

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

**Supporting Statement**

**Customer-Owned Service Lines  
OMB Control No. 2137-0594**

**INTRODUCTION**

This is to request the Office of Management and Budget's (OMB) renewed three-year approved clearance for the information collection entitled, "Customer-Owned Service Lines" (OMB Control No. 2137-0594, which is currently due to expire on May 31, 2018.

**Part A. Justification.**

1. Circumstances that make collection of information necessary.

The mandate in 49 U.S.C. 60113 requires the Secretary of Transportation to issue regulations requiring operators of natural gas distribution pipelines that do not maintain customer-owned service lines up to building walls to advise their customers of: the requirements for maintenance of those lines; any resources known to the operator that could assist customers in maintaining the lines; information the operator has concerning the operation and maintenance of its lines that could aid customers; and the potential hazards of not maintaining the lines.

This information collection request supports DOT's safety performance goal of reducing total incidents for gas and hazardous liquid pipelines which directly supports the DOT's safety strategic objective of enhancing public health and safety by working toward the elimination of transportation-related deaths and injuries.

Current Federal gas pipeline safety standards do not require operators to maintain customer piping that lies downstream from regulated service lines. In many cases, the customer is not aware the operator is not responsible for the maintenance of piping or what those maintenance responsibilities are. To address these concerns and a statutory mandate, the Office of Pipeline Safety (OPS) established notification requirements in 49 CFR 192.16.

This information collection request requires operators of gas service lines who do not maintain their customers' buried piping between service lines and building walls or gas utilization equipment to send written notices to their customers prescribing the proper maintenance of these gas lines and of the potential hazards of not properly maintaining these gas lines. Operators also have to maintain records that include a copy of the notice currently in use and evidence that notices were sent to customers within the previous 3 years.

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

The written notice referenced under Item 1 of this Supporting Statement goes to each customer receiving gas at a particular location. It is used to make them aware of the need to maintain buried customer piping to avoid accidents. OPS and State authorities review operators' records to investigate compliance with the notification requirement.

3. Extent of automated information collection.

Operators are permitted to use any method to send written notices and maintain records. They may use the latest information technology to reduce the additional burden. The operators do not submit any information to OPS but maintain records that include a copy of the notice currently in use and evidence that notices were sent to customers within the previous 3 years. There are no legal obstacles to reducing the burden if the operators choose to keep record electronically.

4. Efforts to identify duplication.

These requirements do not duplicate any other information collection burden for gas pipeline operators. This information cannot be retrieved from any other source.

5. Efforts to minimize the burden on small businesses.

Most of the small businesses impacted by this information collection are operators of master meter systems. Master meter systems, as defined in 49 CFR 191.3, are pipeline systems for distributing gas within, but not limited to, a definable area, such as a mobile park, housing project, or apartment complex, where the operator purchases metered gas from an outside source for resale through a gas distribution system. The gas distribution pipeline system supplies the ultimate consumer who either purchases the gas directly through a meter or by other means, such as by the rents.

To reduce the burden on these businesses, the requirement allows master meter operators to post a general notice in a predominant location frequented by customers rather than issuing individual notices to each customer.

6. Impact of less frequent collection of information.

If this information collection were to occur less frequently, new operators may not receive pertinent information regarding their roles and responsibilities for maintaining service lines. This lack of information could potentially lead to pipeline safety failures.

7. Special circumstances.

No special circumstances exist in this collection.

8. Compliance with 5 CFR 1320.8.

A 60-day Federal Register Notice was published on March 6, 2018 (83 FR 9573). During the 60-day comment period, PHMSA received no comments regarding the information collection.

9. Payments or gifts to respondents.

There is no remuneration provided.

10. Assurance of confidentiality.

PHMSA does not have the authority to assure confidentiality.

11. Justification for collection of sensitive information.

The information requested is not sensitive in nature.

12. Estimate of burden hours for information requested.

According to OPS data, there are approximately 1,500 natural gas distribution operators with approximately 65 million gas services. Of these services, the OPS estimates there are approximately 5.5 million buried customer-owned lines downstream from regulated service lines (excluding the states mentioned above) in the United States.

The OPS estimates that approximately 10 percent of customers with buried piping downstream from regulated service lines will move annually, requiring 550,000 notifications each year. It is assumed that the cost of copying a notification letter is estimated to be 10 cents per notice (the cost of developing the notice will be minimal as generic notifications will be available), the annual recurring cost due to customers moving is \$55,000 annually ( $5,500,000 \times .1 = 550,000 \times \$0.1 = \$55,000$ ).

The OPS estimates the time it takes to issue and maintain a record of notification for each customer at approximately 1 minute ( $1\text{min} \times (1\text{hour}/60\text{ min}) = 0.0167\text{ hours}$ ). Therefore, the total annual hourly burden is 9,167 hours ( $550,000\text{ notifications} \times 0.0167\text{ hours}$ ).

The annual total burden hour is estimated to be 9,167.

13. Estimate of total annual costs to respondents.

There are no additional costs beyond the paperwork expenses stated under item 12.

14. Estimate of cost to the Federal government.

Currently, 100 Federal inspectors spend an estimated 10 percent of their time reviewing records retained by gas pipeline operators. The average salary of a Federal transportation inspector is \$107,630.

This calculates to an estimated annual cost to the Federal Government of:

100 (Federal inspectors) x \$107,630 (mean salary) x 0.10 (time) = \$1,076,300.

15. Explanation of program changes or adjustments.

There is no change in burden due to the renewal of this information collection.

16. Publication of results of data collection.

There are no plans to publish this information.

17. Approval for not explaining the expiration date for OMB approval.

The OPS is not seeking such approval.

18. Exceptions to certification statement:

There is no exception.