



July 22, 2016

Mr. Alan Mayberry
Acting Associate Administrator for Pipeline Safety
Pipeline and Hazardous Materials Safety Administration
U.S. Department of Transportation
1200 New Jersey Avenue, S.E.
Washington, DC 20590

Office of Management and Budget
Attention: Desk Officer for PHMSA
725 17th Street NW.
Washington, DC 20503

RE: Docket No. PHMSA-2014-0092; NOTICE OF INFORMATION COLLECTION REQUEST;
Pipeline Safety: Request for Revision of a Previously Approved Information Collection: National
Pipeline Mapping System Program

Dear Mr. Mayberry and OMB PHMSA Desk Officer:

The Northeast Gas Association (NGA) appreciates the opportunity to share its comments regarding Docket No. PHMSA-2014-0092; Notice of Information Collection Request, Pipeline Safety: Request for Revision of a Previously Approved Information Collection: National Pipeline Mapping System Program. This letter and attachment, submitted on behalf of NGA's member distribution companies, addresses issues associated with this docket.

NGA is a regional trade association that focuses on education and training, technology research and development, operations, planning, and increasing public awareness of natural gas in the Northeast U.S. NGA represents natural gas distribution companies, transmission companies, liquefied natural gas importers and associate member companies. Its member companies provide natural gas service to 12.5 million customers in 9 states (CT, ME, MA, NH, NJ, NY, PA, RI, VT).

With this notice, PHMSA is requesting a "Revision of a Previously Approved Information Collection" for its NPMS program. It is also seeking "suggestions for reducing the [information collection] burden" for review by the Office of Management and Budget (OMB).

Of particular concern to NGA is how the NPMS pipeline attribute collection requirements will impact not only interstate gas transmission pipelines but Local Distribution Companies (LDCs), who operate both significantly less miles of intrastate gas transmission pipelines and much needed distribution pipeline systems. These LDC pipeline systems ultimately supply environmentally and energy beneficial natural gas to all manner of end-users. For many LDCs, there is a significant cost investment in order to provide this NPMS attribute information. In most cases, it involves acquiring specialized geospatial programs, equipment and expertise to operate, perform and manage such an undertaking. Then there are field operations that will require attribute identification, data compilation, records verification, and final validation of all

information before submission to NPMS. Cost estimates for this data collection initiative can reach hundreds of millions of dollars to acquire these resources and perform these tasks within the limited time-frame proposed for each of the three data collection and submission phases. Therefore, as part of the burden reduction effort, and to reinforce accuracy, NGA recommends that 3 additional years should be added to each of these data element phases, and, if possible, even more time added for Phases 1 and 2.

Invariably, almost every regulatory mandate contributes to passing-on costs to already energy-cost burdened consumers for the environmentally premium fuel, natural gas. Currently, PHMSA collects a substantial amount of operator pipeline facility data, which it uses to assess whether or not changes to safety policy are needed and, where applicable, promulgate new regulatory initiatives. The new NPMS data collection initiative seems to duplicate this effort in many ways to support, for example, first responders.

NGA member companies have invested substantially in both mandated and voluntary public awareness programs that provide both education and emergency event coordination with emergency responders and public officials, as well as various other safety authorities. Moreover, LDCs are in a better position to keep their critical data secure (e.g., emergency block valves) and release it to only those that need-to-know or use. Therefore, PHMSA and OMB must remain cognizant of these facts in their commendable efforts for enhancing pipeline safety and protecting the environment.

Once again, NGA appreciates the opportunity to present comments and recommend guidance material that will promote both consistency and compliance with these proposed regulations. Moreover, as pipeline safety stakeholders with extensive field experience resources, NGA looks forward to participating and contributing, whenever possible and appropriate, towards the Commission's regulatory endeavors.

Sincerely,

A handwritten signature in black ink that reads "Thomas M. Kiley". The signature is fluid and cursive, with a long horizontal stroke at the end.

Thomas M. Kiley
President & CEO