

**BEFORE THE
UNITED STATES DEPARTMENT OF TRANSPORTATION
PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION
WASHINGTON, D.C.**

Pipeline Safety: Adjust Annual	)	Docket No. PHMSA-2025-0108
Report Deadlines	)	RIN: 2137-AF77

**COMMENTS ON
PIPELINE SAFETY: MEETING OF THE GAS PIPELINE ADVISORY COMMITTEE
(ADJUST ANNUAL REPORT DEADLINES)**

**FILED BY
INTERSTATE NATURAL GAS ASSOCIATION OF AMERICA
AMERICAN FUEL & PETROCHEMICAL MANUFACTURERS
AMERICAN GAS ASSOCIATION
AMERICAN PUBLIC GAS ASSOCIATION
GPA MIDSTREAM ASSOCIATION
AMERICAN PETROLEUM INSTITUTE**

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TABLE OF CONTENTS

I. Introduction	1
II. PHMSA Should Finalize the June 15 Annual Report Deadline	2
III. PHMSA Should Finalize the NPMS Extension in the Same Rulemaking	3
IV. PHMSA Should Confirm the Federal Deadline Is a Floor, Not a Ceiling	3
V. Conclusion.....	4

I. Introduction

The Interstate Natural Gas Association of America (INGAA)¹, the American Fuel & Petrochemical Manufacturers (AFPM)², the American Gas Association (AGA)³, the American Public Gas Association (APGA)⁴, the GPA Midstream Association (GPA Midstream)⁵ and the American Petroleum Institute (API)⁶ (jointly, “the Associations”) submit these comments for consideration by the Pipeline and Hazardous Materials Safety Administration (PHMSA or the Agency) concerning the meeting of the Gas Pipeline Advisory Committee (GPAC or the Committee) held on July 30, 2026 to review and discuss PHMSA’s proposed rule, *Pipeline Safety: Adjust Annual Report Deadlines* (NPRM)⁷, together with the Agency’s associated regulatory analyses and the other materials pertaining to the NPRM provided in the public docket for this rulemaking.

¹INGAA is a trade association that advocates regulatory and legislative positions of importance to the interstate natural gas pipeline industry in North America. Comprised of 28 members, it represents the vast majority of the U.S. interstate natural gas transmission pipeline companies. INGAA’s members operate nearly 200,000 miles of pipelines and serve as an indispensable link between natural gas producers and consumers.

²AFPM is a national trade association representing most U.S. refining and petrochemical manufacturing capacity. AFPM’s member companies produce the gasoline, diesel, and jet fuel that drive the modern economy, as well as the petrochemical building blocks that are used to make the millions of products that make modern life possible—from clothing to life-saving medical equipment and smartphones. As such, AFPM members strengthen economic and national security while supporting more than 3 million jobs nationwide. To produce these essential goods, AFPM members depend on all modes of transportation to move their products to and from refineries and petrochemical facilities and have made significant infrastructure investments to support and improve the safety and efficiency of the transportation system. AFPM member companies depend upon an uninterrupted, affordable supply of crude oil and natural gas as feedstocks for the transportation fuels and petrochemicals they manufacture. Pipelines are the primary mode for transporting crude oil and natural gas to refiners and petrochemical facilities and refined products from those same facilities to distribution terminals serving consumer markets.

³Founded in 1918, AGA represents more than 200 local energy companies committed to the safe and reliable delivery of clean natural gas to more than 180 million Americans. AGA is an advocate for natural gas utility companies and their customers and provides a broad range of programs and services for member natural gas pipelines, marketers, gatherers, international natural gas companies, and industry associates. Today, natural gas meets more than one third of the United States’ energy needs.

⁴APGA is the trade association representing more than 730 communities across the U.S. that own and operate their retail natural gas entities. These include not-for-profit gas distribution systems owned by municipalities and other local government entities, all locally accountable to the citizens they serve. Public gas systems focus on safely providing reliable and affordable energy to their customers and support their communities by delivering fuel to be used for cooking, clothes drying, and space and water heating, as well as for various commercial and industrial applications.

⁵ GPA Midstream has served the U.S. energy industry since 1921 and represents approximately 45 domestic corporate members that directly employ 57,000 employees engaged in the gathering, transporting, processing, treating, storage, and marketing of natural gas, natural gas liquids, crude oil and refined products, commonly referred to as “midstream activities.” The work of our members indirectly creates or impacts an additional 470,000 jobs across the U.S. economy. In 2024, GPA Midstream members had an economic impact of \$191 billion through operating 502,900 miles of gas gathering pipelines, gathering more than 91 billion cubic feet per day of natural gas, and operating more than 342 natural gas processing facilities that delivered pipeline quality gas into markets across a majority of the U.S. interstate and intrastate pipeline systems.

⁶API represents all segments of America’s natural gas and oil industry, which supports more than 11 million U.S. jobs and is backed by a growing grassroots movement of millions of Americans. Our approximately 600 members produce, process and distribute the majority of the nation’s energy, and participate in API Energy Excellence®, which is accelerating environmental and safety progress by fostering new technologies and transparent reporting. API was formed in 1919 as a standards-setting organization and has developed more than 800 standards to enhance operational and environmental safety, efficiency and sustainability.

⁷Pipeline Safety: Adjust Annual Report Deadlines, 91 Fed. Reg. 22,087 (Apr. 24, 2026).

The Associations support the NPRM to extend the annual report deadline from March 15 to June 15 for gas distribution, gas transmission, regulated onshore gathering, Type R gathering, underground natural gas storage facilities, and liquefied natural gas facilities, and extend the National Pipeline Mapping System (NPMS) submission deadline from March 15 to June 15. Both changes align gas reporting with the June 15 deadline that has applied to hazardous liquid and carbon dioxide operators since 2005.⁸ The Associations urge PHMSA to finalize those amendments.

The Committee voted to approve the proposed rule as technically feasible, reasonable, cost-effective, and practicable by a vote of 10-2, and did not attach conditions to its recommendation.⁹ These comments address the concerns raised during the Committee discussion concerning the availability of annual report data for State inspection planning and trend analysis.

In summary, the Associations recommend PHMSA:

1. Finalize the extension of the annual report deadline from March 15 to June 15 at §§ 191.11 and 191.17;
2. Finalize the corresponding extension of the NPMS submission deadline at § 191.29 in the same rulemaking, so that annual report and NPMS data remain consistent; and
3. Confirm that the federal deadline establishes a floor and does not restrict the authority of State authorities to require earlier submission from the operators they oversee.

II. PHMSA Should Finalize the June 15 Annual Report Deadline

The Associations recommend that PHMSA finalize the extension of the annual report deadline from March 15 to June 15. The justification is straightforward: the June 15 date has governed the hazardous liquid and carbon dioxide pipeline operators reporting for two decades without safety consequence, and no safety rationale supports maintaining a different date for gas pipeline operators.

Hazardous liquid and carbon dioxide operators have reported by June 15 since 2005 and PHMSA has not identified a safety consequence attributable to the later date, has not proposed to move liquid reporting earlier, and has not suggested that its oversight of liquid systems is impaired relative to gas systems by the three-month difference. This deadline has functioned for twenty years across an entire regulated sector without safety concerns.

The distinction between gas and liquid reporting dates is historical rather than reasoned. Operators running both gas and liquid systems currently assemble two annual reporting packages on two

⁸ PHMSA/RSPA, Amdt. 195-80, 69 Fed. Reg. 541 (Jan. 6, 2004).

⁹PHMSA, “Gas Annual Report Deadlines (2137-AF77) — Gas Pipeline Committee Voting Slides,” slide 30, July 30, 2026 GPAC/LPAC meeting materials, Docket No. PHMSA-2026-1156; Transcript of Proceedings, Joint Meeting of the Gas Pipeline Advisory Committee and Liquid Pipeline Advisory Committee, U.S. Dep’t of Transportation, Pipeline & Hazardous Materials Safety Admin. (July 30, 2026) (Transcript), at 255 (GPAC, 10-2).

schedules for no reason connected to the character of the assets. Aligning the deadlines removes that inconsistency and simplifies compliance for integrated operators without changing what must be reported.

It is also important to be clear about the purpose of a pipeline safety annual report. It is a retrospective summary of the preceding calendar year — mileage, materials, leak counts, and comparable aggregate data. It is not a real-time safety instrument and does not function as one regardless of the filing date. Regulators learn of conditions requiring prompt attention through incident and accident reports, safety-related condition reports, and immediate notifications, all of which operate on their own timelines throughout the year and none of which this rulemaking touches.¹⁰ Data describing calendar year 2025 does not become less accurate, or less useful for trend analysis, because it is filed in June rather than March.

III. PHMSA Should Finalize the NPMS Extension in the Same Rulemaking

The Associations recommend that PHMSA amend the corresponding National Pipeline Mapping System submission deadline at § 191.29 to June 15 in the same rulemaking. Beyond avoiding harm, the additional preparation time can help improve the quality of what PHMSA receives, and aligning the two deadlines helps keep the annual report and NPMS datasets consistent with one another.

Annual reports for large operators aggregate data across extensive asset inventories drawn from multiple systems of record — geographic information systems, work management systems, leak surveys, and integrity databases. Reconciling those sources, validating the results, and correcting discrepancies takes time. A compressed schedule does not reduce the volume of that work; it reduces the time available to do it well, which produces submissions that require subsequent correction. Every hour spent amending a filed report is an hour PHMSA and the operator both spend on data quality after the fact rather than before.

The NPMS extension is important for the same reason, and the two changes should be finalized together. Annual report data and NPMS submissions describe the same underlying assets and are closely interconnected. Preparing them on a common schedule allows operators to reconcile the two before filing, which helps produce more consistent submissions. Preparing them on divergent schedules invites the opposite: two descriptions of the same system, assembled at different times from different snapshots, that PHMSA must then reconcile. Aligning the deadlines will better keep the datasets in sync.

IV. PHMSA Should Confirm the Federal Deadline Is a Floor, Not a Ceiling

The Associations recommend that PHMSA confirm in the final rule that the federal deadline establishes a floor and does not restrict the authority of State authorities to require earlier

¹⁰49 C.F.R. §§ 191.5, 191.9, 191.15, 195.50, 195.52 (incident, accident, and safety-related condition reporting).

submission from the operators they oversee. That confirmation answers the concern raised during the Committee discussion about the availability of annual report data for State inspection planning.

The Associations recognize the concern that later filing delays access to data used for inspection planning and trend analysis. The concern is understandable but does not withstand examination, for three reasons.

First, as noted above, the safety-relevant information regulators need during the year does not arrive through annual reports. Incident, accident, and safety-related condition reporting operate continuously and are unaffected by this proposal. An inspector planning work in April has the same real-time information under a June 15 deadline as under a March 15 deadline.

Second, the federal reporting deadline sets a floor, not a ceiling. States administering intrastate pipeline safety programs retain authority to establish earlier submission requirements for the operators they oversee where they conclude that state inspection planning requires data on a different schedule. Nothing in this proposal restricts that authority. A state that needs January data for an April inspection cycle can require it.

Third, the comparison to the liquid sector cuts directly against the concern. State programs oversee hazardous liquid operators reporting on a June 15 schedule today, and there is no evidence that oversight of those systems is degraded relative to gas systems. If a June 15 deadline impaired inspection planning, the effect should already be visible on the liquid side after twenty years. It is not.

The Associations note that an alternative alignment — moving hazardous liquid reporting to March 15 rather than moving gas reporting to June 15 — would achieve consistency but at real cost and with no offsetting benefit. It would compress the schedule for a sector that has reported successfully on the current timetable for two decades, potentially degrade data quality for those operators, and could disturb the NPMS alignment this proposal is designed to create. Alignment is worth achieving; achieving it by making reporting harder for everyone is not.

V. Conclusion

The Associations commend PHMSA's continuing commitment to pipeline safety and appreciate the opportunity to comment on the proceedings of the GPAC meeting. Extending the gas annual reports and NPMS deadlines to June 15 aligns gas reporting with a schedule that has served the hazardous liquid sector well for twenty years, allows operators more time to validate large and complex submissions, and will help keep annual report and NPMS data consistent by permitting both to be prepared together. The information regulators rely on for real-time safety oversight arrives through separate reporting channels that this rulemaking does not affect. The Associations urge PHMSA to finalize the rule as proposed and look forward to continuing engagement as it moves forward.

Respectfully submitted,

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