



September 15, 2025

The Honorable Sam Graves
Chairman
Committee on Transportation and Infrastructure
2165 Rayburn House Office Building
Washington, DC 20515

The Honorable Rick Larsen
Ranking Member
Committee on Transportation and Infrastructure
2165 Rayburn House Office Building
Washington, DC 20515

Dear Chairman Graves and Ranking Member Larsen,

On behalf of the Interstate Natural Gas Association of America (INGAA), I write in support of H.R. 5301, the Promoting Innovation in Pipeline Efficiency and Safety (PIPES) Act of 2025, which would reauthorize the Office of Pipeline Safety for four years within the Pipeline and Hazardous Materials Safety Administration (PHMSA).

INGAA's member companies, which remain integral to building needed energy infrastructure, transport most of the natural gas consumed in the United States through a network of approximately 200,000 miles of transmission pipelines. Our members' large capacity, critical infrastructure systems span multiple states and regions and deliver natural gas to local distribution companies, electricity generators, industrial manufacturers, and LNG facilities.

The INGAA membership is committed to transporting natural gas in a safe, reliable and environmentally responsible manner. Our industry has a long history of supporting Congress' enactment of bipartisan pipeline safety reauthorization measures, which help advance the safe operation and maintenance of critical energy infrastructure.

We applaud the Committee for employing such a strategy in the 118th Congress when it approved via voice vote a measure that largely mirrors the PIPES Act of 2025, which would provide an efficient and effective framework to advance the safety of energy infrastructure across the United States. As you continue your deliberations on this version, INGAA recommends that the following priorities of the interstate natural gas pipeline sector be retained.

Class Location Changes (Section 11). H.R. 5301 would mandate completion of the class location rule, which would improve safety, protect the environment, and possibly increase capacity of existing infrastructure that has been downrated. Class location change regulations have not been substantially updated in more than 50 years. Originally noticed in 2020, this proposed rulemaking would address these regulations where population changes around pipelines necessitate modifications to existing pipeline infrastructure. In lieu of class location pipeline replacements, operators often submit special permit applications, which are lengthy and burdensome. Finalizing the class location rule would prevent unnecessary service disruptions to communities and provide regulatory certainty and consistency for industry stakeholders and PHMSA.

Maximum Allowable Operating Pressure (MAOP) (Section 32). The PIPES Act of 2025 would require that the agency finalize a rulemaking – originally promulgated in 2019 – containing a technical correction clarifying the applicability of the record keeping requirements for reconfirming MAOP of certain gas transmission lines. It would also leverage the recommendations of an established stakeholder working group. At present, there remains ambiguity on the records operators would need to produce to demonstrate pipeline operability at the specified MAOP. This provision would resolve a longstanding confusion and reaffirm PHMSA’s issuance of the final rule to ensure that operators do not retest previously tested pipelines with documented records showing a sufficient minimum pressure.

Technical Safety Standards Committees (Section 8). H.R. 5301 would mandate that PHMSA hold two meetings annually of its advisory committees – including the Gas Pipeline Advisory Committee (GPAC). Providing guidance to the Department of Transportation and PHMSA, the GPAC is comprised of 15 members, with equal representation from the natural gas industry, federal and state agencies, and the public. GPAC’s review of regulatory initiatives is integral to the agency’s rulemaking process. The PIPES Act of 2025 would modify the current ambiguous law on advisory committee meetings to ensure the technical feasibility, reasonableness, cost-effectiveness and practicability of each regulatory proposal.

Workforce Development (Section 4). Additionally, the PIPES Act of 2025 would authorize PHMSA to hire up to 30 additional agency staff with certain subject matter expertise, namely advanced engineering background, to develop and implement pipeline safety policies and regulations and fulfill congressional rulemaking mandates. H.R. 5301 would also require a one-year reporting requirement on PHMSA’s progress and challenges to hiring and retaining employees, and any additional workforce needs. In so doing, the agency would be able to expedite rulemakings, increase inspections, deepen state partnerships, and ultimately, improve safety outcomes.

INGAA and the companies we represent stand ready to work in a bipartisan manner to enact a pipeline safety reauthorization measure to ensure that PHMSA has the resources and direction to continually improve safety in our industry.

Sincerely,

A handwritten signature in blue ink, appearing to read "A. Andryszak", with a stylized, flowing script.

Amy Andryszak
President and CEO
Interstate Natural Gas Association of America