

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

**Supporting Statement
“National Registry of Pipeline and LNG Operators”
OMB Control No. 2137-0627**

INTRODUCTION

This supporting statement is to request the Office of Management and Budget’s (OMB) approval of a revision to the information collection entitled, “National Registry of Pipeline and LNG Operators” currently under OMB Control No. 2137-0627 which expires on May 31, 2018. This request is necessary due to the following PHMSA action that will affect the current collection of information:

Docket No. PHMSA-2011-0023:- Safety of Gas Transmission and Gathering Pipelines
- Adds 290 responses and 290 burden hours for operator registry and notifications.

The revisions to this information collection are detailed under Part A, 15.

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 may 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 issued a Notice of Proposed Rulemaking (NPRM) on April 8, 2016 [81 FR 20722].

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.

OPID Assignment Burden

PHMSA expects an estimated 210 new operators to apply for an OPID each year. 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. As a result of the changes in the proposed rule, PHMSA estimates an additional 167 new operator assignments will be generated each year. This will result in approximately 377 responses (210 +167) and 377 annual burden hours.

Operator Notification Burden

Based on the previous years' trend, PHMSA estimates that it will receive 420 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.

Based on the provisions in the proposed rule, PHMSA estimates 123 additional notifications will be made each year. This will increase the burden by 123 hours (123 responses x 1 hr = 123 hours). This increase will result in a total burden, related to notifications, of 458 notifications (420 + 123) with a total annual burden of 543 hours (420 + 123).

Summary

Therefore, PHMSA estimates the combined hourly burden for OPID Assignment and Operator Notification will increase from **630 hours** (210 burden hours for OPID Assignment + 420 burden hours for OPID Notifications) to **920 hours** (377 burden hours for OPID Assignment + 543 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 \$358,974 per year (\$64.75* 5,544 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 is proposing to expand the scope of reporting to include gathering line operators that were previously not regulated. PHMSA estimates that this expansion will impact 38 gathering line operators who will each submit approximately one notification a year. The time burden per report is expected to remain unchanged at one hour. Therefore, the total estimate burden for this modification of the information collection will be 123 burden-hours (123 responses x 1 hr = 123 hours) as detailed below.

Table 1	Hours per response	Responses	Total Hours
Additional Operator Notifications	1	123	123
Additional Operator Assignments	1	167	167
	Additional Burden	290	290

16. Publication of results of data collection.

PHMSA will publish basic information at 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.