

**Mr. Christopher “C.J.” Osman**  
**Director of Operations, Safety and Integrity**  
**Interstate Natural Gas Association of America**

**The Honorable Robert E. Latta (R-OH):**

1. As you know, the States oversee more than 80 percent of the nation’s pipeline infrastructure—especially the gas distribution pipelines that connect our homes and businesses to the main transmission system.
  - a. Can you talk a little bit about state programs and the relationships that your member companies have with State and local pipeline safety regulators?

**RESPONSE: Federal regulators from PHMSA set baseline requirements for all pipeline operators and directly oversee interstate gas transmission pipelines, while State regulators oversee intrastate gas transmission and distribution. This shared oversight responsibility between Federal and State regulators is a key reason why America’s pipeline infrastructure enjoys a strong safety record.**

**The Interstate Natural Gas Association of America (INGAA) only represents interstate natural gas transmission pipelines that are regulated entirely by the PHMSA Federal program. As such, I do not have specific comments to offer regarding relationships with State regulatory agencies.**

- b. What are the main elements of good quality state programs and what is the industry doing to provide technical training and support?

**RESPONSE: INGAA only represents interstate natural gas transmission pipelines that are regulated entirely by the PHMSA Federal program. As such, I do not have specific comments to offer regarding the effectiveness of state regulatory programs.**

- c. Is there anything that Congress, or PHMSA, could do to support cooperation and collaboration among State regulators and the industry?

**RESPONSE: Reauthorizing the Federal pipeline safety program is essential in order for the State programs to function effectively and engage in collaborative efforts because PHMSA provides much of the funding for State pipeline safety programs. Without reauthorization legislation, funding for existing State pipeline safety programs may be at risk, and it also becomes challenging to fund new state programs that may be warranted to meet evolving needs.**

**The Honorable Cathy McMorris Rodgers (R-WA):**

1. As you know, PHMSA is currently undertaking significant rulemakings for both gas and liquid pipelines.
  - a. I would like for you to put these rulemakings in context for us. How significant of a change are you expecting from the current regulatory framework?

**RESPONSE: PHMSA is finalizing four rulemakings to fulfill the outstanding gas transmission pipeline safety mandates that were at the center of the last two Pipeline Safety Act reauthorizations:**

- 1) **“Pipeline Safety: Safety of Gas Transmission Pipelines: MAOP Reconfirmation, Expansion of Assessment Requirements, and Other Related Amendments”** (final rule published in October 2019);
- 2) **“Pipeline Safety: Safety of Gas Transmission Pipelines, Repair Criteria, Integrity Management Improvements, Cathodic Protection, Management of Change, and Other Related Amendments”** (final rule expected in January 2021);
- 3) **“Pipeline Safety: Amendments to Parts 192 and 195 to Require Valve Installation and Minimum Rupture Detection Standards”** (final rule expected in April 2021); and
- 4) **“Pipeline Safety: Class Location Requirements”** (proposed rule published in October 2020).

**Collectively, these rulemakings represent the most significant enhancement to gas transmission pipeline safety regulations since the federal safety code was first promulgated in 1970. These rules reflect a comprehensive update to PHMSA’s gas transmission regulatory code, some aspects of which has remained stagnant for decades. These updates will make great strides in incorporating modern technologies and engineering practices into our nation’s pipeline safety program.**

**In addition to enhancing safety, incorporating newer technologies and practices into PHMSA’s regulations will promote greater energy reliability, reduced emissions, and more efficient use of operators’ resources because today’s methods are generally less invasive than those that we relied upon decades ago. INGAA members strongly support prompt completion of these rulemakings.**

- b. Given the pending regulations at PHMSA, what are your member’s priorities for pipeline safety reauthorization?

**RESPONSE: INGAA’s priority is ensuring that PHMSA has the resources**

**and direction from Congress to complete these pending rulemakings. Once the rulemakings have been completed and implemented by pipeline operators and PHMSA, and there has been sufficient time to assess the impacts of the new requirements, then we will have a better picture of what PHMSA's future policy priorities should be.**