



## **NATIONAL ASSOCIATION OF PIPELINE SAFETY REPRESENTATIVES RESOLUTION**

**Central Region  
State of Kansas  
Resolution 2011-1 AC 1**

**Action Category 1**

### **URGING PHMSA TO FORM A TASK GROUP TO ANALYZE AND TREND DOT-REPORTABLE INCIDENT DATA FOR GAS DISTRIBUTION**

**WHEREAS:** Despite an overall downward trend during the past 20 years, Gas Distribution incident data have represented the biggest contribution to the yearly number of gas incidents;

**WHEREAS:** Government authorities, the media and the public view such statistics as an indication that the level of safety of gas distribution systems is in need of improvement;

**WHEREAS:** Gas distribution incident data collected by PHMSA are classified into 8 cause categories and over the past 5 years the "Excavation Damage" and "Other" incident categories have been shown to have a comparable number of serious incidents;

**WHEREAS:** The incident data collected by PHMSA do not have sufficient granularity to characterize the incidents in the "Other" category, which by virtue of its magnitude, makes it impossible to address added significant threats to pipeline safety that may exist hidden in this category;

**WHEREAS:** The safety threat ranking calculated by PHMSA using incident data may be significantly altered by a more in-depth evaluation of those incidents listed in the "other" and "excavation" categories;

**WHEREAS:** Potential litigation for property damage associated with an incident has the possibility of affecting the operator's determination of the cause of the incident;

**WHEREAS:** Most state pipeline safety programs collect their own data on serious incidents and may have a different version than the account presented by the operator filing the incident report;

**WHEREAS:** The findings of the state pipeline safety programs are not reflected in the DOT database or its incident statistics available to the public;

**WHEREAS:** On the basis of their own incident data, over the years, many state pipeline safety oversight bodies have instituted provisions or established programs, such as more frequent leak surveys or failure-prone pipe replacement, that are more stringent than the

federal code, and are aimed at safety threats rendered visible by the state's own incident analysis;

**WHEREAS:** Accurate data on the root cause of an incident is the foundation for a valid risk analysis; and

**WHEREAS:** The American Gas Association in conjunction with pipeline safety regulators has instituted the Plastic Pipe Database Committee (PPDC) as a successful means of evaluating plastic pipe failures from various perspectives.

**NOW THEREFORE BE IT RESOLVED:** That similar to the PPDC technique, PHMSA be urged to convene a group of experts representing all affected stakeholder groups to:

1. Agree on a method of analysis and the level of detail needed in combining the state program incident data and the DOT data for incidents that have occurred on distribution systems;
2. Periodically analyze the combined distribution system incident data accounting for the various perspectives of the committee members, and develop any trends and conclusions that identify with a high level of confidence causes that contribute to incidents and categorize the biggest risks to pipeline safety; and
3. Periodically share the most significant findings with all stakeholders, including Congress, federal government agencies, representatives of concerned public groups and the media, by widely publicizing such findings.

*Adopted by NAPS Board of Directors  
September 1, 2011*