



Cedric Flowers
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June 13, 2025

Mr. David A Barrett
Acting Director, Central Region, OPS
Pipeline and Hazardous Materials Safety Administration
901 Locust Street, Suite 480
Kansas City, MO. 64106-2641

Re: **Notice of Amendment**
Case Number CPF 3-2025-015-NOA

Dear Mr. Barrett:

DTE Gas Company (DTE Gas), a subsidiary of DTE Energy, acknowledges receipt of your letter of May 20, 2025, regarding findings by representatives of the Michigan Public Service Commission acting as an interstate agent for the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), during an inspection of records for the Milford-Belle River Loop Line - F Line (Vector Pipeline System) in Michigan during September, 2024.

While DTE Gas performs the tasks cited, DTE Gas does not contest the procedural findings described in the Notice of Amendment and hereby submits our response to each of the two items. The applicable rules and findings listed in the Notice are shown below in bold and italics, respectively:

- Item 1: § 192.463 External corrosion control: Cathodic protection.**
(a) Each cathodic protection system required by this subpart must provide a level of cathodic protection that complies with one or more of the applicable criteria contained in Appendix D of this part. If none of these criteria is applicable, the cathodic protection system must provide a level of cathodic protection at least equal to that provided by compliance with one or more of these criteria.

Appendix D states:

I. Criteria for cathodic protection –

A. Steel, cast iron, and ductile iron structures.

(1) A negative (cathodic) voltage of at least 0.85 volt, with reference to a saturated copper-copper sulfate half cell. Determination of this voltage must be made with the protective current applied, and in accordance with sections II and IV of this appendix.

(II) Interpretation of voltage measurement. Voltage (IR) drops other than those across the structure electrolyte boundary must be considered for valid interpretation of the voltage measurement in paragraphs A(1) and (2) and paragraph B(1) of section I of this appendix.

DTE's corrosion control standard 451, "Corrosion Control for Metallic Pipelines" (Standard 451), did not address how often DTE personnel are to conduct voltage (IR) drop surveys on DTE's anode protected lines. Appendix D, section II, requires that IR drops other than those across the structure electrolyte boundary must be considered for valid interpretation of the voltage measurement in (A)(1) and (A)(2) of Appendix D. Section 4.10 of Standard 451 specified obtaining IR free readings (a method of considering IR drops) on DTE's rectified systems every five years, but Standard 451 did not state how often DTE must do an IR free reading on its anode protected lines, such as the Vector line segment. Therefore, PHMSA proposes that DTE must revise its procedures to meet the requirements of § 192.463(a), in accordance with § 192.605(b)(2).

DTE Gas Response

DTS Standard 451 Section 4.13 has been revised to include the requirement for taking IR reads on galvanic protected pipeline segments once every 5 years not to exceed 63 months. (See attached document "DTS Standard 451 Section 4.13").

Item 2: § 192.921 How is the baseline assessment to be conducted?

(a) Assessment methods. An operator must assess the integrity of the line pipe in each covered segment by applying one or more of the following methods for each threat to which the covered segment is susceptible. An operator must select the method or methods best suited to address the threats identified to the covered segment (See § 192.917).

(1) Internal inspection tool or tools capable of detecting those threats to which the pipeline is susceptible. The use of internal inspection tools is appropriate for threats such as corrosion, deformation and mechanical damage (including dents, gouges and grooves), material cracking and crack- like defects (e.g., stress corrosion cracking, selective seam weld corrosion, environmentally assisted cracking, and girth weld cracks), hard spots with cracking, and any other threats to which the covered segment is susceptible. When performing an assessment using an in-line inspection tool, an operator must comply with § 192.493.

In addition, an operator must analyze and account for uncertainties in reported results (e.g., tool tolerance, detection threshold, probability of detection, probability of identification, sizing accuracy, conservative anomaly interaction criteria, location accuracy, anomaly findings, and unity chart plots or equivalent for determining uncertainties and verifying actual tool performance) in identifying and characterizing anomalies;

DTE's integrity management procedure, "ILI of Transmission Pipelines (13-SWI-011-0053)," for using in-line inspection (ILI) tools for assessments was not in accordance with §§ 192.921(a)(1) and 192.493. Section 192.493 incorporates by reference API RP 1163, "In-line Inspection Systems Qualification." API RP 1163, section 8, "System Results Validation," prescribes methods that shall be applied to validate if the reported inspection results meet or are within the performance specification for the pipeline being inspected. DTE's procedure did not contain any guidance or specificity on how and when they would do this validation process. Therefore, PHMSA proposes that DTE must revise its integrity management procedures to meet the requirements of §§ 192.921(a)(1) and 192.493.

DTE Gas Response

DTE Gas created Document 13-SWI-011-0170 identifying how and when the validation process will be applied. This was completed June 2025. (See attached document "13-SWI-011-0170 API 1163 Verification and Validation").

DTE Gas believes that our actions listed above will achieve compliance with § 192.463 and §192.921.

Sincerely,

Cedric Flowers
Vice-President, DTE Gas Operations

Enclosures:

Attachment A - DTS Standard 451 Section 4.13

Attachment B - 13-SWI-011-0170 API 1163 Verification and Validation

cc. Joi Harris, President and COO, DTE Energy
Dave Chislea, MPSC