

June 30, 2023

The Honorable Cathy McMorris Rodgers
Chair, Committee on Energy and Commerce
U.S. House of Representatives
United States House of Representatives
Washington, DC 20515

The Honorable Frank Pallone
Ranking Member, Committee on Energy and
Commerce
U.S. House of Representatives
Washington, DC 20515

Dear Chairman Rodgers and Ranking Member Pallone,

The undersigned organizations represent construction contractors, manufacturers, distributors and other service providers, pipeline operators, labor unions, professionals in surveying, mapping and engineering, and others engaged in construction of underground facilities, and have a vested interest in pipeline safety. As the Energy and Commerce Committee develops the next Pipeline and Hazardous Materials Safety Administration (PHMSA) reauthorization measure, we offer the perspective from the industries responsible for engineering, building and repairing distribution and transmission pipeline infrastructure across the country.

It is becoming clear that excavation damage prevention will be an issue in this year's reauthorization measure. Ensuring for a safe worksite is fundamental to the pipeline industry, and preventing damages to underground facilities is critical in achieving that goal. However, all key stakeholders must meet their responsibilities in the damage prevention process. This means that all excavators must call 811 before excavating and follow safe digging practices, and all underground facility operators must ensure their facilities are accurately located and marked as required by state law. Accurate locating begins with accurate facility maps, where is ample room for improvement.

The PIPES Act of 2020 included language that would require operators of gas distribution pipelines to identify and manage traceable, reliable, and complete records, *including* maps and other drawings. Accurate mapping of underground facilities essential to accurate and timely locating, and use of geographic information systems (GIS) is the most effective way to identify and document a wide range of data about the underground infrastructure in a given area.

GIS can create, manage, visualize, analyze, and map different layers of data by creating maps and scenes related to underground facilities. GIS connects data to a map, integrating location data with a range of limiting information regarding the subsurface facilities in that area, and it allows for layering of data tied to geographic points. Rather than restricting the user to limited features on a static map, GIS mapping allows for viewing customizable combinations of data layers in a single dynamic tool.

Referencing and integrating data within a spatial context, GIS can help provide pipeline operators with a definitive view or "digital twin" of their pipeline systems for optimized asset knowledge management. Ensuring the use of readily available GIS mapping technologies to the extent possible would be the most efficient way to identify and document the exact location of underground pipelines (as well as other subsurface infrastructure). This precise mapping system is an increasingly utilized to ensure for the accurate locating and marking of underground facilities, particularly when data is collected by qualified professionals and in conformance with accepted standards.

While there is interest in the pipeline construction industry in requiring use of GIS mapping, we understand that a federal mandate would be problematic for certain pipeline operators, particularly for small operators and operators of pipelines subject to new or pending federal regulations. However, PHMSA offers funding opportunities that focus on a range of pipeline safety issues, including those that encourage the development of new technologies and help municipality and community-owned utilities improve and maintain safe pipeline infrastructure.

Specifically, PHMSA's Technical Assistance Grants (TAG) program provides funding for a broad range of activities to encourage the development of new technologies that support a range of pipeline safety priorities, including improvement of safe digging programs through technologies that enhance locating capability. The undersigned organizations would support language in the next PIPES Act that would promote use of GIS mapping by distinguishing GIS as a priority in existing PHMSA grant programs.

Efficient GIS houses asset information, construction, inspection, integrity management, regulatory compliance, risk analysis, history, and operational data that many pipeline companies have deemed mission-critical to successfully managing natural gas, hazardous liquids, renewables and water pipelines. Knowing where pipelines are and what's around them is critical to pipeline safety, and GIS mapping offers the most effective way to document and update important data associated with the location of pipeline and other underground facilities. In short, as the industry responds to the 2020 mandate for the industry to "manage traceable, reliable, and complete records, including maps and other drawings," incentivizing use of GIS will bolster efforts to improve pipeline mapping and facility locating.

We appreciate your consideration of this issue as the 118th Congress continues to develop the next pipeline safety reauthorization, and we are available to provide information on these matters.



Association of Equipment Manufacturers



American Society of Civil Engineers



Distribution Contractors Association



Feel the Power

Laborers International Union of North America



Pipeline Open Data Standard

Pipeline Open Data Standard Association



United Association of Union Plumbers and Pipefitters