

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

Notice of Proposed Rulemaking
Pipeline Safety: Plastic Pipe Rule



Docket No. PHMSA-2014-0098

**COMMENTS OF National Grid
TO PHMSA NOTICE OF PROPOSED RULEMAKING: PLASTIC PIPE RULE**

National Grid appreciates the opportunity to comment on the Notice of Proposed Rulemaking (NPRM) on Plastic Pipe published on May 21, 2015 (80 FR 29263) ("Plastic Pipe Rule"). National Grid serves approximately 3.5 million customers in upstate New York, New York City, Long Island, Massachusetts and Rhode Island. Its gas distribution companies own and operate more than 34,960 miles of gas pipelines, including more than 14,968 miles of plastic pipe. National Grid is dedicated to the safe and reliable operation of its gas systems, and supports PHMSA's efforts to implement new regulations for plastic pipe that will further enhance gas safety.

National Grid supports many of the changes described in the NPRM. However, National Grid requests that PHMSA remove Tracking & Traceability from the Plastic Pipe Rule. Due to the complexity and potential magnitude that the Tracking & Traceability requirements may have, National Grid believes discussions and cost-benefit estimates associated with this topic will inhibit progression of the remainder of the rule, which contains many elements of positive impact to the industry and pipeline safety

National Grid anticipates that the financial burden of complying with the material Tracking & Traceability component of the Plastic Pipe Rule will be approximately \$8.1 million dollars for each of the next three years, including the costs of scanning devices, software, training, and licensing, but exclusive of incremental labor resources. Also, as stated above, we cannot be assured of the effectiveness and accuracy of current Tracking & Traceability initiatives. Furthermore, all current manufacturers of pipes and fittings are not equipped to supply pipes, valves and fittings with barcodes for complying with this requirement.

In general, National Grid supports most of the plastic pipe regulation updates as proposed. National Grid encourages PHMSA to reevaluate the technical justifications for a few sections throughout the Proposed

Rule. National Grid supports the modifications outlined by the American Gas Association (AGA) in their comments submitted on the docket for the Plastic Pipe Rule, PHMSA-2014-0098.

National Grid supports the intent and concepts behind the Tracking & Traceability of pipe and components. However, National Grid urges PHMSA to remove this section of the proposal from the final rulemaking. The challenges for implementation remain numerous and uncertain and, therefore, cannot be considered insignificant at this time. Removing this portion of the proposed rule would allow PHMSA to move forward on the remainder of the items found within the Plastic Pipe Rule. Furthermore, the removal would also allow PHMSA to work with the appropriate stakeholders to continue the progressive conversations pertaining to Tracking & Traceability.

Respectfully submitted,

Date: July 31, 2015

By:

A handwritten signature in black ink, appearing to read 'Susan Fleck', with a long horizontal line extending to the right.

Susan Fleck, Vice President Gas Pipeline Safety and Compliance

National Grid

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