

**Department of Transportation  
Office of the Chief Information Officer**

**Supporting Statement  
“National Registry of Pipeline and LNG Operators”**

OMB Control No. 2137-0627  
Docket No. PHMSA-2014-0018

**INTRODUCTION**

This supporting statement is to request the Office of Management and Budget’s (OMB) renewed three-year approved clearance for the information collection entitled, “National Registry of Pipeline and LNG Operators” currently under OMB Control No. 2137-0627. PHMSA has revised this collection to streamline the collection of certain data fields and to account for a significant burden reduction.

**Part A. Justification**

**1. Circumstances that make the collection of information necessary.**

PHMSA’s statutory authority to collect pipeline facility information from operators is found in 49 U.S.C. 60102. This authority allows for the collection of information such as pipeline location, description, transported products, and any other information pertaining to the safe operation of a pipeline facility under PHMSA jurisdiction.

Moreover, 49 CFR 191.22 and 195.64, require operators to notify PHMSA when they experience significant asset changes, including new construction, that affect PHMSA’s ability to accurately monitor and assess pipeline safety performance. Certain types of changes to, or within, an operator’s facilities or pipeline network represent potential safety-altering activities for which PHMSA may need to inspect, investigate, or otherwise oversee to ensure that any public safety concerns are adequately and proactively addressed. In these cases, timely notification will allow PHMSA to efficiently manage its inspection resources or notify one of its partner state pipeline safety agencies if needed.

The accurate and timely representation of the scope and make-up of the nation’s pipeline and LNG facility infrastructure is not only critical to PHMSA, but it is also critical to the various oversight bodies, Congress, the GAO, the DOT Inspector General, and the NTSB.

**2. How, by whom, and for what purpose the information is to be used. INDICATE** PHMSA will use two forms to collect the applicable registration and notification information from operators for the Registry. The forms and the purpose of the resulting information are identified below:

**Operator Assignment Request Form (PHMSA F 1000.1)**

The information provided in this form is broken into four different steps as detailed below:

*Step 1 “..Basic Report Information”*

This step allows for the operator to provide basic information that PHMSA will use to determine whether the requesting operator has regulated assets and currently exists in the registry. PHMSA will also use this information to distinguish relationships between companies and reduce the potential for assigning unnecessary OPIDs to companies.

*Step 2 “...Description of Pipelines and/or Facilities”*

PHMSA will use this information to collect asset type and location to determine oversight authority (PHMSA region staff or State partners). Once the oversight authority is determined, PHMSA will contact the appropriate entity to assist in the approval process for issuing OPIDs.

*Step 3 “...PHMSA-Required Pipeline Safety Program .... Information”*

PHMSA will use this information to quickly identify whether the requesting operator’s program is part of any programs for existing operators ( i.e., whether the requesting operator is operationally related to other operators under PHMSA jurisdiction). PHMSA will use this information to efficiently coordinate future inspections.

*Step 4 “Provide Contact Information”*

PHMSA will use this information to maintain direct lines of communication with key Operator personnel. Contact information is invaluable and vital to the efficient handling of pipeline emergencies and regulatory compliance.

**Operator Registry Notification Form (PHMSA F 1000.2)**

The purpose of this form is to provide PHMSA with notifications as required under §§ 191.22(c) and 195.64(c). PHMSA will use the information from this form to update the Registry and equip PHMSA and state regulatory staff with relevant and up-to-date information on the operators subject to applicable jurisdictions.

**Summary**

This Registry is necessary to compile an integrated national pipeline inventory of operator contact and facility information that is current. The Registry will also enable PHMSA to distribute up-to-date pipeline safety information for various technology applications used in the performance of inspections, regulatory oversight, reporting, and other safety-based needs, and will provide the accurate and up-to-date compilation of operating entities and facilities that is a critical element of PHMSA’s pipeline safety mission.

**3. Extent of automated information collection.** Operators will be required submit the required forms (OPID Assignment Request and Operator Registry Notification) electronically. Operators unable to submit electronically can contact PHMSA for an alternate means of submission.

**4. Describe efforts to identify duplication.**

To date, PHMSA is the only entity that compiles a national database of regulated pipeline operators

**5. Efforts to minimize the burden on small businesses.**

PHMSA expects affected operators to be both large and small businesses. However, this information is necessary for safety and tracking purposes regardless of business size. There are currently no exceptions for small businesses.

**6. Impact of less frequent collection of information.**

The information collection is event driven and therefore cannot be conducted less frequently. PHMSA would be unable to appropriately and properly assess its regulated community. Less frequent information collection could compromise the safety and economic viability of the U.S. pipeline system.

**7. Special Circumstances.**

No special circumstances apply with this regulation.

**8. Compliance with 5 CFR 1320.8(d).**

PHMSA published a 60-day FR notice on March 31, 2014 (79 FR 18118) to solicit comments on this collection and the associated forms (OPID Assignment Request and Operator Registry Notification). PHMSA received one (1) comment from the Pipeline Safety Trust in support of the collection. The comment period ended May 30, 2014.

**9. Payments or gifts to respondents.**

PHMSA will not provide payments or gifts to respondents.

**10. Assurance of confidentiality.**

PHMSA does not issue any assurance of confidentiality. The requirements of this information collection do not include anything of a sensitive nature or of any matters considered confidential.

**11. Justification for collection of sensitive information.**

The requirements of this information collection do not involve questions of a sensitive nature.

**12. Estimate of burden hours for information requested.**

**630 Responses and 630 burden hours** (*Aburden reduction of 2,123 responses and 4876 hours*)

PHMSA expects an estimated 210 new operators to apply for an OPID. PHMSA also expects to receive 420 operator notifications for a combined **630** (210 OPID requests + 420 Operator Notifications) **annual responses.**

**OPID Assignment Burden**

PHMSA estimates that each operator will take approximately 1 hour to complete the OPID Assignment form (PHMSA F 1000.1). Therefore, PHMSA estimates an hourly burden of **210 hours** (1 hour \* 210 operators) for the OPID Assignment burden.

**Operator Notification Burden**

Based on the previous years' trend, PHMSA estimates that it will receive 410 operator notifications. PHMSA estimates that each Operator Notification form (PHMSA F 1000.2) will take approximately 1 hour to complete. Therefore, PHMSA estimates an hourly burden of **420 hours** (1 hour\*420 notifications) for the Operator Notification burden.

**Summary**

Therefore, PHMSA estimates the combined hourly burden for OPID Assignment and Operator Notification at **630 hours** (210 burden hours for OPID Assignment + 420 burden hours for OPID Notifications).

**13. Estimate of the total annual costs burden.**

PHMSA expects for a senior engineer will to handle their company's registry information. PHMSA estimates the engineer's hourly wages at \$64.75 per hour. Based on this information; PHMSA estimates that this requirement will cost the community of impacted operators a total of \$40,792 per year (\$64.75\* 630 hours).

**14. Estimates of costs to the Federal Government.**

PHMSA expects to incur no additional costs due to the collection of this information.

**15. Explanation of the program change or adjustments.**

PHMSA has reduced the burden for this collection to account for the fact that the vast majority of operators have already applied for and obtained an OPID. This collection would mainly apply to new operators or, in the future, newly regulated entities. This collection also takes into consideration the operator notification trends of the previous 3 years. As a result, the burden for this collection has been reduced drastically.

**A. Changes to the OPID Request Form**

Changes have been made to PHMSA form F-1000.1 to streamline the collection of this information. An explanation of the changes are as follows:

- (1) Aligned the gas distribution and gas transmission commodity choices with those found on the annual and incident reports. Consistent commodity categories across all report forms enhance PHMSA and our State Partner understanding of gas pipeline facilities.
- (2) Modified the list for types of gas distribution operators to reflect the ownership structure of the operator. The current list is a mix of ownership structure and commodity. Commodity

values are entered elsewhere on the form. Ownership structure could be used as an indicator of the operator's sophistication and access to resources for pipeline safety programs. This change allows PHMSA and our State Partners to clearly determine ownership structure without commodity data mixed in.

(3) Collect the miles of pipe and facility descriptions for each State. PHMSA and our State Partners would gain a better understanding of the new operator's pipeline facilities through this by-State reporting.

(4) Eliminated LNG Plans and Procedures as a separate safety program type. LNG Plans and Procedures are equivalent to the Operating, Maintenance, and Emergencies program type. The pipeline system types, LNG, gas distribution, hazardous liquid, etc., are collected elsewhere on the form. This change would remove a redundancy from this form.

(5) Collect cell phone numbers for contacts in addition to office phone numbers. Having both phone numbers would enhance the ability of PHMSA and our State Partners to communicate with new operators.

(6) Several changes are proposed for the instructions to enable the changes listed above, provide additional clarity, and reflect that the Validation process has ended. These changes would allow operators to complete the form quickly and accurately.

## **B. Changes to the Operator Registry Notification**

The following changes have been made to the Operator Registry Notification (PHMSA F 1000.2):

(1) Removed and revised instructions regarding safety programs at several locations in the form and instructions. Over the past year, PHMSA has found many operators erroneously submitted Type C notifications based on these confusing instructions. These revisions will help operators avoid submitting unnecessary notifications that must later be retracted.

(2) Reduced the number of notification types and the text describing each type to enhance clarity. The current form provides a type for each regulatory requirement for notification submission. Instead of selecting one of three types for gas or liquid construction, we are proposing a single type. Details about the construction project are collected in Step 3 of the form. This would reduce operator confusion about which notification type should be submitted and eliminate a needless distinction in PHMSA's data.

(3) Required type B notifications to include whether the operator is assuming or ceasing operatorship of pipeline facilities. PHMSA has to rely on the "reason for change" text field to determine which applies to the Type B notifications submitted to date. In some cases, the text

field does not explain the type of change. This change would require operators to submit the information needed by PHMSA to process the operator's notification properly.

(4) Required separate notifications for an acquisition and a divestiture. Only one set of gas distribution pipeline facilities can be reported in Step 3 of the current form. If an operator were to select both acquisition and divestiture in Step 2, we would not know which gas distribution pipeline facilities were acquired and which were divested. In Step 3, gas gathering, gas transmission, and hazardous liquid pipeline facilities can be reported as acquired or divested. By restricting each notification to either acquisition or divestiture, we can eliminate half of the data fields required for gas gathering, gas transmission, and hazardous liquid pipeline facilities in Step 3 and insure that we are interpreting an operator's notification accurately.

(5) Allow an operator submitting a divestiture to request the deactivation of their OPID. If an operator no longer has regulated pipeline facilities, PHMSA deactivates the OPID. This informs our internal staff and our State Partners that the OPID is no longer responsible for any regulated pipeline facilities. Under the current form and instructions, such operators are encouraged to contact PHMSA regarding deactivation. Including the ability to request deactivation in the notification would result in more efficient communication about operators with no remaining regulated pipeline facilities.

(6) Aligned the gas distribution and gas transmission commodity choices with those found on the annual and incident reports. Consistent commodity categories across all report forms would enhance PHMSA and our State Partner understanding of gas pipeline facilities.

(7) Collect data about miles of pipeline separate from facilities, such as breakout tanks, storage fields, and compressor stations, in Step 3. This change is proposed in conjunction with reducing the number of construction notification types. Instead of selecting a type corresponding to facilities, the operator would select the "generic" construction type and provide data about the facilities in Step 3. Under the current form, two separate notifications would be required. This change would allow an operator to submit a single construction notification for both pipeline miles and facilities, making compliance easier for operators.

(8) Required operators to provide data about pipeline facilities (Step 3) when they submit a change in entity operating (Type B) notification. Currently, an operator provides notification of a change in the entity operating, but submits no information about the pipeline facilities affected by the change. By collecting pipeline facility information, PHMSA and our State Partners would understand the scope of the operating entity change.

(9) Collect the miles of pipe and facility descriptions for each State. PHMSA and our State Partners would gain a better understanding of the pipeline facilities covered by a notification through this by-State reporting.

(10) Several changes are proposed for the instructions to enable the changes listed above and provide additional clarity.

(11) Added a “Guidance for Selecting the Appropriate Notification Type” section to the instructions. The current instructions, both on the form and in the instruction document, have resulted in many operators submitting the incorrect type of notification. The new section summarizes the purpose of notification types and contains flow charts to guide operators to the correct type of notification based on the action they are taking. This new section would eliminate wasted time for operators submitting unnecessary notifications and for PHMSA troubleshooting these nonsensical notifications.

**16. Publication of results of data collection.**

PHMSA will publish basic information at [www.phmsa.dot.gov](http://www.phmsa.dot.gov). “Basic Information” will be focused on summary data such as:

- # of operators per state/county
- # of operators by transported commodity
- # of operators for all commodities
- # of miles for each commodity
- # of miles for each operator

**17. Approval for not displaying the expiration date of OMB approval.**

PHMSA is not requesting approval to not displaying the expiration date.

**18. Exceptions to the certification statement.**

There are no exceptions to the certification statement.