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April 14, 2021

Ms. Lisa Felice  
Executive Secretary  
Michigan Public Service Commission  
7109 West Saginaw Highway  
P.O. Box 30221  
Lansing, MI 48909

**RE: MPSC Case No. U-20903 – In the matter, on the Commission’s own motion, to amend the rules governing gas safety.**

Dear Ms. Felice:

Included in this electronic file are the **Comments of Consumers Energy Company**. This is a paperless filing and is therefore being filed only in a PDF format to the MPSC e-docket.

Sincerely,

Robert W. Beach

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter, on the Commission’s own )  
motion, to promulgate rules governing gas pipeline )  
safety )  
\_\_\_\_\_ )

Case No. U-20903

**COMMENTS OF CONSUMERS ENERGY COMPANY**  
**ON THE PROPOSED RULES GOVERNING GAS PIPELINE SAFETY**

**I. INTRODUCTION**

In the February 18, 2021 Order and Notice of Hearing in this proceeding, the Michigan Public Service Commission’s (“MPSC” or the “Commission”) sought input from all interested persons on proposed rules governing gas pipeline safety. Consumers Energy Company (“Consumers Energy” or the “Company”) appreciates the opportunity to provide comments. Based on its review of the proposed rules, Consumers Energy provides the following comments and recommended revisions.

**II. COMMENTS**

**PART 3. ADDITIONAL MINIMUM SAFETY STANDARDS**

**R 460.20308 Customer meters and regulators; location.**

Consumers Energy supports the clarification proposed for 460.20308(d). The Company recommends that consideration be given to revise this section to allow for the use of excess flow valves (“EFVs”) as a suitable means for protection from the result of vehicular damage for meters where installation of physical barrier is impracticable.

R 460.20311 Test requirements for pipelines operating below 100 psig.

Consumers Energy supports the clarification provided in the proposed update to Rule 311.

R 460.20322 Maximum allowable operating pressure of pipelines containing cast-iron pipe.

Consumers Energy supports the clarification provided in the proposed update to Rule 322.

R 460.20329 Valve maintenance; distribution systems.

Based on the Company's discussions with the Commission Staff ("Staff"), Consumers Energy understands the intent of this proposed revision is to inspect all valves required per CFR 192.747, and operate metallic valves on an annual basis. Based on the discussions, the Company suggests the proposed rule be revised to read as follows:

*Rule 329. In addition to the requirements contained in CFR 192.747, which is adopted by reference in R 460.20606, an operator shall partially operate a valve that may be necessary for the safe operation of a distribution system, other than plastic valves, at intervals of not more than 15 months, but at least once each calendar year. Plastic valves shall be inspected in accordance with the manufacturers' requirements.*

**PART 4. SOUR GAS PIPELINES**

Consumers Energy has no comments on the proposed revisions to Part 4 – Sour Gas Pipelines

**PART 5. RECORDS AND REPORTS**

R460.20501 Records.

Consumers Energy appreciates the proposed gas safety record retention summary presented as Table 1 in the order. The Company requests that the Commission consider the following revisions to Table 1:

	<b>Rule</b>	<b>Record Required</b>	<b>Required Retention</b>	<b>Additional Instructions</b>
As proposed	460.20331(a)	Yes	Life of pipeline	None
<b>Recommendation</b>	460.20331(a)	Yes	<b>10 years (per DIMP requirements)</b>	<b>Consideration should be given by operators to maintain record for the life of the pipeline</b>
As proposed	460.20501(3)	No	N/A	R 460.20501(3) requires an operator to maintain records as may be reasonably required to demonstrate compliance with these rules and 49 CFR part 192
<b>Recommendation</b>	460.20501(3)	<b>Yes</b>	<b>Maximum of 2 inspection cycles, if applicable; or for 5 years (per 460.20501(3))</b>	

**R460.20503 Reports of incidents; telephonic notice to the commission.**

Consumers Energy supports the clarifications proposed in Rule 503. The Company requests that Staff review the monetary threshold for reportable incidents . On January 11, 2021, the Pipeline and Hazardous Materials Safety Administration (“PHMSA”) published changes to the federal monetary threshold for incident reporting, revising the value consistent with inflation rates from 1984 to 2019.

**R460.20504 Reports.**

Consumers Energy has no comments on the proposed revisions to Rule 504.

## **PART 6. ADOPTION OF STANDARDS**

Consumers Energy has no comments on the proposed revisions to Part 6 – Adoption of Standards

### **III. CONCLUSION**

Consumers Energy appreciates the opportunity to comment on the proposed rules and respectfully requests that its recommended changes be adopted by the Commission.

Respectfully submitted,

Consumers Energy Company



Alida D. Sandberg  
Director, Pipeline Safety & Regulatory Compliance  
DTE Gas Company  
One Energy Plaza, WCB 1850  
Detroit, Michigan 48226

April 14, 2021

Lisa Felice  
Executive Secretary  
Michigan Public Service Commission  
PO Box 30221  
Lansing, Michigan 48909

**RE: Case No. U-20903, Commission's own motion: Proposed Safety Standard Amendments**

Dear Madam:

DTE Gas Company (DTE Gas) is an intrastate natural gas transmission and distribution pipeline operator and an operating subsidiary of DTE Energy, a Detroit-based diversified energy company involved in the development and management of energy-related businesses and services nationwide. DTE Gas serves over 1.2 million customers in Michigan and is pleased to have the opportunity to submit the following comments relating to the Order and Notice of Hearing (Order) issued by the Commission on February 18, 2021.

DTE Gas submits the following comments relating to the proposed revisions in Case Number U-20903:

**1. Amendment of R 460.20308, Customer meters and regulators; location.**

DTE Gas supports the editorial amendment of Rule 308 as presented in the Order.

**2. Amendment of R 460.20311, Test Requirements for pipelines operating below 100 psig.**

DTE Gas supports the editorial amendment and striking of Rule 311 as presented in the Order.

**3. Amendment of R 460.20322, Maximum allowable operating pressure of pipeline containing cast-iron pipe.**

DTE Gas supports the editorial amendment of Rule 322 as presented in the Order.

**4. Amendment of R 460.20329, Valve maintenance; distribution systems.**

DTE Gas supports the editorial amendment of Rule 329 as presented in the Order.

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**5. Amendment of R 460.20402, Materials for pipe and components; requirements.**

DTE Gas offers no comment to the editorial amendment of Rule 402 as presented in the Order, since we do not operate sour gas pipelines.

**6. Amendment of R 460.20405, Valves; qualification for sour gas.**

DTE Gas offers no comment to the editorial amendment of Rule 405 as presented in the Order, since we do not operate sour gas pipelines.

**7. Amendment of R 460.20408, Qualification of welding procedures.**

DTE Gas offers no comment to the editorial amendment of Rule 408 as presented in the Order, since we do not operate sour gas pipelines.

**8. Amendment of R 460.20501, Records.**

DTE Gas supports the editorial amendment of Rule 501 and the record retention schedule identified in Rule 501(4), Table 1, Part 1 of Rules 101(2)(a), 101(3), 102(a) – (g), 102(i)-(j), 103(1)-(4), 104; Part 2 of Rules 201(1)-(3), 202 (1) – (3); Part 3 of Rules 301(1) – (2), 302(1)-(4), 303, 304(a)-(c), 305, 306 (1)-(2), 307, 308 (a)-(g), 309(1) – (3), 311(a) –(d), 312, 313(a)-(b), 314(a)-(c), 315(1)-(2), 316(1)-(2), 317, 318(1)-(3), 319-325, 326(1) – 326(2), 327(a) – (c), 328 – 330, 332(1)-(2), 335(1) – (5), 338(1)-(4); Part 5 of 501(1), 501(2)(a), 501(2)(b), 502(1)-(6), 503(1)-(3), 504(1)-(2); Part 6 of Rules 601(1)-(2), 602(a)-(d), 603, 604, 605 and 606(1)-(2).

DTE Gas offers no comment to the amendments in Part 1 of Rules 101(2)(b) and Rule 102(h), Part 3, of Rules 310(1) – (2), Part 4 of Rules 401(1) – 431 as presented in the Order, since we do not operate petroleum, aluminum, galvanized and sour gas pipelines.

DTE Gas proposes, as an alternative to the amendment in Part 5 of Rule 501(3) as proposed in the Order, that Rule 501(3) be revised to adopt a “Yes” in the “Required Record” column, indicate the applicable requirement in the “Retention” column and “None” in the column, entitled “Additional Information. Our suggested text, added in bold/italicized/underlined text below to the version of Rule 501(3) contained in the Order, is as follows:

<b>Part 5 - Records and Reports</b>			
<b>Rule</b>	<b>Required Record</b>	<b>Retention</b>	<b>Additional Information</b>
<b>460.20501 (3)</b>	<b>No</b>	<b>N/A (See additional instructions)</b>	<b><del>R 460.20501(3) requires an operator to maintain records as may be reasonably required to demonstrate compliance with these rules and 49 CFR part 192.</del></b>

<b>Part 5: Records and Reports</b>			
<b>Rule</b>	<b>Required Record</b>	<b>Retention</b>	<b>Additional Information</b>
<b>460.20501 (3)</b>	<b><u>Yes</u></b>	<b><u>Minimum of 2 inspection cycles or a minimum of 5 years, whichever is longer.</u></b>	<b><u>None</u></b>

DTE Gas objects to the retention schedule in Part 3: Additional Minimum Safety Standards of Rule 331(a), which indicates that the repair records for Caulked bell and spigot joints are maintained for Life. In 49 CFR 192.275, cast iron pipe in distribution systems are repaired using caulked bell and spigot joints and distribution systems are addressed in the Distribution Integrity Management rules. In accordance with PHMSA's Docket Number, PHMSA-RSPA-2004-19854; Amdt. 192-1137, RIN 2137-AE15, Final Rule on Integrity Management Program for Gas Distribution Program, effective February 2, 2010, the Comment Topic 11: Required Documentation states, "Proposed documentation requirements were seen as unreasonably burdensome. In particular, the proposed requirements to document "all" decisions and changes related to a distribution integrity management (IM) program and keep all related records for the life of the pipeline were seen as unreasonable." PHMSA revised the federal register notice to require that operators maintain records demonstrating compliance for 10 years and these records must include superseded IM Plans.

DTE Gas proposes, as an alternative to the amendment of Rule 331(a) as proposed in the Order, that Rule 331(a) be revised to adopt 10 years in the "Retention" column and "None" in the column, entitled "Additional Information. Our suggested text, added in bold/italicized/underlined text below to the version of Rule 331(a) contained in the Order, is as follows:

<b>Part 3: Additional Minimum Safety Standards</b>			
<b>Rule</b>	<b>Required Record</b>	<b>Retention</b>	<b>Additional Information</b>
<b>460.20331 (a)</b>	<b>Yes</b>	<b><u>Life of pipeline</u></b>	<b>None</b>

<b>Part 3: Additional Minimum Safety Standards</b>			
<b>Rule</b>	<b>Required Record</b>	<b>Retention</b>	<b>Additional Information</b>
<b>460.20331 (a)</b>	<b>Yes</b>	<b><u>10 years</u></b>	<b>None</b>

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**Rule 501.** (1) An operator shall maintain the information generated by any recordkeeping requirement in these rules within the state at the operating headquarters office of each service area and shall make the information available to the commission and its staff for inspection and copying upon request.

(2) An operator shall maintain all of the following additional records:

(a) Maps and records showing the locations of pipelines and service lines, including lines that have been abandoned but not removed.

(b) An up-to-date schematic drawing of station piping, which must be available at each aboveground pressure-regulating station containing buried station components.

(3) In addition to the requirements contained in 49 C.F.R. § **CFR** 192.603(b), which is adopted by reference in R 460.20606, an operator shall establish and maintain records, make reports, and record such information as may be reasonably required to demonstrate that the operator has acted or is acting in compliance with these rules and 49 C.F.R. **CFR** part 192. The operator shall maintain these records and reports for the time periods prescribed in 49 C.F.R. **CFR** Part 192; for a minimum of 2 inspection cycles, if applicable; or for a minimum of 5 years, whichever is longer.

**(4) The specific record retention requirements for each rule or subrule, if required, are listed in Table 1, and are as follows:**

<b>Table 1 - Gas Safety Record Retention Schedules</b>			
<b>Part 1 General Provisions</b>			
<b>Rule</b>	<b>Required Record</b>	<b>Retention</b>	<b>Additional Instruction</b>
460.20101 (1)	No	N/A	None
460.20101 (2)	No	N/A	None
460.20101 (3)	No	N/A	None
460.20102 (a)	No	N/A	None
460.20102 (b)	No	N/A	None
460.20102 (c)	No	N/A	None
460.20102 (d)	No	N/A	None
460.20102 (e)	No	N/A	None
460.20102 (f)	No	N/A	None
460.20102 (g)	No	N/A	None
460.20102 (h)	No	N/A	None
460.20102 (i)	No	N/A	None
460.20102 (j)	No	N/A	None
460.20103 (1)	No	N/A	None
460.20103 (2)	No	N/A	None
460.20103 (3)	No	N/A	None
460.20103 (4)	No	N/A	None
460.20104	No	N/A	None
<b>PART 2: SAFETY STANDARDS AND TESTING REQUIREMENTS</b>			
460.20201 (1)	No	N/A	None
460.20201 (2)	No	N/A	None
460.20201 (3)	No	N/A	None
460.20202 (1)	No	N/A	None
460.20202 (2)	No	N/A	None
460.20202 (3)	No	N/A	None

<b>PART 3: ADDITIONAL MINIMUM SAFETY STANDARDS</b>			
<b>460.20301 (1)</b>	<b>No</b>	<b>N/A</b>	<b>None</b>
<b>460.20301 (2)</b>	<b>No</b>	<b>N/A</b>	<b>None</b>
<b>460.20302 (1)</b>	<b>No</b>	<b>N/A</b>	<b>None</b>
<b>460.20302 (2)</b>	<b>No</b>	<b>N/A</b>	<b>None</b>
<b>460.20302 (3)</b>	<b>No</b>	<b>N/A</b>	<b>None</b>
<b>460.20302 (4)</b>	<b>No</b>	<b>N/A</b>	<b>None</b>
<b>460.20303</b>	<b>No</b>	<b>N/A</b>	<b>None</b>
<b>460.20304 (a)</b>	<b>Yes</b>	<b>5 year minimum (See additional instructions.)</b>	<b>Consideration shall be given by the operators to maintain these records for the life of the pipeline.</b>
<b>460.20304 (b)</b>	<b>Yes</b>	<b>5 year minimum (See additional instructions.)</b>	<b>Consideration shall be given by the operators to maintain these records for the life of the pipeline.</b>
<b>460.20304 (c)</b>	<b>No</b>	<b>N/A</b>	<b>None</b>
<b>460.20305</b>	<b>Yes</b>	<b>5 year minimum (See additional instructions.)</b>	<b>Operators shall maintain records demonstrating that welders welding pursuant to 49 CFR 192.229(a) have maintained their qualification back to their last destructive test if no longer than 5 years.</b>

460.20306 (1)	Yes	Life of pipeline	None
460.20306 (2)	Yes	Life of pipeline	None
460.20307	No	N/A	None
460.20308 (a)	No	N/A	None
460.20308 (b)	No	N/A	None
460.20308 (c)	No	N/A	None
460.20308 (d)	No	N/A	None
460.20308 (e)	No	N/A	None
460.20308 (f)	No	N/A	None
460.20308 (g)	No	N/A	None
460.20309 (1)	No	N/A	None
460.20309 (2)	No	N/A	None
460.20309 (3)	No	N/A	None
460.20310 (1)	No	N/A	None
460.20310 (2)	No	N/A	None
460.20311 (a)	Yes	5 year minimum	None
460.20311 (b)	Yes	5 year minimum	None
460.20311 (c)	Yes	5 year minimum	None
460.20311 (d)	Yes	5 year minimum	None
460.20312	Yes	5 year minimum (See additional instructions.)	Except that each segment of a steel service line stressed to 20% or more of specified minimum yield strength must be tested pursuant to 49 CFR 192.507. This record must be retained for the life of the facility (49 CFR 192.517(a)).
460.20313 (a)	Yes	5 year minimum	None
460.20313 (b)	Yes	5 year minimum	None
460.20314 (a)	Yes	Life of pipeline	None
460.20314 (b)	Yes	Life of pipeline	None
460.20314 (c)	Yes	Life of pipeline	None
460.20315 (1)	Yes	Life of pipeline	None
460.20315 (2)	Yes	Life of pipeline	None
460.20316 (1)	Yes	Life of pipeline	None
460.20316 (2)	Yes	Life of pipeline	None
460.20317		RESCINDED	
460.20318 (1)	Yes	5 year minimum	None
460.20318 (2)	Yes	5 year minimum	None
460.20318 (3)	Yes	5 year minimum	None

<b>460.20319</b>	<b>No</b>	<b>N/A (See additional instructions.)</b>	<b>Consideration shall be given by the operators to maintain the most current submission of this record to the commission.</b>
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<b>6460.20320</b>		<b>RESCINDED</b>	
<b>460.20321</b>		<b>RESCINDED</b>	
<b>460.20322</b>	<b>No</b>	<b>N/A</b>	<b>None</b>
<b>460.20323</b>	<b>Yes</b>	<b>5 year minimum</b>	<b>None</b>
<b>460.20324</b>	<b>No</b>	<b>N/A</b>	<b>None</b>
<b>460.20325</b>	<b>Yes</b>	<b>5 year minimum</b>	<b>None</b>
<b>460.20326 (1)</b>	<b>No</b>	<b>N/A</b>	<b>None</b>
<b>460.20326 (2)</b>	<b>No</b>	<b>N/A</b>	<b>None</b>
<b>460.20327 (a)</b>	<b>Yes</b>	<b>5 year minimum</b>	<b>None</b>
<b>460.20327 (b)</b>	<b>Yes</b>	<b>5 year minimum</b>	<b>None</b>
<b>460.20327 (c)</b>	<b>Yes</b>	<b>5 year minimum</b>	<b>None</b>
<b>460.20328</b>	<b>No</b>	<b>N/A</b>	<b>None</b>
<b>460.20329</b>	<b>Yes</b>	<b>5 year minimum</b>	<b>None</b>
<b>460.20330</b>	<b>No</b>	<b>N/A</b>	<b>None</b>
<b>460.20331 (a)</b>	<b>Yes</b>	<b>Life of pipeline</b>	<b>None</b>
<b>460.20332 (1)</b>	<b>Yes</b>	<b>5 year minimum</b>	<b>None</b>
<b>460.20332 (2)</b>	<b>Yes</b>	<b>5 year minimum</b>	<b>None</b>
<b>460.20335 (1)</b>	<b>No</b>	<b>N/A</b>	<b>None</b>
<b>460.20335 (2)</b>	<b>No</b>	<b>N/A</b>	<b>None</b>
<b>460.20335 (3)</b>	<b>No</b>	<b>N/A</b>	<b>None</b>
<b>460.20335 (4)</b>	<b>No</b>	<b>N/A (See additional instructions.)</b>	<b>Consideration shall be given by the operators to maintain the most current submission of this record to the commission.</b>
<b>460.20335 (5)</b>	<b>No</b>	<b>N/A (See additional instructions.)</b>	<b>Consideration shall be given by the operators to maintain the most current submission of this record to the commission.</b>
<b>460.20338 (1)</b>	<b>No</b>	<b>N/A</b>	<b>None</b>
<b>460.20338 (2)</b>	<b>No</b>	<b>N/A</b>	<b>None</b>
<b>460.20338 (3)</b>	<b>No</b>	<b>N/A</b>	<b>None</b>
<b>460.20338 (4)</b>	<b>No</b>	<b>N/A (See additional instructions.)</b>	<b>Consideration shall be given by the operators to maintain the most current submission of this record to the commission.</b>
<b>PART 4: SOUR GAS PIPELINES</b>			
<b>460.20401 (1)</b>	<b>No</b>	<b>N/A</b>	<b>None</b>
<b>460.20401 (2)</b>	<b>No</b>	<b>N/A</b>	<b>None</b>
<b>460.20401 (3)</b>	<b>Yes</b>	<b>Life of pipeline</b>	<b>None</b>
<b>460.20402</b>	<b>No</b>	<b>N/A</b>	<b>None</b>
<b>460.20403</b>	<b>Yes</b>	<b>Life of pipeline</b>	<b>None</b>

460.20404 (a)	No	N/A (See additional instructions.)	Consideration shall be given by the operators to maintain this record for the duration of the work requiring the procedure.
460.20404 (b)	No	N/A (See additional instructions.)	Consideration shall be given by the operators to maintain this record for the duration of the work requiring the procedure.
460.20405	No	N/A	None
460.20406	No	N/A	None
460.20407 (a)	No	N/A	None
460.20407 (b)	No	N/A	None
460.20407 (c)	No	N/A	None
460.20407 (d)	No	N/A	None
460.20407 (e)	No	N/A	None
460.20408	Yes	5 year minimum (See additional instructions.)	Consideration shall be given by the operators to maintain these records for the life of the pipeline.
460.20409	Yes	Life of pipeline	None
460.20410	No	N/A	None
460.20411	No	N/A	None
460.20412	Yes	Life of pipeline	None
460.20413	No	N/A	None
460.20414 (a)	No	N/A	None
460.20414 (b)	No	N/A	None
460.20414 (c)	No	N/A	None
460.20415 (a)	No	N/A	None
460.20415 (b)	No	N/A	None
460.20416	Yes	Life of pipeline	None
460.20417	Yes	5 year minimum	None
460.20418	Yes	5 year minimum (See additional instructions.)	For transmission lines, repair records must be maintained pursuant to 49 CFR 192.709.
460.20419	No	N/A (See additional instructions.)	Consideration shall be given by the operators to maintain the most current submission of this record to the commission.
460.20420	No	N/A (See additional instructions.)	Consideration shall be given by the operators to maintain the most current submission of this record to the commission.
460.20421 (a)	Yes	5 year minimum	None

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<b>460.20421 (b)</b>	<b>Yes</b>	<b>5 year minimum</b>	<b>None</b>
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460.20422	No	N/A (See additional instructions.)	Consideration shall be given by the operators to maintain the most current submission of this record to the commission.
460.20423 (a)	No	N/A (See additional instructions.)	Consideration shall be given by the operators to maintain the most current submission of this record to the commission.
460.20423 (b)	No	N/A (See additional instructions.)	Consideration shall be given by the operators to maintain the most current submission of this record to the commission.
460.20424	Yes	5 year minimum	None
460.20425	Yes	5 year minimum	None
460.20426	Yes	5 year minimum	None
460.20427 (a)	No	N/A	None
460.20427 (b)	No	N/A	None
460.20428 (1)	Yes	5 year minimum (See additional instructions.)	For transmission lines, repair records must be maintained pursuant to 49 CFR 192.709.
460.20428 (2)	Yes	5 year minimum (See additional instructions.)	For transmission lines, repair records must be maintained pursuant to 49 CFR 192.709.
460.20429	Yes	5 year minimum (See additional instructions.)	For transmission lines, repair records must be maintained pursuant to 49 CFR 192.709.
460.20430	Yes	5 year minimum	None
460.20431	Yes	5 year minimum	None
<b>PART 5: RECORDS AND REPORTS</b>			
460.20501 (1)	No	N/A	None
460.20501 (2)(a)	Yes	Life of pipeline (See additional instructions.)	This record must be maintained for pipelines that are abandoned and not removed.
460.20501 (2)(b)	No	N/A	None
460.20501 (3)	No	N/A (See additional instructions)	R 460.20501(3) requires an operator to maintain records as may be reasonably required to demonstrate compliance with these rules and 49 CFR part 192.

<b>460.20502 (1)</b>	<b>No</b>	<b>N/A (See additional instructions.)</b>	<b>Consideration shall be given by the operators to maintain this record for the duration of the project.</b>
<b>460.20502 (2)</b>	<b>No</b>	<b>N/A (See additional</b>	<b>Consideration shall be given by the</b>

		instructions.)	operators to maintain this record for the duration of the project.
460.20502 (3)	No	N/A (See additional instructions.)	Consideration shall be given by the operators to maintain this record for the duration of the project.
460.20502 (4)	No	N/A (See additional instructions.)	Consideration shall be given by the operators to maintain this record for the duration of the project.
460.20502 (5)	No	N/A	None
460.20502 (6)	No	N/A	None
460.20503 (1)	No	N/A (See additional instructions.)	Consideration shall be given by the operators to maintain this record for the duration of the incident investigation.
460.20503 (2)	No	N/A (See additional instructions.)	Consideration shall be given by the operators to maintain this record for the duration of the incident investigation.
460.20503 (3)	Yes	5 year minimum	None
460.20504 (1)	No	N/A (See additional instructions.)	Consideration shall be given by the operators to maintain the most current submission of this record to the commission.
460.20504 (2)	No	N/A (See additional instructions.)	Consideration shall be given by the operators to maintain the most current submission of this record to the commission.
<b>PART 6: ADOPTION OF STANDARDS</b>			
460.20601 (1)	No	N/A	None
460.20601 (2)	No	N/A	None
460.20602 (a)	No	N/A	None
460.20602 (b)	No	N/A	None
460.20602 (c)	No	N/A	None
460.20602 (d)	No	N/A	None
460.20603	No	N/A	None
460.20604	No	N/A	None
460.20605	No	N/A	None
460.20606 (1)	No	N/A	None
460.20606 (2)	No	N/A	None

**9. Amendment of R 460.20503, Reports of incidents; telephonic notice to the commission staff.**

DTE Gas supports the editorial amendment of Rule 503 as presented in the Order.

**10. Amendment of R 460.20504, Reports.**

DTE Gas supports the editorial amendment of Rule 504 as presented in the Order.

**11. Amendment of R 460.20602, Names, addresses, and phone numbers of organizations.**

DTE Gas supports the editorial amendment of Rule 602 as presented in the Order.

**12. Amendment of R 460.20603, American petroleum institute standard; adoption by reference.**

DTE Gas supports the editorial amendment of Rule 603 as presented in the Order.

**13. Amendment of R 460.20606, Pipeline and hazardous materials safety administration standards, adoption by reference.**

DTE Gas supports in concept the amendment of Rule 606 (1) as presented in the Order and the editorial amendment, to adopt more recent editions of 49 CFR Parts 1-99 and 178-199. We suggest that, since the referenced PHMSA standards were updated on October 1, 2020, then we are recommending the following changes in Rule 606(1), regarding the hyperlink reference: <http://bookstore.gpo.gov/products/cfr-title-49-pt-1-99-code-federal-regulationspaper2020> and we recommend the proposed wording, "... (October 1, 2020 edition)".

DTE Gas supports in concept the amendment of Rule 606 (2) as presented in the Order and the editorial amendment, to adopt more recent editions of 49 CFR Parts 1-99 and 178-199. We suggest that, since the referenced PHMSA standards were updated on October 1, 2020, then we are recommending the following changes in Rule 606(2), regarding the hyperlink reference: <http://bookstore.gpo.gov/products/cfr-title-49-pt-178-199-code-federal-regulationspaper2020> and we recommend the proposed wording in (2) (a), (b) and (c) "... (October 1, 2020 edition)".

DTE Gas appreciates the opportunity to participate in the revision of Michigan's Pipeline Safety Standards.

Sincerely,



Alida D. Sandberg  
Director of Pipeline Safety & Regulatory Compliance