

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

**Supporting Statement  
“Annual and Incident Reports for Gas Pipeline Operators”  
OMB Control No. 2137-0522  
Docket No. PHMSA-2018-0046  
RIN 2137-AF36**

**INTRODUCTION**

The Pipeline and Hazardous Materials Safety Administration (PHMSA) requests approval from the Office of Management and Budget (OMB) for a revision of a currently approved collection entitled “Incident and Annual Reports for Natural Gas Pipeline Operators” (OMB Control No. 2137-0522). The current expiration date for this information collection is January 31, 2023.

The revision of this information collection is necessary due to the following PHMSA action that will affect the current collection of information:

**Docket No. PHMSA-2018-0046 - Pipeline Safety: Gas Pipeline Regulatory Reform**

- Eliminates the Mechanical Fitting Failure Report form
- Reduces overall burden by 8,300 hours for reporting activities.

**Part A. Justification**

1. Circumstances that make collection of information necessary.

The reports contained within this information collection support the Department of Transportation’s strategic goal of safety. Annual summary reports help to inform PHMSA and the public of release incident risks and trends. 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 minimize natural gas storage, transmission, gathering, and distribution pipeline failures.

The requirements for annual reporting and telephonic notification of incidents 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 the recently revised 60139.

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

PHMSA uses this information collection to gather annual data and failure information from natural gas pipeline operators. The term “natural gas pipeline operators” includes Gas Transmission operators, Gas Distribution operators, and LNG pipeline facility operators.

PHMSA collects annual information from gas pipeline operators via annual reports. The annual report form has query fields regarding incident cause categories, impacts, failure mechanisms, locations, and other details about natural gas pipeline incidents. PHMSA uses the information to track incidents and help guide future regulations to reduce future pipeline incidents. The annual report forms are identified as follows:

- Underground Natural Gas Storage Annual Report
- Gas Transmission Annual Report
- LNG Annual Report

The information from annual reports are used for identifying existing or potential pipeline safety problems, to develop statistical and data/safety reports, and to develop benefit-cost analyses pertaining to pipeline safety.

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 annual reports on-line at [www.opsweb.phmsa.dot.gov](http://www.opsweb.phmsa.dot.gov).

4. Efforts to identify duplication.

PHMSA is the only federal agency that collects information related to distribution pipeline failures. No similar information is requested by the government or industry on distribution pipeline failures that occur between the point-of-sale to a distribution company and a customer’s meter.

The information collection on gas transmission and gathering pipelines is extremely limited in terms of scope and population of gas pipeline operators covered. The Department of Interior (DOI) collects information that is in some ways similar to that collected by PHMSA, but the information DOI collects does not cover all gas transportation or gathering pipelines.

5. Efforts to minimize the effects on small business.

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. PHMSA will make exception in cases where it is not feasible for operators to submit electronically.

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 report data. 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.

PHMSA published a Notice of Proposed Rulemaking [85 FR 35240] on June 9, 2020. During the comment period, PHMSA received various comments on the elimination of the Mechanical Fitting Failure form.

Several commenters including AmeriGas, National Propane Gas Association (NPGA), Superior Plus Propane (SPP), Dresser Natural Gas Solutions, Norton McMurray Manufacturing Company (NORMAC), Oleksa and Associates, Plastics Pipe Institute (PPI), and a private citizen expressed their support that mechanical fitting failure reporting be eliminated. Dresser Natural Gas Solutions noted that this data has been found by PHMSA to not provide any meaningful trends related to risk of pipeline leaks. PPI stated that the removal of this regulatory reporting burden reduces the unnecessary focus on mechanical fittings as a potential source of incidents. NORMAC expressed their full support for the termination of the Mechanical Fitting Failure Report F 7100.1-2 (MFF), stating that pipeline safety depends on accurate and actionable information and we agree that the information collected in the MFF has not provided statistically significant trends or information upon which operators or regulators can act.

The public-interest group, Pipeline Safety Trust, expressed concerns with regards to reducing reporting requirements for failures of mechanical fittings. They questioned whether this would blindfold PHMSA to many thousands of fitting failures per year, many of which result in hazardous and potentially explosive leaks, others of which result in non-explosive but hazardous leaks of methane into the atmosphere.

All comments pertaining to the elimination of the Mechanical Fitting Failure form have been summarized and addressed in the preamble of the Final Rule.

9. Payments 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 guarantee confidentiality, however, this information collection does not include anything of a sensitive nature or of any matters considered private.

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.

Current Number of Responses: 10,547	Proposed Number of Responses: 2,247
Current Burden Estimate: 80,101 hours	Proposed Burden Estimate: 71, 801 hours

The burden estimate for this information collection has been revised to include a decrease in burden resulting from provisions of the Pipeline Safety: Gas Pipeline Regulatory Final Rule. PHMSA expects that the **currently-approved burden for this information collection will decrease by 8,300 hours** for the reporting of mechanical fitting failures on DOT PHMSA Form 7100.1-2. PHMSA proposes to eliminate this form altogether and have operators submit the annual number of mechanical joint failures on the Gas Distribution Annual Report under 2137-0629.

A breakdown of the estimated burden for this information collection is detailed below:

IC	Responses	Burden Per Response	Total Burden
Gas Transmission and Gathering Annual Report	1,440`	47 hours per report	67,680 hours
LNG Annual Report	113	12 hours per report	1356 hours
Underground Storage Annual Report	124	20 hours per report	2,480 hours
Immediate Notice of Incidents	570	0.5 hours per report	285 hours
<b>Total</b>	<b>2,247 Annual Responses</b>		<b>71, 801 Annual Burden Hours</b>

*(a) Annual Reports for gas transmission and gas gathering systems, LNG Facilities, and underground natural gas storage facilities (Section 191.17) w/1677 responses*

Annual reports are required for all operators of gas transmission and gathering pipeline systems, liquefied natural gas facilities and underground natural gas storage facilities. An explanation of the estimated burden for each report collection is detailed as follows:

1. Transmission Systems Annual Report **(67,680 hours)**

PHMSA estimates that it receives approximately 1,440 gas transmission annual reports each year. PHMSA previously estimated that it would take operators of natural gas transmission and gathering systems approximately 42 hours, per response, to satisfy the reporting requirement. This includes time for reviewing instructions, gathering the data needed, completing, reviewing and submitting the requested data. Based on the proposed revisions associated with the Pipeline Safety: Safety of Gas Transmission Pipelines: MAOP Reconfirmation, Expansion of Assessment Requirements, and Other Related Amendments Final Rule, PHMSA estimates that completing the Gas Transmission and Gathering Annual report will require an additional 5 hours per report to include the newly required data increasing the burden for each report to 47 burden hours for an overall **burden increase of 7,200** burden hours across all natural gas transmission operators. Accordingly, PHMSA estimates the burden associated with collecting Gas Transmission and Gathering Systems annual data to be 67,680 hours (1,440 reports \*47 hours per report) each year.

2. LNG Annual Report **(1,356 hours)**

PHMSA estimates that there are 82 LNG pipeline operators for 113 LNG facilities. PHMSA expects to receive an annual report submission for each of the 113 LNG facilities. PHMSA estimates that it will take LNG operators 12 hours to prepare each annual report submission. This includes the time it will take to review instructions, gathering the data needed, completing, reviewing and submitting the requested data. Accordingly, PHMSA estimates the information collection burden associated with the LNG annual report information collection to be approximately 1,356 hours (113 LNG reports\* 12 hours per report) each year.

3. Underground Natural Gas Storage Facility Annual Report **(2,480 hours)**

49 CFR § 191.17 requires each operator of an underground natural gas storage facility to submit an annual report on DOT PHMSA Form 7100.4-1 by March 15, for the preceding calendar year. PHMSA estimates that there are 124 operators of underground natural gas storage facilities. PHMSA expects each of these operators to spend 20 hours, annually, to prepare annual report submissions. This includes time for reviewing instructions, gathering the data needed, reviewing the required data, and completing and submitting

PHMSA Form 7100.4-1 for an overall burden of 2,480 hours (124 reports \*20 hours per report) for annual report submissions.

*(b) Immediate Notice of Incidents (Section 191.5) w/570 Responses*

Gas Pipeline operators are required to provide immediate notification of incidents as detailed in § 191.5. Based on past estimates, there was an annual average of 570 immediate notifications. PHMSA estimates that these notifications are estimated to require 30 minutes for operators to complete. The total time is expected to be **285 hours** (= 570 reports x 0.5 hours).

**(c) Total Hours:**

Telephonic Notification (285 hours) Annual Reports (+67,680 +1,356+2,480) = **71,801 hours**.

13. Estimate of total annual costs to respondents.

PHMSA assumes that the reporting would be made by an engineering manager. Based on the industry-specific occupational and wage estimates provided by the U.S. Department of Labor’s Bureau of Labor Statistics, median hourly wage of an engineering manager (for NAICS 486000 – pipeline transportation)<sup>1</sup> is estimated as \$77.50. Using an estimated fringe benefit of approximately 35 percent, the recordkeeping requirements for the gas operators are prepared at the average rate of \$104.63 per hour.

The total annual estimated costs for this information collection with all of the incorporated proposals would be \$7,512,538.63 (= \$104.63 \* 71,801 hours)

14. Estimate of cost to the Federal Government.

PHMSA spends an estimated cost of \$189,969.00 to operate and maintain this information collection. Operations and maintenance includes PRA compliance, interface improvements, database management, planning, revisions, and customer service.

	Monthly Average (Hrs)	Hourly Rate	Annual Hours	Total Costs
Salary Costs*	7	\$38.82/hr	84	\$3,260
Contracting Costs- Gas Annual Forms (GT, LNG, UNGS)	129.25	\$120.38/hr	1551	\$186,709
<b>TOTAL</b>				<b>\$189,969.00</b>

<sup>1</sup> [https://www.bls.gov/oes/current/naics3\\_486000.htm](https://www.bls.gov/oes/current/naics3_486000.htm)

15. Explanation of program changes or adjustments.

Due to the provisions in the Pipeline Safety: Gas Regulatory Reform Final Rule, PHMSA has eliminated form PHMSA F&100 1-2 Mechanical Fitting Failure Report. This change has resulted in a decrease of 8,300 responses and 8,300 burden hours for this information collection.

16. Publication of results of data collection.

PHMSA will summarize the incident and annual reports post the results on PHMSA's website.

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

PHMSA will display the expiration date.

18. Exceptions to certification statement.

There are no exceptions to the certification statement.