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From: rrcwebcontact@gmail.com
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To: Rules Coordinator
Subject: Comment Form for Proposed Rulemakings

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Comments Form for Proposed Rulemakings

Date Submitted

Monday, November 18, 2019 5:18:54 PM

Submitted By

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Amend Chapter 8--HB 864 and HB 866 (2019) and HB 2982 (2013), gathering lines, federal updates, construction reports, penalties

Amend Chapter 8--HB 864 and HB 866 (2019) and HB 2982 (2013), gathering lines, federal updates, construction reports, penalties

CPS Energy appreciates the opportunity to comment on the proposed amendments to Chapter 8 following the passage of HB 864 and HB 866 during the 86th Legislature. The following are items on which we seek the Commission's clarification in response to the amendments made to §8.115 (New Construction Commencement Report).

- With respect to the New Construction Commencement Report requirements, does the term "Pipeline" include

services installed on each Installation?

- In the case of joint trench installations, is the installation length mentioned in the New Construction Commencement Report requirements based on total length of pipe installed or the distance from originating point to terminating point of the installation?
- CPS Energy would like the RRC to consider exempting natural gas distribution and master meter systems from the reporting requirements of 8.115 (a)(2). In turn, we recommend revising 8.115 (a)(4) to add new construction on natural gas distribution or master meter systems at least three miles in length but less than 10 miles in length as a reporting requirement of this paragraph. For 8.115(a)(5), we would like to also suggest adding to the current proposed version "For the initial construction of a new liquefied petroleum gas distribution system, master meter system, or a natural gas distribution system that will result in a new distribution system ID, an operator shall notify the Commission not later than 30 days prior to the installation." These revisions would create reporting consistency, align with current PHMSA requirements, and provide increased RRC awareness for all three types of activities of natural gas distribution and master meter systems.

Again, thank you for the opportunity.