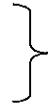


**BEFORE THE
PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION
WASHINGTON, D.C.**

Notice of Proposed Rulemaking
Pipeline Safety: Plastic Pipe Rule



Docket No. PHMSA-2014-0098

**COMMENTS OF Atmos Energy Corporation
TO PHMSA NOTICE OF PROPOSED RULEMAKING: PLASTIC PIPE RULE**

Atmos Energy Corporation (Atmos) appreciates the opportunity to comment on the Notice of Proposed Rulemaking (NPRM) on Plastic Pipe published on May 21, 2015 (80 FR 29263).

Atmos supports many of the proposed changes found within the proposed rule. However, Atmos 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, Atmos 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.

Atmos appreciates PHMSA's intent to codify material Tracking & Traceability within the natural gas industry, however the work and research on this initiative remains in its infancy. The full impact of completing system-wide Tracking & Traceability on installed pipe and components is not fully understood and should be further explored prior to codifying the requirement. Due to its significance and the potential cost of implementation, Atmos encourages PHMSA to remove it from the Plastic Pipe Rule. The Tracking & Traceability requirements for plastic pipe and components should be evaluated with the intent that the same modifications made by manufacturers and operators could also be utilized by all material manufacturers and for transmission pipeline operators. Atmos believes addressing Tracking & Traceability independently for each construction material type is short sighted and will cause the industry to spend additional resources without added benefits.

In general, Atmos supports most of the plastic pipe regulation updates as proposed. There are a few sections throughout the Proposed Rule where Atmos encourages PHMSA to reevaluate the technical justifications. Atmos 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.

Atmos supports the intent and concepts behind the Tracking & Traceability of pipe and components. However, Atmos urges PHMSA to remove this section of the proposal from the final rulemakings. The challenges for implementation remain numerous and uncertain and can therefore not be considered non-significant 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. The separation 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 "Phillip J. Murdock". The signature is fluid and cursive, with a large initial "P" and "M".

Phillip J. Murdock, P.E.

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