

DEPARTMENT OF TRANSPORTATION

**INFORMATION COLLECTION
SUPPORTING STATEMENT**

**Annual Report for Gas Distribution Operators
OMB Control No. 2137-0629
Docket: PHMSA-2017-0110**

This supporting statement is associated with a request for revision of a previously approved information collection. PHMSA is revising form PHMSA F 7100.1-1 Annual Report—Gas Distribution System and the instructions associated with this form.

Part A. Justification

1. Circumstances that make the collection of information necessary.

Annual reports inform PHMSA and the public about the extent of gas distribution pipeline systems and leaks from these systems. The National Transportation Safety Board (NTSB), the U.S. Department of Transportation's Office of the Inspector General, and the General Accounting Office all urged PHMSA to collect this information. The information is an essential part of PHMSA's overall effort to characterize the extent and safety record of natural gas distribution pipeline systems.

The requirements for annual reporting are in 49 CFR Part 191. The PHMSA delegation of authority is found in 49 CFR 1.97 which allows for PHMSA to exercise the authority vested in the Secretary in under Chapter 601 of title 49, U.S.C. The specific legislative authority cites for the requirements in 49 CFR Part 191 include 49 U.S.C. 60102, 60103, 60104, 60108, 60117, 60118, 60124 and 60139.

This collection supports the DOT strategic safety mission by providing metrics that enable PHMSA to be aware of and mitigate inherent risks in the operation of gas distribution pipelines.

2. How, by whom, and for what purpose the information is to be used.

PHMSA uses this information collection to gather annual report data from gas distribution pipeline operators. The annual report form collects data about the pipe material, size, and age. The form also collects data on leaks from these systems as well as excavation damages. PHMSA uses the information to track the extent of gas distribution systems and normalize incident and leak rates.

3. Extent of automated information collection.

PHMSA requires operators to submit all required reports electronically with an exception for those operators to whom electronic submissions would pose an undue burden and hardship. Pipeline operators are encouraged to file the annual reports on-line at www.opsweb.phmsa.dot.gov.

4. Describe efforts to identify duplication.

PHMSA is the only federal agency that collects information related to miles of mains, number of services, leaks, and excavation damages for gas distribution pipeline systems. No similar information is requested by the government or industry.

5. Efforts to minimize the burden on small businesses

For PHMSA to be able to effectively carry out its legislative mandate and monitor natural gas pipeline safety, it is essential that both large and small operators of pipelines provide annual reports.

6. Impact of less frequent collection of information.

The biennial report to Congress mandated by 49 U.S.C. 60124(b) would not have current information without the annual reports. Less frequent information collection could compromise the safety and economic viability of the U.S. pipeline system.

7. Special Circumstances.

There are no special circumstances within this request.

8. Compliance with 5 CFR 1320.8(d).

A 60 Day Notice was published on October 18, 2017 [82 FR 48574]. PHMSA received five comments in total. PHMSA received one comment from The American Public Gas Association (APGA) specifically addressing the proposed revision of this information collection. PHMSA summarized and addressed the comment in the 30 Day Notice which published on January 25, 2017 [83 FR 3461].

9. Payment or gifts to respondents.

There is no payment or gift provided to respondents associated with this collection of information.

10. Assurance of confidentiality.

PHMSA does not have the authority to assure confidentiality.

11. Justification for collection of sensitive information.

This information collection does not involve questions of a sensitive nature.

12. Estimate of burden hours for information requested.

There are approximately 1, 446 gas distribution operators. These operators are required to submit annual reports for their pipeline systems to PHMSA on an annual basis. PHMSA estimates that it will take each operator 17 hours to compile information pertaining to this report and to submit the requested data to PHMSA for an estimated total burden of 25,582 hours {17 hours * 1, 446 operators}.

A table detailing this burden estimate is listed below:

Number of Operators	Hours to Complete	Total Burden
1,446	17	25,582

13. Estimate of the total annual costs burden.

PHMSA assumes that the reporting would be made by an engineering manager, who is expected to cost, fully loaded, \$68.60 per hour. PHMSA calculates a total annual cost burden of \$1,686,325.20 for 25,582 hours at \$68.60 per hour.

14. Estimates of costs to the Federal Government.

The estimated cost to the Federal Government for the development, maintenance, and operation of the the Gas Distribution Annual Report data collection is approximately **\$76, 700.00**. This estimate includes the costs of acquiring contractor time (3 man months total using a blended rate for developers, database admin, and analysts for requirements and testing. This also includes the annual Operations & Maintenance costs which are estimated to be \$15,000 for contractor support to address any issues, correct operator reports, if needed, and to patch/upgrade software and hardware as required. There is an additional \$1, 700 for Federal FTE to manage the operations and maintenance of the application, which includes user support.

15. Explanation of the program change or adjustments. EXPLAIN THE REASONS FOR ANY PROGRAM CHANGES OR ADJUSTMENTS REPORTED IN ITEMS 13 OR

14.

PHMSA is revising the gas distribution annual report (PHMSA F 7100.1-1) and its instructions. PHMSA will remove “Other” as a selection for Operator Type in Part A7 and add guidance for the proper selection to the instructions. By eliminating “Other” as a selection, PHMSA will obtain more accurate data about the types of gas distribution operators.

PHMSA is also changing the instructions for PHMSA Form 7100.1-1, Gas Distribution System Annual Report, related to calculating the percent of LAUF gas and negative percent values. PHMSA will calculate the percent of LAUF gas by dividing the LAUF volume by the gas consumption volume. PHMSA will allow a negative value to be reported for percent LAUF gas. These changes will harmonize the PHMSA and Energy Information Administration (EIA) methodologies for calculating percent LAUF gas.

16. Publication of results of data collection.

PHMSA summarizes the annual report data on its public website and makes the entire data set available for download.

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

PHMSA will display the expiration date.

18. Exceptions to the certification statement.

There are no exceptions to the certification statement.