

February 7, 2019

The Honorable Elaine L. Chao
Secretary
United States Department of Transportation
1200 New Jersey Ave. SE
Washington, DC 20590

Re: Support for PHMSA Safety of Gas Transmission Pipelines Final Rule

Secretary Chao:

Our organizations write to express support for the Department of Transportation's pending gas transmission pipeline safety rule.¹ As public safety advocates and representatives of natural gas transmission pipeline companies, we encourage you to act expeditiously to advance this important update to the regulations of the Pipeline and Hazardous Materials Safety Administration.

PHMSA's rule will advance gas transmission pipeline safety by defining specific requirements to facilitate the use of 21st-century pipeline safety technologies and processes. The rule provides a foundation upon which PHMSA can better promote the utilization of modern pipeline inspection technologies, recognizing the safety, environmental, and consumer benefits that such technologies can provide. For example, the rule will facilitate the deployment of non-invasive tools that can evaluate pipeline condition and identify pipe needing repair or replacement.

The rule also sets out requirements for operators to test certain existing pipelines to ensure that they meet today's safety standards. Thus, the rule provides a means for pipeline companies to continue advancing the safety initiatives identified by Congress in 2011.²

Our organizations are represented on the Department's pipeline advisory committees. During the public meetings convened by the Department throughout 2017-2018, the Gas Pipeline Advisory Committee provided PHMSA with recommendations on the technical feasibility, reasonableness, cost-effectiveness, and practicability of the proposed rule. While our organizations sometimes disagree about the specifics of pipeline safety regulations, in this case consensus was achieved on many important pipeline safety topics through the advisory committee process. The advisory committee ultimately provided PHMSA with recommendations to support finalizing the rule.

Thank you for considering our request to expedite the completion of this important rulemaking. We look forward to continuing to work with the Department on our shared goal of pipeline safety.

¹ Pipeline Safety: Safety of Gas Transmission Pipelines, MAOP Reconfirmation, Expansion of Assessment Requirements and Other Related Amendments. RIN 2137-AE72.

² Pipeline Safety, Regulatory Certainty, and Job Creation Act of 2011

Sincerely,



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