

association also questions whether this refers to pumps only, or if seal or packing leaks on valves, couplings, regulators, meters and other equipment should be included. Unless RSPA/OPS requires that the cause categories be identical across all three incident forms (liquid, gas transmission, and distribution), the field should be deleted. If the pump identification is retained on the form, RSPA/OPS should recognize that confusion about its proper application may make it more difficult to draw statistically significant conclusions about causes of equipment and operations failures.

Con Edison believes this section refers more appropriately to hazardous liquid operations, especially "pump packing." They recommend changing this item to address more common equipment failures, such as "Mechanical Device Not Installed Properly." There are many mechanical connectors being used on plastic pipe systems that may not be properly installed, and could lead to an incident. There should be a provision for this. Although there is a box to check off for "Poor Workmanship," there appears to be no follow-up to this category when a mechanical device is involved.

RSPA/OPS Response: RSPA/OPS recognizes that pump packing is not a common element in the natural gas distribution pipeline industry. Therefore, we change this cause category from "Ruptured or leaking seals/pump packing" to "Leaking Seals."

Annual Report Form RSPA F 7100.1-1 Federal Land Incident

With regard to leaks reported on annual reports, AGA asks RSPA/OPS to clarify the exclusion that "Federal Buildings such as Federal court houses and warehouses are not to be reported in the incident on Federal lands." Southwest asks whether the exclusion also applies to leaks reported on the annual report.

RSPA/OPS Response: RSPA/OPS has corrected the definition in the form instructions to state: "All lands owned by the United States except lands in the National Park System, lands held in trust for an Indian or Indian tribe, and lands on the Outer Continental Shelf." We have eliminated the exclusion of federal buildings because determining whether buildings were federally owned would be an unnecessary burden on pipeline operators and would serve no analytical purpose.

Miles of Main and Numbers of Services by Decade of Installation

RSPA/OPS asks operators to submit data on the decade of installation of mains and services. AGA and APGA state that this information may not be readily available to operators, and ask RSPA/OPS to clarify that operators are not required to undertake a massive records search to develop the data. APGA offers that operators should be able to list mains and services as "unknown" if the data is not readily available.

APGA notes that RSPA/OPS recently began collecting this data from gas transmission and hazardous liquid operators. Transmission and liquid operators are more likely to have the information readily available because these pipelines tend to be constructed in major projects in a particular decade. Distribution mains and services are installed in smaller increments. Every day an operator may be installing new mains and services, retiring mains and services, and replacing small sections of its piping network. Depending on the record keeping systems, developing the requested installation-by-decade data could require significant time and effort.

Southwest believes that the new requirement will require an increase in the number of hours required to collect distribution data—approximately a day or two longer than is required to complete the current distribution annual report.

Atmos questions the value of such information. Until the value of the data is better justified, Atmos prefers that the proposed changes not be made.

RSPA/OPS Response: The lack of information about overall age of the national pipeline infrastructure has been a major data gap identified by RSPA/OPS, the National Transportation Safety Board, the Department of Transportation Office of the Inspector General, the General Accounting Office, and others. RSPA/OPS also emphasizes that operators are not required to undertake a massive records search to develop the data if it is not readily available. RSPA/OPS seeks best estimates only and does not expect operators to conduct costly manual searches. However, we believe that information on most lines should be available. RSPA/OPS believes the value of the data will increase over time and its accuracy will improve. In the long term, mileage by decade will be of significant value.

Average Length of Service Line

Mr. Erikson reports that the use of the RSPA/OPS Annual Report data for

analyses is necessary in his safety consultancy, and therefore accuracy and usability of the data is of high interest. Mr. Erikson recommends that RSPA/OPS cease asking for average length of service line. Few, if any, operators know this length, and nearly one-sixth of operators reported an average length of zero feet. Experience with operators points to the fact that numbers reported are often a guess, rendering the information unreliable.

RSPA/OPS Response: The estimated average length of service line data element is the sole source for mileage of services nationally. RSPA/OPS uses this information to survey per decade changes in the overall environment. We also use the information to characterize the overall infrastructure. Therefore, this data element will be retained.

Leak Cause

RSPA/OPS proposes to revise the categories for leaks eliminated and/or repaired during the year. However, APGA asks that RSPA/OPS recognize that many operators collect leak repair data using forms and procedures provided to the field crews. Many operators use computer software to store this data. These forms, procedures, and software will have to be modified to reflect the new categories and the new procedures must be explained to field personnel. APGA urges RSPA/OPS to provide adequate lead-time to allow operators to modify their forms, procedures, and software to start tracking new categories. A minimum of six months between the date that RSPA/OPS promulgates changes to leak categories and the start of the year for which new annual reports will be used to collect leak repair data is deemed reasonable.

RSPA/OPS Response: RSPA/OPS acknowledges that time is needed to revise systems to tabulate the new information on the revised annual report form. Accordingly, we will request the information annually beginning March 15, 2005 for calendar year 2004.

Altering Leak Cause Categories

CPUC provided RSPA/OPS with an extensively revised instruction guide and proposed form for annual report completion to ensure leakage data that would be useful for Colorado regulatory analysis purposes. The proposed form is a tool that alters past definitions used to classify "leaks" into different "Leak Cause" categories. CPUC's recommended instructions are provided with the intent to provide clarity and correlation with past leak cause data collection efforts. Because in-depth