Department   of Transportation
Office of the Chief Information Officer

Supporting Statement
"Annual Report for Gas Distribution Operators"
OMB Control No. 2137-0629
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 "Annual Report for Gas Distribution Operators" (OMB Control No. 2137-0629). The current expiration date for this information collection is October 31, 2021.

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

- Revises form PHMSA F 7100.1-1 Annual Report—Gas Distribution System to collect annual number of mechanical joint failures.
- Adds 723 burden hours to this information collection for resporting activities.

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 include49 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).

PHMSA published a Notice of Proposed Rulemaking [85 FR 35240] on June 9, 2020.   During the comment period, severalcommenters expressed concerns regarding PHMSA's proposal to modify the Gas Distribution Annual Report (DOT Form PHMSA F 7100.1-1) to collect data on mechanical joint failures. A few commenters stated that modifications should not be made to

Form F 7100.1, noting that since no value was derived from independent reporting, it is reasonable to conclude that no new value will be created through tracking and reporting on the Form F 7100.1

NORMAC noted that modifying the Gas Distribution Annual Report could lead the user to jump to the conclusion that in any leak involving a mechanical joint, the mechanical fitting is "faulty"; when in reality the leak is caused by "Incorrect Operation".

PHMSA has addressed these and all other comments regarding the reporting of mechanical joint failures on the Gas Distribution Annual Report in the preamble section of the Final Rule.

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.

Table 1: Estimated Change in Burden

Current Number of Responses: 1,446	Proposed Number of Reponses: 1,446
Current Burden Estimate: 24,582 hours	Proposed Burden Estimate: 25,305 hours

There are approximately 1,446 gas distribution operators. These operators are required to submit annual reports for their pipeline systems to PHMSA on a yearly basis. PHMSA previously estimated that it would take each operator 17 hours to compile information pertaining to this report and to submit the requested data to PHMSA. PHMSA proposes to revise form F7100.1-1, the Gas Distribution Annual Report, to collect the total number of mechanical joint failures that occur within each calendar year. PHMSA estimates that it will take operators approximately 30 minutes (0.5 hours) to add this information to the annual report, assuming that reporting each mechanical joint failure takes 3 minutes and each operator has an average of approximately 9 mechanical joint failures per year on average. As a result, the burden for this information collection will increase by approximately 723 hours for an estimated total burden of 25,305 hours (17.5 hours * 1,446 operators).

Table 2 below details this burden calculation:

Table 2: Estimated Burden Calculation

Number of Operators	Hours to Complete	Total Burden
1,446	17.5	25,305

13. Estimate of the total annual costs burden.

Preparing incident reports will require input from a diverse array of occupations, including technical input, legal review, database development/entry, and senior executive approval. PHMSA developed a weighted average labor cost based on wage rates for several relevant occupational categories that are likely to be involved in the reporting process. Table 3 below shows the calculations used to derive the average labor cost utilized by PHMSA.

Table 3: Estimated Labor Costs (2019 $)

Occupation Code	Occupation Category	Mean Wage Rate	Total Labor Cost	Estimated % of Reporting Hours
13-1041	Compliance Officers	$38.05	$54.75	40%
23-1011	Lawyers	$69.86	$100.52	20%
17-2171	Petroleum Engineers	$59.72	$85.93	20%
11-1000	Top Executives	$57.60	$82.88	10%
15-1240	Database and Network Administrators and Architects	$45.72	$65.78	10%
Total	Average Loaded Wage Rate	$51.47	$74.05	100%

Source: U.S. Department of Labor's BLS March 2020 Occupational Employment Statistics (2019 Data), modified July 6, 2020, www.bls.gov/oes/tables.htm. [NAICS code: 486200 - Pipeline Transportation of Natural Gas]

Note: The wage rate was scaled upward to account for the total cost of performing these tasks. Wages composed an estimated 69.5% of total employee costs for private industry workers (BLS 2019), https://www.bls.gov/news.release/archives/ecec_06182019.pdf

For each category of labor cost, PHMSA calculated those values based on the BLS data indicating that wages constitute 69.5 percent of total labor cost. For example, the total labor cost for compliance officers (second row of Table 2) is computed as follows: $38 / 69.5% = $54.75.

Based on these calculations, PHMSA estimates an average loaded wage rate of $74.05 per hour. This figure was calculated from the wage rates for the various occupation codes in North American Industry Classification System (NAICS) 486200 – Pipeline Transportation of Natural Gas.

The total annual estimated costs for this information collection with all of the incorporated proposals would be $1,873,835 ($74.05 * 25,305 hours).

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.**

Due to the provisions in the Pipeline Safety: Gas Pipeline Regulatory Reform Final Rule, PHMSA is revising the Gas Distribution Annual Report to collect the total number of mechanical joint failures that occur within a calendar year.

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.