

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

Pipeline Safety: Information Collection Activities  
Mitigation of Ruptures on Onshore Gas Transmission  
and Gathering, Hazardous Liquid, and Carbon Dioxide  
Pipeline Segments Using Rupture-Mitigation Valves  
or Alternative Equivalent Technologies and Blending  
of Hydrogen Gas and Natural Gas within Gas Pipelines

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Docket No. PHMSA-2022-0085

**COMMENTS IN RESPONSE TO MITIGATION OF RUPTURES AND BLENDING OF  
HYDROGEN GAS INFORMATION COLLECTION**

**FILED BY  
INTERSTATE NATURAL GAS ASSOCIATION OF AMERICA  
AMERICAN PUBLIC GAS ASSOCIATION  
AMERICAN GAS ASSOCIATION  
AMERICAN PETROLEUM INSTITUTE  
GPA MIDSTREAM ASSOCIATION  
LIQUID ENERGY PIPELINE ASSOCIATION  
AMERICAN FUEL & PETROCHEMICAL MANUFACTURERS**

**JUNE 24, 2024**

## I. Introduction

The Interstate Natural Gas Association of America (INGAA),<sup>1</sup> the American Public Gas Association (APGA),<sup>2</sup> the American Gas Association (AGA),<sup>3</sup> the American Petroleum Institute (API),<sup>4</sup> the GPA Midstream Association (GPA),<sup>5</sup> the Liquid Energy Pipeline Association (LEPA),<sup>6</sup> and the American Fuel & Petrochemical Manufacturers (AFPM),<sup>7</sup> collectively, the Associations, respectfully submit these comments in response to the Pipeline and Hazardous Materials Safety Administration's (PHMSA or the Agency) Notice and Request for Comments (the Notice).<sup>8</sup> In the Notice, PHMSA proposes to add new questions to the transmission and gathering annual reporting form to collect the number of miles of pipe that are within a shut-off segment (*i.e.*,

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<sup>1</sup> INGAA is comprised of 27 members, representing the vast majority of the U.S. interstate natural gas transmission pipeline companies. INGAA's members operate nearly 200,000 miles of pipelines and serve as an indispensable link between natural gas producers and consumers.

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

<sup>3</sup> Founded in 1918, AGA represents more than 200 local energy companies committed to the safe and reliable delivery of clean natural gas to more than 180 million Americans. AGA is an advocate for natural gas utility companies and their customers and provides a broad range of programs and services for member natural gas pipelines, marketers, gatherers, international natural gas companies, and industry associates. Today, natural gas meets more than one third of the United States' energy needs.

<sup>4</sup> API is the national trade association representing all facets of the oil and natural gas industry, which supports 10.3 million U.S. jobs and 8 percent of the U.S. economy. API's nearly 600 members include large integrated companies, as well as exploration and production, refining, marketing, pipeline, and marine businesses, and service and supply firms. They provide most of the nation's energy and are backed by a growing grassroots movement of millions of Americans.

<sup>5</sup> GPA has served the U.S. energy industry since 1921. GPA Midstream is composed of nearly 60 corporate members that directly employ 55,000 employees that are engaged in the gathering, transportation, processing, treating, storage and marketing of natural gas, natural gas liquids (NGLs), crude oil and refined products, commonly referred to in the industry as "midstream activities." In 2022, GPA Midstream members operated over 495,000 miles of pipelines, gathered over 85 Bcf/d of natural gas and produced over 4.6 million barrel/day of NGLs from over 375 natural gas processing facilities. To the extent PHMSA's proposal applies to gathering operators, GPA Midstream supports these comments.

<sup>6</sup> LEPA (formerly Association of Oil Pipe Lines) promotes responsible policies, safety excellence, and public support for liquids pipelines. LEPA represents pipelines transporting 97 percent of all hazardous liquids barrel miles reported to the Federal Energy Regulatory Commission. LEPA's diverse membership includes large and small pipelines carrying crude oil, refined petroleum products, NGLs, and other liquids.

<sup>7</sup> AFPM is the leading trade association representing the makers of the fuels that keep Americans moving and the petrochemicals that are the essential building blocks for modern life. Our industries make life better, safer, healthier and — most of all — possible.

<sup>8</sup> Pipeline Safety: Information Collection Activities, Mitigation of Ruptures on Onshore Gas Transmission and Gathering, Hazardous Liquid, and Carbon Dioxide Pipeline Segments Using Rupture-Mitigation Valves or Alternative Equivalent Technologies and Blending of Hydrogen Gas and Natural Gas within Gas Pipelines and Repair, 89 Fed. Reg. 20, 751 (Mar. 25, 2024). These comments were originally due on May 24, 2024, but the comment deadline was extended to June 24, 2024. *See* Pipeline Safety: Information Collection Activities: Mitigation of Ruptures on Onshore Gas Transmission and Gathering, Hazardous Liquid, and Carbon Dioxide Pipeline Segments Using Rupture-Mitigation Valves or Alternative Equivalent Technologies and Blending of Hydrogen Gas and Natural Gas within Gas Pipelines, 89 Fed. Reg. 37, 281 (May 6, 2024).

between a set of rupture-mitigation valves (RMVs) or alternative equivalent technologies).<sup>9</sup> PHMSA also proposes to amend various reporting forms to incorporate new questions covering commodity values for pipelines transporting blended natural gas and hydrogen gas.

While the Associations understand PHMSA's desire to collect additional information, the Agency must comply with the Paperwork Reduction Act (PRA)<sup>10</sup> and the Office of Management and Budget's (OMB) regulations for paperwork burdens<sup>11</sup> prior to implementing new data requests. For the valve data, the Associations are concerned with PHMSA's stated need, utility, and burden and request that the Agency reconsider its proposal. The Associations also request certain modifications to the hydrogen blending proposal.

## **II. Detailed Comments**

### **A. PHMSA Should Revise its Proposed Modifications to the Gas Transmission and Gas Gathering and Hazardous Liquid and Carbon Dioxide Annual Reporting Forms and Instructions.**

Prior to submitting a proposed information collection to OMB for approval, PHMSA must seek comments to "[e]valuate whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information will have practical utility."<sup>12</sup> PHMSA must also gather comments to "[e]valuate the accuracy of the agency's estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions used."<sup>13</sup> The Associations provide these comments to respond directly to these factors.

#### **1. PHMSA's proposed collection, as written, is not necessary for the proper performance of the functions of the Agency.**

The Associations question whether it is necessary to collect this type of detailed information to resolve the open National Transportation Safety Board's (NTSB) recommendation. In the Notice, PHMSA states that it needs to collect the mileage between RMVs to assist in closing out the NTSB Recommendation 11-11.<sup>14</sup> That recommendation was issued in 2011, almost 13 years ago.<sup>15</sup> In it, NTSB recommended that PHMSA "Amend Title 49 Code of Federal Regulations 192.935(c) to directly require that automatic shutoff valves or remote control valves in high consequence areas and in class 3 and 4 locations be installed and spaced at intervals that consider the factors listed in that regulation."<sup>16</sup> In January of 2022, PHMSA proposed several options to satisfy the NTSB, one of which included issuing a data request to operators.<sup>17</sup> That

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<sup>9</sup> Redlined Instructions for Annual Report for Natural and Other Gas Transmission and Gathering Pipeline Systems, <https://www.regulations.gov/document/PHMSA-2022-0085-0006>.

<sup>10</sup> 44 U.S.C. §§ 3501–3521.

<sup>11</sup> 5 C.F.R. § 1320.1 *et seq.*

<sup>12</sup> 5 C.F.R. § 1320.8(d)(1)(i).

<sup>13</sup> 5 C.F.R. § 1320.8(d)(1)(ii).

<sup>14</sup> Notice, at 20,752.

<sup>15</sup> National Transportation Safety Board, P-11-11 (Sept. 26, 2011).

<sup>16</sup> *Id.*

<sup>17</sup> Official Correspondence from PHMSA to the NTSB dated January 14, 2022 (emphasis added).

option did not include collecting the mileage between each RMV. Instead, PHMSA stated that it could meet the intent of the recommendation by “requiring operators to inform PHMSA of the *number of valves installed on their system(s)* to protect HCAs and class 3 and 4 segments and how they are monitored/operated for emergency closure.”<sup>18</sup> In the Notice, PHMSA now seeks to collect the number of miles between RMVs or alternative equivalent technologies, and require operators to determine if pipeline segments can be fully isolated by RMVs. This proposal is broader and more impactful than the Agency’s initial proposal to resolve the NTSB Recommendation. In fact, the NTSB acknowledged this disconnect in its comment on the Notice.<sup>19</sup>

NTSB also stated that it would need additional information from PHMSA to determine whether the proposal in the Notice would satisfy Recommendation 11-11.<sup>20</sup> That information included having (a) special permit conditions that address RMVs; (b) an advisory bulletin on addressing existing pipelines in high consequence areas; (c) a new directive on valves that emphasizes requirements for operators to consider the addition of rupture-mitigation valves in high consequence areas; and (d) a requirement for operators to inform PHMSA of the number of valves installed on their system.<sup>21</sup> The Associations examined each referenced piece of information and notes that all but (d) are already complete. The special permit conditions currently require remote-control valves (RCVs) or automatic shutoff valves (ASVs) to protect high consequence areas. While NTSB states that it would need to see an advisory bulletin on addressing existing pipelines in high consequence areas, section 192.935(c) addresses this concern.<sup>22</sup> That regulation also addresses the third category of information noted by the NTSB.<sup>23</sup> The last category of information that NTSB states it would need to determine if Recommendation 11-11 has been satisfied is the number of valves installed on each operator’s system to protect high consequence areas and class 3 and 4 segments. PHMSA can revise the Notice to fulfill this request. Specifically, the Agency should collect the number of valves on a pipeline system consistent with its January 2022 proposal.

For these reasons, the Associations question whether the information collection, as proposed, is necessary to meet the stated need (*i.e.*, to fulfill a NTSB recommendation). Instead, the Associations request that PHMSA consider revising its proposal to collect the number of RMVs/RCVs/ASVs on each system rather than the mileage between RMVs.

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<sup>18</sup> *Id.* (emphasis added).

<sup>19</sup> [Comment from the National Transportation Safety Board](#), PHMSA-2022-0085 (May 28, 2024)(“These proposed changes do not appear to be consistent with the approach previously proposed by PHMSA in its January 14, 2022, letter to the NTSB.”).

<sup>20</sup> *Id.* at 2.

<sup>21</sup> *Id.* at footnote 5.

<sup>22</sup> Section 192.935(c): Risk analysis for gas releases and protection against ruptures. If an operator determines, based on a risk analysis, that a rupture-mitigation valve (RMV) or alternative equivalent technology would be an efficient means of adding protection to a high-consequence area (HCA) in the event of a gas release, an operator must install the RMV or alternative equivalent technology. In making that determination, an operator must, at least, evaluate the following factors—timing of leak detection and pipe shutdown capabilities, the type of gas being transported, operating pressure, the rate of potential release, pipeline profile, the potential for ignition, and location of nearest response personnel. An RMV or alternative equivalent technology installed under this paragraph must meet all of the other applicable requirements in this part.

<sup>23</sup> *Id.*

## **2. PHMSA’s proposed information collection is unnecessary after a Congressionally mandated report was completed.**

Congress directed PHMSA and the National Academies of Sciences, Engineering, and Medicine (the National Academies) to “...conduct a study of potential methodologies or standards for the installation of automatic or remote-controlled shut-off valves on an existing pipeline in a high consequence area....for a gas transmission pipeline facility...”<sup>24</sup> Congress had required that the study take into account, “methodologies that conform to the recommendations submitted by the National Transportation Safety Board to the Pipeline and Hazardous Materials Safety Administration and Congress regarding automatic and remote-controlled shut-off valves.”<sup>25</sup> PHMSA and the National Academies were also required to consider “methodologies that maximize safety and environmental benefits; and the economic, technical, and operational feasibility of installing automatic or remote-controlled shut-off valves on existing pipelines by employing such methodologies or standards.”<sup>26</sup>

In response, PHMSA and the National Academies produced a detailed, peer-reviewed report earlier this year.<sup>27</sup> The study concluded that “[a] broadly applicable requirement for the installation of rupture mitigation valves, such as in the rule for newly constructed and entirely replaced segments of pipelines, would not be advisable for existing hazardous liquid and gas transmission pipelines in high consequence areas.”<sup>28</sup> The study also determined that “[w]hile newly constructed and entirely replaced segments of pipelines can be designed for RMVs, a similar broad-based requirement that is retroactively applied to existing pipelines would not be advisable because the available evidence on costs and benefits attributed to the installation of RMVs varies widely as a function of factors such as site-specific pipeline characteristics, land use patterns, the built environment, ecological sensitivity, topographic, and commodity.”<sup>29</sup> PHMSA should work with the NTSB to close the recommendation due to the strengthened requirement of 192.935(c) and the National Academies’ findings.

## **3. The proposed information collection does not currently have a practical utility.**

In addition to assisting the Agency with its response to the NTSB, PHMSA states that it needs the mileage between RMVs to “illustrate the current utilization of the RMVs [and] measure the implementation of the Valve Rule.”<sup>30</sup> The Valve Rule went into effect in October of 2022. There has only been one construction and maintenance cycle since this rule became effective. The data for RMVs installed in response to the rule would be limited at this point in time and would not produce a practical utility.

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<sup>24</sup> Protecting Our Infrastructure of Pipelines and Enhancing Safety Act of 2020, Consolidated Appropriations Act, 2021, Division R, § 119, Pub. L. 116-260, 134 Stat. 1181.

<sup>25</sup> *Id.*

<sup>26</sup> *Id.*

<sup>27</sup> <https://nap.nationalacademies.org/read/27521/chapter/1#xiii>;

<sup>28</sup> *Id.*

<sup>29</sup> *Id.*

<sup>30</sup> Notice, at 20,752.

Moreover, collecting information on *miles isolated* is an imprecise measure of RMV installation, since the mileage isolated within a given segment will increase and/or decrease as HCA and class location mileage changes, regardless of whether an RMV has been installed. Mileage may also change as a result of construction within the RMV shut-off segment, even when no new RMV installation has occurred.

PHMSA may also be creating security concerns by publishing the number of RMVs on specific pipeline systems. Publishing mileage between RMVs, along with other currently publicly-available facility data (e.g., NPMS) may allow bad actors to discern which pipeline segments have been identified as having the greatest potential consequence for disruption.

The Associations respectfully submit that the information collection, as proposed, would not meet the stated need of verifying the implementation of the Valve Rule or lead to a practical utility.

#### **4. PHMSA's burden estimate is incorrect.**

PHMSA has underestimated the time an operator will need to respond to the proposed information collection. The Agency estimates that the burden for completing this information collection would take one hour.<sup>31</sup> Under the PRA and OMB's regulations, the concept of "burden" is not limited to the time required to fill out forms from information already at hand. OMB defines "burden" as "the total time, effort, or financial resources expended by persons to generate, maintain, retain or disclose or provide information to or for a Federal agency,"<sup>32</sup> and this includes, without limitation, the burden associated with "developing, acquiring, installing and utilizing technology and systems for the purpose of collecting, validating, and verifying information"<sup>33</sup> or "for the purpose of processing and maintaining information."<sup>34</sup> One hour is not nearly enough time to review instructions, acquire the data, develop technology and systems to acquire and maintain the information, train personnel, and ultimately complete the revised section of the new annual report. An operator would need to make several decisions to complete the information collection including, not limited to, whether the valve is a RMV, where it is located, and whether it can be fully isolated.<sup>35</sup> High consequence areas can change over time and operators would need to reassess the location of its RMVs for each annual filing.

The Associations have surveyed several of its members and submit that completing Part U of the transmission and gathering annual report would take an average of 50 hours per operator for the first year of reporting.<sup>36</sup> The burden for completing this form will be the most impactful during

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<sup>31</sup> Notice, at 20,754 and 20,755

<sup>32</sup> 5 C.F.R. §1320.3(b)(1).

<sup>33</sup> 5 C.F.R. §1320.3(b)(1)(ii).

<sup>34</sup> 5 C.F.R. §1320.3(b)(1)(iii).

<sup>35</sup> Redlined Instructions for Annual Report for Natural and Other Gas Transmission and Gathering Pipeline Systems, <https://www.regulations.gov/document/PHMSA-2022-0085-0006> at 25 (PHMSA explains in the proposed instructions that while operators would be required to report the mileage between RMVs, "...if the segment has RMVs or alternative equivalent technologies [] installed on it but that are not able to be fully isolated, [these miles] are not considered to be miles of pipe within a shut-off segment").

<sup>36</sup> These figures were developed by surveying multiple natural gas transmission operators. Many operators may need more time than the average figure described in these comments.

the first reporting cycle as each operator must develop an application to gather the data, perform the data entry, query the data, and complete the form. In subsequent years, Association members estimate between 5-16 hours per operator to complete Part U. Furthermore, operators would likely spend similar additional hours completing Part S of the revised hazardous liquid and carbon dioxide annual reporting form.

In order to ultimately approve a proposed information collection request, OMB must consider a number of factors, including whether it “is the least burdensome necessary for the proper performance of the agency’s functions to comply with legal requirements and achieve program objectives”<sup>37</sup> and whether the collection has “practical utility.”<sup>38</sup> In this case, the additional burden is not justified by the practical utility of the data at this time. The practical utility, as discussed above, is minimal at this point in time. The information collection, as proposed, will not only burden operators but it will also impact PHMSA, an already resource constrained agency, and could divert resources away from other work.

**5. PHMSA does not take into account RCVs or ASVs installed prior to the effective date of the valve rule.**

PHMSA is requesting information on RMV installation but does not take into account RCVs or ASVs that were installed before the valve rule was implemented or that are installed for operational needs, not required by the valve rule. PHMSA would miss a large number of valves that can be remotely or automatically closed by limiting the information collection to RMVs only. The Associations recommend that PHMSA modify the question to ask how many valves can be remotely or automatically operated separately from the number of RMVs.

**6. Request to PHMSA**

The Associations request that PHMSA reconsider its information collection proposal and choose a less burdensome option. The Associations suggest that PHMSA require operators to submit the number of valves installed on their pipeline systems and not the number of miles between each RMV. This approach would be consistent with previous commitments to NTSB and would reduce the burden associated with the proposed information collection for transmission and gathering operators.

**B. PHMSA Should Revise its Proposed Collection of Hydrogen Blending Data.**

**1. PHMSA’s proposal to collect data on discrete hydrogen blend percentages is not practicable.**

The Associations commend PHMSA for proposing to collect and catalogue information about the use of hydrogen blends. The Associations agree with the need to take “measured and cautious approach[es], and to account for risks to pipeline integrity, public safety, and environmental protection in the performance of the requirements of part 192.”<sup>39</sup> The data will help

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<sup>37</sup> 5 C.F.R. § 1320.5(d)(1)(i).

<sup>38</sup> 5 C.F.R. § 1320.5(d)(1)(iii).

<sup>39</sup> Notice, at 20,753.

ensure that PHMSA, the public, and state and local pipeline safety regulators are informed. In addition, the data will ensure that operators are also informed of the changing landscape of hydrogen blending adoption. However, the Associations propose the following changes to ensure that PHMSA's information collection is practicable for operators to complete.

PHMSA proposes to modify the OPID Assignment, National Registry Notification, Incident and Annual Reporting forms and instructions to require operators of gas pipelines transporting blended natural gas and hydrogen gas to select one of three new commodity values corresponding to various percentages of hydrogen gas by volume: (1) greater than zero percent but less than or equal to five percent; (2) greater than five percent but less than 20 percent; and (3) greater than or equal to 20 percent.

The Agency should revise its proposal to require operators to report typical blending values. For those operators who are practicing hydrogen blending, hydrogen is introduced into the natural gas stream at discrete locations. The use of a typical blending percentage by volume provides a practical way of addressing the challenges of knowing the exact amount of hydrogen at any point in a gas system. The interconnected and multidirectional nature of pipeline systems, in gas transmission and distribution, means that it is common for hydrogen blends to mix with non-blended natural gas streams, as well as other hydrogen blends of differing percentages. Therefore, while an operator may know the volumetric percentage of hydrogen being introduced at the point of injection, *i.e.*, a typical blending volume, it is not always feasible to know the percentage of hydrogen being transported by the downstream pipelines by segment. Even determining where hydrogen-blended natural gas ends and non-blended gas begins would be prohibitively difficult, given how blended and non-blended natural gas streams mix.

Parsing out each blend, by pipeline segment, as a "predominantly transported commodity group" requiring its own annual report<sup>40</sup> is also impractical. PHMSA is reminded that operators may adjust the amount of hydrogen being introduced into the gas stream. For instance, the percentage of blended hydrogen may change based on seasonal demand and the availability of hydrogen, especially if the hydrogen is produced using excess renewable energy. It is not clear how a pipeline that has carried two commodity values (e.g., 5% hydrogen and 6% hydrogen) would be reported, particularly in a report spanning a long period of time such as an annual report. Even if an operator could feasibly sample gas streams across their system to determine volumetric percentages of hydrogen, it does not follow that the operator would be able to identify the commodity value of blended hydrogen, since some small percentage of hydrogen gas is typically present in unblended natural gas, as allowed by gas quality parameters prescribed by tariff.

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<sup>40</sup> Instructions for completing Form PHMSA F 7100.1-1 (Annual Report, Gas Distribution System):

"Note: "If an operator has two pipeline segments with one pipeline segment used to transport natural gas and the other pipeline segment transporting hydrogen gas, that operator should file two annual reports - 1 report for natural gas and 1 report for hydrogen gas."



For these reasons, it is not feasible for an operator to report the “specified percentage range, by volume, of hydrogen gas *transported by the pipelines being reported,*” as PHMSA proposes. The Associations instead recommend revising the reports in this information collection as follows:

1. Eliminate *Natural Gas and Hydrogen Gas* as distinct commodity groups.
2. Report any natural gas-hydrogen blends under the *Natural Gas* commodity group.
3. Add a separate yes-no question asking Operator: “Hydrogen Gas blended with reported Commodity Group during reporting interval?”
4. For Operators answering “Yes” to previous question, add the following prompts:
  - a. Typical volume percentage hydrogen injected (for reporting period or incident date)
  - b. Narrative description of hydrogen blending that operator deems pertinent (e.g., hydrogen blending areas, duration of blending, and information regarding whether the blending is in an isolated/disconnected demonstration loop, etc.)

The Associations request that the topics included in 4(b) above are used as examples. Hydrogen blending is in its infancy. PHMSA should keep this portion of the annual report flexible and scalable.

PHMSA should revise the reporting instructions accordingly to direct operators to answer these questions for reporting on any pipeline segment downstream of intentional injection of hydrogen gas into the natural gas stream.

## 2. Report Form Redline

The Associations recommend the following redlines to the report.

**THIS REPORT PERTAINS TO THE FOLLOWING COMMODITY GROUP** (*Select Commodity Group based on the predominant gas carried and complete the report for that Commodity Group. File a separate report for each Commodity Group included in this OPID.*)

- Natural Gas ([including Blended Natural Gas and Hydrogen Gas](#))
- Synthetic Gas
- Hydrogen Gas
- Propane Gas
- Landfill Gas
- ~~Blended Natural Gas and Hydrogen Gas (Hydrogen by volume of greater than 0% but less than or equal to 5%)~~
- ~~Blended Natural Gas and Hydrogen Gas (Hydrogen by volume of greater than 5% but less than or equal to 20%)~~
- ~~Blended Natural Gas and Hydrogen Gas (Hydrogen by volume of greater than 20%)~~
- Other Gas → Name of Other Gas:

**WAS HYDROGEN GAS BLENDED WITH REPORTED COMMODITY GROUP DURING REPORTING INTERVAL?**

- No
- Yes

**FOR BLENDING DURING REPORTING PERIOD:**

Typical % Hydrogen Gas Injected

Narrative Description of Hydrogen Blending (e.g., hydrogen blending areas, duration of blending, and information regarding whether the blending is in an isolated/disconnected demonstration loop, etc.)

*Note:*

**Typical % Hydrogen Gas Injected:** If the percentage of hydrogen injected is modified during the reporting period, and/or if the hydrogen is injected at more than one location of the natural gas system being reported, enter the largest percentage of hydrogen introduced into the system during the reporting period.

It is important to keep the reporting form flexible. PHMSA will need to modify the annual report in the future as more injection locations come online for both transmission and distribution systems. At this time, the burden is low due to the number of injection points being low. This reporting format will become more burdensome as more hydrogen facilities come online in the future.

**C. PHMSA should revise the deadline to file an annual report from March to June.**

The current deadline for a Gas Transmission Annual Report (DOT Form PHMSA F 7100.2-1) is March 15<sup>th</sup>. Consistent with the joint trades' comments<sup>41</sup> and INGAA's comments<sup>42</sup> on the Gas Pipeline Leak Detection and Repair NPRM, the Associations request that PHMSA revise the deadline to file an annual report to June 15<sup>th</sup>. The Agency has provided additional time for annual reports in the past. PHMSA's predecessor, the Research and Special Programs Administration, previously provided hazardous liquid operators until June 15<sup>th</sup> to file annual reports recognizing that the industry would need additional time to gather the requested information.<sup>43</sup> Hazardous liquid operators continue to have until June 15<sup>th</sup> to file annual reports each year.<sup>44</sup> A June deadline for natural gas operators will ease the reporting burdens and provide consistent deadlines for both natural gas and hazardous liquid operators.

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<sup>41</sup> <https://www.regulations.gov/comment/PHMSA-2021-0039-26350> at 140.

<sup>42</sup> <https://www.regulations.gov/comment/PHMSA-2021-0039-26287> at 6.

<sup>43</sup> Pipeline Safety: Hazardous Liquid Pipeline Operator Annual Reports, 69 Fed. Reg. 537, 539 (Jan. 6, 2004).

<sup>44</sup> 49 C.F.R. § 195.49.

### **III. Conclusion**

As discussed above, the Associations request that PHMSA reconsider its proposal by (1) collecting the number of valves on transmission pipeline systems, not the mileage between each RMV; (2) updating its burden estimate for completing the valve question; (3) and revising the reporting questions and instructions for hydrogen blending.

Respectfully submitted,



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