRM's own safety logic shows that operational controls, system-specific records, and direct risk management – not additional aggregated annual reporting – are what improve safety.

The NPRM itself provides clarity regarding the mechanisms through which safety improvements for low-pressure systems are expected to occur. The rule focuses on strengthening operational and procedural controls, including enhancements to integrity management programs, improvements to recordkeeping requirements, and the implementation of more robust monitoring and overpressure protection measures for low-pressure distribution systems. These provisions directly impact how pipeline systems are designed, operated, and maintained. They ensure that personnel responsible for system integrity have access to accurate, actionable information and that appropriate safeguards are in place at locations where risks may arise.

The NPRM does not establish a clear linkage between the aggregated, end-of-year summaries of system characteristics they propose to collect through the annual report and the proposed operational controls driving safety outcomes. Without a demonstrated

[48] PHMSA PUBLIC MEETINGS: *2025 Pipeline Data Public Meeting* (YouTube, aired Sep. 18th, 2025, and Sep. 19th, 2025).

connection between the proposed reporting elements and measurable improvements in safety performance, the expansion of the annual report lacks a sufficient technical basis. If PHMSA cannot demonstrate that additional annual reporting fields will materially improve safety outcomes, then they should not be imposed merely because the data are available and may be useful to a stakeholder in the future.

Safety of low-pressure distribution pipeline systems depends on system-specific conditions, including performance-based deployment of technologies and operational practices at individual locations. Aggregating these conditions into system-level annual counts necessarily removes important context and variability. While such data may provide a general overview of system composition, it does not meaningfully inform how systems perform under real-world operating conditions or how risks are managed at critical points within the system.

5) Conclusion

The proposed revisions to PHMSA F 7100.1-1 would expand reporting requirements without demonstrating that the additional data would meaningfully improve pipeline safety outcomes. The proposal is inconsistent with PHMSA's evolving data strategy, as reflected in the September 2025 Pipeline Data Public Meeting, as well as the Transportation Department's broader initiative to streamline reporting and eliminate unnecessary regulatory burdens. It is also inconsistent with the principles established in the applicable Executive Orders, which emphasize cost-effectiveness, burden reduction, and the need to avoid requirements that do not provide commensurate public benefit.

Accordingly, PHMSA should not finalize the proposed revisions. Instead, the agency should continue its measured and thoughtful approach to evaluating data collection, ensuring that any future modifications to reporting requirements are clearly supported by demonstrated need, active stakeholder use, and a direct connection to improved safety outcomes.

X. Conclusion

The Associations commend PHMSA's continuing commitment to pipeline safety and appreciates the opportunity to comment on the proceedings of the GPAC Meeting. The Associations remain committed to working with PHMSA to address our concerns with the proposed requirements, to meet the Congressional mandates, and continue to enhance pipeline safety. We look forward to continuing our engagement in the GPAC process and providing industry's insights, experience, and recommendations as the process moves forward.

Respectfully submitted,
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