

damages related to the incident should be reported. Southwest requests clarification if relighting costs are to be included in the total dollars for property damage.

RSPA/OPS response: We agree and we will clarify that relighting costs are to be included in the instructions.

#### Gas Ignited—Explosion or No Explosion

The current form instructions require operators to report whether gas ignited with or without an explosion, but do not clarify at what point in time “explosion” is considered to have occurred or what constitutes a fire or explosion. AGA and Southwest suggest adoption of definitions based on National Fire Protection Association (NFPA) standards.

APGA states that an unconfined cloud of natural gas cannot explode (*i.e.*, causing a shock wave that causes damage outside the immediate area of the gas cloud). If gas is ignited within a confined space (*e.g.*, within a building) it can cause the building to explode. APGA does not understand how RSPA/OPS would treat an incident differently depending on whether property damage was caused by fire or explosion of a structure. Given the confusion about what is or is not an explosion, any analysis relying on this data element is unlikely to provide statistically significant results. APGA suggests that the term “explosion” not be included on the form, but instead that RSPA/OPS ask whether the gas ignited or did not ignite. Con Edison recommends re-labeling the field “Gas Ignited—No Explosion” to “Gas Ignited”.

RSPA/OPS Response: To provide needed clarity, RSPA/OPS has relabeled block 5d on the form to “Gas Ignited,” adding two checkbox options, one appearing as “explosion” and the other as “no explosion.” Block 5e has been relabeled as “Gas Did Not Ignite,” adding checkbox options “explosion” and “no explosion.” RSPA/OPS did not propose to adopt a definition of ignition, fire, or explosion based on NFPA standards. We will continue to rely on the common understanding of these terms as reflected in NFPA and other documents and standards.

#### Evacuation Reason

RSPA/OPS asks operators to estimate the number of persons evacuated as a result of the incident. Commenters noted that evacuation is sometimes performed by firemen, police, or other emergency officials, in which case the operator may not know how many persons were evacuated. Even when the operator requests evacuation, obtaining

an accurate count of the number of persons is not and should not be a priority. RSPA/OPS should clarify that the operator is not expected to expend significant time and effort to determine this number. Southwest requests clarification of which field should be selected as the default when the reason for evacuation or who ordered it is not known. If there is no default field, a supplemental report will have to be sent to RSPA, possibly contradicting the idea behind the Paperwork Reduction Act of 1995. A similar comment stated that supplemental report filing may contract the intent of the Paperwork Reduction Act of 1995 regarding incidents with cause of plastic pipe failure not always determined or known at the time that the report is submitted.

RSPA/OPS Response: The operator is not expected to expend significant time and effort to determine the numbers of people involved during an evacuation. An indication of order of magnitude is sufficient (1, 10, or closest hundred, thousand, *etc.*) Local companies should have contact with local emergency responders and officials as part of their standard operating procedures, and obtaining this information could be as simple as calling officials and speaking with responders.

Filing supplemental report information is routine where additional information not available at the time of incident becomes available. Furthermore, RSPA/OPS was urged by the General Accounting Office and others to seek complete incident information beyond that which is known at initial reporting.

#### Incident Origin—Failure Occurred On

Con Edison recommends that another option labeled “Saddle Tee” be added because it may be confusing as to whether the failure occurred on the body of pipe, joint, component, or other.

RSPA/OPS Response: RSPA/OPS believes that the general public will be best served by utilizing the “Other” option along with the form allowance for a write-in cause. This will allow RSPA/OPS to consider future additions based on frequency of write-in causes.

#### Corrosion

AGA and Southwest point out that current form fields only allow operators to answer yes or no to the question of whether the pipe was previously damaged in the area of corrosion. Operators would be able to correctly indicate unknown if a field were provided or if instructions included the caveat that a “no” response would be inclusive of an “unknown” response.

RSPA/OPS response: RSPA/OPS has added an “Unknown” field for this element.

#### Other Outside Force Damage—Fire/Explosion as Primary Cause

AGA believes that instructions on reporting fire or explosion occurring as a result of the pipeline failure, but not as a cause of the failure, should read:

If a fire/explosion occurred as a result of the failure, but was not a primary cause of the failure, do not check item 10 of this section. Part A, items 5d and/or 5f should already be checked to show that the fire/explosion occurred.

Southwest believes that the instructions given for completing this section are inaccurate, and currently lead the operator to the section referencing corrosion. If it is the intent of the form to cover the possibility of fire and/or explosion due to corrosion, Southwest explains that there could be other causes of failure (fatigue, stresses due to rocks or other infrastructure), and suggests that RSPA/OPS revisit the instructions for clarity and relevance.

Con Edison recommends that an item be added for “Electric Wire Down or Electric Fault in a Manhole.” The current form instructions appear to cover only one possibility, namely a fire and/or explosion due to corrosion. There could be other causes of failure due to a downed electric wire or an electric fault in a manhole, which are more common type incidents.

RSPA/OPS response: RSPA/OPS agrees with the comments and has revised the instructions.

#### Test Medium

RSPA/OPS requires operators to specify the test medium used to establish the Maximum Allowable Operating Pressure (MAOP) and provides check boxes for “water,” “natural gas,” “inert gas,” and “other.” If RSPA/OPS elects to include this data element in the final revised form, APGA recommends that “air” be included as one of the options since the vast majority of distribution piping is tested with air prior to being placed into service. APGA questions whether knowledge of the test medium is necessary for any analysis.

RSPA/OPS Response: RSPA/OPS agrees that information on the test medium is not necessary for analysis. We have eliminated this data element.

#### Equipment or Operations

RSPA/OPS offers the cause option, “Ruptured or leaking seals/pump packing.” APGA finds this confusing as pumps are not a common component on gas distribution systems. The