



April 26, 2016

The Honorable Fred Upton
Chairman, House Committee on Energy and Commerce
United States House of Representatives
Washington, D.C. 20515

Dear Chairman Upton,

The Distribution Contractors Association (DCA) represents contractors, suppliers and manufacturers who provide construction services including installation, replacement and rehabilitation of natural gas distribution systems and interstate gas transmission pipelines. DCA has a vested interest in natural gas pipeline safety and we support the committee's Pipeline Safety Act of 2016, but we believe language to ensure full participation in the one-call process would substantially improve the legislation.

Sec. 7 of the legislation would require the General Accountability Office (GAO) to "conduct a study on improving existing damage prevention programs through technological improvements in location, mapping, excavation, and communications practices to prevent excavation damage to a pipe or its coating." DCA strongly supports the language requiring this study, which will provide Congress updated information about state-of-the-art technologies and practices employed to better locate and mark gas and hazardous liquid pipelines and other underground facilities by pipeline operators and the contractors who work for them.

In 2015, DCA developed a position paper on practices, roles and responsibilities to mitigate "cross bores," which are the result of an intersection of one underground facility with another underground facility during installation. Cross bores remain a major concern to gas pipeline contractors, who are commonly in a position to address cross bores encountered in the field as well as identify "legacy," cross bores that already exist. Cross bores that are most hazardous are gas mains and service lines that intersect with sewer mains or laterals that were not located and marked prior to excavation.

Recognizing that municipalities derive revenue from the water and sewer facilities they oversee, DCA believes they should be responsible for locating and marking them. The same is true for virtually all other underground facilities, including natural gas and hazardous liquid pipelines. DCA believes policy regarding federal damage prevention grant dollars should include a restriction on grant assistance for state programs that exempt municipalities from one-call membership requirements. DCA supports any amendment to include this provision in this year's pipeline safety reauthorization.

The vast majority of pipeline construction is performed by contractor personnel, both on gas distribution systems and interstate gas transmission pipelines. DCA members work every day to expand and improve America's natural gas pipeline network. The GAO study as required by Sec. 7 of the legislation would provide key information about technologies and practices related to pipeline mapping, location and other areas critical to achieving pipeline safety. Congress would significantly improve the bill by requiring full municipal participation in the one-call process as part of the criteria for obtaining PHMSA grant assistance. DCA supports this language as well as passage of the legislation this year.

Sincerely,

Robert Darden

Executive Vice President