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April 12, 2011  
File: PHMSA

Ms. Cynthia Quarterman  
Administrator  
U.S. Department of Transportation  
Pipeline and Hazardous Material Safety Administration  
1200 New Jersey Avenue, SE  
Washington, DC 20590

RE: Pipeline Safety Forum Addressing Aging Infrastructure

Dear Ms. Quarterman:

By letter dated March 31, 2011, you invited comments from state pipeline safety programs concerning plans for replacement of the highest risk pipelines. We understand this information will be uploaded to a Web site associated with the upcoming Pipeline Safety Forum on April 18, 2011.

The Iowa Utilities Board conducts the pipeline safety program in Iowa. We are fortunate in that Iowa has little pipe considered in unsatisfactory condition. For example, we have only 22 miles of cast iron pipe, down from 245 in 1991 - 20 years ago. From 1995 to 2000, hundreds of miles of Century brand polyethylene gas pipe was replaced after a tragic accident led to the discovery that it was susceptible to embrittlement and stress cracking. In both instances the companies affected voluntarily came forward with major replacement programs after inquiries were initiated by the Board. Today we have one operator with a program to replace 58 miles of main and 6,000 services comprised of unprotected steel pipe. This program was initiated by the operator after leak history review and risk evaluation.

Replacement is not the only means of maintaining safe infrastructure. Another Iowa operator is actively investigating and taking corrective action to improve its corrosion control. And while pipe condition has not been a major issue in Iowa, the Board has conducted civil penalty cases where operators were not properly operating and maintaining their pipelines in compliance with safety standards.

In addition, the Board has adopted additional or more stringent standards regulations than those of PHMSA to improve safety. Those regulations require:

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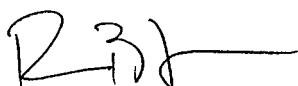
- A greater pipeline burial depth in tilled agricultural land than the federal rules require.
- That a report of a gas leak be treated as an emergency requiring immediate attention.
- Prompt remedial action if gas odorization is insufficient.
- Separation between gas lines and buried electrical lines – fatalities have occurred when a short in an electric line damaged a gas line and a leak resulted.
- More accident reporting than federal rules, and also service outage reports.
- Checking for leaks on customer piping when the utility turns the gas on.

We believe that Iowa and Iowa operators have been proactive in addressing issues related to pipe that is in unsatisfactory condition and in operating and maintenance activities that go beyond federal standards. The implementation of the new Distribution Integrity Management regulations should help refine and improve the process by which the need for such actions can be identified.

Iowa is also opening a proceeding to determine if a special cost recovery mechanism through gas rates should be developed for government mandated or safety related infrastructure improvements. We note that rate incentives are a method of promoting replacement programs and other remedial activities that is available to states, but not to PHMSA.

Iowa appreciates the opportunity to comment in this matter. If further information is desired, please contact Don Stursma, Manager of the Safety and Engineering Section, at [don.stursma@iub.iowa.gov](mailto:don.stursma@iub.iowa.gov) or 515-725-7352.

Sincerely,



Robert B. Berntsen  
Chair

/ds