

**BEFORE THE
UNITED STATES DEPARTMENT OF TRANSPORTATION
PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION
WASHINGTON, D.C.**

Pipeline Safety:
Information Collection Activities

}

Docket No. PHMSA-2025-0078

**COMMENTS ON
PIPELINE SAFETY: INFORMATION COLLECTION ACTIVITIES**

**FILED BY
AMERICAN GAS ASSOCIATION
AMERICAN PUBLIC GAS ASSOCIATION**

September 15, 2025

**Pipeline Safety: Information Collection Activities
Notice and Request for Comments
Docket No. PHMSA-2025-0078**

Table of Contents

I. Introduction	3
II. New Customer Notifications for Excess Flow Valves (OMB Control Number: 2137-0631).....	3
A. <i>New customer notification requirements for Excess Flow Valves (EFVs) are obsolete and unnecessary.</i>	3
B. <i>The ongoing information collection related to new customer EFV notifications does not advance pipeline safety.</i>	4
C. <i>PHMSA should consider amending 49 CFR Part 192 to eliminate requirements for this information collection.</i>	4
III. Notification Requirements for Gas Transmission Pipelines (OMB Control Number: 2137-0636).....	6
A. <i>Certain Notification Requirements for Gas Transmission Pipelines are unnecessary and redundant.</i>	6
B. <i>The ongoing Information Collection related to Gas Transmission Pipelines does not advance pipeline safety.</i>	6
C. <i>PHMSA should consider amending 49 CFR Part 192 to eliminate requirements for this information collection.</i>	7
IV. Amendments to Annual Report for Gas Distribution Operators (OMB Control Number: 2137-0629).....	9
A. <i>Part G of the Annual Report for Gas Distribution Operators (PHMSA F 7100.1-1) is obsolete.</i>	9
B. <i>The ongoing information collection related to LAUF in the Gas Distribution Annual Report does not advance pipeline safety.</i>	9
C. <i>PHMSA should amend PHMSA Form F 7100.1-1.</i>	10
V. Conclusion	11

I. Introduction

The American Gas Association (AGA)¹ and the American Public Gas Association (APGA)² (jointly “The Associations”) submit these comments for consideration by the Pipeline and Hazardous Materials Safety Administration (PHMSA) regarding PHMSA’s notice and request for comments entitled “Pipeline Safety: Information Collection Activities.”³

PHMSA’s intention to renew these information collections without change has presented an opportunity to re-evaluate certain requirements that should be modified, streamlined, or repealed, particularly:

- Reporting requirements that simply make no sense or have become unnecessary, ineffective, or ill-advised
- Information collection that DOT does not need or use effectively
- Regulations, guidance, reporting requirements, or regulatory processes that are unnecessarily complicated or could be streamlined⁴

II. New Customer Notifications for Excess Flow Valves (OMB Control Number: 2137-0631)

A. New customer notification requirements for Excess Flow Valves (EFVs) are obsolete and unnecessary.

The Associations respectfully submit that PHMSA should reconsider the ongoing information collection associated with 49 CFR § 192.383(e). Operators have consistently reported that customer interest in Excess Flow Valve (EFV) installation – when notified of its availability – is minimal. Despite the regulatory requirement to notify new customers of their right to request EFV installation, the actual take-up rate remains negligible, suggesting that the notification does not meaningfully influence customer behavior or safety outcomes.

Moreover, PHMSA itself has demonstrated the diminishing value of EFV data

¹ Founded in 1918, AGA represents more than 200 local energy companies committed to the safe and reliable delivery of clean natural gas to more than 180 million Americans. AGA is an advocate for natural gas utility companies and their customers and provides a broad range of programs and services for member natural gas pipelines, marketers, gatherers, international natural gas companies, and industry associates. Today, natural gas meets more than one third of the United States’ energy needs.

² APGA is the national, non-profit association of publicly-owned natural gas distribution systems. APGA was formed in 1961 as a non-profit, non-partisan organization, and currently has over 740 members in 37 states. Overall, there are nearly 1,000 municipally-owned systems in the U.S. serving more than five million customers. Publicly-owned gas systems are not-for-profit retail distribution entities that are owned by, and accountable to, the citizens they serve. They include municipal gas distribution systems, public utility districts, county districts, and other public agencies that have natural gas distribution facilities.

³ Pipeline Safety: Information Collection Activities, Federal Register Vol. 90, No. 133 (July 15, 2025).

⁴ Ensuring Lawful Regulation; Reducing Regulation and Controlling Regulatory Costs, Federal Register Vol. 90, No. 63 (April 3, 2025).

collection as recently as March 2022⁵, when PHMSA discontinued the requirement for operators to report EFV data in annual distribution reports (beginning 2023). The data generated by § 192.383(e) lacks utility and the mandate for its ongoing collection should be reconsidered.

B. The ongoing information collection related to new customer EFV notifications does not advance pipeline safety.

The EFV notification requirement under § 192.383(e) does not advance pipeline safety in a measurable way. EFVs are already required for most new or replaced service lines serving single-family residences, and operators routinely install them as part of standard practice. The additional requirement to notify customers of optional EFV installation for multifamily or commercial service lines no longer achieves meaningful uptake or improved safety outcomes.

Furthermore, there is no evidence that the notification requirement is cost-beneficial on a go-forward basis. The cost-benefit analysis supporting the original rule did not demonstrate net benefits in perpetuity, given the lack of customer interest. The administrative burden of tracking and issuing notifications, combined with the low rate of customer response, undermines the justification for continuing this requirement. Without demonstrable safety or economic benefits, the renewal of this information collection is inconsistent with the principles of the Paperwork Reduction Act.

C. PHMSA should consider amending 49 CFR Part 192 to eliminate requirements for this information collection.

The Associations acknowledge that withdrawing the EFV notification requirement would necessitate changes to 49 CFR § 192.383. Accordingly, the Associations recommend the following mark-up to the regulatory text to reflect the removal of paragraphs (e), (f), and (g):

§ 192.383 Excess flow valve installation.

...

~~(e) Operator notification of customers concerning EFV installation. Operators must notify customers of their right to request an EFV in the following manner:~~

~~(1) Except as specified in paragraphs (c) and (e)(5) of this section, each operator must provide written or electronic notification to customers of their right to request the~~

⁵ Pipeline Safety: Information Collection Activities, Federal Register Vol. 87, No. 48 (March 11, 2022).

~~installation of an EFV. Electronic notification can include emails, Web site postings, and e-billing notices.~~

~~(2) The notification must include an explanation for the service line customer of the potential safety benefits that may be derived from installing an EFV. The explanation must include information that an EFV is designed to shut off the flow of natural gas automatically if the service line breaks.~~

~~(3) The notification must include a description of EFV installation and replacement costs. The notice must alert the customer that the costs for maintaining and replacing an EFV may later be incurred, and what those costs will be to the extent known.~~

~~(4) The notification must indicate that if a service line customer requests installation of an EFV and the load does not exceed 1,000 SCFH and the conditions of paragraph (c) are not present, the operator must install an EFV at a mutually agreeable date.~~

~~(5) Operators of master meter systems and liquefied petroleum gas (LPG) operators with fewer than 100 customers may continuously post a general notification in a prominent location frequented by customers.~~

~~(f) Operator evidence of customer notification. An operator must make a copy of the notice or notices currently in use available during PHMSA inspections or State inspections conducted under a pipeline safety program certified or approved by PHMSA under 49 U.S.C. 60105 or 60106.~~

~~(g) Reporting. Except for operators of master meter systems and LPG operators with fewer than 100 customers, each operator must report the EFV measures detailed in the annual report required by § 191.11.~~

These edits would eliminate the notification requirement while preserving the core safety provisions of § 192.383 related to mandatory EFV installation for applicable service lines.

III. Notification Requirements for Gas Transmission Pipelines (OMB Control Number: 2137-0636)

A. Certain Notification Requirements for Gas Transmission Pipelines are unnecessary and redundant.

The Associations appreciate the opportunity to comment on PHMSA's intent to renew the information collection under OMB Control Number 2137-0636. However, the Associations are concerned that the notification requirements for gas transmission pipeline operators – particularly those involving the use of alternative equivalent technologies (AETs) and engineering analyses – impose undue administrative burdens on operators and PHMSA alike.

Operators are already required to demonstrate conformance to acceptance criteria explicitly stated in the regulations (e.g., §§ 192.634(b)(3), 192.634(b)(4), and 192.712(c)). Once conformance is proven, requiring additional notification to PHMSA introduces duplicative oversight that delays project implementation and adds uncertainty to the regulatory process. These delays can result in costly shifts to technologies that do not require notification, discouraging the use of innovative, cost-saving methods that are otherwise permitted by regulation.

B. The ongoing Information Collection related to Gas Transmission Pipelines does not advance pipeline safety.

The current notification framework does not enhance safety outcomes. In many cases, the technologies and analyses subject to notification are already vetted and codified as acceptable. For example:

- § 192.634(b)(3) allows the use of check valves as AETs with clear inspection and maintenance criteria.
- § 192.712(c) outlines exhaustive requirements for engineering critical assessments, including strain analysis and fatigue modeling.

Requiring operators to notify PHMSA after meeting these criteria does not yield additional safety insights. Instead, it creates a procedural bottleneck that can delay safety-enhancing projects. Moreover, PHMSA's review of these notifications often results in added stipulations beyond those in the code, further complicating compliance and undermining regulatory certainty.

Some operators have experienced situations where PHMSA delays the use of an AET or analysis by issuing an initial response within the 90-day window that outlines added stipulations an operator must comply with in order to use an

AET or analysis that otherwise meets acceptability criteria established elsewhere in 49 CFR 192. In these instances, the operator must then re-submit justification to PHMSA and is forbidden from using the AET or analysis until permission is received from PHMSA. This can delay projects or require costly 11th-hour pivots to other technologies or methods. Consequently, operators are discouraged from pursuing certain AETs or other analyses that are already allowed by 49 CFR 192.

The lack of demonstrable safety benefit from collecting this data – especially when the technologies are explicitly permitted within 49 CFR 192 – raises questions about the practical utility of the information collection, as required under the Paperwork Reduction Act.

C. PHMSA should consider amending 49 CFR Part 192 to eliminate requirements for this information collection.

The Associations acknowledge that eliminating or modifying the notification requirement would necessitate changes to specific sections of 49 CFR Part 192. Accordingly, the Associations recommend the following mark-ups to the regulatory text to reflect the removal of mandatory notifications where acceptance criteria are already defined:

§192.634 Transmission lines: Onshore valve shut-off for rupture mitigation.

...

(b) *Maximum spacing between valves.* RMVs, or alternative equivalent technology, must be installed in accordance with the following requirements:

...

(3) *Laterals.*

...

For laterals that are 12 inches in diameter or less, a check valve that allows gas to flow freely in one direction and contains a mechanism to automatically prevent flow in the other direction may be used as an alternative equivalent technology where it is positioned to stop flow into the shut-off segment. Such check valves that are used as an alternative equivalent technology in accordance with this paragraph (b)(3) are not subject to § 192.636, but they must be inspected, operated, and remediated in accordance with § 192.745, including for closure and leakage to ensure operational reliability. An operator using such a check valve as an alternative equivalent technology ~~must notify~~ is not required to notify PHMSA in accordance with §§ 192.18 and

192.179 ~~and, but it must develop~~ and implement maintenance procedures for such equipment that meet § 192.745.

(4) *Crossovers*. An operator may use a manual valve as an alternative equivalent technology in lieu of an RMV for a crossover connection if, during normal operations, the valve is closed to prevent the flow of gas by the use of a locking device or other means designed to prevent the opening of the valve by persons other than those authorized by the operator. The operator must develop and implement operating procedures and document that the valve has been closed and locked in accordance with the operator's lock-out and tag-out procedures to prevent the flow of gas. An operator using such a manual valve as an alternative equivalent technology ~~must notify~~ is not required to notify PHMSA in accordance with §§ 192.18 and 192.17.

§ 192.712 Analysis of predicted failure pressure and critical strain level.

...

(c) Dents and other mechanical damage. To evaluate dents and other mechanical damage that could result in a stress riser or other integrity impact, an operator must develop a procedure and perform an engineering critical assessment as follows:

...

(11) An operator using ~~an engineering critical assessment procedure,~~ other technologies, or techniques to comply with paragraph (c) of this section must submit advance notification to PHMSA, with the relevant procedures, in accordance with § 192.18.

These edits preserve the integrity of the safety requirements while removing unnecessary procedural hurdles that do not contribute to improved safety outcomes.

IV. Amendments to Annual Report for Gas Distribution Operators (OMB Control Number: 2137-0629)

A. Part G of the Annual Report for Gas Distribution Operators (PHMSA F 7100.1-1) is obsolete.

The requirement for operators to report “Percent of Unaccounted for Gas” in Part G of Form PHMSA F 7100.1-1 imposes an unnecessary and duplicative burden on operators. This data is already collected by the U.S. Energy Information Administration (EIA) under 15 U.S.C. §772, via Form EIA-176, which mandates reporting of “lost” gas. The instructions provided by PHMSA and EIA for calculating lost and unaccounted for (LAUF) gas are consistent, further reinforcing the redundancy of this collection.

Operators must gather data from multiple internal systems and perform calculations that do not contribute to actionable safety insights. This administrative effort diverts resources without providing added value to PHMSA or the industry. The original rationale for collecting this data – established in the Final Rule issued January 8, 1970, under 49 CFR Part 191 – was to explore whether a connection existed between gas loss and pipeline accidents. However, this rationale has since been invalidated.

B. The ongoing information collection related to LAUF in the Gas Distribution Annual Report does not advance pipeline safety.

In its March 9, 2017, report to Congress, submitted in response to Section 29 of the PIPES Act of 2016⁶, PHMSA stated:

“PHMSA has not identified any potential safety issues surrounding LAUF gas; as such, neither alternate reporting nor measures would resolve any safety issue.”

This conclusion directly addresses the original intent of the Office of Pipeline Safety, which had acknowledged in 1970 that the data was imprecise and should be studied to determine any link to accidents⁷. PHMSA’s 2017 report confirms that no such link exists.

Therefore, the continued collection of “Percent of Unaccounted for Gas” does not advance pipeline safety and should be eliminated. Removing this requirement would reduce the regulatory burden on operators while

⁶ <https://www.phmsa.dot.gov/news/report-congress-lost-and-unaccounted-natural-gas-metrics>

⁷ Office of Pipeline Safety; Leak Reporting Requirements, Federal Register Vol. 35, No. 5 (January 8, 1970).

maintaining the integrity of safety oversight through other more relevant and effective data collections.

C. PHMSA should amend PHMSA Form F 7100.1-1.

Accordingly, the Associations recommend that Part G of the PHMSA Form 7100.1-1 and associated Instructions be amended as follows:

PART F - TOTAL NUMBER OF LEAKS ON FEDERAL LAND REPAIRED OR SCHEDULED FOR REPAIR	PART G - PERCENT OF UNACCOUNTED FOR GAS RESERVED
_____	Unaccounted for gas as a percent of total consumption for the 12 months ending June 30 of the reporting year: $\frac{[(\text{Purchased gas} + \text{produced gas}) - (\text{customer use} + \text{company use} + \text{appropriate adjustments})]}{(\text{customer use} + \text{company use} + \text{appropriate adjustments})} \times 100 = \text{percent unaccounted for.}$ For year ending 6/30 _____ %.

**Instructions (rev 6-2023) for completing
Form PHMSA F 7100.1-1 (rev 6-2023)
ANNUAL REPORT FOR CALENDAR YEAR 20_____
GAS DISTRIBUTION SYSTEM
[OMB No. 2137-0629]**

PART G – ~~PERCENT OF UNACCOUNTED FOR GAS~~ RESERVED

~~“Unaccounted for gas” is gas lost; that is, gas that the operator cannot account for as usage or through appropriate adjustment. Adjustments are appropriately made for such factors as variations in temperature, pressure, meter reading cycles, or heat content; calculable losses from construction, purging, line breaks, etc., where specific data are available to allow reasonable calculation or estimate; or other similar factors.~~

~~State the amount of unaccounted for gas as a percent of total consumption for the 12 months ending June 30 of the reporting year.~~

~~$$\frac{[(\text{Purchased gas} + \text{produced gas}) - (\text{customer use} + \text{company use} + \text{appropriate adjustments})]}{(\text{customer use} + \text{company use} + \text{appropriate adjustments})} \times 100 = \text{percent unaccounted for.}$$~~

V. Conclusion

The American Gas Association (AGA) and the American Public Gas Association (APGA) appreciate the opportunity to provide comments on PHMSA's intention to renew these information collections. The Associations and their members remain committed to advancing pipeline safety and ensuring that regulatory requirements are both effective and practicable. As demonstrated in these comments, the continued collection of certain data elements does not meaningfully enhance safety outcomes, and thus places unnecessary reporting burdens on operators.

AGA and APGA thank PHMSA for its continued collaboration and looks forward to working together to ensure that information collection efforts are targeted, relevant, and supportive of the shared goal of pipeline safety.

Respectfully submitted

Date: September 15, 2025



Alan Chichester
Managing Director, Safety, Operations, & Engineering
American Gas Association
400 North Capitol Street, NW
Washington, D.C. 20001
(202) 824-7328



Erin Kurilla
Executive Vice President, VP Advocacy & Operations
American Public Gas Association
201 Massachusetts Ave NE
Suite C-4
Washington, D.C. 20002
(202) 905-2904