	DOT USE ONLY
![logo] U.S. Department of Transportation Pipeline and Hazardous Materials Safety Administration	Voluntary Adoption of American Petroleum Institute Recommended Practice 1173 for Gas Distribution Systems	Initial Date Submitted _____ Report Submission Type _____ Date Submitted _____

A federal agency may not conduct or sponsor, and a person is not required to respond to, nor shall a person be subject to a penalty for failure to comply with a collection of information subject to the requirements of the Paperwork Reduction Act unless that collection of information displays a current valid OMB Control Number. The OMB Control Number for this information collection is 2137-XXXX. Public reporting for this collection of information is estimated to be approximately 3 hour per response, including the time for reviewing instructions, gathering the data needed, and completing and reviewing the collection of information. All responses to this collection of information are mandatory. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to: Information Collection Clearance Officer, PHMSA, Office of Pipeline Safety (PHP-30) 1200 New Jersey Avenue, SE, Washington, D.C. 20590.

Important: *Please read the separate instructions for completing this form before you begin. They clarify the information requested and provide specific examples. If you do not have a copy of the instructions, you can obtain one from https://www.phmsa.dot.gov/forms/pipeline-compliance-forms.*

1. Operator's OPS-Issued Operator Identification Number (OPID) _____

2. Name of Operator _____

3. Number of Customers Served by the Operator _____

4. Amount of Gas Transported by the operator during Calendar Year 2022 in Thousands of Standard Cubic Feet _____

5. Do you have procedures, processes, or programs in place to address? (select all that apply)
_____ a. Promoting a positive safety culture
_____ b. Communicating and educating employees, contractors, and/or the public regarding pipeline safety
_____ c. Reducing risk and maintaining integrity to your pipeline assets
_____ d. Developing and maintaining safe work practices.
_____ e. Investigating incidents and near-misses on your pipeline system to identify and implement corrective actions
_____ f. Verifying existing operations and safety practices are improving pipeline safety
_____ g. Reviewing your safety performance to determine if additional actions are necessary to improve pipeline safety
_____ h. Responding effectively to pipeline incidents
_____ i. Assuring personnel are competent in tasks that impact the integrity of your system
_____ j. Maintaining documentation needed to ensure pipeline safety

6. Has your company or system's leadership demonstrated a tangible commitment to the implementation of a pipeline safety management system (PSMS)?
Yes _____   No ___

7. How did you become aware of RP 1173? (select all that apply)
_____Internal staff
_____Industry Affiliate
_____State regulator
_____Federal regulator
_____ Not aware of RP 1173
_____Other (specify, up to 100 characters) _____

8.   Have you performed a gap assessment or other comparable exercise to compare your pipeline safety and safety culture efforts to the concepts of safety management systems described in API RP 1173?
Yes _____   No ____

9.   What barriers are preventing you from implementing an SMS program per API RP 1173 or other SMS? (select all that apply)
_____ Size of company
_____ Limited Staff
_____ Financial Considerations
_____ Unfamiliar with SMS principles
_____ N/A
_____ Other (specify, up to 100 characters) _____

10.   What is the timeframe for closing initially identified gaps or addressing improvement opportunities? (select only one)
_____ a. current year
_____ b. next year to 2 years
_____ c. more than 2 years to 5 years
_____ d. more than 5 years to 10 years
_____ e. more than 10 years
_____ f. no plan

11.   Is the implementation of your PSMS: (select only one)
_____ a. on track with the plan
_____ b. slower than planned
_____ c. faster than planned
_____ d. stalled for the moment

12.   What element(s) are you currently focused on for implementation? (select all that apply)
_____ a. Leadership and Management Commitment
_____ b. Stakeholder Engagement
_____ c. Risk Management
_____ d. Operational Controls
_____ e. Incident Investigation, Evaluation, and Lessons Learned
_____ f. Safety Assurance
_____ g. Management Review and Continuous Improvement
_____ h. Emergency Preparedness and Response
_____ i. Competence, Awareness, and Training
_____ j. Documentation and Record Keeping
_____ k. Other (specify, up to 100 characters) _____

13.   What elements have been the most challenging to implement? (select all that apply):
_____ a) Leadership and Management Commitment
_____ b) Stakeholder Engagement
_____ c) Risk Management
_____ d) Operational Controls
_____ e) Incident Investigation, Evaluation, and Lessons Learned
_____ f) Safety Assurance
_____ g) Management Review and Continuous Improvement
_____ h) Emergency Preparedness and Response
_____ i) Competence, Awareness, and Training
_____ j) Documentation and Record Keeping
_____ k) Other (specify, up to 100 characters) _____

14. Have you conducted a review of your PSMS program?
Yes _____ No____

15. If you answered "Yes" in #14, by whom? (select all that apply)
_____Internal staff
_____Independent third-party evaluator
_____State regulator
_____Federal regulator
_____Other (specify, up to 100 characters) _____

16. Are you maintaining a method to evaluate PSMS maturity?
Yes _____ No ____

Preparer Name: _____

Preparer's E-Mail Address: _____

Preparer's Phone Number: _____

Authorized Person Name: _____

Authorized Person's E-Mail Address: _____

Authorized Person's Phone Number: _____

Instructions for completing Form PHMSA GD-SMS-2022
Voluntary Adoption of American Petroleum Institute Recommended Practice 1173
for Gas Distribution Systems

If you need copies of the Form PHMSA F7100.5 and/or these instructions, you can obtain one from
https://www.phmsa.dot.gov/forms/pipeline-compliance-forms.

Each operator of a gas distribution system required to submit a Gas Distribution Annual Report, Form PHMSA F7100.1-1, is requested to submit Form PHMSA GD-SMS-2022. As this is a one-time information collection PHMSA is requesting only basic safety management system (SMS) implementation information.

Form PHMSA GD-SMS-2022 and these instructions can be found on https://www.phmsa.dot.gov/forms/pipeline-compliance-forms. The applicable documents are listed in the section titled "GD-SMS-2022 Reporting Form".

ONLINE REPORTING REQUIREMENTS

Reports must be submitted online through the PHMSA Portal at https://portal.phmsa.dot.gov/portal. Use the following procedure for online reporting:

1.   Go to the PHMSA Portal at https://portal.phmsa.dot.gov/portal

2.   Enter PHMSA Portal Username and Password; press *enter*

3.   Select OPID; press "*continue"* button

4.   In the main panel, select the tab named "**GD SMS**"

5.   Select the link named "**Create Report**" and proceed with entering your data.

6.   Click "**Submit**" when finished with your data entry to have your report uploaded to PHMSA's database as an official submission or click "**Save**" which doesn't submit the report to PHMSA but stores it in a draft status to allow you to come back to complete your data entry and submit at a later time. Your draft report is available at the link named **"Saved Report"** on the "**GD SMS**" tab.

If your submitted report needs to be corrected, you can submit a supplemental report. On the "**GD SMS**" tab, click on the "**Submitted Report**" link and then click on Create Supplemental.

SPECIAL INSTRUCTIONS

All applicable data fields must be completed before you can submit the report.

1.   An entry should be made in each applicable space or check box.

2.   If **OTHER** is checked for any answer to a question, include an explanation or description in the text field provided, making it clear why "Other" was the necessary selection.

3.   Pay close attention to each question for the phrase:
a.   **(*Select all that apply)*
b.   **(*Select only one)*
If the phrase is not provided for a given question, then "select only one" applies. "Select only one" means that you should select the single, primary, or most applicable answer. DO NOT SELECT MORE ANSWERS THAN REQUESTED. "Select all that apply" requires that all applicable answers (one or more than one) be selected.

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SPECIFIC INSTRUCTIONS

1. Operator's OPS-Issued Operator Identification Number (OPID)

The OPID will automatically populate based on the selection you made when entering the PHMSA Portal. If you have log-in credentials for multiple OPID, be sure the report is being created for the appropriate OPID. Contact PHMSA's Information Resources Manager at 202-366-8075 if you need assistance with an OPID. Business hours are 8:30 AM to 5:00 PM Eastern Time.

2. Name of Operator

The name will automatically populate based on the OPID entered in 1. If the name that appears is not correct, you need to submit an Operator Name Change (Type A) National Registry Notification.

3. Number of Customers Served by the Operator

This is the number of meters through which the operator sells gas.

4. Amount of Gas Transported by the operator in Calendar Year (CY) 2022 in Thousands of Standard Cubic Feet

This is the amount of gas transported by the operator in CY 2022 in Thousands of Standard Cubic Feet.

5. Do you have procedures, processes, or programs in place to address? (select all that apply)

The question includes the terms procedures, processes, or programs to provide flexibility. In other words, an operator may have a general program in place, but not necessarily a procedure or vice versa. API RP 1173 leans towards a procedure such as through the following language "At the operator level, these elements may not appear distinctly in a single document but should be identifiable in a clear and mandated process within the operator's procedures." However, other SMS approaches may not specifically call for a procedure.

6. Has your company or system's leadership demonstrated a tangible commitment to the implementation of a pipeline safety management system (PSMS)?

Examples of tangible commitments include: a commitment statement from leadership, an assignment of PSMS responsibilities to an employee, the dedication of resources, or the hiring of a PSMS consultant.

8. Have you performed a gap assessment or other comparable exercise to compare your pipeline safety and safety culture efforts to the concepts of safety management systems described in API RP 1173?

Check "Yes" if you performed a gap assessment consistent with API 1173, even if you aren't using API RP1173 specifically. If you did not perform a gap assessment, check "No".

9. What barriers are preventing you from implementing an SMS program per API RP 1173 or other SMS? (select all that apply)

This question is intended to understand barriers and challenges to implement an SMS whether you performed an initial gap assessment or are choosing not to implement (start) an SMS at this time. Answers to this question will likely help provide input on the number of companies implementing a pipeline SMS and the feasibility of an operator of a natural gas distribution company to implement a pipeline SMS in line with the PIPES Act 2020 Section 205 language.

N/A means not applicable. In other words, you are in the process of implementing SMS.

Select Other and provide comments if there are other challenges not on the list or you want to provide additional information related to the question.

10. What is the timeframe for closing initially identified gaps or addressing improvement opportunities?

"Current year" means that you either have already addressed initially identified gas or opportunities or you will have all initially identified gas or opportunities addressed within the current year. Check "no plan" only if you have no plans to address the identified gaps or opportunities or are not planning to implement an SMS in general.

11. Is the implementation of your PSMS: (select only one)

Choose "stalled for the moment" if your implementation is currently stalled or you are not implementing SMS.

13. What elements have been the most challenging to implement? (select all that apply)

If your company is challenged by a specific element of PSMS and categorizes the elements differently than the RP, please select "Other" and describe the element(s) your company is currently challenged by in the text field.

16. Are you maintaining a method to evaluate PSMS maturity?

For a description of the PSMS maturity model, see https://pipelinesms.org/pipeline-sms-maturity-model/

PREPARER

The Preparer is the person who compiled the data and prepared the responses to the report and who is to be contacted for more information (preferably the person most knowledgeable about the information in the report or who knows how to contact the person or persons most knowledgeable). Enter the Preparer's e- mail address and the phone number of the Preparer.

AUTHORIZED PERSON

The Authorized Person is responsible for assuring the accuracy and completeness of the reported data. In addition to their name, include a phone number and email address.