



August 15, 2022

U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration
Docket No: PHMSA–2022–0009

Pipeline Safety: Agency Request for Emergency Approval of an Information Collection Associated With the Natural Gas Distribution Infrastructure Safety and Modernization Grant Program

Background

The Distribution Contractors Association (DCA) represents contractors, suppliers and manufacturers who provide distribution construction services including installation, replacement and rehabilitation of gas distribution pipelines in communities across the country. DCA strongly supports the Natural Gas Distribution Infrastructure Safety and Modernization (NGDISM) program, which will provide needed resources to municipality- or community-owned utilities to repair, rehabilitate, or replace their natural gas distribution pipeline systems.

The Role of Natural Gas

The natural gas industry has publicly supported the goal of achieving net-zero emissions by 2050 and clean-burning natural gas *enables* the use of renewable fuels, while the often-unpredictable nature of renewables such as solar and wind demonstrates that these energy sources alone will not be able to meet current and future demand. The bottom line is that America will simply not be able to achieve its clean energy ambitions without substantial growth of natural gas production and a large expansion of natural gas distribution pipeline networks.

However, we have to focus on replacing antiquated infrastructure with current piping materials with the ability to carry clean burning natural gas to American communities for extended periods. As America updates our energy infrastructure, municipal and/or other community-owned gas utilities cannot be overlooked, and any federal resources provided toward improving these systems.

Needed Resources for Public Gas Distribution Systems

On November 15, 2021, President Biden signed the Infrastructure Investment and Jobs Act (IIJA), which included authorization of federal resources to establish the NGDISM grant program. The legislation authorized \$200 annually with a total of \$1 billion over the next five years for municipal gas distribution pipelines.

Federal grant funding will be made available to publicly-owned utilities to repair, rehabilitate, or replace natural gas distribution pipeline systems and/or to acquire equipment to (1) reduce incidents and fatalities and (2) to avoid economic losses. The IIJA is clear that these resources will not be available to for-profit entities.

Natural gas pipeline operators continue to accelerate replacement of cast iron, bare steel, and antiquated plastic pipeline, and DCA members continue to perform the necessary construction. While these efforts will undoubtedly increase safety, they will also help reduce emissions.

DCA works to improve America's energy infrastructure every day. We fully support the NGDISM, and we appreciate the opportunity to comment on this important new program.