

Commenters:

American Gas Association (AGA)
American Public Gas Association (APGA)
Frank Volgstadt
Interstate Natural Gas Association of America (INGAA)
Northeast Gas Association (NGA)
Norton McMurray Manufacturing Company (NORMAC)
Pipeline Safety Trust (PST)

The following is a summary of the comments to OMB followed by PHMSA responses regarding each form.

A. PHMSA F 7100.1-1 Annual Report for Calendar Year 20 Gas Distribution System

During 2013, PHMSA proposed changes to this form in Docket PHMSA-2013-0004. Comments received and resource constraints result in PHMSA asking OMB to renew the current form with no changes. Early in 2014, PHMSA will begin a new information collection change request to implement the changes originally proposed in 2013.

B. PHMSA F 7100.1 Incident Report—Gas Distribution System

There were no comments to OMB regarding the proposed changes.

C. PHMSA F 7100.1-2 Mechanical Fitting Failure Report Form for Calendar Year 20xx for Distribution Operators

Comment: Frank Volgstadt and NORMAC strongly urge PHMSA to recognize that “joint” failures, not “fitting” failures, are being reported on the form. Frank Volgstadt requests that “failure” be replaced with “leak.” NORMAC urges OMB to reject the extension of the report, require PHMSA to repeal the authorizing regulations, and publicly declare that the data collected is flawed and should not be used for any purpose. By continuing to call the report a “fitting” failure report, PHMSA perpetuates the misperception that the fitting is always to blame for the joint failure.

Response: Changing the word “failure” to “leak” will not eliminate the misperception that the fitting is always to blame. PHMSA proposes to change the name of the report from “Mechanical **Fitting** Failure” to “Mechanical **Joint** Failure” to more accurately reflect the scope of the information collection. The form and instructions will be revised to change the word “fitting” to “joint” where appropriate. These changes would be made retroactively to the beginning of the information collection on January 1, 2011. PHMSA’s public displays of the data would be revised to use the word “joint” instead of “fitting” where appropriate. PHMSA would implement a rule change as expeditiously as feasible to change the word “fitting” to “joint” where appropriate in Part 191.12 and Part 192.1009.

D. PHMSA F 7100.2 Incident Report—Natural and Other Gas Transmission and Gathering Pipeline Systems

Comment: INGAA encourages PHMSA to consider collecting data about the pipes being joined when any type of weld fails.

Response: PHMSA will. PHMSA proposes no change in response to the comment.

E. PHMSA F 7100.2-1 Annual Report for Calendar Year 20xx Natural and Other Gas Transmission and Gathering Pipeline Systems

Comment: Part C - Volume Transported is hotly contested. The PST supports collecting volume transported from all gas transmission operators. INGAA and APGA recommend removing Part C since the US Energy Information Administration (EIA) already collects this data and makes it publicly available. AGA and NGA point out that operators of both distribution and transmission pipelines cannot readily provide the data requested. AGA recommends that Part C be deleted. NGA recommends no changes to Part C.

Response: While the EIA makes data available, PHMSA is not certain that the EIA data can be allocated to specific pipeline operators recognized by PHMSA. "Apple" company in EIA data may be "orange" company in PHMSA data. Considering the proximity of the calendar year 2013 reporting deadline, it is not reasonable to expect operators of both distribution and transmission pipelines to report the data. PHMSA proposes making no changes to Part C at this time. "Transmission lines of gas distribution systems" would continue to be exempt from reporting data in Part C. We plan to investigate the EIA data and discuss this issue further with the commenters.

Comment: AGA and NGA support the proposed change for the "third party damage" category in Part M. AGA opposes the inclusion of first and second party damage in the "incorrect operations" category.

Response: The commenters support removing first and second party damage from the third party damage category. While reviewing the comments, PHMSA noted that the term "third party damage" is defined in an industry standard (ASME/ANSI B31.8S) incorporated by reference in 49 CFR Part 192. The current edition of the annual report form properly reflects the definition. PHMSA proposes to drop the changes to the Part M instructions in response to the comments. The current edition of the Part M instructions would remain in effect.

Comment: AGA and INGAA generally support the instruction changes for Parts Q and R. They both raise concerns about potential confusion within Part Q. Each segment of transmission pipeline is to be reported under one, and only one, MAOP determination method. They are concerned that this statement "For each combination of class location and HCA shown on the form, report the miles for each MAOP determination method" may cause confusion about whether a segment is to be reported under only one method. In the Part R instructions, AGA recommends that operators be given the option to considering elevation changes when reporting the pressure test range. Rather than stating "operators must consider elevation changes...", AGA recommends "operators may consider elevation changes..."

Response: PHMSA proposes to modify the Part Q statement as follows "For each combination of class location and HCA shown on the form, report a segment of pipeline under only one MAOP determination method." PHMSA proposes to implement the AGA recommendation regarding the consideration of elevation changes.

Comment: INGAA continues to support the elimination of "traceable, verifiable, and complete" to describe MAOP records.

Response: PHMSA maintains that the phrase only provides guidance to operators to meet the requirements of 49 U.S.C. § 60139

Comment: In Part R, AGA and NGA recommend that “commercially available” as a descriptor of pipeline inspection devices be defined. AGA recommends changing the phrase to “widely commercially available.”

Response: PHMSA contends that “commercially available” is defined by the inspection devices offered by manufacturers of these devices and is not otherwise able to be defined. Adding “widely” does not provide any additional clarity. PHMSA proposes no change in response to the comments.

Comment: NGA recommends a 0.5 mile accuracy level among all sections and categories within the report.

Response: PHMSA has established accuracy requirements based on the magnitude and type of miles. PHMSA desires higher accuracy for pipelines in high consequence areas and covered by integrity management programs than for other pipelines. If PHMSA were to implement NGA’s recommendation for a flat 0.5 mile accuracy, an operator reporting 2,500 miles of pipe in one part of the report would need to have an accuracy of 99.98% in each of the other parts. PHMSA expects that this level of accuracy is not attainable considering the variety of pipeline attributes reported in different parts of the report. PHMSA proposes no change in response to the comment.

Comment: NGA recommends that all changes to the form and instructions be delayed until calendar year 2014 data collection occurs in 2015 so operators have time to modify their data collection processes.

Response: PHMSA proposes to make no change to Part C – Volume Transported. With the retraction of this proposed change, the remaining changes to the report provide subtotal and total values in certain parts. There is no new data collection on the form. The proposed instruction changes have been available since the start of this information collection activity. Operators who are able to implement the revised instructions for calendar year 2013 data should do so. Operators who are not would implement the revised instructions in future years. PHMSA proposes no change in response to the comment.

F. PHMSA F 7100.3 Incident Report—Liquefied Natural Gas Facilities

There were no comments to OMB regarding the proposed changes.

G. PHMSA F 7100.3-1 Annual Report for Calendar Year 20xx Liquefied Natural Gas Facilities

There were no comments to OMB regarding the proposed changes; however PHMSA will not be able to implement the changes until the calendar year 2014 data collection in 2015.