

complete the required incident and annual report forms.

RSPA/OPS believes that the time differential for filing a revised incident report compared to the existing incident report is small, because the form is completed for only one of the 25 cause categories for any given incident. Furthermore, because only a small percentage of distribution operators have reportable incidents, the cumulative total time for filing the revised annual information with RSPA/OPS will not increase significantly.

The revised natural gas distribution pipeline operator annual report is substantially unchanged, with the major revision being the addition of the new table for mileage by decade of installation. The increased time to file the new information for mileage by decade of installation should not be substantial for most companies, because the information will be readily available in existing computerized systems for those decades for which the information is available. When the information is not available, RSPA agrees that mileage should be tabulated in the "Unknown" category, in lieu of an extensive and costly information gathering effort. For those operators with computerized systems, there would be an initial cost for conversion to provide the information in the tabulated format, but RSPA/OPS believes the cost would be minimal and the value of collecting the information outweighs completion time or conversion costs. Smaller companies without computerization of the information would generally have little mileage to tabulate. This would result in a minimal increase in preparation time relative to the time required to complete the current form.

#### Operator Cost Burden

AGA stated that:

\* \* \* [p]roper trending of incidents needs to account for inflationary cost increases. The \$50,000 [property damage] incident reporting threshold has not been increased for more than ten years. The effect of inflation over a period of time involving the past decades can be considerable.

For example, a \$50,000 loss in 1989 dollars would be equivalent to \$61,543 in 1998. Conversely, if inflation is ignored, a \$50,000 incident today can be compared to a \$40,622 incident in 1989. Thus, when adjusted for inflation, natural gas distribution incidents decreased from 105 in 1989 to 98 in 1998. Accordingly, AGA suggests that, as part of a future rulemaking, OPS consider raising the monetary threshold for incident reporting to a higher limit. Additionally, any reporting of intrastate incidents meeting lower cost thresholds

(e.g., \$5,000) should be identified and segregated from the \$50,000 incidents.

RSPA/OPS response: RSPA/OPS interprets AGA's comment to mean that if operators were required to report incidents with property damage of \$50,000 in 1989, they would estimate the change in the consumer price index and report only incidents with a real cost of \$50,000 in 2003. Although this would save operators a small amount of money in reduced paperwork costs, it would cause a great loss to RSPA/OPS in terms of safety information. For instance, if there were 10 fewer incidents reported per year, this would save operators 120 hours per year if each incident took 12 hours to report. At \$80 per hour, the total savings would be less than \$1,000 per year. However, if the information from any incident helped RSPA/OPS identify a potential problem that could prevent one major incident in the future, the value of this information would potentially prevent an incident that could cost millions of dollars in property damage, as well as preventing potential injuries or fatalities.

RSPA/OPS feels the small burden of reporting incidents resulting in \$50,000 or more in property damage is outweighed by the benefit of the information provided. Due to the relative scarcity of pipeline incidents, the information that is gained from any one incident is very valuable and justifies the minimal expense to the operators.

#### Data Clarity and Intended Use

APGA observed that if data elements and instructions are unclear, incorrect data submissions will make it less likely that statistically significant conclusions could be drawn from the information. APGA supports data collection if the data is readily available and beneficial, but urges RSPA/OPS not to collect data unless it can identify how it will be used in analyses. Moreover, APGA urges RSPA/OPS to provide information on the intended use for each data element requested.

RSPA/OPS response: RSPA/OPS agrees that unclear instructions could result in incorrect submissions and our goal is to ensure that all instructions are as clear as possible. However, practicality and resource constraints prohibit line-by-line justification of each requested data element. Current RSPA/OPS forms are based on the work of two separate data teams that extensively evaluated reporting needs, taking into consideration the American Society of Mechanical Engineers (ASME) cause categories contained in standard ASME B31.4. These cause categories have

already been adopted for natural gas transmission incident and hazardous liquid accident report forms beginning in 2002, along with the adopted stakeholder best practices. RSPA/OPS based its submission requirements on this information and concludes that its data requests are reasonable and cost of compliance is minimal.

#### Item Labeling

AGA, Con Edison, and Southwest recommend renumbering subsections to correct sequential item identification. Various minor renumbering suggestions were made to improve form flow. For brevity's sake, they are not individually outlined in this summary.

RSPA/OPS response: Renumbering and reformatting suggestions are accepted as general recommendations for proper formatting and increased clarity.

#### Latitude/Longitude

AGA and APGA request definition of the phrase "projections and datum used in collecting this data." Both associations ask for clear identification of where this information is to be entered on the form or elimination of the phrase from the form instructions.

AGA alleged that many local distribution company operators may not have latitude and longitude information and the information would more likely be used by cross-country pipeline operators. AGA also noted that while Tiger/Line Data tools were considered helpful in locating latitude and longitude, AGA believes it is important for operators to understand how the data would be used so they could support RSPA/OPS data trending efforts. AGA recommends the inclusion of form instructions that demonstrate how latitude/longitude data would be used.

APGA tested logon time to the tiger.census.gov website (<http://tiger.census.gov/cgi-bin/mapbrowse-tbl>) to determine the time required to pinpoint the latitude and longitude of the APGA office using a broadband internet connection. This effort required approximately ten minutes and provided an address to seven decimals. However, the form's space allotment does not provide enough room for numbers of this size.

APGA believes there is no known or proven geographical trend in incidents. If no potential use for this data can be identified, APGA urges RSPA/OPS to delete it from the form and instructions. If, however, RSPA/OPS chooses to continue to ask for the data, it should specify how many decimals to include