



# Pipeline Data Public Meeting

## PHMSA Pipeline Data Collection



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January 8, 2013



# OMB Approval Process

- Each PHMSA data collection form must be approved by the Office of Management and Budget (OMB) on a three year cycle
- Process begins with a Federal Register notice with 60-day comment period includes description of proposed changes, red-lined reporting form, and red-lined instructions
- After reviewing comments, PHMSA may modify the proposal
- Federal Register notice summarizes comments received and changes made in response. “Refreshed” red-lines of forms and instructions provided in the docket with a 30-day comment period.
- Comments go to OMB and OMB decides whether to approve the revised forms and instructions



## Then Comes the Hard Part

- Operators modify systems to collect data in the new format and PHMSA modifies data collection software in the Portal
- If the changes are substantial (new data model):
  - New data and old data must be melded for long-term trending – may end up with conglomerated cause category like Material/Weld/Equipment Failure
  - New data becomes a separate “download”



# Recent Form Changes

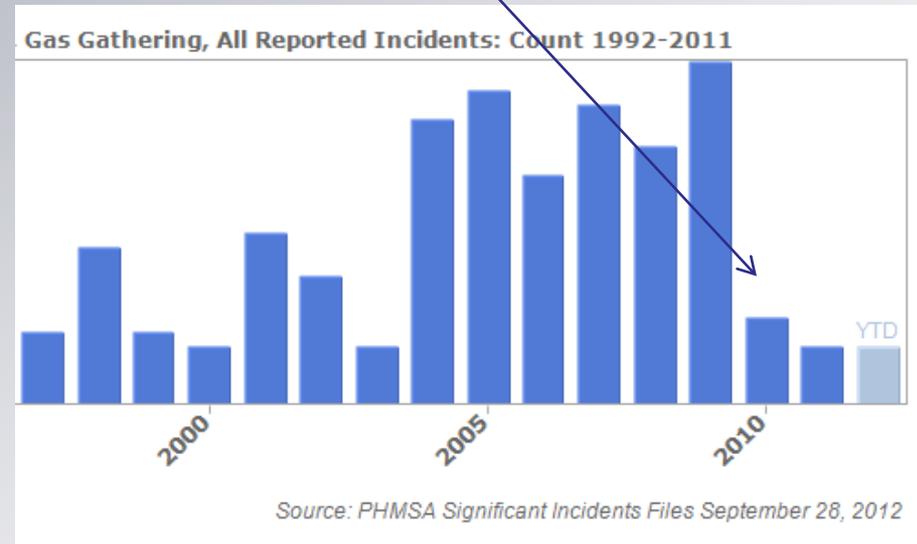
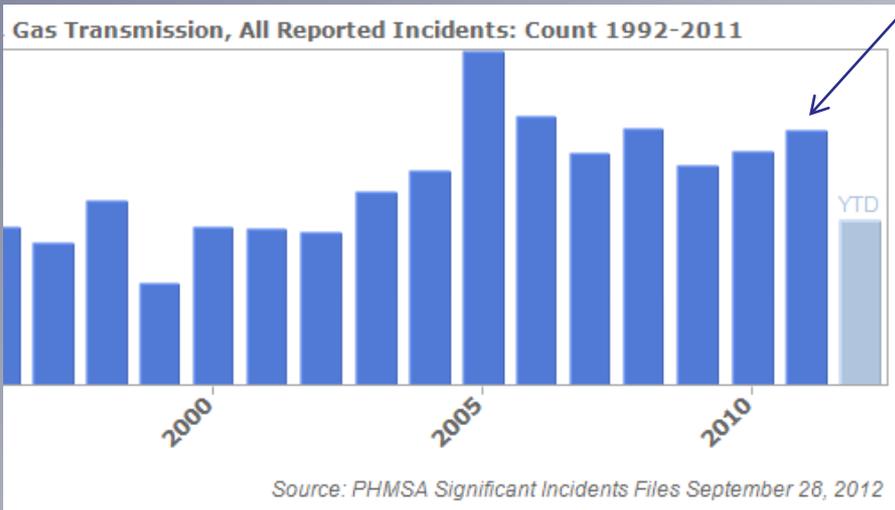
- 60-day Federal Register notice was published in late April 2012
- In December 2012, OMB approved changes to:
  - GT GG Annual Report – Congressional mandates, NTSB Recommendations, additional by-State mileage data, etc
  - GT GG Incident Report – additional data for girth weld failures, Data Quality improvement - clear identification of GT or GG, etc
  - HL Accident Report – additional data for girth weld failures, stop 100% alignment with GT GG, etc

# Data Quality Challenges

## GT/GG Incident Reports

### identifying GT vs GG

- Starting 1/1/2010, reports for system portion other than "Pipe" are assumed to be all GT and none GG



### PHMSA Corrective Action

December 2012 revisions require identification of GT or GG on every incident report. PHMSA plans to request that operators submit supplemental reports after the PHMSA Portal is modified.



## Data Quality Challenges

# HL Accident Volume Released

- In 2010 for all commodities, began collecting intentional release volume in addition to unintentional volume
- Public display adds intentional and unintentional volumes as spill size post-2010, but pre-2010 spill size is only unintentional release volume
- Post-2010, several CO<sub>2</sub> accidents have had immense intentional release volumes

### **PHMSA Corrective Action**

December 2012 form change collects intentional release volume for CO<sub>2</sub> and HVL only. PHMSA plans to request that operators submit supplemental reports after the PHMSA Portal is modified. Subsequently, begin displaying unintentional release volume as spill size.



# Data Collection Renewals in 2013

- Forms expiring in late 2013 or early 2014
  - GD Annual and Incident Report
  - GTGG Annual and Incident Report
  - HL Annual and Accident Report
  - LNG Annual and Incident Reports
- PHMSA began discussing proposed changes with the industry in August 2012
- PHMSA intends to maintain current data model for all in/accident reports – avoid another data download
- Stakeholder collaboration on the next incident report data model should start in 2015 for implementation in 2017
- Future data format for infrastructure and meaningful performance metrics – Magic 8-Ball says - Future Uncertain



# Safety Related Condition Reports (SRCR)

- No OMB-approved form and instructions
- Reporting requirements and contents of report specified directly in PHMSA regulations
- Within PHMSA regulations, SRCR is the closest thing we have to LEADING indicators
- BUT the regulations do not require reporting for most conditions if they are corrected before the report “due dates”
- SRCR should be replaced with Meaningful Performance Metrics