THE VOICE OF AN INDUSTRY

Date: June 16, 2015

To: Pipeline and Hazardous Materials Safety Administration

Subject: Docket # PHMSA-2014-0098: Notice of Proposed Rulemaking on the Plastic Pipe Rule

## **Petition of the Plastics Pipe Institute**

The Plastics Pipe Institute (PPI) files this Petition to extend the comment period for the above Notice of Proposed Rulemaking (NPRM) which proposed amendments to natural and other gas pipeline safety regulations that address regulatory requirements involving plastic pipe systems used in gas services.

PPI is submitting this petition to the Pipeline and Hazardous Materials Safety Administration (PHMSA) to extend the comment duration to August 31, 2015. The following reasons are provided as the basis for this petition:

- 1. The PHMSA NPRM proposes extensive changes throughout the 49 CFR Part 192 that impact the design, construction, maintenance, and operation of plastic piping systems used in gas distribution. Additional time is needed to fully evaluate the significant number of proposed changes to the code and the impact on PPI member companies.
- 2. The 30-day extension will allow PPI member companies to gather feedback from many associated stakeholder groups involved in plastic gas systems providing for a more thorough response.
- 3. PPI has formed at Task Group of interested members that is developing a collective response to the NPRM. The draft comments will then need to be reviewed by the Management Committee of the Energy Piping Systems Division (EPSD) and PPI Board of Directors prior to being submitted to PHMSA for consideration. The 30-day extension will provide PPI with sufficient the time to gather, review, and approve comments, and provide substantive feedback to PHMSA.

PPI is submitting this petition more than 10 days prior to the July 31, 2015 deadline for submitting comments.

Respectfully Submitted,

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