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February 6, 2023

Alan Mayberry
Deputy Associate Administrator for Policy and Programs
Pipeline and Hazardous Material Safety Administration
U.S. Department of Transportation

Comments on Special Permit Application
East Tennessee Natural Gas Transmission, LLC (ENTG)
Docket PHMSA-2022-0167

Dear Mr. Mayberry:

Please consider this letter in your deliberations on the special permit request of East Tennessee Natural Gas Transmission, LLC (ENTG) for exemption from certain pipeline safety regulations. The Pipeline Safety Trust is the only national non-profit organization that focuses on pipeline safety. We do this through education and advocacy, increasing access to information, and building partnerships with residents, safety advocates, government, and industry to promote safe communities and a healthy environment. We have reviewed the application and associated documentation in the Federal Register and have the following concerns.

First, Condition 3(a) in the Draft Special Permit Conditions document states that *“ETNG must not tap, branch, or split the special permit segment Smartpipe® without the use of the appropriate Smart Pipe Company Inc. (SPCI) manufactured fittings for the specified application.”* Given that this special permit is being requested as a way to pilot an alternative technology project, we would encourage PHMSA to alter this condition to prohibit tapping, branching, or splitting the special permit segment unless requested, reviewed, and permitted by PHMSA.

Second, Section IV (6) of the draft Special Permit document suggests that *“PHMSA grants this special permit limited to a term of no more than 5 or 10 years (to be determined by PHMSA) from the date of issuance.”* Because this special permit request is being utilized as a pilot project for alternative technology, we strongly urge PHMSA to limit this term limitation to no more than five years from the date of issuance.

Thank you for the opportunity to comment. If you have any questions or would like to discuss, please contact me at amanda@pstrust.org or (360) 543-5686 x106.

Sincerely,

A handwritten signature in black ink that reads "Amanda McKay". The signature is written in a cursive style with a large initial 'A'.

Amanda McKay
Program Manager
Pipeline Safety Trust