U.S. DEPARTMENT OF TRANSPORTATION
PIPELINE AND HAZARDOUS MATERIALS
SAFETY ADMINISTRATION

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GAS PIPELINE ADVISORY COMMITTEE

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MEETING

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WEDNESDAY
OCTOBER 7, 2020

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The Gas Pipeline Advisory Committee met via Videoconference, at 10:35 a.m. EDT, David W. Danner, Chairman, presiding.

MEMBERS PRESENT
DAVID W. DANNER, Washington Utilities and Transportation Commission
W. JONATHAN AIREY, Vorys, Sater, Seymour, and Pease, LLP
RONALD BRADLEY, PECO
MARK BROWNSTEIN, Environmental Defense Fund
DIANE BURMAN, New York State Public Service Commission
PETER CHACE, Public Utilities Commission of Ohio
J. ANDREW DRAKE, Enbridge Gas Transmission and Midstream
SARA ROLLET GOSMAN, University of Arkansas School of Law
ROBERT HILL, Brookings County Zoning & Drainage
SARA LONGAN, Alaska Department of Natural Resources
MARY PALKOVICH, Consumers Energy
TERRY TURPIN, Federal Energy Regulatory Commission
RICHARD WORSINGER, Wilson Energy

ALSO PRESENT
HOWARD "SKIP" ELLIOTT, PHMSA Administrator
DRUE PEARCE, PHMSA Deputy Administrator
BEN KOCHMAN, PHMSA Director of Governmental, International and Public Affairs
PAUL ROBERTI, PHMSA Chief Counsel
ALAN MAYBERRY, Designated Federal Official
MASSOUD TAHAMTANI
JOHN GALE
STEVE NANNEY
CHRIS MCLAREN
SAYLER PALABRICA
GERY BAUMAN
BLAINE KEENER
MAX KIEBA
WASSEL AL-MASHAGBEH
RONALD RAUNIKAR
AMAL DERIA
ROBERT JAGGER
AMY ALLEN

PUBLIC COMMENTERS
CHRISTOPHER J. OSMAN, INGAA
MATTHEW HITE, GPA Midstream Association
SUSAN GINSBERG, Independent Petroleum Association of America
PATRICK CAREY, Kinder Morgan
STEVEN GLASS, National Fuel Gas
MARK HERETH, Blacksmith Group
MICHAEL ELLING, Reserve Equipment, Inc.
DAVID MURK, American Petroleum Institute
DARRAL WARD, Boardwalk Pipelines
CHRIS WILLIAMS, Cheniere Energy, Inc.
LANE MILLER, TRC
BRIAN MOIDEL, Dominion Energy Ohio
ERIN KURILLA, American Public Gas Association

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P-R-O-C-E-E-D-I-N-G-S

10:35 a.m.

MR. GALE: Good morning, members, and good morning, attendees. My name is John Gale, and I'm the Director of the Office of Standards and Rulemaking for the Office of Pipeline Safety in PHMSA. And welcome to a meeting of Gas Pipeline Advisory Committee to discuss PHMSA's recently published Notice of Proposed Rulemaking entitled Pipeline Safety: Gas Pipeline Regulatory Reform.

This meeting is being managed virtually through MS Teams with video capabilities. However, presenters and members of the public are not required to use video when they talk. We ask, however, that participants turn off their video if you are not talking or if you are having bandwidth issues. Also, please keep your line muted if you are not talking.

And finally, though we do not expect any issues, PHMSA will take appropriate actions

if an attendee gets disrupted during the meeting. We also ask that only authorized personnel admit persons into the meeting and this will allow us to address any disruptive attendees, though, of course, we do not anticipate that. And with that being said, I would like to turn it over to Alan and his staff. If you guys could share the agenda, that would be greatly appreciated and get this --

PARTICIPANT: Can't hear you, Alan.

MR. MAYBERRY: Thank you. As John said, I'm Alan Mayberry, Associate Administrator for Pipeline Safety. And thank you for joining us today at the Pipeline -- Gas Pipeline Advisory Committee. Pursuant to the Federal Advisory Committee Act, I'm the Designated Federal Official for GPAC and will serve as the presiding official today.

Our chairperson for the meeting is the Honorable Dave Danner who's chair of the Washington Utilities and Transportation

Commission. Before we get started, I'd like to introduce several guests, special guests today. You'll hear from him in a moment, the Honorable Skip Elliot, the Administrator of PHMSA. We also have Drue Pearce, the Deputy Administrator. Paul Roberti is online somewhere I know, he's our chief counsel, as well as Ben Kochman, our Director of Government, International, and Public Affairs.

Before we get started, I'll go over a few housekeeping items to just ensure the meeting runs smoothly today. This is a virtual meeting and not all participants will have full access or controls. While meeting committee members have full participation access, public participants will be provided the opportunity to comment and ask questions at the allotted times.

I'm sure you're familiar with our format. We'll plan to have the similar format that we provided before where there's an opportunity for public comment. If you're not

presenting or speaking, please mute your microphone to minimize disruptions. If necessary, take a moment now to check that you are muted. I think, John, you covered that as well.

We ask that you hold any comments until we open the floor for discussion. For members of the public when you are acknowledged, please limit your comments to about two minutes or less. If necessary, the chairperson may ask you to cut your comments short to keep the agenda moving.

Now you can also submit your written comments under the advisory committee docket. And that docket number -- and you'll hear it again and we'll have it up on screen. It's PHMSA-2016-0136. And then also, a transcript of this meeting will be available on public docket on the meeting page, and it'll be available about two to three weeks after the meeting.

Now in an effort to maintain the

order and decorum and the schedule throughout the meeting, we ask both the committee members and the public to adhere to these basic rules I'm about to cover. First, perhaps these are obvious to you, but please do not delay or disrupt the meeting whether by conversing separately during proceedings or by causing other distractions. Please don't interrupt the speakers or presenters.

Please follow instructions of the chairperson or myself during the meeting. And please note that anyone who disrupts the meeting will be disconnected. We have tools to make that happen. Now that concludes my housekeeping items.

I just wanted to mention, as John mentioned, this is a meeting to discuss the gas regulatory reform rule. I'd like to thank the staff for making the meeting possible today. A lot of effort went into this, and we have staff strung out across the United States to present to you today and cover the various topics that

we have.

So not only with COVID and dealing with the pandemic since March, it's presented its own challenges. But I can tell you related to moving policies forward such as the one we're talking about today, the staff of PHMSA, I'm just so proud of, stepped up to the challenge to make this meeting possible, and others possible, as well, that we've had. You're well aware of the progress that we've made on a number of fronts, and here today, again, the topic is gas reg reform.

So that concludes what I had to say. At this point, I'll turn it over to the Honorable Dave Danner for you to kick it off. And Dave, thanks. Over to you.

CHAIRMAN DANNER: All right. Thank you. Good morning, Alan. Can you hear me?

PARTICIPANT: Yes.

CHAIRMAN DANNER: All right, great. Thank you. All right. As Alan said, my name is Dave Danner. I'm the chair of the

Washington Utilities and Transportation Commission, and I'll be serving as the chairperson for the meeting this morning. So my job is to official call this meeting to order, and I hereby call this meeting to order, this meeting of the Gas Pipeline Advisory Committee.

So, this meeting is being recorded, and a transcript will be produced for the record. The transcript and the presentations will be available on the meeting page of the PHMSA website, and that's primis.phmsa.dot.gov. So that's primis, P-R-I-M-I-S, dot, P-H-M-S-A, dot, D-O-T, dot, G-O-V. It's also on the eGov docket on Regulations.gov, regulations, dot, G-O-V. The docket number for this meeting is PHMSA-2016-0136. That's PHMSA-2016-0136.

Before we get started again, a few reminders as we've already suggested. Please remember to introduce yourselves each time you speak so the comments can be picked up and properly recorded in the transcript for the

meeting. Additionally, members should hit the Raise Hand on the toolbar of Microsoft Teams, and that alerts us if they wish to make a comment and I will call on you. So at this point, let's take a roll call. Cameron, are you on the line?

MR. SATTERTHWAITE: I am here.

CHAIRMAN DANNER: Great. Can I ask you to take roll?

MR. SATTERTHWAITE: All right. So I'm going to call each member and if you can just say, here, and I will mark you down. Diane Burman?

MS. BURMAN: I am here. Just a note. I will be offline between 11:00 and 11:30 for a conflict, but then I'll be right back. Thank you.

MR. SATTERTHWAITE: Okay. Thank you. Peter Chace?

MR. CHACE: I'm here.

MR. SATTERTHWAITE: David Danner?

CHAIRMAN DANNER: Here.

MR. SATTERTHWAITE: Sara Longan?

DR. LONGAN: Good morning. Here.

MR. SATTERTHWAITE: Good morning. Terry Turpin?

MR. TURPIN: Here. Just noting that I will also be offline between 2:00 and 3:30 for a conflict.

MR. SATTERTHWAITE: All right. Ron Bradley?

MR. BRADLEY: Good morning. Here.

MR. SATTERTHWAITE: Andy Drake?

MR. DRAKE: Here.

MR. SATTERTHWAITE: Mary Palkovich?

MS. PALKOVICH: I'm here.

MR. SATTERTHWAITE: Richard Worsinger?

MR. WORSINGER: Here. Good morning.

MR. SATTERTHWAITE: Chad Zamarin?

(No audible response.)

MR. SATTERTHWAITE: Jon Airey?

MR. AIREY: Here.

MR. SATTERTHWAITE: Michael Balboni?

(No audible response.)

MR. SATTERTHWAITE: All right. Mark Brownstein?

MR. BROWNSTEIN: Here.

MR. SATTERTHWAITE: Sara Gosman?

MS. GOSMAN: Here.

MR. SATTERTHWAITE: And Robert Hill?

MR. HILL: Here.

MR. SATTERTHWAITE: All right. We have a quorum. Back to you, Dave.

CHAIRMAN DANNER: Thank you. So we do have the majority of the members present. I'm going to hand things back to Alan Mayberry at this time and he will introduce the PHMSA attendees. Alan?

MR. MAYBERRY: Okay, thanks. Whoops. Thank you, Dave. Well, for starters, we have John Gale, Sayler Palabrica, Cameron Satterthwaite who you've heard from. We also have Lauren Clegg who's our staff attorney today. And in addition to who I covered so far, I think that covers it. I'll turn it back

to you, Chairman Danner.

CHAIRMAN DANNER: All right, great. So at this point, we're just going to review the agenda. We have today we are being asked to take six votes on a number of topics: farm taps, pressure vessel test requirements, incident report criteria, master meters, mechanical fitting failure reporting, plastic pipe, rectifier remote monitoring, atmospheric corrosion, welder re-qualification, and pre-testing short segments and fabricated assemblies.

We will take each of these topics in order. Some of the votes, we will be grouping several topics together. If we have a need to break those out to take separate votes, we will do so.

At this point, Alan, I'm going to turn it back to you and we'll get right into the first topic area if that's okay with you, unless there's anything else we need to cover. Oh, I think -- excuse me. First of all, we're

going to hear from our administrator, Skip Elliott. So do you want to make the introductions?

MR. MAYBERRY: I think you already have. But thank you, Dave. I'd like to introduce Howard "Skip" Elliott, our administrator. Skip, we look forward to hearing your remarks today.

ADMINISTRATOR ELLIOTT: Thank you. All right, Chairman Danner and members of the committee, it's good to be with you today. And thanks for giving me the opportunity to speak with you about pipeline safety.

I'm delighted to be here today using some of this new technology. Actually, I'm just in the room right across the hall from where the PHMSA staff is meeting. So we're trying some new technology today. But I'd also like to thank you for your flexibility regarding the virtual meeting. I know that this is still something we're trying to get used to. And I'd like to say how grateful I am

that you're able to join us today given perhaps some of the technological issues that might occur.

I'm now moving, hard to believe, into my fourth year here at PHMSA. As many of you are probably aware, prior to joining PHMSA, I worked in the freight rail industry for many years where I focused on a variety of topics that included public safety, security, the environment, occupational health, and most of all, the safe transportation of hazardous materials. During my 40 years with the railroad industry, I did witness devastating impacts that major incidents can have on people, communities, and the environment. And it's these experiences that shaped my personal commitment so much so that I really firmly believe that it must always be PHMSA's top priority.

As you know, PHMSA's mission is to protect people and the environment by advancing the safe transportation of energy products and

other hazardous materials that are essential to our daily lives. The nation's 2.0-million-mile pipeline transportation system carries the vast majority of gas used to power and heat American homes and businesses. In pursuit of our mission, PHMSA promotes the safe, reliable, and environmentally sound operation of that vital energy system.

Like, Alan, I am extremely proud of the dedicate professionals here at PHMSA who work hard every day to achieve this mission through comprehensive inspections, investigations, public and industry outreach, policy, and rulemaking. And this Gas Pipeline Advisory Committee serves as a key part in the rulemaking process. The input that you provide helps inform our rulemaking and allows us to make the best possible decisions regarding pipeline safety.

I'm continually impressed by the quality, diversity, and dedication of our advisory committee members. So I think it's

appropriate to pause and thank you once again for your selfless commitment to the Gas Pipeline Advisory Committee. You are all essential in attaining PHMSA's pipeline safety objectives.

I'm proud to say that PHMSA's three federal advisory committees are often seen as among the very best at DOT, and we really have you to thank for that. But neither PHMSA nor all of you can meet our shared safety goals alone. We're all here today in recognition of the fact that while countless stakeholders are involved with pipeline safety, identifying and resolving pipeline safety issues is a joint responsibility. Despite the pipeline industry's admirable safety record, there is always room for improvement. In fact, I will always remain confident that we can reach the aspirational but achievable goal of zero incidents.

We cannot reverse the events that led to prior accidents. But what we can do and

what we must do is come together to develop innovative solutions to pipeline problems, thus strengthening the industry while protecting the people it benefits. For its part, PHMSA is working to promulgate rules to help operators identify issues and abide by safety regulations that correct issues and concerns so that they never become serious problems.

Today, you'll discuss one of these rules, the Gas Pipeline Regulatory Reform, Notice of Proposed Rulemaking. This rule adopts several regulatory relief items that have evolved from petitions for rulemaking, PHMSA staff remember, and public comments. This rule includes several amendments that will alleviate certain regulatory burdens on the construction, maintenance, and operation of gas transmission, distribution, and gathering systems while maintaining the safety of such facilities.

We've worked together to accomplish great things, but I think it's important that

we always look to the future. Yes, our nation's pipeline system is incredibly safe. But we must continually chase our goal of zero incidents. One of the most important questions we should ask ourselves is, what more can we do to ensure pipeline safety?

I encourage you to take advantage of our time together to offer your input and help create a rule that will meaningfully enhance safety. This will help protect both people in the environment while improving the nation's pipeline system. Thank you all for working with us to create the best safety standards for everyone involved because at the end of the day, we're all in this together. Thank you so much for your time today and good luck with your meeting.

CHAIRMAN DANNER: Thank you so much, Administrator Elliott, and I hope we will do you proud today. At this point, I would like to turn it over to PHMSA staff and let's just get right into the first issue which is farm

taps. So let me turn it over to Alan or John.

MR. GALE: Thank you, Chairman Danner. Members and public, this is John Gale, the Director of Standards of Rulemaking in the Office of Pipeline Safety. Sorry, just getting my microphone set up here. And Bobby, thank you for putting the slide deck up on the screen.

And, also, just to point out, if anyone has any IT issues during the meeting, for the members, there's some information on your meeting invite, some contact info you can call if you need to talk to folks. And also for the members of the public, there's information and contact info that you can use on the meeting page. So with that being said, like Chairman Danner said, let's get into our topic today which again is our Gas Regulatory Reform Rule. Bobby, if we can go to the next slide.

And before we get directly into farm taps, we're going to give a little background

information. As you've probably heard before today, we're going to break this rulemaking into about six votes. Vote 1 will be farm taps. Vote 2 will be our pressure vessel testing requirements. Vote 3 will be the incident reporting criteria.

And then we're going to have a couple votes where we're going to mix a couple topics together just for time and expediency. But as Chairman Danner mentioned, if the conversation is such that we need to split those topics out, we will. So Vote 4 will be master meters and also mechanical failure reporting requirements and then also then plastic pipe. Next slide, please.

Then Vote 5, we'll get into the issues of rectifier remote monitoring and atmospheric corrosion. And then Vote 6 will be welding process requirements and pre-testing short segments and fabricated assemblies. And also because of the diversity of these comments, we're going to have different

speakers today on different topics.

And also we have a variety of SMEs available, different subject matter experts available depending on the topic. We have Blaine Keener here for us to support us in discussing incident reporting and Chris McLaren here supporting us on a variety of distribution issues. And Mr. Nanney of course is always a participant in our meetings, no matter the topic. Max Kieba is here to support us on some plastic pipe issues, and Mr. Gary Bauman is here also to support us on some welding requirements.

The final vote will also then be a vote on our committee report. It was an additional vote we now do at the end of our meetings to make sure that this vote -- basically this transcript and the votes recorded represent the report required by the statute that constitutes this advisory committee. So Bobby, next slide, please.

So a little background information.

So this rulemaking has its origins in a couple of executive orders regarding regulatory reform. And the first one is Executive Order 13,771 titled Reducing Regulation and Controlling Regulatory Costs which basically established expectations of two regulatory actions for each significant regulatory action or referred to as the Two-For-One. And it also set the department's regulatory cost budgeting scheme associated with regulatory development.

The next executive order was Executive Order 13,777 entitled Enforcing the Regulatory Reform Agenda which required agencies to establish a regulatory reform task force and identify potential deregulatory actions. And finally, there was Executive Order 13,783 entitled Promoting Energy Independence and Economic Growth which requires agencies to identify burdens on energy resources. Next slide, please.

So in response to those executive orders, the department took several actions.

First, DOT proposed a notice in the Federal Register called the Transportation and Infrastructure Notice which solicited comments on regulations that pose obstacles for transportation infrastructure. The DOT received over 200 comments, including 6 relevant to pipeline safety regulations in response to that notice. There was also the DOT Notice of Regulatory Reform published in 2017 which requested comment on rules and other actions eligible for repeal, replacement, suspension, or modification without compromising safety. DOT received over 3,000 public comments, approximately 30 of which were relevant to pipeline safety regulations.

And also something I'm personally very proud of, we also constitute out our own review of the regulations. We establish groups looking at all aspects of the regulations, both hazardous liquid and gas, gas distribution, gas transmission, et cetera, and looking at our regulations, looking at our petitioners for

rulemaking and basically got our folks together to identify where those areas of the regulations needed review and needed revision to maintain safety but at the same possibly provide cost savings burden.

And I think it's very important to point out that during that whole development, our administrator, Skip Elliot, and our deputy administrator, Drue Pearce, were very adamant that while we were developing these proposals and these recommendations that though we can look and try to save cost burdens where appropriate that it was also very important not to drop the safety bar at all. And that was a very strict standard that both of them imposed on us. And we have very important, very difficult discussions on all these proposals to assure that that occurred. Next slide, please.

So based on that background back in June of 2020, PHMSA proposed an NPRM that proposed ten amendments to the gas pipeline safety regulations. And these proposals were

drawn from the executive order, the regulatory reform docket comments, the infrastructure docket comments, petitions, and of course, the PHMSA staff review that I mentioned earlier.

And PHMSA estimates that the ten proposed amendments would result in a cost savings of approximately 129 million dollars in annualized cost savings for the industry. In addition, PHMSA proposed a parallel NPRM for hazardous liquid issues. And those topics, including the amendments to part 190 that affect gas will be considered in a separate meeting and we hope to have probably beginning of next year sometime.

So this slide here basically gives you a quick overview of what the cost savings are for each element. Again, we're dealing with ten separate and distinct elements. And as you can see here, the cost savings really are driven by two different proposals, the farm taps and the atmosphere corrosion. There is also some associated cost savings or quantified

cost savings for master meters, mechanical fitting failure incident definition.

But as you can see, the majority of the cost savings are driven from the farm tap proposal and the proposal related to atmosphere corrosion monitoring. And what I'd like to do real quick is go through a couple slides now. And what we'll do is just kind of outline, and these are just summary slides from the cost benefit analysis or the regulatory impact analysis on these different proposals. So you have an idea of how we came up with those cost savings numbers.

So regarding farm taps, for farm taps operated by distribution operators, and this is based on comments from the American Gas Association, PHMSA estimated that there were approximately 81,000 farm taps are operated by local distribution companies for a net cost savings of 1,546 dollars every three years. And that basically comes from a cost savings of 1,625 dollars for each 192.740 inspection,

which occur once every three years, minus the cost associated with including this farm tap now in DIMP of 79 dollars. And that ends up with a cost savings for gas distribution operators of approximately 42 million dollars.

For our farm taps operated by unregulated gathering and production lines, and this again was based on comments from IPAA and other production gathering organizations, PHMSA estimated that there were approximately 75,000 farm taps connected to unregulated source lines with an average cost of 192.740 inspection of 1,013 dollars every three years which equates out to basically an annual cost savings of 25 million dollars. PHMSA anticipates that operators of farm taps connected to regulated gathering and transmission lines will continue to comply with 192.740 and therefore will not experience any cost savings. And the grand total of that cost savings ends up being roughly 64 million dollars per year. Next slide, please.

In this slide, it's a little long. But it basically outlines the cost savings associated with our atmospheric corrosion monitoring requirements. So the cost savings from reduced inspection frequency is 30 million dollars in year 1 and increases over time. And so there's a little bit of a difference with the number you see of the 61 at the bottom there -- 61 million dollars.

The cost savings represents the difference between the cost to perform atmospheric corrosion inspection on service lines with remotely read meters every five years versus every three years. Service lines with manually read meters are visited routinely by operator personnel and therefore do not result in cost savings. Based on annual reports, PHMSA estimated approximately 68 million service lines in year 1 and increases by 0.57 percent each year.

Based on industry comments, PHMSA estimates that approximately 47 percent of

service lines include remote meter reading technology and that the share of remotely read meters will increase over the assessment period. In year 1, PHMSA estimates 30 million remote meters -- 32 million remote meters. I'm sorry. PHMSA estimated that an atmospheric corrosion inspection takes approximately 0.2 hours with a $40.13 hourly cost of labor, assuming that a meter reader can inspect five service lines in an hour on average.

Then the cost savings from coordinating inspections is nine million dollars in year 1 and again increases over time. That cost savings represents the cost difference between performing an AC survey on its own compared with a cost to add an AC survey to a leak survey multiplied by the number of AC surveys each year on a five-year interval. APGA commented that adding an AC inspection to a leakage survey is approximately $4.50 each, excluding overhead labor costs. And PHMSA estimated a cost savings of close to

a dollar per inspection, including overhead. And that ended up representing a total annualized cost savings of 61 million dollars.

Next side, please. And this is the last slide on RIA. I'll represent some of the other proposals that had a quantifiable cost savings related to master meters and the MMF form and the incident definition. And basically, for the master meters which estimate a cost savings of 480,000 dollars per year. PHMSA estimates an average hourly cost for integrity management personnel of approximately 90 dollars per hour.

New master meter operators save 22 hours up front from avoided IM plan preparation and threat identification burden. Both new and existing master meters say four hours every five years from avoided plan updates. PHMSA determined that there are approximately 5,461 existing master meters, 30 new master meters each year, and 30 master meters exit the market each year. And that gets us to our cost

savings of approximately 480,000 dollars per year.

For the mechanical fitting failure form, we estimated cost savings of 940,000 dollars per year with an average of 13,000 mechanical fitting forms each year, approximately one hour per form with a net reduction times the labor rate of roughly 76 dollars per hour. So as you can see here, it says a mechanical fitting failure form takes approximately one hour to fill out and that providing the total number of MMS on the distribution annual report would be 5 percent as burdensome and therefore resulting in the 0.95 hours per report savings.

Regarding the incident definition which we believe will save roughly 30,000 dollars per year, it equates to a savings of 40 fewer incident reports per year times 10 hours per report multiplied by a labor rate of approximately 76 dollars per hour. Based on incident reports between 2010 and 2018, PHMSA

estimated that approximately 40 incidents per year resulted in property damage between 50,000 dollars and 122,000 dollars which is the new number that was proposed in the NPRM and did not result in other reportable consequences. These would not be reported under the proposed rule, in other words.

And then below there, you can see the breakdown between the different areas that impact roughly 26 distribution incidents, 13 gas transmission incidents, et cetera, and that each incident report takes about ten hours to prepare with an average labor rate of 76 dollars per hour. And that's how we get to our cost savings of approximately 30,000 dollars per year. Next slide, please.

And that covers our discussion of the RIA and the little summary of the RIA there. And what I'd like to do is get into a little bit of the general comment discussion we received on this rulemaking. We received 43 comments to the NPRM. The industry and

operator groups included TC Energy, Oleksa and Associates, Sander Resources, AmeriGas Propane, Superior Plus Propane, Southwest Gas, Norton McMurray, and Theresa Pugh Consulting.

The industry trades included American Gas Association, American Petroleum Institute, American Public Gas Association and INGAA, otherwise known as the Associations, GPA Midstream, Independent Petroleum Association of America, Pennsylvania Independent Oil & Gas Association, Ohio Oil & Gas Association, National Propane Gas Association, and the Plastics Pipe Institute. From some of the government groups, we received comments from NTSB and NAPSR. And from public advocacy groups, we received from the Pipeline Safety Trust and the Freedomworks Foundation. And we also received several citizen comments. Next slide, please.

And so I'd like to real quick go through some of the general comments before we get into farm taps, our first topic. So some

of the general comments, the majority of pipeline industry commenters generally supported the proposed regulatory changes, agreed that pipeline safety would not be reduced, and recognized that a cost savings would result. Specific comments or requested modifications are addressed individually in this meeting.

Multiple public commenters opposed any reduction in regulatory requirements. One commenter requests maintaining the current level of safety standards and another recommends that the pipeline industry reduce pipeline mileage and move toward renewable energy. PHMSA's response, PHMSA appreciates the comments received in response to the NPRM topics. The proposed amendments have been determined to maintain the current level of safety standards. Next slide, please.

Multiple commenters supported updates to the Incorporation by Reference standards to incorporate more recent revisions

to those standards. GPA Midstream specifically requested that PHMSA enhance the IBR process to review updated versions of documents already IBR and either adopt the latest edition or provide an explanation for not adopting the document within one year of publication. PHMSA's response, PHMSA will consider these comments and recommendations for future rulemaking actions.

PHMSA reviews and, if appropriate, updates standards incorporated by reference periodically. Additional standards not referenced in the NPRM are being considered for updates in separate actions. And I would like to point out we actually have two rulemaking actions initiated, and we have Rulemaking Identification No. 4 to address specifically our outdated standards. Next slide, please. Next slide, please.

The PST commented on the general methodology used for the regulatory impact analysis, questioning that industry burden is

identified as negative costs rather than benefits as well as lacking explicit quantified benefit from the proposed rule elimination or revision. Benefits are presented as no expected degradation of safety. Pipeline Safety Trust also reminds PHMSA that they believe a cost benefit test is not appropriate in the context of regulations related to human health and safety, nor an appropriate way to decide whether the regulations should be altered.

One industry SME requested modification to the cost benefit analysis and methodology to account for secondary effects on customers for unplanned, emergency outages. Next slide, please. PHMSA's response, the Office Management and Budget, or OMB, directs federal agencies to account for economic impacts to a regulated community on the cost-side of the ledger. Therefore, the cost-savings to an operator are appropriately treated as negative costs in the RIA.

PHMSA has considered the safety impacts of the proposed rule based on available research and information to ensure that the proposed amendments would not reduce pipeline safety. The Pipeline Safety Act and Executive Order 12,866 which addresses rulemaking development and OMB guidance require PHMSA consider the costs and benefits of pipeline safety standards. PHMSA is performing research on the costs that pipeline failures impose on downstream customers, however PHMSA does not anticipate the proposed rule would be adversely impact the reliability of the gas pipeline transportation system. Next slide, please.

Okay. What we'd like to do now is move into some of our topics. We'll have different presenters for these topics. And the first topic we're going to have is farm taps, and that's going to be led by Sayler Palabrica who's going to be supported by Mr. Chris McLaren from a technical standpoint. Sayler?

MR. PALABRICA: Thank you, John. To

begin with, we'll go into what we're talking about when we refer to farm taps as they relate to 192.740 and distribution integrity management program requirements. So the most important thing is that the term, farm tap, is not a regulatory classification or definition in neither part 191 nor part 192.

However, the term colloquially refers to a pipeline providing gas services to customers along a transmission, gathering, or production pipeline rather than from a traditional distribution system. And also, we note that delivering natural gas to a residential or commercial customer is not a production or gathering function under either part 192 or API Recommended Practice 80.

So on farm taps, operators often agree to provide gas service to landowners along a pipeline in exchange for a right-of-way agreement or other terms. These are typically but not always in Class 1 locations, which is where the term, farm tap, originates.

Significant portions of a farm tap may be owned or maintained by the customer.

There are some unique safety considerations with these facilities. Unlike a typical distribution system, the source pipeline may operate at high pressures and the source pipe is also typically not odorized unlike a distribution system which must be odorized. By definition, the source pipeline is not typically operated by a local distribution company. And the farm tap itself may be operated by the source pipeline operator, a local distribution company, the customer, or some combination of those or other entities.

In 2015, we published a final rule attempting to eliminate duplicative integrity management requirements while addressing over pressurization risks for farm tap customers. That rule exempted individual service lines directly connected to production, gathering, and transmission pipelines. In other words,

the service line portion of a farm tap from distribution integrity program requirements. However, it instead required operators inspect pressure regulating devices on farm tap service lines once every three years, and that's in the new section 192.740.

However, some farm taps are owned or operated by local distribution companies. And these distribution operators favored applying the existing DIMP requirements that we had accepted them from versus implementing the new prescriptive inspection requirements. However, the transmission or gathering operators typically preferred a prescriptive inspection requirement to establishing a new integrity management plan for these secondary infrastructure.

In addition to the proposed rule, PHMSA has initiated the following projects with regard to farm taps, the first of which is an exercise of enforcement discretion published in March of 2019. And that indicated that PHMSA

would not pursue enforcement of 192.740 for farm taps included under a DIMP. And this policy would be codified by the proposed rule finalized.

Additionally, PHMSA published a proposed farm taps frequently asked questions on April of 2020, and this consists of 20 FAQs on the applicability of parts 191 and 192 with respect to farm tap facilities. PHMSA is working on finalizing this document considering the public comments. And we will publish updated guidance on the agency website when that's complete.

So in the NPRM that we're discussing today, PHMSA proposed the following for a service line directly connected to a regulated gathering line or a transmission line that is included in a DIMP program is exempt from the inspection requirement at 192.740. And that codifies the enforcement discretion that we just discussed. A farm tap service line that is not included in the DIMP must continue to be

inspected per 192.740. So in other words, they have the choice to comply without a 740 or a DIMP. Service lines connected to non-regulated gathering or production source pipelines would be exempt from 192.740 and annual reporting. And then the existing DIMP exception would continue to apply.

So PHMSA estimated that the NPRM would affect approximately 150,000 farm taps divided between farm taps operated by local distribution companies and farm taps connected to unregulated gathering and production pipelines. And like we stated earlier in the presentation, PHMSA assumes that farm taps operated by transmission or regulated gathering operators will continue to comply with the existing 192.740 inspection requirement and therefore would not be affected by the proposed rule. So regarding comments, some gathering operators and producers commented that the part 192 requirements for distribution pipelines do not or should not apply to farm taps connected

to production pipelines and rural gathering lines, and they request explicit regulatory exceptions to all or portions of 192 and 191 for such facilities.

The -- I believe that's the Independent Oil & Gas Association of West Virginia commented that even as revised, the proposed farm tap rules are not justified and that a producer or unregulated gathering line operator with one qualifying farm tap could be subject to hundreds of regulations otherwise not applicable. And the IPAA noted that many farm taps and related facilities are a result of state statutes or regulations which govern contractual agreements between producers and landowners or other parties and that imposing regulations on those facilities interferes with their established contractual -- sorry, something popped up on my screen -- or statutory relations.

So PHMSA's response is that regulation of service lines and farm tap

configurations is not a new feature of either the NPRM or the 2015 Miscellaneous Rule. The modern definition for the endpoint of a service line was finalized in April of 1973. And regulation of farm taps and other delivery lines where a meter is not present was an explicit goal of the NPRM for that action. And excluding service lines connected to unregulated gathering and production pipelines from the scope of part 191 and 192 would be a consequential change outside the scope of the NPRM. And we can move on to the next slide.

The IPAA and supporting organizations commented that the prior discussions of farm taps have not fully addressed issues related to definitions, terminology and clear requirements for farm taps. IPAA and the IOGAWV requests that PHMSA explicitly exclude farm taps originating from nonregulated lines and the definition of a service line or clarify in the proposed Farm Tap FAQs that customer-owned lines and

equipment are not jurisdictional.

PHMSA's response, the intent of the proposed rule is solely to address the applicability of 192.740 and DIMP requirements for farm taps rather than to resolve the broader definitional issues associated with farm tap service lines. PHMSA will consider these comments and fully respond to these and specifically the issue of operator responsibility for customer-owned service lines when we move to finalized the proposed Farm Tap FAQs. And we repeat that excluding farm taps -- - excluding service lines connected to unregulated gathering and production pipelines from the scope of 191 and 192 entirely would be a consequential change outside of the scope of the proposed rule.

So moving on to additional comments. The Associations generally supported the amendment but opposed the implied definition of the start of a service line in paragraph (c)(4). They and others requested that

operators be allowed to voluntarily classify far taps or other service line piping in the same manner as the regulated source pipeline, i.e., as regulated gathering or transmission depending on what it's connected it, even if it could be classified as distribution. And then all applicable regulations would apply on the classification, and that's based on comments that they have made on the proposed safety of gas transmission and gas gathering rule.

TC Energy suggested revisions to 192.740 in lieu of defining where farm tap service lines start that would instead apply the requirement to any pipeline, other than one that is operated as part of a gas distribution system that delivers gas to a farm tap customer. So more comments related to definitions, several industry commenters requested that PHMSA update or create definitions for transmission line, service line, farm taps, and distribution center.

Additional industry comments suggest

PHMSA allow operators to establish variable start points for service lines in farm tap configurations reflecting the variability of equipment, ownership changes, and operating pressures on such facilities. Industry commenters also suggested that PHMSA recognize that an operator can deliver gas directly to customer piping directly from a production, gathering, or transmission line without first passing through a service line. Again, this rulemaking was intended only to address the applicability of 192.740 and DIMP requirements.

Therefore, PHMSA suggests removing paragraph (c)(4), thus eliminating language implying when a service line begins. Regarding the number of definitional issues, we will attempt to address these to the extent possible in the proposed Farm Tap FAQs. Additionally, certain aspects of the transmission line definition raised by commenters are being considered as part of the safety of Gas Transmission and Gas Gathering proposed rule

proceedings.

Finally, future rulemaking may be considered if necessary to address any remaining definition-related issues surrounding farm taps once those actions are completed. This concludes the PHMSA response to comments on the Farm Tap topic. In light of the comments received from the NPRM, PHMSA recommends the Committee consider adopting the proposal with the following change, and that is removing the proposed paragraph 192.740(c)(4), eliminating language implying when a service line begins in a farm tap facility.

MR. GALE: And Chairman, this is John Gale. I think we're ready to receive public comment on this matter at this time. And if you could just direct the public that want to make such a comment to raise their hand, use the raise the hand feature in Microsoft Team so that you can recognize them. Also, you may need to open up the caret associated with attendees to see the hands

being raised to make public comment on this issue.

CHAIRMAN DANNER: All right. Thank you, John. And yes, there are several hands already raised. Let's start with Christopher Osman. Can you identify yourself, please?

MR. OSMAN: Yes. Good morning, everyone. Am I coming through okay?

CHAIRMAN DANNER: Yes, you are.

MR. OSMAN: Great. Thank you, Chairman Danner. My name is CJ Osman. I'm with INGAA, the Interstate Natural Gas Association of American. Thanks to PHMSA for putting this together in these challenging times, and thanks for the opportunity to comment.

Just wanted to say briefly that we appreciate PHMSA's proposal to remove the proposed 192.740(c)(4), that point that was just made about defining where the service line and the farm tap starts and stops. We do believe that given those two other ongoing

proceedings where this service line starting point issue is being discussed, the pending second part of the gas transmission rule that was mentioned, and also the FAQs that were mentioned. Trying to address that issue in a third place here adds confusion rather than clarity.

And we also would just like to note that we definitely supported the GPAC's recommendation to help resolve this issue about two and a half years ago in the March 2018 GPAC meeting on that gas transmission rule where the advisory committee recommended that PHMSA allow operators the ability to voluntarily designate certain lines as transmission and also make some changes to the distribution center definition to help resolve this farm tap concern and other concerns moving forward. So appreciate that recommendation that was just up on the screen, and we support it. Thanks for the opportunity to comment.

CHAIRMAN DANNER: All right. Thank

you. Matthew Hite?

MR. HITE: Yes, can you hear me?

CHAIRMAN DANNER: Yes, we can.

MR. HITE: Thank you, Chairman Danner, and good morning. My name is Matt Hite, M-A-T-T H-I-T-E for the record. I'm vice president of government affairs for GPA Midstream Association on behalf of the nearly 70 member companies that comprise GPA Midstream membership. I would like to provide the GPAC with the following comments on PHMSA's proposed requirements for farm taps.

As indicated in our previously submitted written comments, GPA Midstream does not agree that farm tap piping should be treated as part of a distribution service line starting at the first isolation point downstream from the source piping. There's no support for using that approach in the tax structure or history of the gas pipeline safety regulations. And apply the gas distribution service line regulations to piping downstream

of the first isolation point would impose substantial costs on the Midstream industry without creating justifiable safety benefits, particularly for operators of non-jurisdictional production and gas gathering pipelines.

Accordingly, GPA Midstream supports PHMSA's decision to withdraw that proposal from the changes on their consideration in this rulemaking proceeding. With that said, GPA Midstream still believes it is necessary for PHMSA to acknowledge in the final rule that operators have the discretion to determine the appropriate classification of piping in farm tap configurations. A wide variety of farm tap configurations exist throughout the country, and operators have traditionally used a functional approach in determining whether piping should be classified as production, gathering, transmission, or distribution in particular scenarios.

In some cases, the classification of

piping may change in a valve, regulator, meter, or other component or at the point where custody of the gas transfers to the customer or another pipeline operator. In other cases, a production, gathering, or transmission line may deliver gas directly to a customer without passing through a distribution line. To provide the certainty required for the GPAC to make a favorable recommendation today, PHMSA must acknowledge that these principles will continue to guide operators in determining the classification of regulatory status of farm tap piping. And with that, thank you for letting me make a comment.

CHAIRMAN DANNER: All right. Thank you. All right. We have somebody who is signed up. You've identified yourself only as SI. Are you there and could you identify yourself, please?

MS. GINSBERG: Yes, this is Susan Ginsberg speaking on behalf of the Independent Petroleum Association. It was just a premature

send when I was trying to identify myself when logging in. IPAA appreciates the proposed changes that PHMSA has put forward, and we very much look forward to more clarity and hopefully appropriate regulatory relief when the FAQs come out.

IPAA members have strongly urged PHMSA to recognize that these farm taps are not distribution lines and that the suppliers, particularly in rural areas, that they are not distribution companies. We think that's important so that the regulation is tailored appropriately. So going forward with the -- given the rather narrow scope of the changes that can be accommodated in this rulemaking, we hope that the FAQs can provide clarity on definitions and also acknowledge the numerous scenarios that exist for farm taps.

It's also important given the various rulemakings that are going on right now, both the gathering safety rule and the FAQs, it's just -- it makes it difficult for

affected parties to understand what are unregulated lines. And so just more clarity that PHMSA can provide would be greatly appreciated. Thank you.

CHAIRMAN DANNER: All right. Thank you. And that appears to be all of the hands that are raised. I don't see any others. So I think at this point, let's begin the discussion. Let me turn to my colleagues on the committee and ask if there are any comments that you would like to make to start the discussion.

(No audible response.)

CHAIRMAN DANNER: All right. I'm seeing no -- oh, there we go. Mark Brownstein, good morning.

MR. BROWNSTEIN: Yes, good morning. Thank you to the staff of PHMSA for holding this meeting under less than ideal circumstances. It's very much appreciated. So Mark Brownstein, Environmental Defense Fund.

I guess one question I have is

several of the commenters and I believe PHMSA itself is reserving certain definitional issues for the farm tap FAQs. And I guess I would just like a little better understanding as to what the farm tap FAQs are, what they will contain, and what force and effect they have in terms of regulatory authority and/or enforcement.

CHAIRMAN DANNER: All right. Does anyone from PHMSA want to respond?

MR. GALE: Yes, thank you, Chairman Danner. This is John Gale. Chris McLaren, would you mind giving a quick review of that of what's in the FAQs. But just to be clear in terms of force and effect, they're based -- they're going to and they can only interpret or give answers to frequently asked questions based on the current statute.

We cannot change any requirements, right? It's based on what's currently in part 192. It's based on the current scope of part 192 and the definitions of things like service

line, distribution, and transmission line. And I think that's why some of the commenters noted that there's a connection between what is being brought up here in terms of when the regulations apply to service lines in context of what was discussed in the gas transmission rule because there's discussions in there of how you could -- the change in the definition of the gas transmission rule and how would it then play out to these farm taps.

But these FAQs have to be based on the current regulations and how they apply to farm taps. They can't institute new policies. So with that said, I'd like Mr. McLaren, if you can give a quick overview of what's in those FAQs, it'd be appreciated.

MR. MCLAREN: Thank you, John. Yes, as mentioned previously, there are multiple regulatory movements affecting farm taps and trying to keep the topic available and in communication to improve clarity. The first is the RIN2 (phonetic) gas transmission rule which

will affect some of that.

Following the issuance of this final rule for gas regulatory reform affecting farm taps, things will move to issue farm tap FAQs which are frequently asked questions which would then be worked through our farm tap FAQ team led by Sayler Palabrica, including members of PHMSA and NAPSR to discuss certain questions that have arisen and have been submitted by the public. First off, we would discuss how the exercise of regulatory discretion which allows operators to utilize either 192.740 or DIMP in handling the threats to their farm taps. That'll be finalized hopefully within this final rule.

We then move towards looking at applicability and providing some proposed flow charts for how operators could move through the discussion of the applicability of this proposed regulation and other, further farm taps. Discuss reporting O&M requirements, then, of course, get into the discussion of the

source of supply from regulated and unregulated sources and sometimes the effect of local or state statutes requiring service to communities and to individuals in very rural areas. That sort of provides an overview of the topic areas that we'll be covering.

There are a couple others that are more discrete but within O&M requirements and how to apply these requirements. Totally just trying to add clarity to the discussion. And by issuing it in the Federal Register notice, there would be the ability to accept public comments to that to further refine and even develop additional FAQs. Thank you.

(Simultaneous speaking.)

MR. PALABRICA: And just to add to that -- sorry.

CHAIRMAN DANNER: Yeah, that's all right. Go ahead.

MR. PALABRICA: This Sayler Palabrica with the Office of Pipeline Safety Standards and Rulemaking Division. Just to add

to that, I believe that what the public commenters were referring to in particular is Proposed FAQs 3 and 4, and that addresses the basic question which we didn't intend to address in this rule which is on a farm tap facility, where does the service line -- subject to all the distribution requirements in part 192, where does that start and where does that stop. And so the question of where does the service line on a farm tap begin and the source pipeline ends is something that we attempted to address through the FAQs, and we'll be considering the public comments on that.

CHAIRMAN DANNER: All right. Thank you. Mr. Brownstein, did you have any follow-up questions?

MR. BROWNSTEIN: None at this time. Thank you, Mr. Chairman.

MR. PALABRICA: Back to you, Chairman.

CHAIRMAN DANNER: All right. Thank

you. Jon Airey?

MR. AIREY: The one thing I want to suggest is I think there's a real lack of clarity so far in customer-owned or consumer-owned facilities, and I hope that is --

PARTICIPANT: Chairman Danner, are we ready for the next question?

MR. AIREY: -- clarified.

CHAIRMAN DANNER: Hang on just a second. Who was talking to me?

MR. AIREY: Jon Airey. I was making my comment that I thought --

CHAIRMAN DANNER: Yeah, I heard somebody in the background, Jon. I'm sorry to interrupt you. Go ahead.

MR. AIREY: What I was suggesting is in the FAQs, I think the area that has led to some confusion on farm taps is when the consumer owns the facilities -- and I think that needs to definitely need to be clarified in the FAQs. When the either producer or operator of the gathering line has no ownership

interest or operation interest in the farm tap, I think that needs to be addressed.

CHAIRMAN DANNER: All right. Thank you. Diane Burman?

MS. BURMAN: Thank you. Can you hear me?

CHAIRMAN DANNER: Yes, we can. Thank you.

MS. BURMAN: Okay, great. So I'm sorry. I just got back on, so you may have covered this. But I think it's on Slide 21 which is the farm tap's proposal, the NPRM proposed the following. Could you just pull that up for a minute, because I just want to make sure I'm understanding this right. Okay, yes. So this is.

So I'm looking at the service line directly connected to a regulated gathering line or a transmission line that's included and is exempt from the regulation. And then also service lines directly connected to nonregulated gathering or production source

pipelines are exempt. So I guess I'm pausing and just want clarification from PHMSA because I'm not sure I fully -- I have a discomfort with both of these exemptions.

I can say farm taps not needing to be in a DIMP plan but exempting them from 192.740 if they are in a DIMP plan, I think I'm just a little concerned because these farm tap requirements, in my mind, maybe shouldn't be exempted if coming off a nonregulated or production source unless the farm tap is going to a building that is on the operator's property. These are essentially services and perhaps should be treated as such.

And I'm just picturing a farm tap going to a school, which we do have in New York, and this exemption allows that farm tap, which is a service, to go to that school and be unodorized and not have any regulatory requirements if the law finds it comes off as nonregulated gathering. So I'm just wondering if you can clarify a little bit and if you see

my example as something that is a problem. I'm just trying to understand it a little more. Thank you.

MR. GALE: Mr. Chairman, John Gale here. I'd like to try to take a shot at that.

CHAIRMAN DANNER: Thank you.

MR. GALE: Thank you, Ms. Burman. So just real quick. So this is a little bit related to the topic we were discussing before as to are these service lines are not in the first place. Taking that off the table.

If they are a service line -- I'm not trying to get in argument. But let's just say per our regulations, per the current scope of part 192 and the definitions and our authority, they are a service line just given that fact. If they are, all this rule does would they would be exempt from DIMP which I believe they were already exempt from DIMP and 192.740.

However, if they are a service line, they would still be subject to all of those

requirements in part 192 as a service line, including things like odorization. So all it's exempting them from is annual reporting which was consistent with some of the other small infrastructure areas that we've done in the past and the requirement to do the regulator check. But if they are truly a service line and they meet the definition of a service line per our code, they would have to comply with all other applicable requirements in 192 as a service line. I hope that answers your question.

MS. BURMAN: Excellent. It totally does, and thank you for explaining it. I appreciate it. Thanks.

CHAIRMAN DANNER: So John, could you repeat that again just to clarify? What precisely are they exempted from?

MR. GALE: The requirement is currently in 192.740. And maybe Chris McLaren could help me read this real fast, which is to do a pressure regulator check of the service

line. It says, each pressure regulating or limiting device, relief device, automatic shutoff device, and associated equipment must be inspected and tested at least once every three calendar years, not exceeding 39 months, to determine if it is: in good mechanical conditions; adequate from the standpoint of capacity and reliability of operation for the service in which it is employed; and set to control or relieve at the correct pressure consistent with the pressure limits in 192.197; and to limit the pressure at the inlet of the service regulator, the 60 psi. So that's the only requirement. So they were currently exempted from DIMP, and we would just simply exempt them also from 740.

CHAIRMAN DANNER: All right. Thank you. So, just for my own edification, can you tell me -- this NPRM would cover, you say, about 150,000 farm taps. How many farm taps are there out there that would not be covered by this rule? Do we know?

MR. GALE: I'm not sure if we know the number of service lines. So we got data from both AGA -- this was something that was on AGA's radar for a little bit in terms of the numbers that are connected to distribution operators. And we've received data from IPAA for the unregulated sourcing.

I'd ask Sayler or if any of our commenters on the phone or on the line if they know of those connected to regulated transmission and/or regulated gathering. I'm not sure how many are associated with that number. I don't know if we looked there because we weren't really -- we didn't think there would be an impact there.

MR. PALABRICA: We do not have an estimate of the number of service lines that would be unaffected by the rule change, that is, those connected to the regulated source pipelines. However, our assumption is that they would continue to comply with the regulated checks in 740 rather than implemented

in a program. And they would be submitting those on their gas distribution annual report.

But there isn't really a way to identify service lines on -- or sorry, not -- you can identify lines. There isn't a way to identify farm taps, per se, easily on the gas distribution annual report form. So we do not have that estimate unless -- yeah. Sorry. This is Sayler Palabrica with Standards and Rulemaking.

CHAIRMAN DANNER: All right. Well, that's fine. I was just curious about what the universe looked like out there. And then there was IPAA basically in the comments page. They said that many farm taps are -- basically shouldn't be subject to regulations that interfere with the parties established contractual relations. Is the fact that there's a contract between a producer and a landowner, is that a reason for PHMSA regulations not to apply?

MR. GALE: Chairman Danner, this is

John Gale again. I'll see if there's anybody from our chief counsel's office that wants to chime in. But in general, I would say no. However, if you look at things like customer-owned piping, right? And if it's customer-owned piping, we have a history of saying in many cases that type of piping is not subject to our part 192 requirements.

The question is, is when does it go from unregulated source line to it's now a regulated distribution line to customer piping. And this is an issue that we've been working on for several years now and it's a difficult one. We've put a lot of resources to it, and we're going to continue to put a lot of resources to it.

But the key on this proposal is, is that we're simply trying to provide flexibility to operators that are current subject to the rules to either use 740 or use DIMP, right, because we believe that they provide that equivalent level of safety that we're looking

for. And to deal with the issues related to the scope and the applicability of part 192 to these farm taps is -- basically has to be addressed in a different venue and a different basically vehicle. We're going to move forward the FAQs.

And what we talked about earlier with Mr. Brownstein regarding the scope, we can only interpret them again in terms of what the current regulations say. If we believe that the current regulations get us to a point that we think needs further review, then we have to initiate a rulemaking to do that additional action we think is appropriate, if it's a scope issue or the like.

But that being said, again, this proposal is simply to try to provide flexibility to those operators that are subject to these current requirements, not to try to settle and solve any and all problems related to farm taps which is a very big challenges. And we're up to it and we're going to do it.

We're going to try our best at it. But it's not really the venue today to look at.

CHAIRMAN DANNER: All right. Thank you for that. Committee members, are there any other issues you wish to discuss? I see no hands raised. Okay. Mark Brownstein?

MR. BROWNSTEIN: Yes. So this is more by way of comment than question. I very much appreciate the last intervention on the part of PHMSA on this. And I would only say that these definitional and jurisdictional issues I think are ultimately critical. As this advisory committee has talked about many times in the past, the nature of the gas transmission and distribution system has changed, I would say significantly over the last several decades.

And once upon a time were thought to be minor conveyances and minor uses have now morphed into something quite substantial with significant potential impacts to public safety and the environment. And so I think these

definitional issues are incredibly important to address, although I appreciate that what we're doing here today is not to get into that. But I would just underscore the importance of doing so because as it stands right now, I have a lot of questions and frankly anxiety about the tap of the farm taps and what this may mean for public safety and the environment.

CHAIRMAN DANNER: All right. Thank you for that. Are there any other comments or questions from committee members?

(No audible response.)

CHAIRMAN DANNER: All right. Seeing none, I guess, John, I think we're probably at this point ready to bring this to a vote. Is that the will of the committee?

(No audible response.)

CHAIRMAN DANNER: It seems so. So let me ask if there is anyone willing to make a motion. Robert Hill?

MR. HILL: Robert Hill. I make a motion.

CHAIRMAN DANNER: Go ahead, sir.

MR. HILL: The proposed rule as published in the Federal Register and -- this is Robert Hill. The proposed rule as published in the Federal Register and the draft regulatory evaluation with regard to farm taps are technically feasible, reasonable, cost effective, and practicable -- excuse me -- if the following changes are made: remove paragraph 192.740(c)(4).

CHAIRMAN DANNER: Thank you. Is there a second?

MR. WORSINGER: This is Rich Worsinger. I'll second that.

CHAIRMAN DANNER: All right. Thank you. So Cameron, can we take a vote?

MR. SATTERTHWAITE: Yes, sir. This is Cameron Satterthwaite, PHMSA, and I will do the roll call. And if you agree with the language, you can say yes. If you don't, you can just simply say no and we will keep it going. We'll start off with Diane Burman.

MS. BURMAN: Yes.

MR. SATTERTHWAITE: Peter Chace?

MR. CHACE: Yes.

MR. SATTERTHWAITE: David Danner?

CHAIRMAN DANNER: Yes.

MR. SATTERTHWAITE: Sara Longan?

DR. LONGAN: Yes.

MR. SATTERTHWAITE: Terry Turpin?

MR. TURPIN: Yes.

MR. SATTERTHWAITE: Ron Bradley?

MR. BRADLEY: Yes.

MR. SATTERTHWAITE: Andy Drake?

MR. DRAKE: Yes.

MR. SATTERTHWAITE: Mary Palkovich?

MS. PALKOVICH: Yes.

MR. SATTERTHWAITE: Rich Worsinger?

MR. WORSINGER: Yes.

MR. SATTERTHWAITE: I have Chad. I don't think he joined us. I'll move on to Jon Airey.

MR. AIREY: Yes.

MR. SATTERTHWAITE: Don't have

Michael Balboni. I'll move on to Mark Brownstein.

MR. BROWNSTEIN: Yes.

MR. SATTERTHWAITE: Sara Gosman?

MS. GOSMAN: Yes.

MR. SATTERTHWAITE: And of course, Robert Hill?

MR. HILL: Yes.

MR. SATTERTHWAITE: All right. It is unanimous. Thank you.

CHAIRMAN DANNER: All right. Thank you. Let's now move on to pressure vessel tests. So Mr. Gale, back to you.

MR. GALE: Thank you, Chairman. This is John Gale again. And Steve Nanney is going to lead our discussion here on pressure vessel testing requirements. Mr. Nanney, it's back to you, sir.

MR. NANNEY: Yes. Thank you, John. This is Steve Nanney with PHMSA, and I'll be going through pressure vessels. Going to the next slide is the background. As noted in the

first bullet, pressure vessels are commonly used in metering stations, compressor stations, and other facilities and normally to remove liquids and other materials that are in the gas stream that can hurt the equipment as it goes downstream, whether that's control valves or whether it's getting into homes and hurting the burner tip.

192.505(b), again, it requires testing the compressor station, regulator station, and measuring stations to Class 3 requirements which would be a test factor of 1.5 times the MAOP of the facility. Going to the next bullet, 192.153(b) requires pressure vessels to be designed, constructed, and tested in accordance with Section VIII of the ASME Boiler and Pressure Vessel Code. Next slide. The 1998 and prior editions of the boiler and pressure vessel Section VIII Division 1 required pressure vessels to be subjected to a test pressure of at least 1.5 times the maximum allowable working pressure of the vessel.

And then in 2001 and in later editions of the ASME Boiler and Pressure Vessel Code, it was revised to a 1.3 times the maximum allowable working pressure of the vessel. And PHMSA incorporated by reference the 2001 edition of the ASME Boiler and Pressure Vessel Code. It was effective July 14th, 2004. The PHMSA did not make corresponding changes to the test factor that's in 192.505(b) for testing these type of facilities. Next slide, please.

A little more on the background. Some of the commenters that we got for this proposed rule claimed that the structure of part 192 and conflict between the Boiler and Pressure Vessel Code and part 192 test requirements has led to confusion. Some operators have been testing vessels to 1.3 times the MAOP as specified in the Boiler and Pressure Vessel Code since July 14th, 2004, which was the effective date incorporated by reference was the 2001 edition of the Boiler and Pressure Vessel Code. And industry groups

have argued that 192.505(b) does not apply to pressure vessels and other non-tubing components within compressor stations. Next slide, please.

Some more background is re-testing or replacing large numbers of otherwise safe vessels to comply with 505(b) could result in operational disruptions, worker safety hazards, and significant costs. And to just give you an idea on worker safety hazards, these vessels are normally in stations where there's other piping around. They could be in buildings that would be very hard to actually lift and get them out. And then when you do that, the operational disruptions would be having to blind off or isolate the piping to be able to take these vessels out.

Some of the commenters argued that PHMSA should not accept a manufacture pressure test of an ASME vessel rather than requiring a post-installation, subpart J test. And the ASME Boiler and Pressure Vessel Code is

accepted by many federal agencies. It's adopted by OSHA, by the Bureau of Safety and Environmental Enforcement, by the Department of Energy, and the Department of Defense. Also, the Chemical Safety Board has noted that it is an internationally recognized standard in good practice. Dave Danner, you have your hand up.

CHAIRMAN DANNER: Yeah, thank you, Steve. Just I wanted some clarification. We were talking about the operational disruptions and worker safety standards -- hazards of re-testing or replacing. Are those the same for both re-testing and replacing, or are they different? I mean, do you still have to take the vessel out to test it? Are there different considerations for re-testing and replacement?

MR. NANNEY: Well, the answer is it depends. It depends upon the location of it and what's around it. Normally, a pressure vessel will have other piping that goes to it and it's flanged to it.

So to be able to pressure test it in

place, you would either have to move the pressure vessel some amount of a space or you would have to move the piping that's flanged to it. And that becomes problematic because normally this piping is going to be welded to other piping. So just to say that, well, it's all flange piping, it would be easy to disconnect, would not, in most cases, be a true statement.

So you would probably -- whether if you were pressure testing it or replacing it in place, you would probably have to move it in most cases to be able to test it and then lift it back in place. Or you would be disassembling a lot of different piping that you would have to put back in place. Does that answer your question?

CHAIRMAN DANNER: Yes, it does. Thank you for the clarification.

MR. NANNEY: Uh-huh. Slide 39, please. Again, what has PHMSA done as far as looking at the ASME Boiler and Pressure Vessel

Code. Well, within 2017, PHMSA commissioned a report by the Oak Ridge National Laboratory to evaluate the standard. And the Oak Ridge report determined that safety was equivalent between the 1992 and the 2015 editions.

The 1992 edition includes a 1.5 test factor while the 2015 edition includes the revised 1.3 test factor. Excuse me. Also, the Oak Ridge findings include an independent determination that a 1.3 test factor provided, again, equivalent level of safety compared to the 1.5. And the report evaluated pressure testing requirements in addition to the below requirements.

And they list it here, materials, design including failure modes, strength theories, and the principles of limit design theory; fabrication and inspecting including nondestructive examinations; overpressure protection. They also looked at, that's not listed, NDE methods that they used. They looked at the inspection that the companies use

also. Next slide, please.

Again, the Oak Ridge report, it made the following conclusions with regard to the test factor requirements. A hydrostatic pressure test limits in the 2015 edition provide equivalent safety to hydrostatic pressure testing in the 1992 edition. Pressure tests in the ASME Boiler and Pressure Vessel Code are primarily intended to verify the leak tight integrity of the pressure vessel and are not intended to serve as a burst test of the vessel.

And also, there's overpressure protection requirements in both the 1992 and the 2015 editions of Section VIII of the Boiler and Pressure Vessel Code and in 192.201 which allows you to set overpressure protection to a maximum of 1.1 times MAOP. And then, in fact, on most of your gas transmission lines, it would even be less than that based upon other sections of the code. So it ensures that a vessel will never experience an in-service

overpressure greater than the 1.3 times MAOP while it's in service. And PHMSA also notes that these requirements have not changed between the 2001 edition and the current 2015 edition evaluated by Oak Ridge. Next slide, please.

Again, the proposed rule, what does PHMSA propose to allow? Well, PHMSA proposes to allow operators to continue to operate vessels installed after 2004 but before the effective date of the final rule that were tested to 1.3 times the MAOP in addition to the Boiler and Pressure Vessel requirements. These vessels would no longer need to be retested.

Also, for vessels installed after the effective date of the rule, PHMSA proposes in the rule to allow 1.3 test factor in addition to the Boiler and Pressure Vessel requirements to clarify that subpart J test duration requirements apply. And for newly manufactured vessels, allow an operator to use a strength test performed by the manufacturer

if the operator inspects and remedies any damage to the vessel in accordance with the Boiler and Pressure Vessel Code after it is transported to the installation location. Next slide, please.

Okay. Comments that PHMSA received. The Pipeline Safety Trust, their comment was that they believe that PHMSA is prevented from making changes proposed to 192.153(e) for any pressure vessel that is installed in a pipeline facility prior to the effective date of the rule. And PHMSA's response here is in several bullets. One, PHMSA does not view the non-application clause as applicable here. The rulemaking will not force an operator to take an action to re-design or construct an existing facility. Is somebody asking a question? I hear someone.

MR. PALABRICA: That was my bad. I was unmuted.

MR. NANNEY: Okay. This section is also a response to a petition for

reconsideration of the miscellaneous rule. PHMSA must be able to address challenges to design standards in rulemaking actions. And then the third bullet is requiring operators to remove pressure vessels that otherwise comply with Part 192 in the Boiler and Pressure Vessel Code and have been operating safely would exposed operator employees to unnecessary safety hazards associated with moving and pressure testing large pressure vessels to disrupt pipeline operations and incur significant costs.

And then, lastly, the changes intended to resolve the issue by minimizing safety, operational and economic consequences and is consistent with recognizing engineering standards.

In other words, PHMSA's response is, is vessels that were installed between 2014 and when this rule should go into effect would remain in service. We would not expect them to be taken out of service and re-pressure-tested

or changed out in any form or fashion. We would, going forward, expect the operators to abide by the 1.3 test factor and the time limits that are in the code.

Slide 43, please. Also, another comment we got from the Pipeline Safety Trust, they requested additional technical support to justify the applying a 2015 addition to any vessel designed and fabricated under a prior edition of the standard. The Oak Ridge study does not disclose all changes between the 2001 and 2015 editions, and therefore do not fully support PHMSA's stance that an equivalent level of safety is provided.

And, again, in the Oak Ridge report, it separately determined that the hydrostatic pressure testing limits in the 2015 edition provide equivalent safety to the hydrostatic pressure testing limits in the 1992 edition.

Next slide, please. Next slide, please. Thank you. And PHMSA's response continued here is: the report further

determines that the overpressure protection requirements ensure that a vessel will not be operated at a pressure exceeding 1.3 times the MAWP in service. The required overpressure protection limits in 192.201 and the Boiler and Pressure Vessel Code, including intermediate editions that have been incorporated by reference into the pipeline safety code in the past, have not changed since the 2001 edition was adopted.

Also, the Boiler and Pressure Vessel Code does not specify minimum test durations. Clarifying test duration requirements that apply to new and replaced pressure vessels in the future could result in an increased level of safety depending on the rate of baseline compliance.

And then, lastly, the Boiler and Pressure Vessel Code is an internationally-recognized good practice adopted by several other Federal agencies.

Next slide, please. Next slide.

Yes. Some other comments we received, the associations and National Fuel Gas requested that PHMSA remove the requirement to test pressure vessels "in place." They commented that some configurations make testing impractical or unsafe due to facility activity or installation location.

And PHMSA's response here is that we acknowledge that while testing vessels after tie-in complicates the testing and inspection process, these same challenges create risks of damaging the pressure vessel during movement and installation within a pipeline facility. PHMSA will clarify that testing or inspection is expected to take place after the vessel has been put on its supports at its intended installation location, but may occur prior to tie-in with station piping.

Next slide, please. Next slide, please. Some other comments that we received is the associations supported aligning regulations with the boiler and pressure vessel

test requirements, especially in the option to visually inspect rather than re-testing.

The associations also request that visual inspection or retesting apply to all pressure vessel relocations after the effective date, rather than just "newly manufactured" vessels.

And PHMSA's response here is, the inspection is typically a visual inspection, however the operator's procedure or a qualified inspector may require other inspection methods based upon damage. PHMSA did not propose to allow the use of a manufacturer's test for relocation of existing vessels.

Slide 47, please. Slide 47, please. Again, PHMSA's response is, a technical article published by the National Board of Boiler and Pressure Vessel Inspectors acknowledges jurisdictional requirements for relocations may apply and notes that safety considerations for relocations and other changes require careful consideration and analysis.

PHMSA will consider adding regulatory language clarifying the following requirements for relocating existing vessels.

Number one, the operator must have documentation that the relocated vessel meets current design and construction requirements and the vessel must be re-tested by the operator in accordance with existing 192.503(a).

Also, the operator must inspect the vessel after installation but prior to tie-in to ensure that there are no injurious defects such as corrosion or cracking.

And just one thing, what we're talking about here are vessels that are permanently installed. If it's a vessel such as, you've got a vent stack and you're doing a bore down and it's a vessel that's move around just for venting blown downs to take liquids out of the gas stream during that path operation, we would expect it to be reviewed and make sure that it's safe. But we would not

expect it to be pressure tested for each venting operation.

Slide 48, please. Also, this concludes the PHMSA response to comments on pressure vessel test requirements.

And, again, in light of comments received from the NPRM, PHMSA recommends that the Committee consider adopting the proposal with the following changes.

Number one, clarifying that testing or inspection is expected to take place after a vessel is placed on its supports at its installation location, but may occur prior to tie-in with station piping.

We'll also clarifying that relocated vessels must meet current design and construction requirements, be retested by the operator and be inspected after installation, but prior to tie-in, to ensure there are no injurious defects.

Slide 49, please. Again, I will turn it back over to the Chairman to take

public comments. Chairman Danner.

CHAIRMAN DANNER: Thank you, Steve. All right, we have one hand up. Patrick Carey.

MR. CAREY: Good morning. As Chairman Danner indicated, my name is Patrick Carey. I'm with Kinder Morgan. Can you hear me?

CHAIRMAN DANNER: Yes, thank you.

MR. CAREY: Okay. And my comments are specifically regarding the testing of re-located vessels. I appreciate Steve's comments relative to the testing of blowdown silencers or whatever else.

But I think that this point needs some clarity because there are a lot of implications on the integrity and maintenance practices. Specifically on the use of portable equipment.

And to narrow the example down, the concern really comes over the impact of our, our efforts to reduce methane emissions. If you look at it, currently, one of the

significant methods that we use to reduce methane emissions, in certain cases, is the use of portable facilities to pump down a valve section.

These portable facilities include trailer and skid-mounted vessels. And this is separators as well as the bottles that hang underneath the compressor units.

And the testing of these facilities would require the equipment to essentially be disassembled in order to be able to test that. The removal of water after the fact would be difficult, if not impossible. Not only to get the free water out but all of the moisture that would be associated with that.

In addition, I think the reassembly would cause problems with the leaks. You know, the tightening the flanges back up to the state they were in prior to disassembly.

This raises a lot of safety issues associated with the work. In addition to time and cost.

And this is going to have an adverse effect on the considerations that we use in order to use this type of equipment and our efforts to reduce methane emissions. Thank you.

CHAIRMAN DANNER: All right, thank you. Steven Glass.

MR. GLASS: Ah, yes. My name is Steve Glass, general manager of engineering services for National Gas. I'd like to thank the GPAC and PHMSA for the opportunity to speak. Am I coming through clear?

CHAIRMAN DANNER: You are, sir, thank you.

MR. GLASS: Okay, thank you. National Fuel operates more than 17,000 miles of natural gas, transmission distribution and gathering pipelines in Western New York and Pennsylvania.

I'd like to comment on PHMSA's recommendation of requiring the retesting of relocated pressure vessels, as well as the

recommendation of the pressure testing being performed in place.

As a small to medium sized pipeline, we operate hundreds of pressure vessels in our pipeline system. Under the proposed comments, an operator cannot justify the integrity of the vessel based on its visual conditions nor based on its operational history.

A go, no go pressure test will tell us if the vessel is leak tight. But why impose the additional stress of the hydrotest on a vessel that's visually sound and has a clean operational history.

The incremental level of safety added by a onsite pressure test very well may be negated by several safety and quality concerns with performing the pressure test.

Noteworthy is that an ASME stamped vessel has been designed, manufactured, tested and inspected to an internationally accepted set of industry standards for decades and has proven to be a reliable means of producing

vessels for safe operational service.

As an operator that utilizes portable pressure vessels, such as temporary odorant tanks and ASME knockout vessels, as well as re-purposing existing vessels to other facilities to meet operational demands, it's concerning the current recommendation requires that a relocated vessel would require an additional pressure test regardless of its as inspected condition.

Operationally, the use of portable pressure vessels is a key method of necessary tasks, such as temporary odorization and methane emissions reduction through flares and portable compressor units. These rented and/or leased equipment, including compressor packages, are routinely moved for both methane emissions, reduction and critical energy delivery services.

There is a whole industry of portable equipment. Some of which that I have yet to mention, includes portable silencers and

mist extractors for services such as used during ILIs and drying of pipelines.

The impact of well-established and safe operations of such equipment will introduce unnecessary delay. In addition, the reused of existing vessels is one way to help reduce capital costs on facility upgrades.

An additional concern with onsite testing is related to causing un-intention or unintended damage to the vessel and/or adjacent equipment.

The addition of the weight of hydrotest water calls into question if the vessel is properly supported during the test via its intended in place foundation supports. And also, if the vessel manufacturer designed the vessels integral supports to withstand the weight.

To avoid this concern of exceeding the foundation and/or integral or internal vessel component loads during a hydrotest, an operator may consider using an inert gas for

the testing medium. But this would introduce a significant safety concern due to the conservable energy stored in the compressible gas. In this situation, preferring an in place pressure test just may not be a feasible option.

And as Steve Nanney addressed just a little bit during the review here, but another example of the need to relocate a vessel would be for access to foundations or adjacent equipment repairs, upgrades and maintenance activities should an existing vessel, such as a pulsation bottle, need to be removed for repair of an adjacent compressor foundation. The operator would then need to perform an in-place pressure test on a vessel that is already operating safely and reliably.

For these reasons described, we'd recommend that PHMSA reconsider its position such that the relocation of a vessel is treated no differently than a new vessel and therefore its acceptance is based on a successful visual

inspection, not based on whether it will withstand another pressure test. Thank you.

CHAIRMAN DANNER: Thank you, sir. Mark Hereth.

MR. HERETH: Good morning. Or good afternoon.

Chairman Danner and Members of the Committee, thank you for the opportunity to speak today. My name is Mark Hereth, I'm the managing director of the Blacksmith Group.

I have worked for HSB, the largest ensuring of machinery and equipment in the world for 23 years of the first part of my career and have a deep history in the ASME Code, including the Boiler and Pressure Vessel Code.

I've spent the last 20 years of my experience in the pipeline industry. In preparing my comments today, I spoke with contractors who construct facilities, manufacture vessels associated with pipelines as well as LNG plants, petroleum refining

facilities and petrochemical plants.

This also included Dr. Gene Feigel, who recently retired from HSB who I worked with for many years. Many of you will recall Dr. Feigel served on this committee for many years. He also served as the president of ASME.

I support PHMSA's proposed use of the 1.3 test factor. Their interpretation and the description that was provided by Mr. Nanney this morning of the Oak Ridge National Labs study done for PHMSA on this topic is technically sound.

I support the inspection of pressure vessels at their installed location. However, the risks of pressuring testing a vessel that's already been tested in ASME shop under extensive controls that's then placed on its supported at its installation location outweigh any perceived benefits.

No one I spoke to was aware of pressure vessels resulting in failures resulting from transportation and handling in a

facility. And that's not just in pipelines but also other process industries, including refining petrochemicals that operate systems at higher pressures then those we operate in the pipeline industry.

As mentioned by other public speakers here, water and contaminants in vessels are not only difficult to remove but can damage downstream compression equipment and associated pressure released systems.

With respect to relocated vessels, I also support inspection when installed in a new location. I do not support re-pressure testing relocated vessels with same risks as with a new vessel or applicable in this instance as well, that includes the threats of water and contaminates.

As a past chairman of the INGAA Foundation, which represents 220 members including operators, contractors and service providers, I would be happy to convene a small group of experts to share their expertise and

knowledge of PHMSA if that would be helpful at some point in the future. Thank you for the opportunity to comment.

CHAIRMAN DANNER: No, thank you for your comments. Michael Elling.

MR. ELLING: Hello, my name is Michael Elling and I work for a small company called Reserve Equipment, Inc., which provides portable natural gas compression and has done so for about 50 years.

A majority of our work is pumping down sections of pipeline for transmission companies when they need to perform repairs or maintenance.

Just to quickly describe how we do that. We have essentially what are compressor packages mounted on trailers and we connect to the pipelines using flange connections at valve sites or at compressor stations. And we compress the gas out of an isolated section of pipe across the closed valve or into an adjacent line.

And we do hundreds of projects every year saving billions of cubic feet of natural gas from being blown to atmosphere or flared off.

With our equipment, the proposed pressure vessel tester would potentially have negative effect on us. Our concern is with how the terms relocation and installation are defined. Or even how they're interpreted when determining if vessels need to be retested.

If the relocation of our mobile equipment from one valve site to another were to require that we pressure test our scrubbers each time, that would be completely impractical and cost prohibitive.

Our average project requires only about 48 hours of runtime, so the extra time, labor and equipment needed to perform pressure tests would be significant within the scope of our work. And it would cost us hundreds of days of productive compression every year and prevent us from being able to capture as much

gas.

And it would also cost a lot more for us to perform our services making it less attractive to our customers, the pipeline companies, to save the gas rather than to vent or flare it. We already have safety measures in place to protect from the dangers of unintended release of gas. And our equipment is always manned when in operation.

We simply request that the terms relocation and installation be more narrowly defined so as to exclude mobile equipment like ours that is designed to be moved for brief temporary projects.

And not to mention all the prior discussion of the complications arising when you pressure test vessels over and over. Thank you very much.

CHAIRMAN DANNER: All right, thank you, sir. David Murk.

MR. MURK: Hey, good afternoon. Can you hear me okay, Chairman Danner?

CHAIRMAN DANNER: Yes, we can. Thank you.

MR. MURK: Okay, thank you. Hi, I'm David Murk, I'm the pipeline manager for the American Petroleum Institute.

And I just kind of wanted to reemphasize, we did submit comments and it's really reemphasizing some of the points we raised. I think Mark Hereth, who just spoke, really did a nice job summarizing some of the concerns that we have with testing in place and tie-in.

But first let me say, API supports PHMSA's proposal to align Part 192 with the test requirements with ASME boiler and pressure code. Specifically modifying 192.153 to allow vessels installed after July 14, 2004 to operate at 1.3 MAOP.

And as Steve Nanney pointed out a little earlier, Oak Ridge National Lab found that the pressure vessels that are designed, fabricated and tested in accordance with the

provision specified in the 2015 edition of ASME BPVC and subjected to the hydrostatic test pressure equal to 1.3 MAOP, does present an equivalent level of safety to pressure vessels that are designed and fabricated in accordance with 190 1992 edition of the standard and subjected to a hydrostatic pressure equal to 1.5 MAOP.

In addition to the alignment, which we support, PHMSA should also remove the requirement to inspect vessels after installation. And also remove the requirement that an operator choose to pressure test the vessel onsite. The testing must be with the testing being in place.

And as indicated, as I mentioned earlier, Mark Hereth I thought presented the point well. The tests in place and post tie-in for us raise concerns, and our members concerns, and really pose a potential unintended consequence and damage to associated facilities when you're testing vessels with

piping at a level, or of a facility that is at a level higher than the design test pressure of the vessel. That's my comments. Thank you.

CHAIRMAN DANNER: All right, thank you very much. I don't see any other hands up so why don't we turn to the Committee Members for any comments or questions they have on this proposed rule. Sara Gosman.

MS. GOSMAN: Yes. This is Sara Gosman. All right, so, I'd just like to talk a little bit about the application of this to vessels between 2004 and the effective date.

Changing the standard from 1.5 times MAOP to 1.3 times is a violation of the Pipeline Safety Act. And I actually don't think this is a close question.

Under Section 60104(b), PHMSA simply doesn't have the authority to apply design and initial testing standards to existing vessels that are already installed or otherwise induced, as it proposes to do in 192.153(e)(1) and (e)(2)(I).

This is not a case of scrivener's error or an unclear statute. In 2011, PHMSA specifically recognized the difference between the ASME standard of 1.3 times the MAOP and 1.5 times the MAOP in a notice of proposed rulemaking and stated that if the vessel is not tested to 1.5 times MAOP it cannot be used in a compressor or meter station or other class free location.

In 2015 PHMSA adopted the change in what is now Section 192.153(e). And again specifically stated that unless a vessel is especially ordered with a test pressure of 1.5 times MAOP, as prescribed by the purchaser, the vessel will be tested in accordance with the standard test factor of 1.3 if the vessel is not tested to 1.5 times the MAOP, it cannot be used in a compressor or metered station or other Class 3 or Class 4 locations.

The failure to meet this requirement can potentially be to exceeding the design parameters of the vessel during subsequent

testing of the pipeline system. I simply can't imagine a more specific addressing of the issue that we are dealing with today.

I want to make a few points about PHMSA's response to our comments. Section 60104(b) is not conditioned on whether the standard requires an operator to take an action to redesign or construct an existing facility.

And the petition for reconsideration was submitted in response to the 2015 rulemaking. That's five years ago.

PHMSA did not address it then and the Agency can't change a standard now when it said nine years ago that the standard was 1.5 times MAOP and not 1.3 times the MAOP. This is the very definition of arbitrary and capricious.

I have some concerns about the safety arguments being made here. But even if we accept them, making pipelines safer has never been the bases for adopting changes to existing facilities when the proposed

requirements are more stringent.

So it shouldn't be, for one, to make the requirements less stringent as we are considering here.

Overall, as many of you know, the Pipeline Safety Trust has real concerns about this particular provision in the Pipeline Safety Act that applies to existing facilities. But given that it is in the Pipeline Safety Act, given that it's been applied in the past do not, to PHMSA's actions in a way that, means that existing facilities do not have more stringent standards, I don't think it can be applied here in a de-regulatory action. Thank you.

CHAIRMAN DANNER: Thank you very much. Andy Drake.

MR. DRAKE: Yes, this is Andy Drake with Enbridge. I appreciate Sara's comments. And I actually pretty much agree with her.

I thought maybe it would be helpful just to kind of comb some of the history of

ASME, this developmental a bit. My background with ASME included.

I've been an ASME member for 30 years. I was the Chairman of ASME's Gas Pipeline Standards Committee at the time of these transactions happening.

And I just wanted to maybe go back and talk about some of the things, just to sort of set this flight plan and overview to help people kind of keep it in context.

In '01 ASME changed this requirement. They did not change the design standards for the vessels. What they really did was went back and looked at, in aggregate, all of the controls and barriers that are now in affect with modern manufacturing technics.

Including other entity processes that are in place, controls around the steels, and better inspection technologies that we could use to help, and better welding technics as well, to help mitigate some of the risks in the -- or facts that that you might realize in

the fabrication.

They were never really looking at the pressure test, even at 1.5, as a strength path. They were looking at that test as a fitness for service test. They had a leak test with a 25 to 30 percent margin above the maximum operating pressure.

So, I think going back to Oak Ridge's study it's not a degradation of service, it's actually just an evaluation on a broader scale of the fabrication process and controls and barriers in place throughout the entire process. And how that test fits in.

So, I do want to try help anchor some things. In fact, why that change was made.

I do think where the confusion comes in is that in '04 PHMSA adopted, or incorporated, ASME that changed from a one into the regulations by reference. And it created some confusion between 153(b) and 505(b).

I think the thing that's interesting

of note is that ASME is a, as many folks have noted, is a recognized international good standard. And it's recognized for the design material selection manufacturing processes, inspection and testing in aggregate to certify and stamp that vessels.

They make those vessels for a lot of different industries. Not just the gas pipeline industry.

And so, when they certify a pressure vessel they're certifying it to comply with that composite aggregate standard. And when a customer orders one, they are basically ordering a stamp vessel to that standard. And I think that's really important here.

So, there was confusion. But when you look at, the intent of ASME is to provide a vessel that complies with ASME. That is, what the primary purpose, primary focus of those manufacturer is at that time, and even the operator, to make sure that stamped vessel complied with ASME.

I think we kind of went along for several years, and I think '15 PHMSA came out with a rule interpretation that was intended to clarify that conflict. And I think in doing such issued basically a rule that said 505(b) would be applicable.

And made it retroactive back because it was trying to interpret the regulation from '04. And in doing so, now you created a compliance conundrum for a lot of people. They bought things with the intent of complying with ASME, which was clearly required in the regulations, and adopted by PHMSA regulation.

Now they've got kind of a retroactive liability. And I applaud PHMSA for trying to sort this out.

I shake Sara's point, they're correct, I mean, she's correct in that you can't pass a line standard backward. But I think that's, in essence, what happened in '15. Is when they made that integral interpretation, it did not understand how people had applied

and bought those vessels trying to comply with federal regulations in ASME code application stamps.

But I think that's really an important recognition of how, we got to figure out how to unwind this conundrum because you got a lot of vessels that were purchased and installed in that period and they got to figure out, are they a threat, no, they are not a threat.

So how do we install this 2015 rulemaking interpretation, I think is really what the real essence of this conflict may be.

I do think that there is a question I have about testing in place. I don't, I think that actually would end up being another new requirement.

These vessels don't test in place well. And it's not something that's been practiced, it's not really something that's practical in many cases.

Actually, trying to get water out of

some of these vessels on the site would be its own challenge. And that's why the testing is done in a controlled environment with the certified shop.

And I think the inspection that has to be done on site is not a hydrostatic test, it is a visual inspection of the vessel to see if it was damaged during transport. I think that goes back to Mark Hereth's comments.

Lastly, I think it's important, this thought about relocation of temporary equipment, or relocation of certified vessels. I really want to make sure I clarify a comment I think that Steve made on Slide 51 about testing or inspection.

I think that testing or inspection is appropriate, but I think testing, alone, is not practical. These temporary equipment, I think Pat Carey mentioned, and several others too, as we're relocating a lot of this equipment, it's designed for temporary installation.

It's designed to be portable and moved with a blowdown trailer or piping to connect the blowdown trailers, filter separators, pulsation bottles, all those kind of things that help us pull gas down out of the system. We don't keep that equipment in any one place, we move it around to where that event is happening.

To try to assembly that and then test it onsite, prior to every one of those interim temporary uses, would be absolutely impracticable. And I think the key here is we probably want to do something where it is tested and we can see that it was tested at its manufacturer. And that we do visual inspections of that equipment to make sure it hasn't been damaged in transport.

And I'd even support if we wanted to say that the equipment should be periodically retested or reinspected. But I think to say that that period is every time it's relocated is not practical. And I can't support that.

Thank you.

CHAIRMAN DANNER: All right, thank you, Andy. Mark Brownstein.

MR. BROWNSTEIN: Yes. Well, I wanted to pick up on the, maybe the last point that Andy addressed himself too because it was a little unclear, in my mind, reading through the material what was intended by the conditions for relocation of equipment.

Clearly we've heard from a number of commenters today about temporary location of equipment that's designed to be moved around for the purpose of addressing themselves to blowdowns and the like. As distinct from equipment that may be moved from one, what I'll call permanent installation in a facility to perhaps another permanent installation in the facility.

And I'm just wondering if PHMSA is drawing a distinction between the two. Should PHMSA being drawing a distinction between the two?

Perhaps I just don't fully understand what is being proposed here so maybe I could ask for some clarification.

CHAIRMAN DANNER: All right, thank you. Let me go back to Steve Nanney.

You've heard comments setting aside the authority under the Act, just the other comments you've heard about the fact that these were mobile in nature, visual testing, et cetera. What are your comments?

MR. NANNEY: Can you hear me, Chairman Danner?

CHAIRMAN DANNER: Yes, I can, thank you.

MR. NANNEY: Okay. Well, first of all, if you, going back to the rule, if you have a newly manufactured pressure vessel and it is relocated to a pipeline facility after the initial pressure test by the manufacturer, when it gets onsite and you move it, the operator must do one of the following.

They either must pressure test the

vessel in place after it has been transported in accordance with the requirements of this section or they must inspect the pressure vessel and confirm that the component was not damaged during transportation and installation into the pipeline. And then inspection records for the component must be kept for the operational life of the pressure vessel.

And if the pressure vessel has been damaged, it must be remediated, or retested, in accordance with ASME Boiler and Pressure Vessel Code requirements that are referenced in paragraphs (a) and (b) of the 192.153 section.

So, we don't require, I heard some folks mistake that we're requiring pressure testing in place, that is not the case. The case is, if you've done it in the manufacturer and you move it there and you do an inspection to make sure it hasn't been damaged in lifting and transportation, all of those type things, and you document that, you do not have to pressure test it in place again.

The other comment would be on vessels that would be temporary, like blowdown vessels, if there is some temporary odorant tanks, if there is launchers and receivers that are used temporarily that have, all of these have isolation valves to the main line, from them, that are used in these temporary areas that, like Andy and Pat Carey and others have identified, that are moved around and have been designed for that, PHMSA's intent was never for them to be re-pressure tested each time.

The thing that we can either put in the section or in the preamble, is making sure everybody realizes, oh, that's not the intent. But the intent would be, which any prudent operator should have in their procedures, that they would have to do a safety inspection of the equipment before they put pressure on it and put it in service and document that each time.

Which is very similar to the inspection of a pressure vessel that's moved

from a manufacturer out to a facility. Does that answer your questions, Chairman Danner?

CHAIRMAN DANNER: Well, let me turn to Andy Drake and see if it answers his questions. Andy, and then Alan.

MR. DRAKE: This is Andy Drake with Enbridge. Thank you, Steve, for those clarifications.

That absolutely clarified both questions I had. I would ask that we get the slides that we're voting on to reflect that because it's not really clear.

And like I said, in Slide 51 I just wanted to make sure which way we were interpreting that. But I appreciate those clarifications on both those issues, that was very much help.

CHAIRMAN DANNER: All right, Alan?

MR. MAYBERRY: Okay, thanks, Chairman Danner. I just want to chime in that, okay, so, we'll come to that with the voting slides, but I think we need to get back to

Sara's questions.

I was going to ask if, I believe it's Ben Fred from the Office of the General Counsel can jump on to give an explanation related to the statutory issue that Sara brought up. So, if we can call on Ben Fred I believe.

MR. FRED: Yes. Can you hear me okay, Al?

CHAIRMAN DANNER: Yes.

MR. MAYBERRY: Yes, we can.

MR. FRED: Great. Great. Yes, just in response to Sara's comments. We definitely appreciate the comment.

And when we saw the written comment we looked into this. We will certainly consider your comments here today further. And we'll respond in the final rule.

But I think the slide that Steve read earlier captures our view on this pretty well. We don't think that the non-application clause applies here.

The purpose of that clause is to prevent PHMSA from requiring operators to dig up existing pipeline that was installed according to the code at the time. But now we're coming in adopting revised or heightened designed standards.

You know, we can't make operators go dig up the pipeline to comply with those new design standards. That's not really what's going on here.

But I think more importantly, this particular rulemaking responds to a petition for reconsideration of the miscellaneous rule. You may know that that rulemaking is subject to ongoing litigation.

And so, the current proposed rule would address that challenge through modifying the existing code. But happy to further consider your comments today, and your written comments, when we prepare the final rule.

CHAIRMAN DANNER: All right, Sara, do you want to respond to that?

MS. GOSMAN: Yes. And thank you so much for considering my comments here, and of course the Trust comments.

I mean, you know, on the purpose side, I just want to read the text of Section 60104(b) here because I think it's really, very clear. And problematic because it's clear, but still clear.

A design installation construction initial inspection or initial testing standard does not apply to a pipeline facility existing when the standard is adopted. It doesn't say anything about digging up the pipeline or heightened standards.

And while I'm sure there could be a purpose argument here, I don't think that it would fly in the face of the plain meaning of the text of the statute.

And I think what's concerning me, in addition to that, is that, again, in 2000, at least in 2011, PHMSA said that 1.5 times MAOP was what it was all along, right? That there

was already an existing requirement, Section 192.505(b). And that all it was doing was saying, just because we adopted this ASME standard that says 1.3, we didn't change that 1.5 times MAOP.

So, at least since 2011 Industry was on noticed that this was the standard, as understood by PHMSA. And of course in 2015 the Agency adopted that particular rule and put it in the regulations.

So I don't think, back to Andy's comments, I appreciate those comments as always, but I don't think PHMSA was applying a new standard at the time, it was saying that this was the standard all along and it was simply clarifying it.

And so, again, I mean, at least since 2011 I think everybody should have been on notice here that 1.5 times MAOP was the correct standard. And to the extent that it now creates problems for the Industry, I think that's hard for me to understand given that

that was the clear message from PHMSA. Thank you.

CHAIRMAN DANNER: All right, thank you. Mark Brownstein?

MR. BROWNSTEIN: Yes, I want to address myself to the third bullet on the voting slide.

It's still a little unclear to me. I mean, I understand the overarching intent here is to not have temporary facilities go through pressure testing onsite but instead have inspection.

But I guess I'm a unclear here as to whether this is enunciating something new or if this is essentially enunciating something that currently exists in PHMSA regulation and we're just calling everyone's attention to it.

Maybe another way to ask the question is, under current PHMSA regulation how are temporary, you know what are called temporary maintenance, temporary pressure vessels if you will, how are they currently

handled under current PHMSA regulations?

CHAIRMAN DANNER: Steve Nanney?

MR. NANNEY: Yes. If you look at the slide that's up and you look at the third bullet --

MR. BROWNSTEIN: Yes.

MR. NANNEY: -- is it's basically, the way we have it written there, and the last two lines where it says, but they must be inspected for safety, integrity prior to usage, if it's something that's got, normally these type vessels will have an isolation valve between the main line and where they are that you can actually close in case you have an issue. They normally are not operating at the full maximum MAOP.

So if you went out last week, or probably two years ago, the way we have it described there, or even ten years ago, you would see them operating, if you had a prudent operator, the way that's written.

MR. BROWNSTEIN: And I understand

that that's, a prudent operator would do that. I guess what I'm trying to educate myself to is, is what would PHMSA regulations have required them to do two years ago, and is what we're recommending today a change from what they would have done two years, from what they would have been required to do two years ago?

MR. NANNEY: In my opinion, it would be the same.

MR. BROWNSTEIN: Okay, thank you.

CHAIRMAN DANNER: All right, are there any other Advisory Committee Members who wish to speak on this issue or ask questions?

MR. GALE: Chairman Danner, if I may?

CHAIRMAN DANNER: Yes, sir, go ahead.

MR. GALE: Thank you. John Gale here. Members, what we've done is, based on the conversation we've had today we've added two new bullets as, one was already discussed by Member Brownstein, and the fourth bullet

there trying to address, to a degree, obviously the comments raised by Member Gosman.

I think another point to point out here, what Sara is raising here is an issue where, do we even have the legal authority to do this. So, obviously if we don't, if it's determined that we don't, then we can't even make the change, right?

So I think what we're committing to doing here is thoroughly reviewing the issues that's been raised by the Pipeline Safety Trust and by Member Gosman to make sure that, you know, and make any argument, pro or con, to that.

But be that as it may, we would recommend that the Committee further consider the amendment, the proposal as published with these clarifying amendments that we've listed in the first three bullets. So, I just wanted to point out those changes to that voting slide.

CHAIRMAN DANNER: All right, thank

you. Andy Drake.

MR. DRAKE: Sorry, I was trying to get my mute button turned on. This is Andy Drake with Enbridge.

I'd like to just ask Steve to take a look at Slide 51 of voting slide. The second bullet, I'm kind of confused. I get the third bullet, where you're talking about inspection for relocated, but how does the second bullet fit in, do we need to add words that say something about retested or reinspected? I just wanted to clarify that.

And I did want to follow back, when Steve answers, with a second question or comment, if I could, Mr. Chairman Danner?

CHAIRMAN DANNER: Yes, go ahead.

MR. DRAKE: Do you want to let Steve answer the first one before we go on to the second one?

CHAIRMAN DANNER: Yes. Yes, Steve.

MR. NANNEY: Okay. The first question is the second bullet, correct?

MR. DRAKE: Correct.

MR. NANNEY: Okay. And if you, just looking at, clarify that relocated vessels must meet current design and construction requirements, be retested by the operator and be inspected after installation but prior to tie-in, to ensure that there are no injurious defects.

I think our, if you read the wording, relocated vessels to another facility, if you look at how we have it. In other words, if you have it at Compressor Station A and you move it 50 miles down the road, the new construction of Compressor Station B, we would expect it in this new facility to meet the current design and construction requirements and to be retested by the operator.

MR. DRAKE: So these are --

MR. NANNEY: In other words, you could not move a vessel made in 1970 to a new facility without doing something to it. It may be a new vessel, it may be a retested vessel or

re-certified vessel. You'd have to look at when it was made and what the code requirements were then versus today.

MR. DRAKE: So that requirement is intended to apply to vessels that are being relocated for longer term operations. The third bullet is for temporary, is that --

MR. NANNEY: That's --

MR. DRAKE: -- that's the differentiation I'm just trying to make sure I got.

MR. NANNEY: Yes, that's correct. We've got, on the third, Andy, we got temporary maintenance and repair activities in that second one, third line.

MR. DRAKE: Okay, that's perfect. I just wanted to kind of get clarification on how those two fit together. But if it's for permanent, permanent long-term and installations, that makes perfect sense.

MR. NANNEY: And that's what it was for. You're reading it correctly.

MR. DRAKE: Okay, thank you for that clarification, Steve.

If I could, Chairman Danner, a second question, or sort of a follow-up. I think I'm just looking for some clarification a little bit from Sara because I'm not sure what happened in 2011 as far as clarification.

But in 2015, what I'm showing, is PHMSA kind of came out with this rulemaking, that was intended to clarify. And I agree that post-'15 there was clarity.

I would say this, the conversation in '15, or the conversation prior to '15 was a significant discussion, that might be an understatement, but a disagreement between our 505 and, 505(b) and 153(b) fit together. And I think that's what begged the 2015 interpretation to come out.

But when it came out and went retroactive, I think that's where people really got very anxious is it didn't give any space for people, retroactively, to have a different

interpretation. It clarified, but it clarified backwards.

So that is a problem. It is a problem that was not negligent, malicious. I think the other piece of it is, is it significant enough to warrant a change.

I think going forward, from '15, you know, I think PHMSA was very clear and people should have followed the 1.5. Now we have a separate issue that we're looking at is, 1.3 going forward.

Which is, I think the ASME standard is very clear that this is not a compromise in safety. I think Oak Ridge Labs agrees with that. And I don't want to break it into three different problems but I think I just want to kind of break it down into its components so that we can have a good conversation about that.

I do think that there was quite a recognition in '15 about the different interpretations of the rulemaking from '04.

And I think that that is important for everybody to keep in their mind.

There was confusion over how these fit together. People were genuinely trying to do the right thing.

And I think the conversation that unfolded created some byproducts that we're now having to manage. And I think the key for me is, what is the right thing to do here as far as safety is concerned certainly should be a consideration.

And then, what were people's intent to do. They were trying to do the right thing and I think we just need to figure out how to unwind that quite frankly. Thank you, Chairman.

CHAIRMAN DANNER: All right, thank you. Sara Gosman.

MS. GOSMAN: Thank you. So, when I say 2011, what I'm referring to is the notice of proposed rulemaking which proposed the particular language of 1.5 times MAOP.

So that's what I'm going back to in terms of at least notice that PHMSA thought that this was the way to interpret the regulations.

And back to your safety point. I think that this particular provision, about existing facilities, is problematic.

And I think that it, because it does not address safety, it simply says, you can't apply the standards to existing facilities. We've argued this over and over again. But without a change in the statute I don't think PHMSA has the authority here.

I guess the one question I was thinking about after the update from the PHMSA attorney, and thank you again, is this a settlement of existing litigation challenging the 2015 rule?

Because if so I didn't see that in the notice of proposed rulemaking here. That is, has PHMSA decided that its original position in 2015 was incorrect?

MR. FRED: This is Ben Fred. I'm not sure, I don't think, I'm not aware of a settlement, but PHMSA is, you know proposing this change in response to the challenge.

MS. GOSMAN: Okay. So there is no agreement with the challengers to end the judicial challenge because of this rule?

MR. FRED: I'm not aware of an official agreement.

MS. GOSMAN: Okay.

MR. FRED: I'm not.

MS. GOSMAN: Okay, thank you. Thank you. And then I think I said enough on this topic, and I certainly appreciate the last bullet point with a full and thorough review.

Again, I think the language here is very clear and I think it's not a closed question in terms of applying the act, and so I will voting against this because I think that PHMSA simply does not have the authority.

CHAIRMAN DANNER: So, Mr. Fred, you have it seems already come to a legal

conclusion on this. If you are going to be doing a thorough review how can we know that you are approaching this with an open mind?

MR. FRED: I'm sorry, who was that question towards?

CHAIRMAN DANNER: That was for Ben Fred. Basically what I heard earlier is that you have already reached a legal conclusion and the fourth bullet there is that you will review the law. I mean haven't you already made up your mind?

MR. FRED: Well, this issue was raised in the written comments that were received on the NPRM so we did look into it and as the slide indicated that Steve read earlier that that was our assessment of that issue.

There has been some additional discussion here today that we will certainly have some further consideration on, but ultimately, you know, it will be in the final rule whether we think our position that we communicated today should be different.

CHAIRMAN DANNER: All right. Thank you. So, Diane Burman?

MS. BURMAN: Thank you. Can you hear me?

CHAIRMAN DANNER: Yes. You are breaking up a little bit, Commissioner.

MS. BURMAN: Okay, sorry. So I'm just trying to clarify, Sara, you read some really good points, but one of the questions I have is you said you were voting no, or possibly voting no, because PHMSA didn't have the authority.

If PHMSA did have the authority would you be in support or is there room for tightening this in a way that is satisfactory? I don't mean to put you on the spot, I'm just trying to clarify your concern. Thank you.

CHAIRMAN DANNER: Sara?

MS. GOSMAN: Diane, thank you so much, I appreciate that. I always appreciate the ways in which the Committee tries to come to consensus on these issues.

I think the question of whether PHMSA has legal authority is itself a legal determination, and as you all know I am a law professor, right, so I am comfortable with my legal analysis.

While I appreciate again PHMSA's willingness to go back and look at the arguments I have made, these are arguments I am sure they have considered.

We just apparently have a different interpretation of 60104(b) and if this is, you know, PHMSA's interpretation going forward that, for example, you know, they are allowed to adopt requirements for existing facilities if that doesn't mean that they have to dig up the pipeline, well that will be certainly something that I will bring up later in our discussions because that is a change, I believe, in how everyone has interpreted this particular provision.

But if that is going to be the Agency's position here then I think it needs to

be applied across regulations and when they are considering more stringent requirements.

So, again, I absolutely and always appreciate both PHMSA's willingness to consider my comments and the consensus-building nature of this particular Committee, but I just think it's a straightforward legal analysis here and I think the legal analysis for me is, as I said, I don't think it's actually a very close call and, you know, as I say I am a law professor, I can see gray in many things, but not on this one. Thank you.

CHAIRMAN DANNER: All right. Thank you. Andy, you had your hand up, did you --

MR. DRAKE: Yes, Chairman, I did have my hand up. And maybe this -- I am definitely not a lawyer, but I have lawyers around me, and I got a little bit of counsel here, so to speak, and I think just going backwards I just want to be deliberate about Sara's comment we were put on notice.

I think what we put on notice was --

I don't know who put who on notice, but the industry put PHMSA on notice we don't agree and that that was a lot of confusion on the playing field and we needed to resolve that, so I understand it.

In '11 there was a proposed rulemaking, notice of proposed rulemaking, put out, and it took, as always, several years of discussion and debate and we came out with the rulemaking in '15 that also included the stay of enforcement.

Now maybe I am asking PHMSA to validate that, but the stay of enforcement was issued between the '04 incorporation by reference and the '15 rulemaking about the applicability of 153.4505.

So there was no enforcement intention going backwards to try because I think everybody recognized it was that confusing. Okay, so now we have agreed we are not going to do that, but that's just the stay of enforcement.

I think, you know, what we are looking for here is how do we create permanence to that, you know. I think that's -- I don't have the answer, again, I am not a legal counsel, but I think that is a relevant issue here for us to address.

I think the testing to 1.3 is appropriate as determined by an international agency that is recognized with the expertise in how to test and manufacture these kind of vessels.

So I don't think the safety issue is at question, it's really just how do we clean this up.

CHAIRMAN DANNER: So when you say you are talking to your lawyers did you, do they have the same concerns as Sara?

MR. DRAKE: I can't speak for my lawyers, but I think there is just a general need for us to clean this up.

It was clearly -- I don't agree that "put on notice," I think that what was put on

notice is there is a lot of confusion out here. Both parties agreed there is a lot of confusion here and we needed to debate it and discuss it and in the end a stay of enforcement came out with a clarification of how to go forward.

You know, that's fine. I just want to figure out how do we get that codified.

CHAIRMAN DANNER: Right. I mean it seems to me we have a threshold determination to make about whether PHMSA has authority to do this, so, you know, we need to think about that.

All right. Alan Mayberry?

MR. MAYBERRY: Yes. I was just going to say, you know, I really appreciate the input and the discussion here and, Sara, I always appreciate the value you add to this Committee.

You know, that last bullet that, yes, we will look at it, you know, certainly I appreciate my attorneys here and they provide good advice.

I can assure you that this, you know, what we end up with goes through multiple legal reviews and, you know, if we are going beyond our authority there are a number of checks in the system that will make sure that it corrects us.

We feel confident we are on firm ground right now, but, you know, again, it does goes through -- Even without this provision here, the last bullet, it will go through a review, but we'll make sure to flag it to make sure that we just, you know, concentrate on the explanation, whichever way that ends up being.

You know, if we can forward, obviously we think we can, you know, we'll explain it more clearly. If something, you know, comes up where we can't we'll address that appropriately as well.

But, you know, we'll go through multiple reviews to be very thorough, but thanks for flagging this.

CHAIRMAN DANNER: All right. Sara?

MS. GOSMAN: Oh, I'm sorry. My hand was still up. Just a thanks again for that, Alan, and I think my position stands here and, again, I want to call everybody's attention to the language of the statute because I think it's really important to be very precise about the language that we are applying here.

It simply says a design installation construction, initial inspection, or initial testing standard does not apply to a pipeline facility existing when the standard is adopted.

I don't think that it could be any clearer than that and whatever the confusion was before the language in 2015 was in the rule, we're changing that standard, we're changing it retroactively.

I don't believe PHMSA has the authority to do it.

CHAIRMAN DANNER: All right. Thank you. Are there any other comments from Committee members?

(No audible response.)

CHAIRMAN DANNER: All right. I want to speak for myself here. I share Sara's concerns about PHMSA's authority on this rule saying that I actually like the changes, so I would support this but I would like that fourth bullet to reflect that I also have this, so that in addition to Sara's name that my name be added to that fourth bullet and with that I would support the recommendation.

All right. Are there any other comments?

(No audible response.)

CHAIRMAN DANNER: All right. With these changes is there someone who is willing to make a motion? Andy Drake?

MR. DRAKE: This is Andy Drake with Enbridge and I will make that motion that the proposed rule as published in the Federal Register and the draft regulatory evaluation with regard to testing requirements for pressure vessels are technically feasible --

(Simultaneous speaking.)

CHAIRMAN DANNER: Andy? Andy, let me -- I'm sorry. I just want to make sure -- Diane Burman had her hand up, too, and I don't know if she was offering to make the motion or if she had an additional comment.

MS. BURMAN: Yes, I did, I'm sorry. Can I just for the fourth bullet, which I do appreciate Sara Gosman and Commissioner Danner making sure that they capture that they have comments, but I would like it to be if possible more focused on the fact that the comments addressed from PST Members Gosman and Danner relative to this issue that PHMSA has agreed to fully and thoroughly review the proposal with regard to the applicability because I do think it's important to showcase PHMSA's, you know, sort of due diligence in going back and looking at that issue, so just that's one thing.

The second is I thought we were also going to make clarifications on finalizing the testing and inspection issue and the language. Is that -- I thought from the conversation back

and forth we were going to be making a change to the first bullet.

CHAIRMAN DANNER: Okay. With regard to the fourth bullet did you have language changes that you wanted to --

(Simultaneous speaking.)

MS. BURMAN: Yes. I would just flip it and say with regard to the comments from PST and Members Gosman and Danner relative to this issue PHMSA has agreed to fully and thoroughly review the proposal with regard to the applicability of 49 USC 60104(b) to this proposal and will fully address, so we're just flipping it.

CHAIRMAN DANNER: All right. I would have no problem with that.

MS. BURMAN: Thanks. And then I'm just --

(Simultaneous speaking.)

MS. BURMAN: I'm just making sure, on the first bullet, did we -- I thought we had been discussing some changes to clarify.

I don't see that it does have testing or inspection, but I am just making sure from the back and forth conversation that we fully addressed any changes that we had talked about in the discussion aspect.

And then I do want to just make a comment before we get into the voting.

CHAIRMAN DANNER: All right. So, again, any proposed language that you have on that, on that first bullet?

MS. BURMAN: I don't. I am just making sure that -- Because there was some discussion I am making sure because I thought we had said when we got to the voting slide for that section we were going to be making, possibly tightening the language.

CHAIRMAN DANNER: Okay. Steve or John, do you recall that conversation? Is there some language that you were thinking of to tighten that?

MR. NANNEY: Chairman Danner, this is Steve Nanney. I thought when I went through

what was in the code I think some of the members, whether it was members or the public, that had made some comments had not fully remembered what was in the code and I thought when I went through that there was agreement that it allowed either you had to pressure test or inspect the pressure vessel to confirm that the component was not damaged.

I thought when I went through that that cleared those comments up.

MS. BURMAN: I am comfortable if that's the case. I just wanted to make sure that if we were to make changes there that we didn't forget.

So unless there is someone who thinks that that didn't address people's concerns, notwithstanding Member Gosman's concern, which I appreciate.

Then I just have a third comment before we get into the voting.

CHAIRMAN DANNER: Yes, go ahead.

MS. BURMAN: So I have been

listening very thoughtfully to the comments that were made about the notice, you know, to folks in terms of what PHMSA is doing or not.

As a regulator I often struggle myself when we put out something in a notice of what we are thinking, what maybe our staff is thinking, and then we open it up for comments.

Many times as a regulator at the State level for a variety of reasons the delay in then responding to those comments happened for a variety of reasons and then we several years later at times we then adopt what we had noticed folks that we were doing at the beginning.

I do think it is important for us to keep in mind that just because there was technical notice about what may be in the thought process back in 2011 and was the thinking for PHMSA, especially when parties, whoever they are, in this case many are industry parties, take notice of those comments and put in, you know, their concerns about

that.

I don't think it's a fair assessment to say, well, you've known since 2011, so, you know, there is no reason for you to be surprised about that.

This is the time for us to act and take into consideration whatever those substantive comments are and make decisions especially as it pertains to substantive concerns that are raised, what is the appropriate thing, and it's not fair for us to say, well, you've known since 2011 and, therefore, you know, it's kind of too late, because I don't think it's too late and I don't think it's fair to put it in the category of folks being on notice.

So to me I just want to be clear about that because it is something that I, myself, as a regulator often struggle with when there is a reaction to things that we are doing as if, you know, because we said it then you should have known and planned for it.

So that's just my two cents. It is something that concerns me and I just want to make sure that folks understood where I was coming from, that I don't think that it's fair to have folks say that they have had that notice and, therefore, you know, it's not -- Whatever. So that's just my thoughts. Thank you.

CHAIRMAN DANNER: All right. Thank you very much. So, Richard Worsinger?

MR. WORSINGER: Thank you. This is Rich Worsinger. I just need to share a comment on some of the discussion that has taken place on the pressure vessel testing issue.

I have gone back just to look and just if nothing else to refresh myself on what is the role of GPAC and it says to "review PHMSA's proposed regulatory initiatives to assure the technical feasibility, reasonableness, cost effectiveness, and practicability of each proposal" and "the committees also evaluate the cost benefit

analysis and risk assessment information of the proposals."

I am just throwing that out there to remind everybody what I think our role is. End of my comment. Thank you.

CHAIRMAN DANNER: All right. Thank you. All right, before we go back to Andy does anyone else have a comment on this slide or this matter before we go to a Committee vote?

All right. Andy Drake?

MR. DRAKE: This is Andy Drake with Enbridge. And to answer Commissioner Burman's question, I think Steve did go back and answer a question that I asked him directly about the voting slide to make sure that the words "or inspection" was in there and it is and I appreciate that, just a clarification that he put into the record because there are several different bullets there and I am just trying to figure out which one and for which purpose and he did accomplish that for my questions and concerns anyway.

I appreciate your comments, Commissioner Burman. It is a process and we vet out issues and that is the purpose of this Committee and the purpose of that process and to say that we didn't agree would be an understatement.

There was a lot of confusion and a lot of energy that went into clarifying that. I think that's important background and framework to put around this.

That said, I do think that the proposed rule I would like to make a motion, Chairman Danner, that the proposed rule as published --

CHAIRMAN DANNER: Yes, go ahead. We're ready for you.

MR. DRAKE: Okay. That the proposed rule as published in the Federal Register and the draft regulatory evaluation with regard to testing requirements for pressure vessels are technically feasible, reasonable, cost effective, and practical if the following

changes are made.

One, clarify that testing or inspection is expected to take place after being placed on its supports at its installation location but may occur prior to tie-in with station typing.

Two, clarify that relocated vessels must meet current design and construction requirements being tested by the operator and be re-inspected after installation but prior to tie-in to ensure that there were no injurious defects.

Three, to clarify that the re-testing requirements applicable to pressure vessels do not apply to those vessels that are used for temporary maintenance and repair activities, such as portable launchers or receivers, temporary order intakes, blowdown equipment, and/or similar equipment, but they must be inspected for safety and integrity prior to usage.

And, four, with regard to the

comments from the PST and Members Gosman and Danner relative to this issue PHMSA will fully and thoroughly review the proposal with regard to the applicability of 49 USC 60104(b) to this proposal.

CHAIRMAN DANNER: Thank you very much for reading that and making the motion. Is there a second? Mary?

MS. PALKOVICH: Yes, this is Mary. I will second that motion.

CHAIRMAN DANNER: All right. Mary Palkovich seconds the motion. Cameron, can we take a vote?

MR. SATTERTHWAITE: Okay. We'll just go through and if you agree with the language just say yes, if not --

CHAIRMAN DANNER: Okay, you're a little bit faint, Cameron.

MR. SATTERTHWAITE: All right. How's that?

CHAIRMAN DANNER: That's much better. Thank you.

MR. SATTERTHWAITE: Okay. So I am going to go through the roll and if you agree with the language you can just say yes and if not you can just say no. Diane Burman?

MS. BURMAN: Yes.

MR. SATTERTHWAITE: Peter Chace?

MR. CHACE: Yes.

MR. SATTERTHWAITE: David Danner?

CHAIRMAN DANNER: Yes.

MR. SATTERTHWAITE: Sara Longan?

DR. LONGAN: Yes.

MR. SATTERTHWAITE: Terry Turpin?

MR. TURPIN: Yes.

MR. SATTERTHWAITE: Ron Bradley?

MR. BRADLEY: Yes.

MR. SATTERTHWAITE: Andy Drake?

MR. DRAKE: Yes.

MR. SATTERTHWAITE: Mary Palkovich?

MS. PALKOVICH: Yes.

MR. SATTERTHWAITE: Rich Worsinger?

MR. WORSINGER: Yes.

MR. SATTERTHWAITE: And Chad has

joined us, so Jon Airey?

MR. AIREY: Yes.

MR. SATTERTHWAITE: Mark Brownstein?

MR. BROWNSTEIN: No.

MR. SATTERTHWAITE: Sara Gosman?

MS. GOSMAN: No.

MR. SATTERTHWAITE: And Robert Hill?

MR. HILL: Yes.

MR. SATTERTHWAITE: All right. Thank you very much. It is not unanimous, but the motion still carries.

CHAIRMAN DANNER: All right, motion carries. Alan Mayberry, it is almost 10:30 on the west coast. I am wondering are we going to be taking what I would call a morning break or do you want us to plow through?

MR. MAYBERRY: The mute button was especially difficult. Why don't we plow through.

CHAIRMAN DANNER: All right. So let's move on then to Incident Report Criteria.

MR. GALE: Thank you, Chairman

Danner. For the record this is John Gale again. We are going to get into the issue of Incident Report Criteria.

We have really about nine slides to get through and we believe that after this discussion point, Chairman, would be an appropriate place to go ahead and take a lunch break.

So we are optimistic we can get through this in the next 30 to 60 minutes and then that would be an appropriate break time. That being said, Mr. Jagger, if you can go ahead and take us to the next slide. Thank you.

So a little background on this proposal, an incident is defined in 49 CFR 191.3 as an event that meets any of the following criteria, a death or injury necessitating in-patient hospitalization, property damage of $50,000 or more, including loss to the operator, but excluding the cost of lost gas, an unintentional gas loss of over 3

million cubic feet, or an emergency shutdown of a liquefied natural gas facility or underground natural gas storage facility.

The property damage criterion, however, has not been adjusted since 1984. As a result the criterion results in less consequential incidents being reported over time due to inflation.

This issue was raised in comments on DOT's notice of regulatory reform. Next slide, please.

Therefore, PHMSA proposed the following amendments. PHMSA proposed to raise the property damage criterion to $122,000 consistent with CPI's inflation since 1984, and the other criteria remained unchanged.

What I would also like to point out is that there was a corresponding proposal made in the hazardous liquid rule, a hazardous liquid regulator reform rule.

The number was slightly different because the calculation at the time based on

the timing of that publication was slightly different.

PHMSA estimates that the proposed rules would reduce the number of reportable incidents by approximately 18 percent.

PHMSA also sought comments on the following, procedures for automatic or administrative updates to the criteria in the future similar to those proposed by the Federal Railroad Administration and Appendix B to Part 225, and, also, comments on an appropriate method and frequency of future updates. Next slide, please.

The comments we received on this proposal the associations and other industry commenters supported adjusting the property damage threshold for inflation based on the effective date of the rule and biennially thereafter.

TC Energy recommended a threshold of $250,000 was more appropriate. TC Energy noted that $122,000 would still encompass most minor

incidents that are captured at $50,000 based on current costs for labor, repair materials, permits, et cetera.

The Freedom Works Foundation supported removing the property damage threshold from the definition of incident. Next slide, please.

PHMSA's response. PHMSA continues to support the proposal to update the $50,000 property damage threshold based on inflation. PHMSA will ensure that the value adopted in the final rule is consistent with inflation as of the year of publication.

PHMSA agrees that regular updates are appropriate and will consider procedures similar to those proposed by FRA and consistent with the formula adopted in Appendix B to Part 255 and FRA would announce regular updates based on the formula on their website.

PHMSA does not believe an arbitrary higher damage threshold or eliminating the damage threshold as a criterion are

appropriate. Next slide, please.

The Pipeline Safety Trust opposed increasing the property damage threshold, particularly when it results in collecting additional data for known issues.

The Pipeline Safety Trust opposed frequent, incremental changes to the incident definition commenting that it would affect the ability to compare trends over time.

The Pipeline Safety Trust instead recommended a comprehensive review of the definition of an incident if the current definition is not meeting PHMSA's needs.

NAPSR suggested that PHMSA first study the effects that changing the reportable criterion dollar amount would have on providing information for State programs, the public, and PHMSA analysis associated with rulemaking actions. Next slide, please.

PHMSA's response. Inflation adjustment ensures the consistency of reporting trends. A static property damage criterion

changes over time in inflation adjusted terms.

PHMSA's own analysis of trends already accounts for inflation. The significant trend analysis filters out incidents that don't meet the other criteria and result in less than $50,000 in 1984 in regards to damage. A full description can be found at the web address that is shown here on this slide.

PHMSA will consider changes to the significant incident definition based on the final rule to ensure consistent long-term trending of the significant incidents.

So this concludes PHMSA's response to the comments on Incident Report Criteria and in light of the comments received from the NPRM PHMSA recommends the Committee adopting the proposal with the following changes, adopt an appropriate inflation adjustment based on the CPI at the date of the final rule publication and, secondly, incorporate a formula in Part 191 for future updates similar to that proposed

by FRA.

Chairman Danner, I believe that concludes our discussion of the Incident Report Criteria proposal and we are ready to accept public comments at this time.

CHAIRMAN DANNER: All right, very good. And we do have one hand up, so, Darral Ward, go ahead.

MR. WARD: Yes, sir. Can you hear me?

CHAIRMAN DANNER: Yes, I can. Thank you.

MR. WARD: Thank you. My name is Darral Ward. I am the manager of pipeline safety with Boardwalk Pipelines. Boardwalk supports PHMSA's proposal to update the threshold for property damage in the definition of an instant to account for inflation and to establish a new threshold during the calendar year when the rule finalized. We also support PHMSA's proposal to further update the reporting threshold on a periodic schedule,

therefore accounting for inflation. This will provide certainty and avoid a repeat of the current situation.

I'd like to share with you some typical costs for performing standard pipeline repairs that Boardwalk has incurred in the past. To install a Type B sleeve on a 12-inch pipeline, the average cost could be around $102,000 and on a 30-inch pipeline it's around $121,000. To perform a pipe replacement on a 12-inch pipeline, the average cost is around $122,000. And for a 30-inch pipeline, it's around $144,000. These include normal charges for crews, material labor and inspection. And again, these are entry-level prices. So just of course increasing the current threshold of $50,000.

But the cost of repairing and remediating a leak in today's environment is far greater than it was in 1984. Even with the inflation adjustment, more minor events will still be reported as an incident than would

have been then. Reportable incidents are often used as performance metrics. And those metrics are used to judge the performance of the natural gas industry both internally and externally by equating the cost of a repair of often small, minor leaks such as the pin-hole leak that was found by a patrol who notice bubbles in the water, to other events such as a leak the results in injuries or significant gas loss of 3 million cubic feet or more -- namely to a very distorted view of true industry performance.

Thank you very much for the opportunity to provide comments.

CHAIRMAN DANNER: All right, thank you sir. Matthew Hite?

(Pause.)

MR. HITE: Good afternoon. Can you hear me?

CHAIRMAN DANNER: Yes, we can.

MR. HITE: Okay, thank you. My name is Matt Hite and I am offering final comments

on behalf of GPA Midstream Association. GPA Midstream supports adjusting the incident reporting requirements to account for inflation. PHMSA established the current $50,000 threshold more than 25 years ago, and that amount should be increased to eliminate unnecessary incident reporting. As indicated in our written comments, GPA Midstream also supports incorporating a mechanism for updating the incident reporting threshold every two years to account for inflation through direct final rulemaking. Thank you.

CHAIRMAN DANNER: Thank you. Chris Williams?

MR. WILLIAMS: Yes, thank you. Cheniere Energy also supports raising the threshold and additionally asks PHMSA to consider a higher threshold for large-scale liquefaction facilities. The size and scale of large-scale liquefaction facilities and the specialized nature of the equipment used -- such as large diameter cryogenic piping and

valves tend to cause any repair and maintenance work to cost orders of magnitude more than the typical pipeline facility repair. Also, these facilities are installed with much of the piping and equipment located at high elevations, suddenly reaching many locations requires the use of scaffolding and cranes. For example, replacing a cryogenic valve with a small packing leak could easily cost several hundred thousand dollars.

As the number of these online liquefaction facilities increases, reporting such de minimis releases as incidents could consume both operator and regulatory resources without any appreciable impact on safety, and does not appear to be in keeping with the intent of incident reporting. Thank you for the chance to comment.

CHAIRMAN DANNER: All right, thank you. I don't see any other public comments. Let me now turn to my colleagues on the committee. Any discussion on this issue?

(No audible response.)

CHAIRMAN DANNER: Sara?

MS. GOSMAN: Yes, thank you. So I understand the reason for adjusting the data for inflation. And I note that PHMSA does this, already, as it says, when it shows transverse significant incidents. But that's not the only reason PHMSA should gather this information, right? PHMSA would be losing data that could be used to support the agency's analysis of the benefits of the proposed regulation in the future.

The data is 40 incidents per year, or 18-percent of the reports. This says costs, of, in the language of the cost-benefit analysis used in this action, has negative benefits when the safety rule cannot be justified.

It also takes information away from PHMSA that could help it consider how to address safety issues at all. The fact that these aren't quantifiable, and that negative

costs are, doesn't that the importance, right, of the data doesn't exist. And we're saving $30,000 per year. This is pocket change in the world of regulation. And I think that it's important to gather as much information as possible.

I think the other concern I have about this is we're deciding -- you know, I think we've put off this decision about what to do about the threshold, so that PHMSA is continuing to analyze the data using the 1984 dollars, while continuing to collect information below that. Right? But by doing this we're deciding that that original $50,000 is the best choice. And I think we should really step back and study the reporting requirements to come up with a better system.

Many states have much lower thresholds. So, just looking at the information that I was able to come up with, many states have reporting thresholds of $5,000. Some have $25,000. So, the industry

is already reporting to these states, and I think that it makes sense to report as well to PHMSA.

And the final, I guess, question maybe I have for PHMSA is, you know, when PHMSA is totaling up the property damage costs, is it including the costs of repairing the pipeline that is -- the cost that the commenters were referring to in the public comments, I'm wondering if that goes into the $50,000 threshold. Thank you.

CHAIRMAN DANNER: All right.

(Simultaneous speaking.)

MR. GALE: Yeah, do you want us to address the question from Sara first?

CHAIRMAN DANNER: Would you, please?

MR. GALE: Yeah, not a problem. And Mr. Keener is also on the line if he wants to jump in, as well. But I believe we've interpreted the current reporting requirements to include those repair costs that the commenter brought up, Sara. So, yes, those

type of repair costs, when you're trying to calculate what was the impact of the incident, those repair costs would actually drive you into a reporting criterion -- or to require the submission of the report.

CHAIRMAN DANNER: Okay. Sara, does that answer your question?

MS. GOSMAN: Yes, thank you. Again, I appreciate the comments made during the public comment section. I think that it's clear to me that, of course, this is very expensive to repair pipelines. But I don't think that that -- the fact that it is says anything other than that we're paying for good repairs and I still think we should have this data available to PHMSA. So, thank you.

CHAIRMAN DANNER: Thank you. Mark Brownstein?

MR. BROWNSTEIN: Yes, thank you. So a question and a comment. The question is the -- Sara sort of alluded to this. But the $50,000 number, it would be useful if someone

could provide a little insight as to where that came from and why that was the magic number back in 1984 such that we should be adhering to it now. So that's a question.

The comment -- to pick up a little bit on what Sara was saying, you know, I'm mindful of the fact that small problems often are -- lead to, or are indicators of, bigger problems. And, you know, in past conversations that this committee has had over various regulatory reforms, you know, we've talked about the value of being able to gather -- you know, of data and develop risk management practices based on data. And as a committee, we generally have sort of bought into that kind of mindset.

And yet, here is a recommendation that would potentially take data away, you know, from PHMSA and, by extension, the public. That might be material to understanding the risk profile of the system.

And so I am reluctant to sort of go

along with this adjustment, understanding that we'll lose data, particularly as it's really hard for me, being relatively new to these topics, to understand what was the purpose of the $50,000 threshold in the first place. How was that number derived? And whether there was any conversation at that point in time about the trade-offs between data collection and cost of reporting that led to that number being established in the first instance.

MR. GALE: So, Chairman Danner -- John Gale, if I may?

CHAIRMAN DANNER: Okay. So are you going to address the question about -- the original setting the --

MR. GALE: Yes, the history. Yes. So, reluctantly, I have to admit that actually I worked in PHMSA in 1984. Maybe in a different capacity, but I actually was here in 1984 when it was adopted. But we do not have at our fingertips right now, Member Brownstein, that rulemaking that at -- or the rulemaking

history, more importantly, that brought that amendment into the regulation. So if we may, we will have to get that to you after the meeting if that's okay. I understand, you know, that can affect your vote. But right now we do not have that at our fingertips.

MR. BROWNSTEIN: No, that's fine. And first of all, let me thank you for your many years of service.

(Laughter.)

MR. GALE: Thank you, thank you.

MR. BROWNSTEIN: And it's been time well spent, for user. But it does sort of underscore the point which is that I sort of feel like there's a formalism here in adjusting this number that maybe causes us to want to think more robustly about this set of reporting criteria.

MR. GALE: Understood, thank you.

CHAIRMAN DANNER: All right, thank you. Peter Chase?

MR. CHACE: Yes, thank you. Let me

lower my hand real quick. I guess, speaking as a former statistician, I want to kind of lay a -- stress the importance of comparing similar data over spans of years when you're looking to try and establish trends. So with that result, I fully support this adjustment and doing it on an annual basis. If you look, right now, PHMSA's got a setup where -- I mean, the purpose of incident reporting is to learn what happened in the incident so you can, if necessary, issue advisory bulletins, notices, changed rules, things of that sort.

And now you've kind of -- to me, what always seemed to be the ridiculous situation that you take your data incident that you collect, and you ignore it. And then you look at your significant incident data because the other stuff is garbage. And it seems like this rule would just kind of skip that step and allow you to devote resources to thinking about what to do with the data instead of separating the wheat from the chaff, so to speak.

Sorry about the dogs. Hey. There's a squirrel.

Also I will point out as a state regulator that investigating these incidents is not really cost free. I mean, it is something where we have to mobilize, get instructors, inspectors out into the field. Collect information, pay our overtime, and all that sort of thing. And it's time we're spending on that that we don't have things to spend the -- that we can't spend in other places.

Now if it is an incident, that's something we ought to be doing and we're happy to do it. I just want to point out, it is really not, you know, a cost-free endeavor for the regulators. And I am sure it isn't the operators as well. And I just want to say this, as long as I have the floor on the subject of incidents. Some of the commenters have touched on this, but some things I see -- there are things out there that I would consider routine, non-hazardous leak repairs

that are starting to get into the territory of having to be reported as incidents.

And this is in Ohio. I can't imagine what it's like in a place like New York City or something of that sort. And I questioned whether that's really the kind of information we want to collect. I don't think that's really an issue for this particular discussion, but long term.

I will say, since I came into the program -- I think 11, 12 years ago now -- I think PHMSA has made a lot of good strides taking this incident data and making sense of it and presenting it to the public. So I appreciate what you do there. It's much better than it was 11, 12 years ago. And that's all I have.

CHAIRMAN DANNER: All right, thank you Pete. Andy Drake?

MR. DRAKE: This is Andy Drake with Enbridge. I just want to hit on a thought that occurred several times -- mentioned that we're

losing data. I want to be very clear. I don't think we're losing any data. A lot of the data that we're collecting here would be collected under the annual report the operators are submitting. It would just be reclassified.

And I think part of what the point here is that we're -- and I thought, here, Chace did a great job of illustrating that -- and that is, as costs continue to increase, if we don't start normalizing them we're -- start stealing data and we're including a lot of pears in the apple bucket. You know, we don't -- now we're giving a lot of things that are masking what's really causing significance incidents, because we have a lot of things starting to fill up the bucket that are minor operational maintenance and routine repair work. And I think to separate that -- or figure out a mechanic to separate that so we can use the data to make appropriate decisions, informed decisions. We don't want to lose the data.

I think the minor operational issues -- some of these leaks, the small maintenance issues that we're talking about -- you know, that may be kind of -- you know, amplified by the cost of the repair. We can keep track of those. But when we're trying to make decisions about what risk profiles we have -- what are the highest risks we need to address, what are the prioritization for our mitigation efforts and even regulatory actions? That will help us make those decisions because we've got better data to deal with. And I don't think we're losing any data. We're just going to try to help differentiate it a little bit to help us make better choices. Thank you.

CHAIRMAN DANNER: All right, thank you. Diane Burman?

MS. BURMAN: Hello, this is Diane Burman. Can you hear me?

CHAIRMAN DANNER: Yes.

MS. BURMAN: I just want to remind folks, we had, back in 2019, spent a lot of

time with the Voluntary Information Sharing System Working Group that grew out of the SAFE PIPES ACT. And that report, which was submitted to Secretary Chao as the final Pipeline Safety Voluntary Information Sharing System Recommendation Report, really clearly laid out that all folks, all stakeholders were very focused on information gathering as appropriate, and the use of that data and learning from that data.

So I just think we should be mindful of that when we're looking at this here because I also don't see it as a matter of losing data and I don't think anyone would want to lose appropriate data. It's more focused on what are we doing? What's acceptable? How are we gathering the necessary data and learning from that? So I just want to remind folks about that report because I do think that that is a really helpful guide and the focus on the mission and the goal for SAFE PIPES. Thank you.

CHAIRMAN DANNER: All right, thank you. So I was unclear in PHMSA's response, NAPSR had suggested that PHMSA first study the effects of changing the reportable criteria dollar amount and what impact that would have on providing information for state programs and the public. And I was just wondering if perhaps you can restate that, since I find the written response is not quite clear.

(No audible response.)

CHAIRMAN DANNER: And that's regarding the NAPSR comment on page 57.

MR. GALE: Sure, Bobby, if you could go back to that slide on -- I think it was 57, as Chairman Danner mentioned.

(Pause.)

MR. CHACE: And this is Pete Chace, I am the NAPSR representative. Can I just --

MR. GALE: Sure, Pete, go ahead.

MR. CHACE: I'll be perfectly honest with you, I'm not exactly sure what that's driving at. The initial comments that we put

together from NAPSR quite frankly said something largely along the lines of where PHMSA is going -- that we think that that dollar amount ought to be looked at and kept consistent from year to year. So you don't just say, $122,000 and 20 years down the road we've got the same problem we do now. I think that's what that is saying. Hopefully that answers your question. But I think, in summary, NAPSR's comments are we just want to make sure we're comparing like with like over the years.

MR. GALE: Thank you, Pete.

CHAIRMAN DANNER: Okay, so you are not asking for -- that this be postponed and that we first undertake a study?

MR. CHACE: That is correct. That's my understanding from NAPSR.

CHAIRMAN DANNER: All right, thank you for that. All right, are there any other comments, questions from the GPAC members?

(Pause.)

CHAIRMAN DANNER: Sara, your microphone is lighting up. Go ahead.

MS. GOSMAN: I hit the wrong button. Sorry. Sara Gosman. So when I say losing data I mean it in a very specific way. I mean that the entire regulatory system here is having to respond to the cost-benefit analyses that drive the cost justification for the standards. And that's, I think, granular data -- particularly about incidents -- is really important to those because the result of having less data is less of a chance to show the benefits of safety rules going forward.

Operators can have data, certainly. VIS can have data. All sorts of other entities can have data, but I am particularly concerned about PHMSA having data and being able to use it through the cost-benefit analysis.

And then, I have a question for Andy about his comment. My understanding is that the annual reports are less granular; that they give counts of incidents, but don't get the

kind of information that's in an incident report. Or at least not all of it. So I am wondering if he can educate me on that.

CHAIRMAN DANNER: Andy, do you want to educate her on that?

MR. DRAKE: Well, I'm not sure I am the best educator on that, but we do have to break down incident by cause and costs in that summary report. (Audio interference.) So there is detail in there that regulator can use to break down those reportable events.

CHAIRMAN DANNER: All right, thank you. I mean, I know, in Washington, we collect in the annual reports the leak data information. Peter?

MR. CHACE: Yeah, I just wanted to briefly comment. I wouldn't look at this as PHMSA getting less data. I would look at this as PHMSA deciding not to continuously get more and more data. Because the goal of this is to consistently have the same sorts of things reported as incidents and not reported as

incidents over time.

I will also say that I don't think this wipes away the obligation of operators to look into accidents and failures under 192-617. I can say, in the state of Ohio, that that is something we expect the operators to take a look at. If they have something that causes, for example, property damage, we would expect that operator to learn from it, promulgate changes as necessary. And if it was significant in the eyes of the operator, to report it as an incident.

CHAIRMAN DANNER: All right, thank you. Did I see Diane's hand up? Diane, did you want to --

MS. BURMAN: I'm good. No, I'm good.

CHAIRMAN DANNER: Okay, great. Thank you. Any other comments before we proceed?

(No audible response.)

CHAIRMAN DANNER: All right. I am

hearing none. I think this is the point where we would entertain a motion. Is there someone willing to make a motion here? All right, Ron Bradley?

MR. BRADLEY: Yes, Ron Bradley from PECO. I'd like to make a motion that the proposed rule, as published in the Federal Register, and the draft regulatory evaluation with regard to the property damage threshold for reporting incidents are technically feasible, reasonable, cost-effective and practicable if the following changes are made. One, adopt an appropriate inflation adjustment based on the CPI at the date of final rule publication. And the second bullet, incorporate a formula in Part 191 for future updates similar to proposed FRA procedures.

CHAIRMAN DANNER: All right, thank you. Is there a second? Sara Longan?

DR. LONGAN: This is Sara Longan. I second. Thank you.

CHAIRMAN DANNER: All right, thank

you. Cameron, do you want to take a vote? Or record a vote.

MR. SATTERTHWAITE: Not a problem. Okay, what I will do is the same thing. I will just go through the names, and if you agree with the language, say yes. If not, you can say no. Diane Burman?

MS. BURMAN: Yes.

MR. SATTERTHWAITE: Peter Chace?

MR. CHACE: I vote yes.

MR. SATTERTHWAITE: David Danner?

CHAIRMAN DANNER: Yes.

MR. SATTERTHWAITE: Sara Longan?

DR. LONGAN: Yes.

MR. SATTERTHWAITE: Terry Turpin?

MR. TURPIN: Yes.

MR. SATTERTHWAITE: Ron Bradley?

MR. BRADLEY: Yes.

MR. SATTERTHWAITE: Andy Drake?

MR. DRAKE: Yes.

MR. SATTERTHWAITE: Mary Palkovich?

MS. PALKOVICH: Yes.

MR. SATTERTHWAITE: Rich Worsinger?
MR. WORSINGER: Yes.
MR. SATTERTHWAITE: Chad Zamarin?
(No audible response.)
MR. SATTERTHWAITE: Oh, sorry. Keep moving. Jonathan Airey?
MR. AIREY: Yes.
MR. SATTERTHWAITE: Mark Brownstein?
MR. BROWNSTEIN: No.
MR. SATTERTHWAITE: Sara Gosman?
MS. GOSMAN: No.
MR. SATTERTHWAITE: And Robert Hill?
MR. HILL: Yes.
MR. SATTERTHWAITE: All right. The motion carries, 11 to 2.
CHAIRMAN DANNER: All right, thank you very much. Now Alan, do we want to take a break now? Or should we keep going? We have three -- three matters -- or four matters under Item 4, so what's your -- what's your direction here?
MR. MAYBERRY: Let's take a break,

Chairman Danner. And let's say come back at 3:00.

CHAIRMAN DANNER: So that's one hour from now?

MR. GALE: Yes, that's about 57 minutes from now. So we'll be in recess until 3:00.

MR. MAYBERRY: 3:00 Eastern.

CHAIRMAN DANNER: Thank you.

(Whereupon, the above-entitled matter went off the record at 2:03 p.m. and resumed at 3:02 p.m.)

CHAIRMAN DANNER: Thank you, everyone. And we're back on the record. And we're going to get right into the next topics, which are master meters, mechanical fitting failure reports, and plastic pipe, which are three separate topics, but will be a single vote if the committee approves. So why don't we right into master meters and I'll turn it back to you, John.

MR. GALE: Thank you, Chairman

Danner. Again, this is John Gale and actually, Mr. Chris McLaren will lead our discussion on both the master meters and the mechanical fitting failure form. And then following that, Sayler Palabrica will lead our discussion when it comes to the plastic pipe issues.

So saying that, Chris, I'll turn it over to you, sir.

MR. MCLAREN: Thank you, John, and Chairman Danner. I'm Chris McLaren with PHMSA State Programs in the Policy and Program Division. I'm going to present master meters and mechanical fitting failure reporting.

Some background on master meters, these are covered under 192.1003 where we get the definitions and some high-level requirements and then 192.1015 where the explicit requirements for master meters are. These are both within Subpart P of Part 192, The Distribution Integrity Management Program.

A master meter is defined in Part 191 as a gas distribution system that purchases

metered gas from a local distribution company for resale within a defined area. And they're typically apartment complexes, trailer parks, and there are a few other examples, but those the best. And there are many of them in existence, tens of thousands.

A typical master meter system is less than a mile in length, and serves fewer than 300 customers. It typically operates at a significantly lower pressure when compared to other typical distribution systems, something around 10 psi or so. But that depends upon application.

Master meters must comply currently with the following simplified DIMP requirements specified in 192.1015. And those typical elements of a management system are: have knowledge of your system, identify threats, rank risks, identify and implement risk reduction measures, measure performance, monitor results, and evaluate effectiveness, and periodically evaluate and improve the

program.

Many master meter systems rely on a third-party computer program such as SHRIMP to generate a DIMP program for them. Thank you.

Some background on our experience with DIMP on master meters is that it has had a low safety impact. Inspection reports indicate effective implementation and compliance with DIMP has been a challenge despite inspector focus. Most master meter systems are small, simple systems that do not require a risk-management regime to protect them adequately.

Therefore, DIMP requirements for master meter systems place an unnecessary burden on operators and inspectors. The number of master meter systems and implementation problems create a significant DIMP inspection workload specifically for state inspectors. The requirements for DIMP draw operators' resources towards risk management requirements that they neither need nor understand.

By focusing operator and inspector

efforts on compliance with basic prescriptive requirements, we would be likely to have a greater impact on safety with less burden. Some of these existing prescriptive requirements include operations and maintenance procedures in subparts L and M which include the abnormal operating procedures and those requirements; utilizing more sensibly continuing surveillance requirements in 192.613; and also the failure investigation requirements in 192.617.

In the proposed rule, PHMSA proposes to exempt master meter systems from DIMP, subpart P. PHMSA also sought comment on if it was appropriate to extend incident reporting requirements to master meter systems.

The National Propane Gas Association and many others commented in support of the master meter exclusions. They further stated that small liquefied petroleum gas, LPG, operators should be subject to the same exclusions. Note that a small LPG system is

defined in 192.1001 as a gas distribution system that serves fewer than 100 customers on a single source of LPG, typically a propane tank. And note that the 192.1015 DIMP requirement covers both small LPG and master meter operators.

NAPSR commented in favor of the exclusions, and also requested to exclude small LPG systems and other small distribution operators with fewer than 100 customers from the DIMP requirement.

Pipeline Safety Trust did not oppose DIMP exemptions for master meters provided that other minimum safety standards continue to apply and are effectively enforced.

PHMSA's response to those comments are that the Transportation Research Board or TRB, published a study of the safety requirements applicable to small LPG systems in 2018. The TRB recommended a PHMSA-administered process for approving state waiver programs that would allow a state to exempt small LPG

systems from specific requirements on a case-by-case basis rather than a general exception from DIMP or any other prescriptive requirement.

The TRB Special Report 327 titled Safety Regulation for Small LPG Distribution Systems is available for a free download at the following website. You have to kind of move through it and act like you're purchasing, but it is complimentary.

Based on the comments and conclusions from the TRB study, PHMSA believes that this issue requires additional analysis and notice and comment procedures be applied prior to its inclusions in the discussion. PHMSA will consider the comments and recommendations from the TRB study in a future rulemaking action.

Thank you. One industry subject matter expert commented to oppose extending incident reporting requirements to master meter systems and small LPG operators. The commenter

suggested that the poor data quality from such operators would degrade the usefulness of the incident database.

PHMSA's response is that PHMSA will evaluate if it is appropriate to apply incident reporting to master meters to ensure consistency in the Pipeline Safety Regulations in future rulemaking actions. PHMSA notes that the existing 191.9 does not exempt small LPG operators from incident reporting requirements.

Chairman Danner, that's all on master meters. I'll move on to mechanical fitting failures as appropriate unless there's some comments or questions at this time.

CHAIRMAN DANNER: Thanks, Chris. I guess if there are any clarifying questions from members?

I have one question, Chris. I just want to make sure I'm clear on what the recommendation is right now. Are you still proposing to exempt the master meter systems from DIMP?

MR. MCLAREN: Yes.

CHAIRMAN DANNER: Okay.

MR. MCLAREN: Yes, sir.

CHAIRMAN DANNER: Okay, because there was a slide that said you wanted to continue looking at this.

MR. MCLAREN: It was for the small LPG operators.

CHAIRMAN DANNER: Okay.

MR. MCLAREN: Since they're both covered in the 192.1015 regulation together.

CHAIRMAN DANNER: Thank you very much. I think you can go on to the MMF now.

MR. MCLAREN: Okay. So mechanical fitting failure reporting requirements are found in 192.12 and then within the DIMP regulation also in 192.1009.

As a background, mechanical fittings are devices that join pieces of pipe using mechanical pressure rather than welding or heat fusion. These devices are commonly on distribution lines, especially distribution

service line connections.

In 2011, PHMSA required operators to report leaks caused by mechanical fitting failures that are classified as hazardous leaks, except those that are non-hazardous. A leak is a much broader category compared to an incident since it is not limited by minimum consequence criteria. The mechanical fitting failure form includes basic cause and manufacturing information.

Since 2011 in our analysis of the data, PHMSA has not identified statistically significant trends in the MFF data. The Plastic Pipe final rule addresses failures caused by insufficient pullout restraint and inadequate resistance to anticipated loads regarding the requirements for mechanical fittings. And the low reporting criteria results in an average of approximately 15,000 mechanical fitting failure reports submitted per year.

Attributes about mechanical joint

failures are repeated in incident reports for those more significant and consequential events.

In the proposed rule, PHMSA proposed to eliminate mechanical fitting failure reporting and to reinstate cross-referenced information in the incident report form. PHMSA also proposed to add a count of leaks due to mechanical fitting failures to the gas distribution annual report form. This allows PHMSA to continue measuring overall trends in mechanical joint performance over time and amongst operators and supports inspectors and inspection and inspection planning.

The proposed change eliminates approximately 12,000 to 18,000 reports per year with the average being about 15,000 reports per year, and reduces the burden of providing mechanical fitting failure information by about 95 percent. The change has no safety impact. Keeping a count of leaks provides performance information that is valuable to PHMSA and state

inspectors.

The National Propane Gas Association and others generally support removing mechanical fitting failure reports. Other comments came from equipment providers, Dresser and NORMAC, who were opposed to adding mechanical fitting failure data to the distribution annual report since they are already captured under other categories of leaks.

The Pipeline Safety Trust opposes removing mechanical fitting report requirements on the basis that the data is valuable in identifying problems. Removing reporting requirements that are relatively low in cost and could potentially provide insight to future trends in safety as well as regulatory effectiveness is identified as shortsighted.

In PHMSA's response, PHMSA disagrees with the changes proposed in the comments from NPGA and industry, Pipeline Safety Trust, and manufacturers. Nine years of data collection

of approximately 15,000 mechanical fitting failure reports each year have not provided statistically significant trends in failures of mechanical joints. Conversely, gas distribution incident reports result in approximately 100 reports annually for all causes combined.

A future combination of incident reports and a count of leaks on the gas distribution annual report will adequately meet PHMSA's information needs and indicate if circumstances change in the future.

Other comments Dresser and NORMAC also provided requests to revise the incident report forms and instructions to clarify joint failure causes. NORMAC requested that PHMSA address the distinction between mechanical fitting and joint by changing terminology in the proposed rulemaking to ensure that its regulations and other actions focused on joints, the making of joints, and the qualifying of joining procedures.

And PHMSA's response, other changes to the incident and annual report form are outside the scope of this rule. However, PHMSA will consider these issues raised during future updates to the forms and their instructions via the normal process in the Paperwork Reduction Act. Thank you.

CHAIRMAN DANNER: All right, let me go back to the committee members and see if there are any clarifying questions with regard to MFF.

Mark Brownstein.

MR. BROWNSTEIN: Yes. Thank you, Mr. Chairman. So the clarifying question, PHMSA refers to statistically significant information in discussing the mechanical fitting change. And I'd like to get a little more clarity on what is meant by that phrase or how is that being used in this context?

MR. MCLAREN: This is Chris. Thank you. In the analysis of the data, part of the mechanical fitting failure reporting team

includes a statistician, who is on staff with PHMSA Southern Region, who also supports other analysis teams. And that has been the term used by the statistician. And in looking at the data, I haven't found any fault with that and we publicly post the data and that's how I infer the use of the term statistically is that it was reviewed and used by a statistician.

MR. BROWNSTEIN: Okay, so if I may, as a follow-up, I get that. I guess what -- so you get these 50,000 reports a year. They give information as it relates to leak information. They give information as to the type of pipe, the age of pipe, the location of pipe. And so I'm not sure where the statistical analysis comes into play here. That's what I'm trying to drive at.

MR. MCLAREN: Okay, in terms of the data collected which would include the cause of failure, we would also look at where the leaks occur and in what types of applications or service to service is typically the largest

one, whether they're steel or plastic, what the typical life span is when one of these failures occur. All of those types of data and information have been looked at for several years and trended and that's the application of the word statistically significant looking for trends.

We also do other types of looks at the data -- at different types of data.

MR. BROWNSTEIN: So in other words, you're not seeing any patterns in that data.

MR. MCLAREN: That would be correct. There would not -- the trends hold constant and the findings are consistent and they are consistent with what we anticipated we would find going into the information-gathering activity.

MR. BROWNSTEIN: Okay. Thank you. That's all the questions.

CHAIRMAN DANNER: All right, Alan and then Diane.

MR. MAYBERRY: I want to remind the

folks that the history of this form, we really created it because we did see a trend and so we created this more detailed reporting mechanism and like Chris has pointed out, we really -- it's done what it can do for us. We're really not seeing anything, so therefore at this point we'll just drop back to including information on manual report which is where we already, you know, it's the main repository for leaks and inventory and the like and vintage.

So it's time to move on and just use that way of collecting the information. We've gotten what we needed to out of it. I just wanted to clarify that. Thanks.

CHAIRMAN DANNER: Right. Thank you. Commissioner Burman?

MS. BURMAN: Thank you. Can you hear me?

CHAIRMAN DANNER: Yes, we can.

MS. BURMAN: Great. So I don't want to go backwards. I didn't realize I didn't have my hand up. I want to go back to the

master meter issues, so when we're done with the mechanical fitting failure report section, I just want to make sure I raise my question on the master meters at that time.

CHAIRMAN DANNER: All right. I think I think I'm looking to see if there are any other clarifying questions with regard to the mechanical things. I'm not seeing any unless Alan your hand is still up.

Well, wait a minute. Sara Gosman, do you have question on the MFF?

MS. GOSMAN: Yes. Thank you. I just wanted to follow up on Mark's question and ask what was the specific information that PHMSA got from this data so I can understand why it's not needed any more? Thank you.

MR. MCLAREN: This is Chris McLaren. The mechanical fitting failure reporting team at PHMSA reviewed the submitted data annually and produced a report that is posted on the PHMSA website under the DIMP website performance measures and we analyzed it each

year and continued to look at it. And the data of what types of fittings are failing where, by which cause, and what they're made of. And so that was the -- you know, there's a lot of reports gathered on the mechanical fitting failure form. So we would look at that and typically 67 percent of them are steel fittings and they typically are failing at 46 years.

CHAIRMAN DANNER: Chris, is there any chance you could blow that up a little bit on the screen? Thank you.

MR. MCLAREN: And so the performance measures in the report go through each year what we had found that year that had changed, as well as the overall data and analysis from all years previous. There are unknown data that occur at high rates such as the manufacturer of the failed component or the component that was involved in the joint failure. And so those are some of the specifics. They are typically nut follower. They are typically coupling type steel fittings

involved in service-to-service connections. They typically occur like in the high 90 percent below ground and outside and the data has continued to remain consistent.

Some early reporting, everybody getting used to the report, was discussed very early on, but the data has normalized the last five years, we think, because of the consistent use of it and that data to us shows that there are no significant trends and that the information collection activity has run its course. Thank you. I hope that answers your question.

MS. GOSMAN: So if I may, yes. Thank you very much, Chris.

CHAIRMAN DANNER: All right. Thank you. Are there any other questions with regard to MFF?

Okay, we're going to step back just a little bit and Commissioner Burman, go ahead.

MS. BURMAN: Thank you so much. Hold on for a second. Can you hear me?

CHAIRMAN DANNER: Yes, we can.

MS. BURMAN: Okay, sorry. So if you go back to slide 64 which I believe is the master meter definition. We've got 64 in the background. Yes, so I'm confused on what constitutes a master meter and it's really I guess I'm just looking for PHMSA's clarification on what most people refer to as the Mall of America interpretation on a master meter and just my own sense of that interpretation and then what would be a master meter if that interpretation is not clarified. It may mean in some states having significantly new and create folks who are deemed master meter operators which could range in many areas simple, small landlords, schools, and others.

And so I guess I'm just trying to get a feel for where PHMSA is with this Mall of America interpretation because many of these entities won't have the same knowledge and expertise that an LVC would. And I just really want to make sure we're carefully thinking

about that interpretation, about the definition of what constitutes a master meter and then what would need to be done if that interpretation stands in terms of educating folks on what all that means.

MR. GALE: Okay, Chris, do you want to respond to that?

MR. MCLAREN: Sure. This is Chris McLaren and the definition of a master meter, I guess is what I can address, that it supplies the ultimate consumer either purchase the gas directly through a meter or by other means such as rent. The typical examples are those provided beyond what's in 191 and referring to the interpretation for the Mall of America. I don't have any additional information on that. Thank you.

MR. GALE: And Chairman Danner, if I may, this is John Gale.

CHAIRMAN DANNER: Yes.

MR. GALE: Thank you, Diane, for that comment and we know there is some concerns

relative to the Mall of America interp. But you know, that gets into what is or what may not be a master meter or in that matter some entity subject to our regulations.

The proposal in front of us today is simply for those that are master meters, we would exempt them from DIMP. So though the issue of the master meter is a very challenging one and we do get a lot of questions from different entities, both state and the operators themselves, as are they covered under the regulations as a master meter or what constitutes a master meter? And that's a challenge for my office on a fairly regular basis.

But I think what's in front of us right now is if an entity is a master meter, should we subject them to DIMP or not? And our recommendation is as you see in the proposal, based even on the public comment is that we should exempt them from those DIMP requirements, but rest assured, we are

continually looking at what our regulations say and especially what our interpretations have said with regard to master meters and we hope to clarify those in the future. Thank you.

MS. BURMAN: Thank you. I'd just like to put in a plug for needing to do that sooner rather than later. I think it's a really important issue in looking at the Mall of America interpretation. I'd like to see that clarified in sort of layman's terms and discussion on if it's to stand as a stricter interpretation, what educational campaign is done ASAP to work with those folks who would normally not have been considered master meter operators, but now would find themselves that because could be a real disconnect, so I appreciate if PHMSA works with folks on that.

MR. GALE: Thank you, Ms. Burman.

CHAIRMAN DANNER: All right, any other clarifying questions on master meters or MFF? We're going to move on.

So back to you, John or Sayler.

MR. PALABRICA: Okay, so the next topic is a handful of amendments related to the requirements for plastic pipe.

PHMSA published a final rule addressing a number of plastic pipe topics in November of 2018. The rule allowed a design factor of 0.40 rather than 0.32 for polyethylene pipe with certain conditions including a minimum wall thickness based on ASTM D2513 which is the ASTM standard governing the design specifications for plastic pipe that's incorporated by reference in Part 192.

And addition did not include wall thickness specifications for sizes larger than 12 inches. And so in our requirements it didn't include those larger sizes either.

However, PHMSA indicated in the preamble of that rule that it would evaluate newer editions of ASTM D2513 and consider allowing larger-diameter pipe with a 0.40 design factor in the future based on that review.

PHMSA staff has reviewed the updated edition of D2513-18a edition and determined that incorporating it by reference into part 192 is justified. And that new revision includes minimum wall thickness specifications for sizes up to 24 inches and PHMSA has no technical issue with allowing a 0.40 design factor for those sizes.

So this is additional background for another amendment under this topic related to joining procedures. ASTM F2620 describes procedures for making heat fusion joints on polyethylene pipe.

Section 192.281(c) requires heat fusion joints on PE pipe comply with that standard. And Section 192.285(b)(2) allows visual inspection and testing in accordance with ASTM F2620 as an option for evaluating a polyethylene pipe joiner's test joint prepared for requalification.

So additional background on that -- on this portion. In the preamble of the

Plastic Pipe Rule, PHMSA indicated that alternative procedures comparable to ASTM F2620 could be acceptable if the operator can demonstrate the differences are sound and provide an equivalent or better level of safety. However, that was not made clear in the regulatory text itself and so in response, the American Gas Association submitted a petition for reconsideration suggesting allowing other procedures qualified in accordance with 192.283, including two standards developed by the Plastics Pipe Institute.

And finally, newer editions of ASTM F2620 include safety improvements and clarify how that document relates to other industry standards including those referenced by AGA in their petition.

So in response to those issues with regards to ASTM D2513 and the design specifications for polyethylene pipe, PHMSA proposed to incorporate by reference the 2018a

edition of that standard and allow a 0.40 design factor for PE pipe with a diameter up to 24 inches outside diameter based on the specifications in that revised document.

With respect to joining procedures, PHMSA proposed to incorporate by reference the 2019 edition of ASTM F2620. We note the newer document clarifies how the standard relates to other standard practices referenced in AGA's petition, and additionally clarifies that written procedures that have been demonstrated to be equivalent or superior to ASTM F2620 are permitted.

In addition to those major topics, there are a couple of miscellaneous amendments and corrections. In 192.121, we're revising the term design formula to design pressure. We are correcting the minimum wall thickness for 1 inch CTS pipe based on the ASTM standards for each of the materials referenced. And that was polyethylene, polyamide materials. And clarify that pipe produced on the effective date of the

plastic pipe final rule may use the design factor.

And then in 192.283(a)(3), correct "no more than" to "no less than" and clarify that the test reference there is a tensile test.

And, finally, clarify that specimen PE heat-fusion joints inspected under 192.285(b)(2)(i) must be visually inspected in accordance with F2620 and then tested in accordance with 192.283(a) to better reflect the text of F2620.

So for comments on these plastic pipe amendments, the associations and many other industry entities generally supported the changes to the plastic pipe regulations.

The Pipeline Safety Trust responded with no comment on this item. And many industry commenters stated support of this item without additional comment.

And we appreciate the feedback on the proposed rule.

The associations commented that the proposed revision to table -- for the minimum wall thickness specifications does not include SDR 11.5, 1 inch CTS pipe and this is referring to the 1 inch CTS pipe wall thickness correction in the miscellaneous amendment which had -- and that size has a .099 wall thickness and the commenter said that it is in common use. The associations requested that PHMSA include SDR 11.5 in that table. And NAPSR requested clarification on this issue as well.

And PHMSA's response is a .099 inch wall thickness most closely corresponded to SDR 11 for 1 inch CTS pipe which was what was adopted for the adjacent CTS. However PHMSA does not object to objecting a .099 inch wall thickness and we note that the two specifications are within allowable tolerances of each other in the ASTM code.

The Plastics Pipe Institute supports the IBR of the updated industry standards to ensure the latest materials, testing, and

innovations are recognized in Part 192. And they recognize safety improvements in D2513-2818a such as UV protection and dimension tolerance, although noted that it's not the latest edition of that standard any more.

PPI also requested reference to specific example procedures TR-33 and TR-41, though commenters said that they are not requesting IBR of those procedures.

However, PHMSA cannot IBR documents that have not been subject to notice and comment. However, if an operator can demonstrate that their alternative procedure based on those documents provides an equivalent or a superior level of safety compared with ASTM F2620, it would be acceptable under the proposed amendment.

PPI strongly supported the change to increase the allowable dimensions for polyethylene pipe using a .4 design factor up to 24 inches along with updating the corresponding wall thickness tables. However,

they also requested that PHMSA update 192.121(a) to allow hydrostatic design basis ratings established at 180 degrees Fahrenheit which is allowable in TR-4, incorporated by reference, but not by the text of 192.121.

PHMSA notes that we proposed no changes to the design formula, and so this comment is out of scope of the proposed rule. However, PHMSA will evaluate this issue for future rulemaking if appropriate after analyzing the issue.

PHMSA notes that operators are permitted to interpolate the design formula down from 180 degrees Fahrenheit, but cautions that not all polyethylene compounds are rated at that temperature.

This concludes the PHMSA response to comments on master meter, mechanical fitting failure, and plastic pipe topics.

In light of the comments received from the NPRM, PHMSA recommends the committee consider adopting the proposal with the

following changes. Regarding master meters and DIMP applicability, no changes to the NPRM are recommended. However, PHMSA will consider the comments received with regard to small LPG systems, the TRB report, and propose appropriate revisions to the regulation of such systems in a future rulemaking action.

Regarding the MFF amendments, no changes to the NPRM are recommended. And regarding plastic pipe, modify the minimum wall thickness table for polyethylene to specify a .099 inch minimum wall thickness for 1 inch CTS pipe rather than 0.101 inches.

And that concludes the discussion of the plastic pipe topics and the recommendations for master meters, MFFs, and plastic pipe.

CHAIRMAN DANNER: All right, thank you. So we have three separate issues that we're taking public comment on at the same time, so --

MR. GALE: Chairman, this is John Gale. I think we're ready to receive public

comments on these issues on any way which you want to manage this.

CHAIRMAN DANNER: All right. So what I think I'll do is -- let's open it up for those who want to discuss master meters specifically. And then we'll come back and we'll call on people a second time if they're wanting to talk about more than one issue.

So first any public comment on master meters?

All right. I am seeing no one wishing to comment on master meters. Is there any public comment on MFF?

All right. I am seeing no public comments on MFF. Is there any public comment on plastic pipe?

MR. GALE: Chairman, I believe we see -- I see Lane Miller's hand up.

CHAIRMAN DANNER: Oh, I do too. I'm sorry. All right, are the hands that are up, are they in regard to MFF or to plastic pipe? Lane Miller?

MR. MILLER: For the MFFR report.

CHAIRMAN DANNER: Yes, go ahead, sir.

MR. MILLER: Can you hear me okay?

CHAIRMAN DANNER: Yes, we can.

MR. MILLER: Good afternoon, ladies and gentlemen. My name is Lane Miller and I'm with TRC and I'm representing Norton Manufacturing Company also known in the industry as NORMAC, and I really appreciate the opportunity to provide public comments concerning this rulemaking project.

As with many others in the industry, we appreciate the efforts PHMSA is taking to address the proposed modifications to the regulations without compromising safety.

NORMAC encourages PHMSA and the GPAC to consider some of the written recommendations made by NORMAC.

The first key recommendation concerns the addition of the standalone category of mechanical fittings in Part C of

the annual report.

This section of the annual report requires the operator report the total number of leaks and hazardous leaks by cause, and since the focus of this section of the annual report is about what caused a leak as described by the category, NORMAC doesn't understand the reason why PHMSA would introduce a category that really asks the location of the leak.

All of the categories described in Part C start with the words "leaks caused by" or "leaks resulting from," but then the instructions for the mechanical joint failure also states a leak caused by a mechanical joint failure, and then they go on to define what a mechanical joint is as far as a fitting between two sections of pipe, but a mechanical fitting doesn't cause a failure, just like a weld, flange, a valve doesn't cause a failure.

If a pipe weld fails, it's due to something either by corrosion, hit by a backhoe, vibration, something. It takes

something else and it doesn't fail on its own, but based upon what's proposed, the resulting addition is the location of the leak. This would be the same as asking an operator to report thread leaks, which is a joint on a pipeline, but the answer provides a location, but not the cause.

NORMAC feels that mechanical joint failures are already addressed in the category definitions and the instructions for the annual report for pipe weld and joint failure or incorrect operation.

The pipe weld and joint failure category addresses material defects for all types of fittings and components. It also directs the operator to file under incorrect operation if the cause of the leak is due to poor construction.

As provided in the docket PHMSA has shown in post markups to the annual report and the instructions, the new category of mechanical joint is described, but the pipe

weld and joint failure category has not been modified.

Since this hasn't been modified, it appears that an operator would have to report in both locations, doubling the number of leaks reported for the same leak if a mechanical joint is involved.

So, the question is how does an operator report a leak on a line that's been hit by a third party and the leak is located on an older style mechanical fitting, that category 2 or category 3, and they got to pull it apart? Would this be an excavation damage or a mechanical joint failure, or both?

Additionally, by adding this reporting requirement in Part C, PHMSA seems like they're canceling out some of the savings that they're counting on by removing that part and then moving that over into the annual report.

The second recommendation concerns the gas distribution incident report and the

modifications for sub-clause 5, pipe weld and joint failure under Part G.

With the new proposal, NORMAC has discovered at question 12 of G5 is duplicating the question in the question concerning poor workmanship, procedure not followed, or poor installation procedures that are the same in G7.

So, it seemed like that where material, or excuse me, the pipe weld and joint failure talks about material component failure and it's not about poor workmanship, those need to be removed and depend on Section G7.

The third recommendation concerns the data fields that are used in the current MFFR which are now being proposed to be placed in the sub-clause G5 pipe weld and joint failure under Part G.

In some of those questions that have been in the original MFFR, one of them seems like there's an opportunity to provide some clarity. It's brand-new into the annual

report, an opportunity to really identify what it means.

NORMAC recommends modifying the proposed question F-I which asks how did the joint failure occur, which is stemming over from the MFFR.

Based upon the choices of answers to give, the question is really asking for the type of joint failure. Those choose leak through seal, leak through body, pulled out or other. None of these choices describe how the joint failed, but the type of joint failure.

This concludes my comments. Thank you very much for your time.

CHAIRMAN DANNER: All right, thank you. Brian Moidel?

MR. MOIDEL: Thank you. Can you hear me?

CHAIRMAN DANNER: Yes, I can.

MR. MOIDEL: Okay, good afternoon. My name is Brian Moidel. I'm the principal engineer at Dominion Energy Ohio and I oversee

their plastic piping program.

Dominion Energy Ohio has approximately 1.2 million services, 20,000 miles of distribution main, 1,000 miles of transmission pipelines, and 800 miles of gathering pipelines.

We appreciate the opportunity to comment to the committee on this notice of proposed rulemaking related to plastic pipe.

We would like to support PHMSA's decision to change Table 1 labeled PE pipe, minimum wall thickness and STR values under 192.121(c)(2)(iv) for polyethylene pipe from a minimum wall thickness for one-inch CTS SDR 11 of 0.101-inch wall thickness to SDR 11/11.5 0.099-inch wall thickness.

This notice of proposed rulemaking originally spoke about using a minimum wall thickness of 0.119-inch for one-inch CTS plastic in polyethylene plastic piping systems.

Dominion Energy Ohio and Dominion Energy West Virginia combined uses

approximately 1.1 million feet annually as its service line standard for median pressure customers up to 60 pounds, and have done so for many years with the one-inch CTS 0.099.

Many other distribution operators also utilize one-inch CTS PE-2708 plastic pipe with a wall thickness of 0.099 inches. Well, after speaking to the two most prominent plastic pipe manufacturers in the United States, I obtained the following information.

Manufacturer number one stated in the past 12 months, approximately 94 percent of the one-inch CTS median density PE-2708 pipe that they make was 0.099-inch wall.

Manufacturer two stated in the past 12 months, approximately 95 percent of the one-inch CTS median density PE-2708 pipe they shipped was 0.099-inch wall.

In addition, one-inch CTS 0.099-inch wall PE-2708 has design pressures of 77 PSIG with a 0.32 design factor, and 96 PSIG with a 0.40 design factor at 73 degrees Fahrenheit, so

from a design perspective, it is perfectly acceptable to use in these situations.

Without this change, Dominion Energy, other U.S. natural gas distribution companies and manufacturers will have to scrap perfectly good plastic pipe in this size and wall thickness for no good reason other than a wall thickness difference of two-thousandths of an inch.

End users will have to special order new pipe. This will not only affect the plastic pipe manufacturers and end users. It will also affect plastic fitting manufacturers and their supply chains as the produce valves, polyethylene valves, risers, EFEs, and mechanical fittings with one-inch CTS 0.099-inch wall thickness connections.

In concluding, this pipe has been used for years with no apparent safety or performance issues. I just want to thank the committee for the opportunity to speak on this important matter.

CHAIRMAN DANNER: All right, thank you very much. I don't see any other hands up with regard to any of these three issues, so this is kind of a last call for public comment.

All right, seeing nothing, let's go back to the advisory committee members, and once again, why don't we break these down and let's first talk about master meters. Is there anyone who wishes to discuss that issue? All right, I see Ron Bradley's hand.

MR. BRADLEY: Thank you, Chairman, Ron Bradley from PECO, just a comment, you know, as we go through this discussion and talk about master meters and the other items.

The one that I wanted to just put on the record relative to master meters is when this first came to light, I did struggle a bit, but then after really spending time looking at the comments and understanding, you know, some of the pushes, I absolutely appreciate, you know, some of the comments, specifically the comment that, you know, that some opposed

initially, but, you know, making sure that the master meters do stick with minimum standards and requirements when running their businesses.

You know, this isn't one of those signaling that there's no regulation required, but only that the DIMP program is one that we're willing to vote away.

I really appreciate the fact that there will be focus on operations and maintenance procedures in Subparts L and M, there will be focus on continued surveillance requirements as in 192.613, and continued focus on failure investigation requirements as in 192.617. I just wanted to make that statement. Thank you.

CHAIRMAN DANNER: Thank you, and I share those comments and it leads to a question. How does this get communicated to the master meter operators?

How do we make sure that they understand that this is not walking away from safety regulation, but simply removing some of

the requirements, but that they are otherwise bound to follow the protocols that PHMSA requires?

MR. GALE: Chairman Danner, this is John Gale again. So, one of the things obviously we can do is make sure that the preamble is very clear to these points, but I think we'll then have to do some outreach maybe through some of our state partners to get this information out to those entities that are considered master meters so that they fully are aware of what this change is, and to some degree, what the change isn't, so that they are --

You know, this isn't an exception from, you know, like we had some uncertainty as to the farm tap issue earlier. This isn't an exception from Part 192, for example. This is an exemption or an exception from a specific provision of Part 192.

So, we'll take a look at all of our means available to get the word out and not

just simply rely on a Federal Register kind of communication means in this situation because this is a little bit harder group to get to for sure.

CHAIRMAN DANNER: And that's certainly been our experience, and out in Washington, of course, we're able, we're willing and eager to help you in that effort. Alan Mayberry?

MR. MAYBERRY: Yeah, I was just going to add to that, Chairman, is that, you know, following a pattern we've done with other rulemakings that seems to work really well is we'll develop an implementation plan.

And I'm sure we will work very closely with, you know, the states, you know, your organization and others to ensure that we, you know, get the word out in the appropriate ways, but, you know, and we'll work as well with you to, you know, develop the implementation plan for it, so, thanks, good question.

CHAIRMAN DANNER: All right, well, thank you very much. Are there others who wish to speak to master meters? All right, then anyone wish to speak to the mechanical fitting failure? Rich Worsinger?

MR. WORSINGER: Rich Worsinger, Wilson, North Carolina. Actually, I had trouble getting my hand up. I wanted to make a comment about master meters.

CHAIRMAN DANNER: Well, you go right ahead.

MR. WORSINGER: Thank you. Probably most of you are aware of the APGA SIF program, the Safety and Integrity Foundation that was founded in part by PHMSA, developed the SHRIMP program to help many of the smaller systems comply with DIMP.

Many of the master meter companies and master meter users use SHRIMP to help them comply with the DIMP requirement. We can also reach out to them to communicate anything else that can help them in complying with the DOT

regulations.

MR. GALE: This is John Gale. Thank you, Rich. We'll make sure to take advantage of that.

MR. WORSINGER: 10-4.

CHAIRMAN DANNER: Thank you, Rich. Okay, so we're going to go back to MFF, and I see Sara Gosman has got her hand up. Sara?

MS. GOSMAN: Thank you. So, I would like to ask a question of PHMSA if I may, and that's so I understand that the information here that you'll now be gathering is in the annual reports, and my understanding of why this information was gathered to begin with was a concern about incidents, right, or coupling failures.

So, I'm wondering how the total numbers of these leaks will help PHMSA in making decisions about future regulations when the data they currently have is more granular? Thank you.

CHAIRMAN DANNER: All right, that's

a question for PHMSA.

MR. McLAREN: This is Chris McLaren, and so the MFFR or joint failure data is being looked at to be included with more granularity in both the annual report and incident report, and within the annual report, the total number would allow an understanding of how that number is moving over time, and also to support inspector inspections such that understanding if that is a drill down that needs to be further discussed with the operator to understand which type of mechanical fittings or failing and where, from what causes. Thank you.

MR. MAYBERRY: Mr. Chairman, this is Alan Mayberry if I may.

CHAIRMAN DANNER: Yes, go ahead.

MR. MAYBERRY: You know, our databases really serve a variety of stakeholders, well, all stakeholders, so I would expect as this data is accumulated through our annual reports, you know, much like

the other data, it really informs what Chris just said, but not just that, you know, our inspection program or the state inspection program, but also the various distribution and integrity management programs that operators have.

Because we do expect, you know, through those programs that operators are chasing the risk and addressing the risk, and I would expect that that risk is identified through the numbers that will be reported, much like they are related to, you know, leaks, and cast iron inventory, and the like, that the risk is addressed commensurate with, you know, what the data is showing.

So, I fully expect that that will be done and obviously be something that we as regulators will look to see that operators address the risk appropriately.

CHAIRMAN DANNER: Thank you. Mark Brownstein?

MR. BROWNSTEIN: Yes, thank you, Mr.

Chairman. So, I guess I struggle with this one a little bit for a couple of reasons, first of all because as we've seen over the last several years in doing our field research on methane emissions associated with gas transmission and distribution, that leaks at the service, you know, at the service line couplings are, you know, important in the overall methane footprint coming from the gas utility industry and may be an underappreciated source of emissions overall.

And so having the robust database with regard to the source of the leaks, the materials associated with the leaks, and so one and so forth is incredibly important not just for PHMSA, but I think for state environmental agencies, for the federal environmental agency, and frankly for public service commissions for whom decisions need to be made or oversight needs to be given to capital allocation requests that utilities come in with when they're thinking about investing or asking for

rate treatment for investments in upgrading and improving their systems.

So, on the one hand, I appreciate the fact that the PHMSA staff has looked carefully at this data and believes that they have gleaned all that they can glean in terms of insights, but I am left wondering whether that's the full story or the end of the story in terms of the usefulness of the data, so that's number one.

I guess number two for me is if this were a big ticket cost item, I might be more sympathetic with the idea that this is an important reform to address, but if I understand this correctly, it's, you know, in the neighborhood of $900,000 of savings, which, you know, in the general scheme of things, is not incredibly significant.

So, I do sort of wonder whether the marginal additional costs of collecting this data isn't, you know, trivial relative to some of the benefits that we could hope to get, not

just in the context of PHMSA, but in other contexts.

CHAIRMAN DANNER: So, I guess I would like to ask, I mean, the operators are still required to report and investigate failures, so where are we -- where is the scrutiny slide? What are we going to be missing here? And that's a question, I think, for PHMSA.

MR. McLAREN: This is Chris McLaren, and in terms of what would be missing, the 192.617 requirement for investigation of failures is applicable, but also as Alan mentioned, the distribution integrity management program where operators are monitoring their threats and required to take risk mitigation actions as appropriate based on an evaluation and ranking of those risks.

The 15,000 reports annually that would go away, I think that the inspection and required monitoring of those threats is expected to still occur. The data has shown

that the trends are consistent.

I think the data shows through our website as well as in our annual report, consistently show that these are the typical failure causes, and where they are occurring, and what material types, et cetera.

And I think that adequately addressing and having a number of them allows inspectors to understand the operators' threat level with those mechanical fitting failures. Does that answer your question?

CHAIRMAN DANNER: Yeah, it does. I mean, I was trying to see, I mean, first of all, it seems that you're using data to figure out what you don't need to collect, but that we also have sufficient reporting that we can probably get to the answers we're looking for.

At least, that's my take on it. I could be persuaded otherwise, Mark Brownstein, if you want to go ahead.

MR. BROWNSTEIN: Yeah, Mr. Chairman, so just to be specific, so right now, and thank

you for putting, you know, the report up on the screen, we're asking for, you know, information on leak location, year installed, year manufactured, manufacturer, lot number, the material. In the annual reports, we'll still be getting all of this information, but we'll just be getting, you know, generically the number of leaks.

MR. GALE: Mr. Brownstein, this is John Gale. What you're going to get is generically the number of leaks, but as I understand, and Chris or Sayler can provide further clarity, I think some of the information you're seeing there regarding part number, lot number, or manufacturer is a lot of information in many cases that the operator can't get to because there's not the records or the information available to them when these leaks occur.

So, you know, I think we've seen the trends. We're not seeing changes in the trends, so we have knowing what we know so to

speak at this point, but we do think it's important to continue to keep track of these in maybe a more 64,000 foot level of the number, but we think we've gained the data we need to gain to make any decisions, even if we need to make these decisions in the future.

MR. BROWNSTEIN: Okay, well, no, and that's fair and I hear that. I was just trying to get a little more clarity around the question the Chairman asked in terms of so what we -- you know, if we make this change, here is what we won't be getting, you know, going forward, so I at least have a better understanding of that, so thank you.

MR. GALE: Yeah.

CHAIRMAN DANNER: Sara, go ahead.

MS. GOSMAN: Thank you. So, I guess in addition to all that Mark has expressed, which I agree with, I think that it's hard, particularly when it comes to information gathering, to try to see the what would have happened if, right, you hadn't gathered this

information, or another way of framing that is the very act of gathering the information can alter behavior.

And I think that that's one concern I have here is, you know, it's not just that you're getting this information as PHMSA and you've decided you don't need it anymore, right, but you're also using -- well, yes, you're having reports, right, of particular information.

You're also putting this on your website as part of your performance measures for DIMP, and that in turn, you know, creates a kind of public disclosure here of this information that, again, I think it's hard to know exactly how that might alter behavior.

And I don't know that we can say that there would have been the same lack of incidents, for example, if we had not gathered this information, or that we wouldn't see that in the future maybe more precisely here.

So, in addition to my general

feeling that in a system in which we are relying on operators for integrity management decisions that are largely within their hands, that the tradeoff for that is the PHMSA gathers as much information as it can to be overseeing that as a regulator, I think I have a particular concern about the arguments being made here in terms of the usefulness of the information.

CHAIRMAN DANNER: All right, Peter Chace? Peter Chace, did you have your hand up?

MR. CHACE: Sorry, there's this unmute feature on my computer I figured out just now.

CHAIRMAN DANNER: It's challenging to all of us. Don't feel down.

MR. CHACE: Yeah, I just wanted to talk about the issue of what we're, of looking at leak causes. Honestly, I kind of feel that's what the state programs do and what we're for. Just for the record, we do look at these operators' DIMP programs and how they're

classifying and analyzing leaks.

I personally think the issue of reporting or not reporting on, you know, the mechanical fitting failure report is probably independent from the state programs looking at what operators are doing with their DIMP programs and them saying that leak causes are investigated and understood.

So, that's just my two cents. I feel that's what state programs are for and now that's our role.

CHAIRMAN DANNER: All right, thank you, and that's what I'm hearing from my state program director as well, and so that's why I probably has less discomfort with this than some of the, than Sara or others.

Are there any other hands up on this issue? All right, any discussion on plastic pipe? Okay, Sara?

MS. GOSMAN: I should have asked this question during the discussion, the briefing, and I apologize for that. I just

wanted to make sure I understood. Are any of the proposed changes here, the design factors, being applied to existing plastic pipelines?

That is, is it creating the same set of issues that I highlighted in the pressure vessel context? This is a question for PHMSA, sorry.

CHAIRMAN DANNER: That's all right. All right, PHMSA, Chris?

MR. PALABRICA: Yeah, this will be going forward. This is Sayler Palabrica, sorry.

CHAIRMAN DANNER: Okay, thank you, Sayler. So, going forward, so with regard to existing pipe, this does not apply?

MR. PALABRICA: That's correct.

CHAIRMAN DANNER: All right, any follow-up, Sara?

MS. GOSMAN: No, that's all I meant to ask.

CHAIRMAN DANNER: Okay, thank you.

MS. GOSMAN: And Chairman, I think,

I don't know. If now is not the time to mention it, soon perhaps, I think I'd like to discuss voting on all of these together versus voting on them independently.

CHAIRMAN DANNER: Yeah, I had planned on raising that issue myself. Let's get through the discussion on plastic pipe first if there is any further. Is there any further discussion on plastic pipe?

All right, it looks like we're done with the discussion, so, Sara, do you want to raise the procedural issue?

MS. GOSMAN: Yes, thank you, Chairman. So, I would like to suggest that we vote independently on the three issues, master meters, MFF reports, and plastic pipe. Alternatively, I would be filling to vote on master meters and plastic pipe together and the MFF reports individually.

MR. GALE: Chairman, this is John Gale. We can do that. I think what we'll do is we'll combine, if Mr. Jagger can go ahead

and modify this vote slide and take off the MFF reports, and we'll have that vote, and while we're having that vote, we'll develop a slide specific to the MFF report.

CHAIRMAN DANNER: So, let me ask though, Sara, your preference is to also break up master meters and plastic pipe so that those are separate votes as well?

MS. GOSMAN: So, the person in me who likes clarity would love to break those up, but personally, I don't need them broken up because I plan to vote in favor of both of them.

CHAIRMAN DANNER: Okay, unless there are any objections, let's break this into two votes, not three, and I don't see any hands up objecting to that, so it looks like we will -- John, let's break this up into two separate votes.

MR. GALE: Okay, I think you see in front of you now a revised vote slide specific just to master meters and plastic pipe, and we

can move forward with that, and then we'll develop the slide specific to the MFF report to pull up as soon as this is complete.

CHAIRMAN DANNER: All right, very good. So, is there someone willing to make a motion? All right, Rich, thank you very much. Go ahead.

MR. WORSINGER: The proposed rule as published in the Federal Register and the draft regulatory evaluation with regard to master meter DIMP applicability and plastic pipe are technically feasible, reasonable, cost effective, and practicably if the following changes are made.

Regarding plastic pipe, revise the minimum wall thickness tables for plastic pipe to specify 0.099-inch minimum wall thickness for one-inch CTS pipe rather than 0.101-inch, and this is Rich Worsinger with the City of Wilson.

CHAIRMAN DANNER: All right, thank you very much. Is there a second? All right,

Peter Chace?

MR. CHACE: I'll second.

CHAIRMAN DANNER: All right, thank you. So, we have a motion and a second, so Cameron, can you record the vote?

MR. SATTERTHWAITE: Okay, let me get myself -- sorry, here we go. All right, so we'll do it as before. I'll call your name and if you agree with the language, you can say yes. If you do not agree, you can say no. Diane Burman?

MS. BURMAN: Yes.

MR. SATTERTHWAITE: Peter Chace?

MR. CHACE: Yes.

MR. SATTERTHWAITE: David Danner?

CHAIRMAN DANNER: Yes.

MR. SATTERTHWAITE: Sara Longan?

DR. LONGAN: Yes.

MR. SATTERTHWAITE: Terry Turpin?

MR. TURPIN: Yes.

MR. SATTERTHWAITE: Ron Bradley?

MR. BRADLEY: Yes.

MR. SATTERTHWAITE: Andy Drake?
MR. DRAKE: Yes.
MR. SATTERTHWAITE: Mary Palkovich?
MS. PALKOVICH: Yes.
MR. SATTERTHWAITE: Rich Worsinger?
MR. WORSINGER: Yes.
MR. SATTERTHWAITE: Jon Airey?
MR. AIREY: Yes.
MR. SATTERTHWAITE: Mark Brownstein?
MR. BROWNSTEIN: Yes.
MR. SATTERTHWAITE: Sara Gosman?
MS. GOSMAN: Yes.
MR. SATTERTHWAITE: Robert Hill?
MR. HILL: Yes.
MR. SATTERTHWAITE: Thank you, Bob. It's unanimous. The motion carries.
CHAIRMAN DANNER: All right, thank you very much. Are we ready for our next motion? All right, do I have a volunteer to make the motion? Peter Chace, go ahead. Thank you.
MR. CHACE: Yeah, I'll give it a

try. I move that the proposed rule as published in the Federal Register and the draft regulatory evaluation with regard to mechanical fitting failure reports are technically feasible, reasonable, cost effective, and practicable.

CHAIRMAN DANNER: Thank you, and Sara Longan, will you second?

DR. LONGAN: I second. Thank you.

CHAIRMAN DANNER: Thank you. All right, so we have a motion before us. Cameron?

MR. SATTERTHWAITE: Okay, we will do it as before. I'll say your name, and if you agree with the language, you can say, if not, you can say no. Diane Burman?

MS. BURMAN: Yes.

MR. SATTERTHWAITE: Peter Chace?

MR. CHACE: Yes.

MR. SATTERTHWAITE: David Danner?

CHAIRMAN DANNER: Yes.

MR. SATTERTHWAITE: Sara Longan?

DR. LONGAN: Yes.

MR. SATTERTHWAITE: Terry Turpin?
MR. TURPIN: Yes.
MR. SATTERTHWAITE: Ron Bradley?
MR. BRADLEY: Yes.
MR. SATTERTHWAITE: Andy Drake?
MR. DRAKE: Yes.
MR. SATTERTHWAITE: Mary Palkovich?
MS. PALKOVICH: Yes.
MR. SATTERTHWAITE: Rich Worsinger?
MR. WORSINGER: Yes.
MR. SATTERTHWAITE: Jon Airey?
MR. AIREY: Yes.
MR. SATTERTHWAITE: Mark Brownstein?
MR. BROWNSTEIN: No.
MR. SATTERTHWAITE: Sara Gosman?
MS. GOSMAN: No.
MR. SATTERTHWAITE: Robert Hill?
MR. HILL: Yes.
MR. SATTERTHWAITE: Okay, the motion carries 11 to two. Thank you.
CHAIRMAN DANNER: All right, thank you very much. We're going to move on then to

Topic G, Rectifier Remote Monitoring, and Topic H, which is Atmospheric Corrosion. These two are also bundled, and let's just get right into it. So, John, whoever from your team is presenting here, let's move forward.

MR. GALE: Sorry, yes, Chairman Danner, actually this is John Gale and I'll be leading the discussion for the next two topics, so let's go ahead and get started on rectifier remote monitoring.

A rectifier impresses a direct current onto a pipeline, providing protection from corrosion. Rectifier stations must be inspected six times a year under 192.465 of the pipeline safety regulations. However, it is not clear in the regulations that these inspections may be conducted remotely.

However, PHMSA has interpreted the requirement to be technology neutral. In addition, the code does not currently specify what constitutes a rectifier inspection.

So, in the proposal, in the NPRM,

PHMSA proposed to explicitly permit remote monitoring and clarify that a rectifier inspection consists of recording amperage and voltage readings.

For rectifiers being inspected remotely, PHMSA proposed to require the operator physically inspect the device during annual cathodic inspection surveys under 192.461(a) to ensure that it has not been damaged. Next slide, please?

So, some of the comments we've received on this proposal, the associations, the Pipeline Safety Trust, and many other industry organizations supported allowing rectifier remote monitoring with annual physical inspections.

The associations recommend PHMSA adopt an annual physical inspection based on the cathodic protection survey requirements, rather than require inspections exactly when cathodic protection surveys take place.

The commenter noted the proposed

language could require an operator inspect a rectifier more than once annually if it affects multiple pipeline segments or if CP surveys occur over a few days.

NPGA and other supporting entities supported the proposal, but suggested that physical inspection should be required as needed based on rectifier malfunction rather than specifying annual inspections.

PHMSA's response, PHMSA agrees to clarify that physical inspection is expected to occur annually, and secondly, not all malfunctions would be readily apparent remotely and an operator has several opportunities to perform a once-annual physical inspection during other maintenance tasks, such as CP surveys. Next slide, please?

One individual commenter opposed reducing the reduction of inspection standards and requests and increase of monitoring standards to align with industry practices.

PHMSA's response, the proposed rule

codifies existing PHMSA interpretations and enforcement guidance of this requirement. Operators are not currently required to physically inspect a rectifier six times annually, but may continue to do so if that is their procedure.

Depending on the technology employed, remote monitoring could actually enhance safety by allowing on-demand or real-time evaluation.

So, Chairman, that concludes our discussion of the rectifiers. I didn't know if you wanted to ask to see if there's any clarifying questions, or would you prefer I just move on into atmospheric corrosion?

CHAIRMAN DANNER: I think we can do this quickly. Are there any clarifying questions? All right, you can go ahead then, John.

MR. GALE: All right, very good, atmospheric corrosion. So, the background on atmospheric corrosion, pipeline facilities

exposed to the atmosphere, for example, aboveground, in vaults, or indoors, are susceptible to atmospheric corrosion and must be cleaned and suitably coated per 192.479.

The rate of atmospheric corrosion varies with environmental conditions such as humidity, pollution, and other factors.

All exposed onshore gas pipelines must be inspected for atmospheric corrosion once every three years. If corrosion is found, the operator must protect against the corrosion as described in 192.479.

Virtually all distribution service lines include some aboveground components, for example, the riser and the meter sets.

Comments on DOT's Notice of Regulatory Reform suggested changes to atmospheric corrosion requirements for distribution pipelines. One suggestion was to extend the inspection interval to five years, consistent with the current required frequency of leakage surveys.

One suggestion was to eliminate a specified inspection interval all together, and instead manage atmospheric corrosion under DIMP.

Syncing the frequency of atmospheric corrosion assessment with leakage surveys would allow both tasks to be accomplished by a single crew during the same inspection, and PHMSA Is not aware of an incident caused by atmospheric corrosion currently on a distribution service line.

PHMSA proposed to extend the atmospheric -- so what we ended up proposing was PHMSA proposed to extend the atmospheric corrosion control inspection interview from three calendar years to every five calendar years for distribution service pipelines in accordance with 192.481.

However, PHMSA proposed to require assessment within three years if atmospheric corrosion was identified on the previous inspection.

PHMSA also proposed to clarify that consideration of corrosion threats under DIMP includes atmospheric corrosion, and that significant atmospheric corrosion threats may require more frequent inspections or other measures to mitigate risk.

PHMSA has determined that the low risk of atmospheric corrosion on service lines and safeguards in the proposed rule prevent adverse safety impacts.

Distribution mains and other higher-pressure lines are excluded from the proposed change. The rule requires a shorter inspection interval if corrosion is identified, and explicit consideration of atmospheric corrosion under DIMP may require an operator to take additional mitigative measures if there are significant atmospheric corrosion threats.

So, some of the comments we received on this proposal, the associations and other industry entities supported a five-year interval on atmospheric corrosion inspections

for service lines.

The associations and NPGA however, suggested that a shorter three-year interval when corrosion is identified is unnecessary if the facility, or the corrosion that is, is remediated.

The associations suggested the following remediation alternative. Paragraph D would read if atmospheric corrosion is found on a service line during the most recent inspection, then operators must repair or replace portions of the service line found to have atmospheric corrosion that could reduce the pipeline's integrity and apply new coating, as necessary, to all affected portions of the service pipeline that are aboveground within 12 months of identification of atmospheric corrosion, or meet the requirements of Paragraph C of this section and perform the next inspection of that pipeline or portion of pipeline within three calendar years, with an interval not exceeding 39 months. So,

basically it would go back to what was our original proposal, so this would provide an alternative.

So, PHMSA's response, PHMSA has safety concerns with replacing a shorter reassessment interval with remediation when atmospheric corrosion has already been identified.

Remediation is already required by the existing regulations in 192.481(c) through reference to 192.479. Evidence of corrosion is an indication that a corrosive environment may exist.

Any final action must be consistent with public safety and environmental protection in accordance with the pipeline safety laws.

PHMSA believes that the enhanced remediation alternative requires further analysis and notice and comment procedures to ensure that is it consistent with these goals. Next slide, please?

NPGA and supporting organizations

requests clarification on whether the three-year interval when corrosion is identified applies to the whole system or just the location where corrosion was identified.

NAPSR and others suggested a corresponding change to recordkeeping requirements to support the revised inspection interval. Specifically, an operator should retain records for the last two inspections to ensure that their use of the five-year inspection interval is supported.

PHMSA's response, the shorter inspection interval would apply to service lines on which the atmospheric corrosion was identified and PHMSA will clarify this in the final rule.

PHMSA will also clarify the recordkeeping requirements of this section in 192.491(c) based on the comment from NAPSR to ensure that the operator's inspection interview and inspection results are adequately documented.

The Pipeline Safety Trust generally opposes reducing corrosion inspection interval, but recognizes that atmospheric corrosion hasn't been a factor in recent incidents. As a result, they stated that they mildly oppose this change and request more prescriptive corrosion monitoring regulations.

NAPSR suggested PHMSA consider an alternative of establishing a shorter interval of three to four years for residential leak survey requirements, and that the atmospheric corrosion and leak surveys can be conducted simultaneously as proposed, so in other words, shorter the leak survey requirement than the atmospheric corrosion, extend the atmospheric corrosion survey requirement.

The American Association of Laboratory Accreditation requested a change from a prescriptive inspection interval to a risk-based determination with a maximum interval of five years, not to exceed 63 months.

PHMSA's response, PHMSA determined that due to the low risk of atmospheric corrosion and the conditions in the proposed rule ensure that the safety of distribution lines is maintained.

PHMSA agrees that a prescriptive maximum interval is necessary, but is persuaded that five years is an appropriate maximum interval for atmospheric corrosion surveys for service lines where no active corrosion or atmospheric corrosion threats have been identified.

Explicit consideration of atmospheric corrosion under DIMP effectively serves as a risk-based determination not to exceed five years.

The associations also requested removing of the term "evaluate" from 192.481(a), but PHMSA did not present specific guidance and criteria for the evaluation, and a prescriptive inspect and remediate requirement coupled with explicit considerations through

DIMP would meet PHMSA's justification for revising 192.481 and the term "evaluate" is not necessary.

PHMSA's response, PHMSA's intent was not to change the content of the inspection itself. PHMSA will consider removing the term "evaluate" consistent with the existing language in 192.481, and as indicated in the comments, operators are required to evaluate corrosion under DIMP.

Mr. Chairman, this concludes PHMSA's response to comments on the rectifier remote monitoring proposal and the proposal related to atmospheric corrosion topics.

In light of the comments received from the NPRM, PHMSA's recommending the committee consider adopting the proposal with the following changes.

Regarding rectifier monitoring, require physical inspection of remotely monitored rectifier stations once each calendar year consistent with required CP surveys rather

than exactly when CP surveys occur.

And with regard to atmospheric corrosion, remove the term "evaluate" consistent with the existing language in 192.481, clarify recordkeeping requirements in 192.491(c) to ensure operators retain records necessary to substantiate a five-year inspection interval, but PHMSA does not recommend allowing remediation as an alternative to a shorter inspection interval when corrosion is found.

So, with that said, Mr. Chairman, we're ready to accept public comments on these two topics.

CHAIRMAN DANNER: All right, first let me see if the committee members have any clarifying questions. Are there any questions for John before we go to the public?

All right, now we can go to public comment. Is there anyone on the line who wishes to discuss rectifier remote monitoring or atmospheric corrosion? I am not seeing any

hands. Oh, I am now, two. All right, Erin Kurilla?

MS. KURILLA: Hi, can you guys hear me okay?

CHAIRMAN DANNER: Yes, we can.

MS. KURILLA: I'm sorry. I have many things going on and open. I appreciate the opportunity to provide public comment. My name is Erin Kurilla. I am the vice president of operations and safety at the American Public Gas Association.

I certainly appreciate PHMSA looking to try to help operators align some of these prescriptive requirements, including aligning atmospheric corrosion with leak surveying.

I think it makes all the sense in the world for operators to be able to have one individual duly qualified to do both of these inspections.

And I think that it really helps enhance safety by bringing those two prescriptive inspection cycles together and

enabling them to focus their efforts there instead of, you know, the management of kind of complicated intertwining, you know, some stuff is on three years and some stuff is on five years.

It can get quite confusing and become almost a paperwork exercise instead of an exercise in improving the assets themselves, and for that reason is why the associations provided the "or" option for Part D.

It's because we recognize that, hey, if you, for whatever reason, choose not to replace that piece of aboveground piping or fully remove the atmospheric corrosion and coat the piping, then you should come back to that piece of pipe in three years and check on it, but if you fully remediated and removed that atmospheric corrosion, and frankly removed the threat of atmospheric corrosion from that piece of pipe, then there's no reason why you should have to visit it any more frequently than any other piece of pipe on your system.

And if the concern is about the spread or, you know, I shouldn't say spread, the reoccurrence or the occurrence of atmospheric corrosion elsewhere on your system, that's where this inspection cycle comes in. You're visiting each of those assets every five years.

So, it feels a little bit like the emphasis is being placed on a portion of aboveground piping that has been fully remediated when, in fact, that just became your newest asset on your system, and so I guess it feels like that three-year cycle is not appropriate for especially that asset, not specifically that assets.

And then again, if we're starting to manage, if you can imagine a scenario where you've got 100, say, service lines, and three of them have evidence of atmospheric corrosion that you've fully remediated, now you've got 97 on five years and three on three years, and you're going to go back to those three, and now

you're going to put them back on five years.

Well, now they're never going to be on the same five-year cycle as your other ones, so we're back to where we started in the original code language or the existing code language with things on all different cycles and no efficiency being realized.

So, that's why I would encourage the committee to consider the "or" option offered by the associations. Thank you.

CHAIRMAN DANNER: All right, thank you. Are there any other comments on these topics? All right, I am not seeing any, so I will then go back to the advisory committee. Peter Chace?

MR. CHACE: Yeah, I think Erin's comments that she just made were pretty good, and then you throw in the fact that a lot of these distribution operators will look at leak surveys and atmospheric corrosion concurrently, particularly with indoor meters, inside meters, where I think a lot of these less exposed by

does.

Really, well, first, I believe Erin is right that the five-year versus three-year thing will be an administrative burden to the point that it's simply not worth doing for operators and they'll just stick with the three-year cycle. And honestly, I think that the economic impact of this is probably going to be more close to zero than anything else, but that's all I really had.

CHAIRMAN DANNER: All right, thank you. Mark Brownstein?

MR. BROWNSTEIN: Yes, thank you. I guess I'm a little confused about the value of synchronization only because, at least to my layperson's understanding, a lot of the leak detection inspection work that goes on is done with, you know, drive-by technology, and it seems to me that the equipment that we're talking about here requires some sort of physical in-person inspection.

So, I'm sort of wondering where the,

you know, where the labor savings comes from, from a synchronization of these two activities, but I could be wrong. You know, I freely admit I could be wrong on that.

I guess my second point is if there is value in synchronization, I guess I would fall into the camp of the NAPSR comment that maybe the way to synchronize this is to get everything on a three or four-year inspection timeline as opposed to synchronizing everything at five.

We do know that as a practical matter, you know, leaks on the distribution system are, you know, considerable, and we probably should be moving to a more frequent, and I know some jurisdictions already have and some utilities already have moved to a more frequent leak detection survey, some even doing it annually.

So, if anything, you know, if there is value to synchronization, I think that we should be looking at something that, you know,

syncs everything up on a three-year cycle.

CHAIRMAN DANNER: All right, thank you. Sara Gosman?

MS. GOSMAN: I agree with Mark's points. I also want to raise this issue of taking the term "evaluate" out of the proposed rule.

So, I think this is a moment in time in which I think that the focus of the pipeline industry on the worries about compliance and enforcement here is, it's hard to understand because I don't think that the term "evaluate" does anything but reassure folks like me that, in fact, the operators are going to be thinking about the information.

And so, and at this point, taking the term "evaluate" out of the proposed rule and putting it into the final rule without "evaluate" sends the opposite message.

So, I just think that this is an issue that we should leave the term "evaluate" in, and I feel strongly enough about this, and

I think it adds some comfort for me that I am comfortable, not happy, but comfortable with a reduction in inspection intervals here, but I do want the term "evaluate" in. I think it's reassuring.

CHAIRMAN DANNER: All right, thank you very much. Ron Bradley?

MR. BRADLEY: Thank you, Mr. Chair. This is Ron Bradley from PECO. So, I just want to take a shot at a couple of the comments that I heard.

One was regarding the frequency of the move and one was regarding synchronizing, and I will tell you as a utility operator, when we do this task, it is aligned with our service leak survey work.

So, I get that in some cases, there is mobile survey where there's different equipment, sometimes RMLD equipment, you know, older school might be flame ionization, and that goes down the street and down the main, but then there's a different activity where we

actually have people that walk the services and walk up to the building wall and work their way, if it's an indoor meter, to get inside the house.

And so the task for both of those, whether it's an outdoor meter and looking at it, or indoor, is the service leak survey person. So, I would say in most utilities, that's not a separate, so synchronization definitely makes sense.

As far as frequency, you know, I heard some discussion about maybe, you know, go the other way and do everything on a three-year cycle. I will tell you that that is the way that some of us went.

You know, as we look at our DIMP plans and we try to figure out how to align our process, I'm not a fan of that. I think we're doing work where we found out that on the other hand, we're turning over our infrastructure.

And in my case, for example, we have a number of -- we're probably down to about

nine percent of our services are bare steel. Ninety one, 92 percent makes up plastic, you know, we have plastic services.

And as we put more plastic in, the system gets even tighter and, you know, it encourages us to -- you know, when we find our leaks, it's not on the services. It's on the main that we're taking, you know, that we're working on and we're remediating that as well.

So, I would say that our systems get tighter. We're doing the leak survey. We're walking it with services. The five and the three-year made it a real bear to try to stay aligned, so we took the much more expensive tact of going after them on a three-year cycle. I think it's best to go to a five-year cycle.

And I will also give you one other set of numbers. Every month, I get an update. Our odor calls this year to date are down 1,300 versus last year, so that doesn't put it in any frame.

It just shows you that the system is

tightening and we're getting less calls for issues because we're putting modern equipment in that, quite frankly, has a much lower leak rate and we're getting ahead of that.

So, I don't know if those two things help, but I wanted to offer that.

CHAIRMAN DANNER: Thank you. Rich Worsinger?

MR. WORSINGER: Hi, this is Rich Worsinger, City of Wilson, North Carolina. I just want to first add a little something to this atmosphere corrosion discussion.

When people use the term atmospheric corrosion, I try to remind them what we're talking about is rust. And typically on this atmospheric corrosion, it is some rust on the piping for the meter set.

We, too, as Ron Bradley stated they do at PECO, we, too, coordinate our annual leak survey on a three-year basis; we do one-third of the system each year and coordinate the atmospheric corrosion survey the same time.

We also have equipment. And Mark brought up a good point, or good concern there, if you're doing a mechanized survey, what is the savings of coordinating these two?

But we do them at the same time. We drive the system with mobile leak detection equipment, but then we also walk the system to look at every meter set at each customer's house. And where we find rust, we then prepare a work order and come back, and we sand it and prime it and paint it.

And I question the value of going from five years -- I agree with going to five years for the atmospheric corrosion inspection, but if you fully remediate that, I question why would you want to look at that again in three years?

We're not finding those issues where we've remediated a meter set, some surface rust on the pipes, and we go back three years later, it hasn't begun rusting again.

And also, we are seeing the same

thing as our services are replaced. We don't have any bare steel at this point; it's all plastic and protective steel. We don't have very many leaks on the surfaces; we're seeing them on our mains also. Thank you.

CHAIRMAN DANNER: All right, thank you. Mary Palkovich?

MS. PALKOVICH: Yeah, this is Mary with Consumers. I echo both what Erin said, what Ron said, and then also what Rich said. And then I would add, in addition to supporting the recommendation, is that there are also leakage surveys, like business district and cast iron, that take into account other risk factors. So, I just want to go on record in supporting moving atmospheric corrosion inspections to the five-year interval.

CHAIRMAN DANNER: All right, thank you. Rick Worsinger, your hand is up. You want to speak again?

MR. WORSINGER: Sorry.

CHAIRMAN DANNER: That's all right.

I don't see any other hands up. I wanted to go back to what Sara was saying about she's okay with the five-year interval, but she has some problems with other language in the rule. Sara, do you want to restate that? And then I can ask PHMSA for response?

MS. GOSMAN: Sure. Thank you Chairman. So, my concern is that PHMSA originally had language in the proposal that included that statement that each operator must inspect and evaluate each pipeline or portion of the pipeline that is exposed to the atmosphere, for evidence of atmospheric corrosion.

And because of comments received during the public comment period, is now taking the term evaluate out. And as I said, I think that at the very -- perhaps it's duplicative, but if it's duplicative, I think it's better to have it in there just to make sure that everybody understands.

And if it's not duplicative, if it's

new, I think it's important to have an evaluation requirement.

CHAIRMAN DANNER: All right, do you want respond to that?

MR. GALE: Yeah, Mr. Chairman. John Gale here. I'm asking for staff to go ahead and pull up the section of the NPRM so that the members can see the wording in context.

While that's happening, regarding leak survey, I would like to remind the members of something that occurred during the valve rule a couple of months ago regarding leak surveys, and it was in association with some comments we've received from, I think it was both NTSB and Pipeline Safety Trust regarding applicability of their proposal related to leak detection and distribution lines.

And we had stated in our response to that, that for distribution pipelines, PHMSA will review the existing leakage survey requirements in 192.723, to looking to strengthen those leak survey requirements,

e.g., the more frequent surveys, and account for advancement in technology and the associated repair criteria.

So, just to be clear, we understand the leakage issues is an important issue, and we're looking at that and we have it on our radar for something to review and consider.

So, I just want to make sure the members are aware that we are -- remind them that we talked about during the valve rule, and it is something we're going to be looking at in the future.

So, regarding the term evaluate, Sayler, are we seeing the NPRM on the screen? Can you highlight where the use of the term evaluate the Ms. Gosman -- is this --

MR. PALABRICA: So, on the left is the NPRM, on the right is the existing language.

MR. GALE: Very good, thank you. And could Chris or Sayler, could you address Ms. Gosman's concern?

MR. PALABRICA: Yes. So, the commenter has raised issue with the inclusion of the term evaluate here. The intent of the proposed rule wasn't to change the content of the inspection itself. However, as we noted in the slides -- and this is based on the proposal to clarify the consideration of corrosion under DIMP includes atmospheric corrosion -- they are required to evaluate atmospheric corrosion threats under that section. But the intent wasn't to change the content of the inspection under this section.

MR. GALE: Very good. Thank you, sir. What you're saying -- and this is John Gale. So, that's why we're seeing this screen to the right, Sayler, is we're seeing what the existing regulation states, where it just says each operator must inspect each pipeline, and it doesn't say inspect and evaluate. Is that correct?

MR. PALABRICA: Yes.

MR. GALE: Okay, very good. Thank

you. Thank you, Mr. Chairman.

CHAIRMAN DANNER: All right, thank you. Mark Brownstein?

MR. BROWNSTEIN: Yes. So, thank you for that. So, that's a great reminder that leak frequency is on the agenda. And I'll look forward to that, number one, and number two, will expect that all the fans of synchronization today will be fans of synchronization in a couple of years when we get around to addressing the frequency of the leak surveys.

MR. GALE: Thank you, Mr. Brownstein.

CHAIRMAN DANNER: All right, and are there any other comments on this subject? All right, I would just say -- Mark, did you still have your hand up?

MR. BROWNSTEIN: No. Sorry about that.

CHAIRMAN DANNER: That's all right. Sara?

MS. GOSMAN: I guess I wonder if there are any committee members who are supportive of taking evaluate out. Yes, thank you.

CHAIRMAN DANNER: Okay. I'm going to do a quick poll. Rich, do you want to respond? Or do you have another question?

MR. WORSINGER: No, I want to respond. Rich Worsinger, Wilson. I agree with Sara. I'm fine leaving the term, and evaluate, in the proposed rulemaking.

And I think it's actually what our people do when they go out there. They not only inspect, they're evaluating what needs to be done to remediate it.

Is it as I described earlier, where you sand away the rust, prime and paint? Or is it a situation where you're better off replacing a couple of sections of piping? Thank you.

CHAIRMAN DANNER: All right, thank you. Andy Drake?

MR. DRAKE: This is Andy Drake with Enbridge. I'm just trying to respond to Sara's point. I am in favor of leaving evaluate in there. It is a fundamental part of the activity to determine fitness for service.

CHAIRMAN DANNER: All right, thank you. Mary Palkovich?

MS. PALKOVICH: No problem with leaving evaluate from my perspective. I think earlier, Sara said that she could go along with the five-year if she had evaluate in there, and I agree with Andy. When they are inspecting, they are evaluating.

CHAIRMAN DANNER: All right, and I also think it's important that we leave evaluate in. In the Pacific Northwest, where we had a little problem in British Columbia the winter before last, and we're dealing with 14 percent rate increases as a result, I know it was a different kind of pipe, but nonetheless atmospheric corrosion was a factor. And so it gives me chills when I hear the term.

I'm less interested in synchronization than I am in safety, but I think we've got a result here, I think, that doesn't jeopardize safety or doesn't compromise it. So, I'm okay with the term evaluate in it.

So, with that, we're going to do these two votes together, G and H. We have the proposal in front of us. Is there a volunteer to make a motion? Ron Bradley, thank you.

MR. BRADLEY: Yes, thank you chair. This is Ron Bradley from PECO. I'd like to make a motion for the committee that the proposed rule, as published in the Federal Register, and the draft regulatory evaluation, with regard to remote monitoring of rectifiers and atmospheric corrosion, are technically feasible, reasonable, cost-effective, and practicable, if the following changes are made.

Regarding rectifier monitoring, require physical inspections of rectifier stations once each calendar year, consistent with required CP surveys, rather than exactly

when CP surveys occur.

Regarding atmospheric corrosion, revise Code 192.491(C)to require operators retain records of the last two atmospheric corrosion inspections.

CHAIRMAN DANNER: And is there a second?

Mark Brownstein?

MR. BROWNSTEIN: No, I'm not actually raising my hand to second. I'm suggesting maybe we want to split this vote. I personally don't have a problem with what's being proposed for rectifiers, but for the reasons I stated earlier, I going to oppose the atmospheric corrosion piece.

CHAIRMAN DANNER: All right. So, in that case, Ron Bradley, would you be willing to withdraw the motion so that we can split it up?

MR. BRADLEY: Ron Bradley. Actually, I have to withdraw the motion. I think it's great timing. I think something's missing. So, yes, I'm going to withdraw the

motion.

CHAIRMAN DANNER: All right. So, you have some language that you want to add when we split it up?

MR. BRADLEY: I thought the -- I don't know if the five years was going to be in there, or if it's a given. I just don't see the five years in there.

CHAIRMAN DANNER: Oh, okay. But we're doing the proposed rule with these changes. So, the five years is in the original and not changed.

MR. BRADLEY: Okay, got it. I pull my motion back. Yes.

CHAIRMAN DANNER: Okay, thank you very much. And John, can I have your team break this up and we'll --

MR. GALE: Yes, this is John Gale. Yes, Chairman, I think we're in the process of doing that right now.

CHAIRMAN DANNER: All right. Okay, I think we've got a rectifier motion in front

of us. Ron, do you want to take that one? Ron Bradley?

MR. BRADLEY: Absolutely. Thank you. Okay, so I'd like to make a motion for the committee regarding the proposed rule, as published in the Federal Register, and the draft regulatory evaluation, with regard to remote monitoring of rectifiers, are technically feasible, reasonable, cost-effective, and practicable, if the following change is made.

Regarding rectifier monitoring, require physical inspections of rectifier stations once each calendar year, consistent with required CP surveys, rather than exactly when CP static protection surveys occur.

CHAIRMAN DANNER: All right, thank you. Is there a second? Okay, Rich Worsinger?

MR. WORSINGER: Rich Worsinger, Wilson, North Carolina. I'll second.

CHAIRMAN DANNER: All right, thank you very much. We have a motion before us.

Cameron, can you take the vote and record?

MR. SATTERTHWAITE: Okay. All right, I'll call your name. If you agree, you can say yes. If not, you can say no. Diane Burman?

(No audible response.)

MR. SATTERTHWAITE: Peter Chace?

MR. CHACE: Yes.

MR. SATTERTHWAITE: David Danner?

CHAIRMAN DANNER: Yes.

MR. SATTERTHWAITE: Sara Longan?

DR. LONGAN: Yes.

MR. SATTERTHWAITE: Terry Turpin?

MR. TURPIN: Yes.

MR. SATTERTHWAITE: Ron Bradley?

MR. BRADLEY: Yes.

MR. SATTERTHWAITE: Andy Drake?

MR. DRAKE: Yes.

MR. SATTERTHWAITE: Mary Palkovich?

MS. PALKOVICH: Yes.

MR. SATTERTHWAITE: Rich Worsinger?

MR. WORSINGER: Yes.

MR. SATTERTHWAITE: Jonathan Airey?

MR. AIREY: Yes.

MR. SATTERTHWAITE: Mark Brownstein?

MR. BROWNSTEIN: Yes.

MR. SATTERTHWAITE: Sara Gosman?

MS. GOSMAN: Yes.

MR. SATTERTHWAITE: Robert Hill.

MR. HILL: Yes.

MR. SATTERTHWAITE: And Diane Burman? Just double-check that.

(No audible response.)

MR. SATTERTHWAITE: Okay, it is unanimous. The motion carrier.

CHAIRMAN DANNER: All right, thank you. I believe Commissioner Burman said she had to step out this afternoon for a few minutes.

All right, now we have before us the motion on atmospheric corrosion. Is there a volunteer to make a motion? Mary Palkovich, thank you.

MS. PALKOVICH: Before I make the

motion, just could you clarify one more time, and I know you said it a minute or two ago, where in this change it moves the atmospheric corrosion periodic interval from three years to five years?

CHAIRMAN DANNER: John, do you want to state that? It's my understanding that what we have before us is a motion to adopt the rule that was proposed, that was published in the Federal Register, and (audio interference).

MR. GALE: Yes. So, just to be clear, members, so what we're recommending in this vote language is, like Chairman Danner said, is to adopt what we proposed, which was move from three years to five years, unless atmospheric corrosion is identified, and then you'd move back to three --

MS. PALKOVICH: Okay, John, you got cut off a little bit --

MR. GALE: -- recommendation from commenters. Though it does not include the recommendation from commenters to allow to

retain the five-year inspection interval if you remediate the corrosion. It does not include that currently.

MS. PALKOVICH: And this is Mary. I thought we kind of agreed we were going to add the language that if it was remediated, that it goes to five years.

MR. GALE: Okay. Well, we'll add that bullet there. So, Mr. Jagger, if you can go ahead and add that bullet if that's what's recommended by the committee, we'll add that bullet under here.

CHAIRMAN DANNER: Well, let's make sure that that's what our understanding is with the committee members again. Is that your understanding? Sara Gosman, you have your hand up?

MS. GOSMAN: Yes. We had a good discussion about this, but that was not my understanding of where we ended up, and I afraid I can't support that.

CHAIRMAN DANNER: And that is my

understanding as well, and I also would have problems with that. Anyway, that's my own view. Richard Worsinger?

MR. WORSINGER: Rich Worsinger, City of Wilson. I also feel very strongly that if we've remediate the atmospheric corrosion, that that should continue in the five-year inspection period.

CHAIRMAN DANNER: Ron Bradley?

MR. BRADLEY: Yes, thank you. Ron Bradley from PECO. Yeah, I'll tell you where I connected it. When we had the conversation about the word "evaluate," as far as when we get up to the scene and we see that's going on, we make an evaluation on whether or not we, as Rich said, wire-brush it, paint it, clean it up, or, this thing's too far gone, we need to put a new piece in or a new component, that we've actually remediated completely the situation.

You could argue the atmosphere, you know, could be the issue. But, in many cases,

these things, they're outside and they're just in the environment. Or if they're inside in the basement, it's not that they're in a very corrosive environment.

So I think that the "evaluate" triggers us to the step where we actually remediate completely, or mitigate completely, and then come back in the five-year cycle. That's where I felt we got there.

CHAIRMAN DANNER: All right. Sara?

MS. GOSMAN: Ron, I appreciate that. I mean, my view of the term evaluate really came from giving me comfort with the initial expansion of the interval. And also my concern that taking it out at this point sends a message about what we want operators to do.

I think that, for me, it's an extra layer of safety, the three years. And while I certainly understand the comments made during the public comment period, as well as the comments you have made about why you think that you could go to five years with remediation, I

think for me it's about -- I'm already concerned about going to five years, frankly.

And the three years gives me some comfort that if you find something -- and yes, you evaluate it, right -- that you will be back sooner, in essence creating the same interval that we have now, in order to make sure everything's okay. So, that's why I'm at the position I am.

CHAIRMAN DANNER: All right, thank you. Andy Drake?

MR. DRAKE: This is Andy Drake with Enbridge. I would like to kind of come back to a term that we've seen weaving around a lot of different potential definitions. And that is the term "remediation." I mean, if remediation were -- and I think when Rich was talking, it sounded like "replaced." I mean, if you replace it, it's new. And, I mean, that's pretty compelling. That service may have been in place for 20 years, you've identified an issue and you've replaced it, but I'd like some

thoughts, or maybe a little expanded thought, around what do others here define remediation to be?

If it's wire-brush it and paint it, well, that's a lot different. So, I'd just like maybe a little more color on that.

CHAIRMAN DANNER: All right, anybody care to take that one on? Mary Palkovich?

MS. PALKOVICH: Yeah, I would say that when you find atmospheric corrosion, the operating procedures are that you remove the atmospheric corrosion and you leave the pipe as though it's new.

I mean, I could dig out my operating procedure here, but you're coding it and you're following current 2020 practices for remediating the corrosion, and it's like brand new when you leave.

You've either replaced the pipe or you've completely removed the corrosion and added a protective coating to it.

So, it's like brand new when you

walk away. That's why I'm in support of once you've remediated it, you can go to the five-year cycle, because you've enhanced the safety of the pipe.

CHAIRMAN DANNER: All right, Richard Worsinger.

MR. WORSINGER: Rich Worsinger, Wilson. Quite frankly, I see very little difference between how the building of a meter set and when you find atmospheric corrosion are treated.

When you build a new meter set, you're taking some brand new sections of pipe and fittings. You're cutting them, cutting threads on them, assembling them. You're priming them and painting them.

And you don't go back and inspect that again until three years later, when you're doing your atmospheric corrosion inspection.

And I would say it's very rare that you find any atmospheric corrosion on a brand new meter set three year later.

When you do find atmospheric corrosion, i.e., rust, you wire-brush it, sand it, prime it, paint it, the same as you're doing with a brand new meter set. And it lasts for many, many years, until you start to see a little bit of rust. Usually it happens at the threads where a nipple is going into a fitting.

And you get in there, you wire-brush it, sand it, prime it and paint it, and you're good for another many, many years.

And I just don't see the value of going back three years later, when atmospheric corrosion has been found and remediated, is any different than a brand new meter set.

CHAIRMAN DANNER: All right, thank you. Is there any more discussion on this point? All right, we have a motion in front of us, which it has been suggested that we clarify in this motion that if it has been remediated, then we're back on a five-year cycle.

Is it the preference of the committee that we entertain that motion, or the

motion that is currently before us? Mary Palkovich?

MS. PALKOVICH: I would like to add a bullet that says once it's remediated with the -- atmospheric corrosion is found, evaluated and remediated, then that particular asset can go to the five-year cycle. And then I'd like us to take a vote on that.

CHAIRMAN DANNER: All right. Sara Gosman?

MS. GOSMAN: I'm going to suggest something a bit perhaps out of the ordinary. But I wonder if we could take two votes here, one on the language with the one bullet point, and the other one on the other.

That is, we're providing recommendations to PHMSA for it to consider, and it may be that some members support both of these things, they might support one, they might support neither. But I think that would be helpful information for the agency to know.

CHAIRMAN DANNER: So, you wouldn't

see that as having two inconsistent motions?

MS. GOSMAN: No, because I think they can nest within each other. That is --

CHAIRMAN DANNER: So, explain again. What is your intention? You would take the bullet that has just been proposed by Mary, and you would hold that back for a second motion?

MS. GOSMAN: Yes.

CHAIRMAN DANNER: Mary, how would you respond to that?

MS. PALKOVICH: I don't think it seems right to vote on two different options. I think we should put in the language and take a vote.

CHAIRMAN DANNER: Well, the way I see it, my prediction would be that if we did break it up, that you would have something close to unanimity on the first, and the majority, with some dissent, on the second.

But that's the outcome I would see, where if we had it combined, you would not have that unanimity. You would just have some no-

votes on the motion as a whole. Alan, did you want to speak up?

MR. MAYBERRY: Yeah. I just had a thought for the committee to consider. Was considering Mary's provision there, which if it's remediated, and also not subject to systemic or corrosive environment.

I know there might be some environments by the seashore, where you may want to do -- but I don't know if that would add any clarity or help Sara, if it would help you all get to at least a common place on this one.

CHAIRMAN DANNER: Rich Worsinger?

MR. WORSINGER: Rich Worsinger, Wilson. I was going to add a similar comment to what Alan has there. Prior employment, I worked at a location that was along the Atlantic Ocean, and it was before DIMP.

But we did inspections more frequently because it was a much more corrosive location. Mr. Chairman, probably like what you

could have up in the Northwest.

And I would be supportive of having some verbiage in there that just said, unless there are other mitigating factors that would require more frequent inspections. But of course, that's where DIMP should already be taken into account through DIMP.

And I guess with regards to Sara's suggestion, I think that's interesting, but I'd have to ask Alan if that would be the preference of PHMSA to have two recommendations.

MR. MAYBERRY: So, there's some debate here. But I'd really prefer one recommendation. Or, let me back up. Let's try this. Let's try two votes on this.

CHAIRMAN DANNER: So again, the outcome is that you may have unanimity on the first and there'll be dissent on the second. If we combine it, then we don't have unanimity, and does that matter?

MR. MAYBERRY: Yes.

CHAIRMAN DANNER: So, but I do have a question, Alan. When you're talking about those areas where you're more likely to have corrosion, how are you defining those? And how would that be determined?

MR. MAYBERRY: Well, it's where you have atmospheric corrosion. And so, it was described as rust. They should do the surveys, the visual indication, as you have corrosion on the riser, corrosion at the fittings, and something that needs to be remediated.

CHAIRMAN DANNER: Yeah, I thought there was a suggestion that we say in areas where you're more likely to find corrosion. How is that --

MR. MAYBERRY: I'm sorry. Well, right. I was really teeing up that an area of high corrosivity, with systemic atmospheric corrosion prevalence, a prevalence of atmospheric corrosion, or a history, due to the environment or other specific factors, that would be required to go with the three-year

interval.

CHAIRMAN DANNER: So, Mary, I know you've got your hand up. I just wanted to go back to Sara. The idea of putting in Rich's second bullet, would that be okay with you? Or would you prefer two votes?

MS. GOSMAN: Chairman, did you mean Alan's -- I'm not sure who was speaking lastly.

CHAIRMAN DANNER: Well, both Alan and Rich, I think, suggested that we state in the areas where you're likely to have corrosion, that we would create that as kind of an exception to the three-year cycle, after remediation has been completed.

MS. GOSMAN: And I appreciate that as a compromise here. I think part of my concern is that we're moving from a very specific requirement of an interval, to one that now we're putting it in the judgment of the operator.

And I'll say again that I think that the folks on this committee I trust and think

are terrific operators. I'm really thinking about the entire industry here, and the ones that may not be quite as trustworthy.

And so, any time we give more discretion in that way, I think I'm just not as sure that we're going to end up in the same place. So, if this is an ultimate determination made by the operator, I think that that really, to me, is no different than what we're already doing in DIMP, and it doesn't give me that extra safety comfort of the specific interval. But I do again appreciate the compromise.

I will just say that I think in terms of the votes, I think there can be multiple ways that a proposal can be technically feasible, reasonable, cost-effective and practical.

And so, while ideally the committee would come to consensus on one, and that would obviously most helpful to the agency, I think that it is also helpful to the agency to know

that at some minimum level everybody agrees, and then there are people who agree that also with an additional, in this case actually extending the cycle, that that is also technically feasible, reasonable, cost-effective and practicable, which I do not.

CHAIRMAN DANNER: All right, thank you. So, I don't know if this is something that as Chair I can kind of make an executive decision on.

But unless there is strong opposition, what I suggest is we entertain the motion with just the first bullet, and then we would take a second motion with the same preamble and the second bullet.

So, we'll take two votes. I think we can get those done quickly, and that will give the agency a good idea of where the committee stands.

So, if you're okay with that, Alan, I think that that's the way I would like to proceed.

MR. MAYBERRY: That works for me Chairman.

CHAIRMAN DANNER: Okay. So, Mary has made a -- let's see. Well, actually I think Mary, once again you're going to have to withdraw the motion. Then, we're going to have to re-read this one. And then we'll do the next one. Or do you want someone else to make this motion?

MS. PALKOVICH: Yeah, I didn't make a motion. And I'm not going to make this motion.

CHAIRMAN DANNER: All right. Is there a volunteer to make this motion? All right, Sara? Sara Gosman, I think you're on mute.

MS. GOSMAN: I apologize. The proposed rule, as published in the Federal Register, and the draft regulatory evaluation with regard to atmospheric corrosion, is technically feasible, reasonable, cost-effective and practicable if the following

change is made.

Revise Section 192.491(c) to require operators to obtain records of the last two atmospheric corrosion inspections.

CHAIRMAN DANNER: All right, is there a second? Andy Drake?

MR. DRAKE: This is Andy Drake with Enbridge. I'll second that motion.

CHAIRMAN DANNER: All right. So, we have a motion before us. Cameron, will you take the roll on this one?

MR. SATTERTHWAITE: Okay. If you agree with the language, say yes. If you do not agree, you say no. Diane Burman? She hasn't gotten in yet. Peter Chace?

MR. CHACE: I vote no.

MR. SATTERTHWAITE: David Danner?

CHAIRMAN DANNER: I vote yes.

MR. SATTERTHWAITE: Sara Longan?

DR. LONGAN: Yes.

MR. SATTERTHWAITE: Terry Turpin?

MR. TURPIN: Yes.

MR. SATTERTHWAITE: Ron Bradley?

MR. BRADLEY: I vote no.

MR. SATTERTHWAITE: Andy Drake?

MR. DRAKE: Yes.

MR. SATTERTHWAITE: Mary Palkovich?

MS. PALKOVICH: No.

MR. SATTERTHWAITE: Rich Worsinger?

MR. WORSINGER: No.

MR. SATTERTHWAITE: Jonathan Airey?

MR. AIREY: Yes.

MR. SATTERTHWAITE: Mark Brownstein?

MR. BROWNSTEIN: No.

MR. SATTERTHWAITE: Sara Gosman?

MS. GOSMAN: Yes.

MR. SATTERTHWAITE: The motion passes seven to five.

CHAIRMAN DANNER: All right. So, let's have the preamble and the second bullet put up for our consideration. Is there a volunteer to make the motion here? Mary?

MS. PALKOVICH: The proposed rule, as published in the Federal Register, and the

draft regulatory evaluation with regard to atmospheric corrosion, are technically feasible, reasonable, cost-effective and practicable, if the following change is made.

If atmospheric corrosion is found, evaluated and remediated following an inspection, and there is no evidence of systemic atmospheric corrosion due to the environment or similar factors, the operator can inspect for atmospheric corrosion on a five-year cycle, rather than the proposed three-year cycle.

CHAIRMAN DANNER: Thank you. And a second? Richard Worsinger?

MR. WORSINGER: I actually had a clarification first. Does this recommended change also include the first bullet from the last vote?

CHAIRMAN DANNER: No. The first one is done, so that one is already included. So, this one simply adds the second bullet to the first bullet from the first vote.

MR. WORSINGER: In that case, I'll second this motion.

CHAIRMAN DANNER: All right. So, Cameron, can we proceed?

MR. SATTERTHWAITE: Okay. Peter Chace?

MR. CHACE: Yes.

MR. SATTERTHWAITE: David Danner?

CHAIRMAN DANNER: Yes.

MR. SATTERTHWAITE: Sara Longan?

DR. LONGAN: Yes.

MR. SATTERTHWAITE: Terry Turpin?

MR. TURPIN: Yes.

MR. SATTERTHWAITE: Ron Bradley?

MR. BRADLEY: Yes.

MR. SATTERTHWAITE: Andy Drake?

MR. DRAKE: Yes.

MR. SATTERTHWAITE: Mary Palkovich?

MS. PALKOVICH: Yes.

MR. SATTERTHWAITE: Rich Worsinger?

MR. WORSINGER: Yes.

MR. SATTERTHWAITE: Jonathan Airey?

MR. AIREY: Yes.

MR. SATTERTHWAITE: Mark Brownstein?

MR. BROWNSTEIN: No.

MR. SATTERTHWAITE: Sara Gosman?

MS. GOSMAN: No.

MR. SATTERTHWAITE: Robert Hill?

MR. HILL: Yes.

MR. SATTERTHWAITE: The motion carries ten to two.

CHAIRMAN DANNER: All right, thank you. So now, let's move on. It is 2:25 Pacific time. I know it's much later out there. We have welding and pre-testing short segments still to go. Shall we carry on?

MR. GALE: Yes, Chairman, we should. And we'll pile into it.

CHAIRMAN DANNER: Fine. Go right ahead.

MR. PALABRICA: Okay. So, the first amendment is with respect to the welding process requirement in 192.229(b). The background for this is the Gas Piping

Technology Committee petition to extend the internal for remaining engaged in the welding process from six months to at least twice each calendar year, not to exceed seven-and-a-half months, unlike the process requirement, which is the subject of this proposed rule, of their welder requalification requirements, use a flexible calendar year format.

However, since this does not, sometimes it limits operators to doing it both on the six-month interval.

So, therefore, PHMSA proposed to extend the interval for remaining engaged in a welding process to seven-and-a-half months.

PHMSA received no specific comments submitted in opposition to this amendment. Many industry commenters supported this item without additional comment, and the Pipeline Safety Trust responded with no comment on this item. And PHMSA appreciates the feedback on the proposed rule.

The next topic is pre-testing short

segments of pipe and fabricated assemblies. Generally, pipeline facilities must be pressure-tested after installation.

If a post-installation test isn't practicable, certain components may be tested pre-installation. Section 192.503(e) permits pre-installation testing of individual components, but excludes short segments of pipe and fabricated assemblies.

Section 192.505(d) permits pre-testing short segments of pipe and fabricated units on steel pipelines operating at a hoop stress of 30 percent or more.

However, there is no similar allowance for fabricated assemblies in short segments of pipe for lower stress lines, despite relatively lower risks, and they're limited to the general 192.503(e).

Therefore, PHMSA proposed to extend the allowance for pre-tested pipe and assemblies to steel pipelines operating at an MAOP producing a hoop stress less than

30 percent of SMYS, but above 100 psig, which is the scope of 192.507.

The associations and many other industry entities generally supported PHMSA's proposal with the following suggestions. First was extending the requirement to allow pre-tested short segments of pipe and fabricated units to pipelines operating below 100 psi in 192.509.

And second, extend the requirement to short segments of pipe, and basically extend it to service lines and plastic pipelines under 192.511 and 513.

Other industry commenters and NAPSR stated support of this item without additional comment, and the Pipeline Safety Trust did not object to extending this allowance as proposed.

National Fuel estimated cost savings of approximately $8.8 million if the pre-testing allowance was extended to those lower pressure pipelines, based on estimated cost savings for repairs done due to excavation

damage-related leaks.

PHMSA's response to these comments is that it's not necessarily straightforward to extend pre-testing allowances to other categories of pipelines, and this generally covers distribution lines for those low-pressure pipe and service lines and plastic pipe, due to the proximity to customers and the differences in design construction, inspection and testing requirements for such facilities, compared with higher pressure lines.

Therefore, PHMSA has determined that extending the pre-testing requirement below 100 psi, plastic pipe and service lines requires additional analysis, and notice and comment procedures.

The associations and other industry entities suggested removing or revising the term hydrostatic from the proposed 192.507(d), because natural gas, inert gas and air are allowable test media for pipelines operating at a hoop stress less than 30 percent of SMYS

under that section.

And PHMSA agrees with these comments to remove the term "hydrostatic" from the proposed 192.507(d), since that section allows pressure tests with materials other than water.

This concludes PHMSA's response to comments on the welding process requirement and pre-testing topics. In light of the comments received from the NPRM, PHMSA recommends the committee adopt the proposal, with the following changes.

Regarding the welding process requirement, no changes to the NPRM are recommended. And with regard to pre-testing, PHMSA recommends removing the term hydrostatic from the proposed 192.507(d).

However, PHMSA does not recommend extending the proposed pre-testing allowance beyond 192.507 in this final rule. However, PHMSA may consider this issue in a future rulemaking action.

CHAIRMAN DANNER: All right, thank

you. Are there any clarifying questions from committee members? All right, seeing none, let's go to public comments. Are there any public comments on welding process requirements for pre-testing short segments?

All right, I am seeing no public comments. Committee members, are there any comments that you would like to share?

I am seeing none, so I think that means that we can go right into a motion. Is there a volunteer to make this motion? Richard Worsinger. Thank you.

MR. WORSINGER: Rich Worsinger, Wilson. The proposed rule, as published in the Federal Register, and the draft regulatory evaluation with regard to the welding process requirement and pre-testing short segments of pipe and fabricated units, are technically feasible, reasonable, cost-effective and practicable, if the following changes are made.

Regarding pre-testing, remove the word hydrostatic from proposed 192.507(d).

CHAIRMAN DANNER: All right, thank you. Is there a second? Robert Hill?

MR. HILL: Robert hill will second that motion.

CHAIRMAN DANNER: All right, thank you very much. We have a motion before us. Cameron, would you like to take roll, please? Cameron, are you there? You want to count the votes?

MR. SATTERTHWAITE: Sorry, I have two mute buttons on my side. Okay, let me go back. All right, Peter Chace?

MR. CHACE: Yes.

MR. SATTERTHWAITE: David Danner?

CHAIRMAN DANNER: Yes.

MR. SATTERTHWAITE: Sara Longan?

DR. LONGAN: Yes.

MR. SATTERTHWAITE: Terry Turpin?

MR. TURPIN: Yes.

MR. SATTERTHWAITE: Diane Burman? Okay, we should be trying to get her back on. Ron Bradley?

MR. BRADLEY: Yes.

MR. SATTERTHWAITE: Andy Drake?

MR. DRAKE: Yes.

MR. SATTERTHWAITE: Mary Palkovich?

MS. PALKOVICH: Yes.

MR. SATTERTHWAITE: Rich Worsinger?

MR. WORSINGER: Yes.

MR. SATTERTHWAITE: Jonathan Airey?

MR. AIREY: Yes.

MR. SATTERTHWAITE: Mark Brownstein?

MR. BROWNSTEIN: Yes.

MR. SATTERTHWAITE: Sara Gosman?

MS. GOSMAN: Yes.

MR. SATTERTHWAITE: Robert Hill?

MR. HILL: Yes.

MR. SATTERTHWAITE: Unanimous. The motion carries.

CHAIRMAN DANNER: All right, thank you very much. I believe that takes us to the end of our work today. And so I'm going to turn it back over to Alan, and see if there are any remarks he makes before we formally adjourn

the meeting.

MR. MAYBERRY: Mr. Chairman, I'll turn it over to Mr. Gale here for a quick bit and I'll come back to you. Thanks. Go ahead, John.

MR. GALE: Yeah, thank you Alan. Thank you Chairman. Again, this is John Gale. Chairman, we actually do have one more vote to take.

As you may recall during our November 2019 meeting, PHMSA's chief counsel, Paul Roberti, made a recommendation that at all future meetings the committee make a motion stating that the meeting transcript and voting slide represent the group's report, as required by 49 USC 60115.

The committee's voting slides can name the language that the committee agrees is necessary, to include or change on the proposed safety standard in a brief format, the transcript is the full verbatim record of the meeting, and together we believe these

documents form a comprehensive report out of what was discussed at each meeting.

Going forward, at the end of the committee's deliberation on each proposed safety standard, we recommend the committee make the following motion: to submit the voting slides, along with the transcript, to the Secretary as a report required by the statutory provisions that apply to this committee.

So, Chairman, if there is a motion to put for this vote, we'll take another roll call.

CHAIRMAN DANNER: All right, thank you very much. Yes, I missed this very important vote. So, looks like Rich Worsinger is willing to make the motion. Go ahead.

MR. WORSINGER: Yes, Rich Worsinger, Wilson. A transcript of this meeting, duly recorded and accurately transcribed, together with the presentations slides documenting the committee's votes during this meeting,

represent the report of this proceeding.

CHAIRMAN DANNER: And is there a second? Sara Longan?

DR. LONGAN: I second. Thank you.

CHAIRMAN DANNER: Great. Thank you. All right, Cameron, count the votes one more time today.

MR. SATTERTHWAITE: All righty, here we go. We'll go right through. I'm going to go past Diane Burman. I think she lost power. We'll go straight to Peter Chace?

MR. CHACE: Yes.

MR. SATTERTHWAITE: David Danner?

CHAIRMAN DANNER: Yes.

MR. SATTERTHWAITE: Sara Longan?

DR. LONGAN: Yes.

MR. SATTERTHWAITE: Terry Turpin?

MR. TURPIN: Yes.

MR. SATTERTHWAITE: Ron Bradley?

MR. BRADLEY: Yes.

MR. SATTERTHWAITE: Andy Drake?

MR. DRAKE: Yes.

MR. SATTERTHWAITE: Mary Palkovich?
MS. PALKOVICH: Yes.
MR. SATTERTHWAITE: Rich Worsinger?
MR. WORSINGER: Yes.
MR. SATTERTHWAITE: Jonathan Airey?
MR. AIREY: Yes.
MR. SATTERTHWAITE: Mark Brownstein?
MR. BROWNSTEIN: Yes.
MR. SATTERTHWAITE: Sara Gosman?
MS. GOSMAN: Yes.
MR. SATTERTHWAITE: Robert Hill?
MR. HILL: Yes.
MR. SATTERTHWAITE: It's unanimous. The motion carries. Thank you all.
CHAIRMAN DANNER: All right. And I think that concludes our business for today. So, thank you very much everyone, including the PHMSA team. Alan, we're back to you for some closing thoughts before we formally adjourn.
MR. MAYBERRY: Sure. Just some quick thoughts. First of all, Chairman Danner, thank you again for leading another successful

meeting and your good work. It's much appreciated, as well as the work of the members.

We obviously value your opinion, and I really enjoy these meetings. It's unfortunate, I really want to talk to you more than I'm able to. In fact, I rarely get to call you. But I really appreciate your involvement nonetheless in this great forum that we have here.

I can tell you now we've got what we need to go forward. You'll see the meeting record shelved in about two to three weeks, as I indicated earlier.

Our work is far from done, as we prepare a final rule, would be the next step after considering the recommendations provided by the committee today. And as you may know, we have a lot of irons in the fire here at the sausage factory. We have a lot of success pointers you've seen in the great work that you've really been involved in.

But there's a lot more to do on the number of topics. So, we'll be looking forward to meeting with you in the future, as we go forward.

With that, I think I will turn it back to you, Mr. Chairman. But again, thanks. Oh yes, lastly, like I said coming in, a big thank you to the PHMSA staff.

As you know, it takes a lot to put these meetings on, and they've really just gotten this down to a science, even in light of COVID. So, my thanks to the PHMSA staff for pulling this off today.

We changed it up on you a bit. We were on the phone last time. This time we're using teams. Seems to work out pretty well, but we'll continue to make improvements as we go along, and much appreciate the efforts of the staff.

So, with that, I will turn it back to you, Mr. Chairman, to close us out. Thanks again.

CHAIRMAN DANNER: Thank you very much. And thank you for your comments. I hope that someday the committee will once again be able to meet in person, and that PHMSA will provide coffee.

And I think we're done for the day. Last call for comments from committee members. All right, hearing none, I think we can adjourn. So, we are adjourned. Thank you all.

(Whereupon, the above-entitled matter went off the record at 5:39 p.m.)

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This is to certify that the foregoing transcript

In the matter of: Meeting

Before: Gas Pipeline Advisory Committee

Date: 10-07-20

Place: Video Teleconference

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Neal R. Gross

Court Reporter