

**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-2021-0046
RIN 2137-AF53**

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 June 30, 2026.

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

Pipeline Safety: Safety of Gas Distribution Pipelines and Other Pipeline Safety Initiatives

- Increases annual burden by 8, 676 hours to collect additional information on gas distribution systems such as the number and miles of low-pressure service pipelines, including their overpressure protection methods.

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).

9. On September 7, 2023 PHMSA published a Noticed of Proposed Rulemaking (88 FR 61746) to seek public comments on the proposed data collection.

10. 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 Responses: 1,446
Current Burden Estimate: 28,920 hours	Proposed Burden Estimate: 37,596 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 proposes to revise form F7100.1-1, the Gas Distribution Annual Report, to collect additional information on gas distribution systems such as the number and miles of low-pressure service pipelines, including their overpressure protection methods.

The current estimated burden for operators to submit each report is 20 hours per report for an overall annual reporting burden of 28,920 hours [20 hours x 1,446 reports]. PHMSA estimates that these respondents will incur an additional annual burden of 6 hours to accommodate the expanded data request. As a result, the annual reporting burden would increase from 20 hours to 26 hours per report. This will result in an increased burden of 8, 676 hours [1,446 reports x 6 hours] for an overall annual reporting burden of 37,596 hours [1,446 reports x 26 hours].

Table 2 below details this burden calculation:

Table 2: Estimated Burden Calculation

Number of Operators	Hours to Complete	Total Burden
1,446	26	37,596

13. Estimate of the total annual costs burden.

PHMSA expects the annual reports to be completed by a senior engineer with 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 \$2,783,983.80 (\$74.05 * 37,596 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.

This ICR is revised to reflect changes proposed in the Pipeline Safety: Safety of Gas Distribution Pipelines and Other Pipeline Safety Initiatives NPRM. PHMSA revised form PHMSA F 7100.1-1, the Annual Report for Gas Distribution pipeline systems to collect additional information on gas distribution systems such as the number and miles of low-pressure service pipelines, including their overpressure protection methods.

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.