

**BEFORE THE
PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION
WASHINGTON, D.C.**

Pipeline Safety: Plastic Pipe Rule

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Docket No. PHMSA-2014-0098

**PETITION OF THE AMERICAN GAS ASSOCIATION
TO EXTEND THE COMMENT PERIOD
FOR THE NOTICE OF PROPOSED RULEMAKING ON THE PLASTIC PIPE RULE**

The American Gas Association files this Petition to extend the comment period for the above proposed amendments to natural and other gas pipeline safety regulations that address regulatory requirements involving plastic pipe systems used in gas services.

This Petition is submitted to the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to 49 CFR 190.319. AGA is submitting this Petition more than 10 days before the July 31, 2015 deadline for submitting comments. The following reasons provide the basis for PHMSA to extend the duration of the comment period until August 31, 2015.

1. In the Federal Register notice, PHMSA outlines nine different subject areas, which encompasses alterations to 27 independent sections with 49 CFR 192 and changes to 17 standards that are incorporated by reference. These modifications to federal regulations will impact the design, construction, maintenance and operations of plastic pipe. A 72 day comment period does not allow AGA, nor its operators, time to fully evaluate the burden associated with the significant number of changes found within PHMSA's proposal. An additional 30 days will allow the industry sufficient time to analyze and provide meaningful comments to PHMSA's proposals.

2. AGA has developed a Task Group comprising of representatives from twelve natural gas local distribution companies. With their guidance AGA is evaluating the proposed changes and will survey the full AGA membership on the resultant cost burden that the proposal will place on natural gas operators. AGA also plans to have conversations with other stakeholders, such as the plastic material manufacturers, to determine the overall impacts to the natural gas industry.

The additional 30 days will provide an adequate amount of time for the AGA Task Group to properly gather this information and provide substantive comments to PHMSA.

It is in the public interest to extend the comment period so that gas utilities have the opportunity to thoroughly review the proposal and provide an accurate assessment of its impact.

Respectfully submitted,

Date: May 29, 2015

AMERICAN GAS ASSOCIATION

By:

A handwritten signature in black ink, appearing to read 'CS' followed by a stylized flourish.

Christina Sames

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