

Instructions for completing Form PHMSA GD-SMS-2022
Voluntary Adoption of American Petroleum Institute Recommended Practice 1173
for Gas Distribution Systems

If you need copies of the form and/or these instructions, you can obtain one from <https://www.phmsa.dot.gov/forms/pipeline-compliance-forms>.

Each operator of a gas distribution system required to submit a Gas Distribution Annual Report, Form PHMSA F7100.1-1, is requested to submit Form PHMSA GD-SMS-2022. As this is a one-time information collection PHMSA is requesting only basic safety management system (SMS) implementation information.

ONLINE REPORTING REQUIREMENTS

Reports must be submitted online through the PHMSA Portal at <https://portal.phmsa.dot.gov/portal>. Use the following procedure for online reporting:

1. Go to the PHMSA Portal at <https://portal.phmsa.dot.gov/portal>
2. Enter PHMSA Portal Username and Password; press *enter*
3. Select OPID; press “*continue*” button
4. In the main panel, select the tab named “**GD SMS**”
5. Select the link named “**Create Report**” and proceed with entering your data.
6. Click “**Submit**” when finished with your data entry to have your report uploaded to PHMSA’s database as an official submission or click “**Save**” which doesn’t submit the report to PHMSA but stores it in a draft status to allow you to come back to complete your data entry and submit at a later time. Your draft report is available at the link named “**Saved Report**” on the “**GD SMS**” tab.

If your submitted report needs to be corrected, you can submit a supplemental report. On the “**GD SMS**” tab, click on the “**Submitted Report**” link and then click on Create Supplemental.

SPECIAL INSTRUCTIONS

All applicable data fields must be completed before you can submit the report.

1. An entry should be made in each applicable space or check box.
2. If **OTHER** is checked for any answer to a question, include an explanation or description in the text field provided, making it clear why “Other” was the necessary selection.
3. Pay close attention to each question for the phrase:
 - a. **(Select all that apply)**
 - b. **(Select only one)**If the phrase is not provided for a given question, then “select only one” applies. “Select only one” means that you should select the single, primary, or most applicable answer. **DO NOT SELECT MORE ANSWERS THAN REQUESTED.** “Select all that apply” requires that all applicable answers (one or more than one) be selected.

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SPECIFIC INSTRUCTIONS

1. Operator's OPS-Issued Operator Identification Number (OPID)

The OPID will automatically populate based on the selection you made when entering the PHMSA Portal. If you have log-in credentials for multiple OPID, be sure the report is being created for the appropriate OPID. Contact PHMSA's Information Resources Manager at 202-366-8075 if you need assistance with an OPID. Business hours are 8:30 AM to 5:00 PM Eastern Time.

2. Name of Operator

The name will automatically populate based on the OPID entered in 1. If the name that appears is not correct, you need to submit an Operator Name Change (Type A) National Registry Notification.

3. Number of Customers Served by the Operator

This is the number of meters through which the operator sells gas.

4. Amount of Gas Transported by the operator in Calendar Year (CY) 2022 in Thousands of Standard Cubic Feet

This is the amount of gas transported by the operator in CY 2022 in Thousands of Standard Cubic Feet.

5. Do you have procedures, processes, or programs in place to address? (select all that apply)

The question includes the terms procedures, processes, or programs to provide flexibility. In other words, an operator may have a general program in place, but not necessarily a procedure or vice versa. API RP 1173 leans towards a procedure such as through the following language "At the operator level, these elements may not appear distinctly in a single document but should be identifiable in a clear and mandated process within the operator's procedures." However, other SMS approaches may not specifically call for a procedure.

6. Has your company or system's leadership demonstrated a tangible commitment to the implementation of a pipeline safety management system (PSMS)?

Examples of tangible commitments include: a commitment statement from leadership, an assignment of PSMS responsibilities to an employee, the dedication of resources, or the hiring of a PSMS consultant.

8. Have you performed a gap assessment or other comparable exercise to compare your pipeline safety and safety culture efforts to the concepts of safety management systems described in API RP 1173?

Check "Yes" if you performed a gap assessment consistent with API 1173, even if you aren't using API RP1173 specifically. If you did not perform a gap assessment, check "No".

9. What barriers are preventing you from implementing an SMS program per API RP 1173 or other SMS? (select all that apply)

This question is intended to understand barriers and challenges to implement an SMS whether you performed an initial gap assessment or are choosing not to implement (start) an SMS at this time. Answers to this question will likely help provide input on the number of companies implementing a pipeline SMS and the feasibility of an operator of a natural gas distribution company to implement a pipeline SMS in line with the PIPES Act 2020 Section 205 language.

N/A means not applicable. In other words, you are in the process of implementing SMS.

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Select Other and provide comments if there are other challenges not on the list or you want to provide additional information related to the question.

10. What is the timeframe for closing initially identified gaps or addressing improvement opportunities?

“Current year” means that you either have already addressed initially identified gas or opportunities or you will have all initially identified gas or opportunities addressed within the current year. Check “no plan” only if you have no plans to address the identified gaps or opportunities or are not planning to implement an SMS in general.

11. Is the implementation of your PSMS: (select only one)

Choose “stalled for the moment” if your implementation is currently stalled or you are not implementing SMS.

13. What elements have been the most challenging to implement? (select all that apply)

If your company is challenged by a specific element of PSMS and categorizes the elements differently than the RP, please select “Other” and describe the element(s) your company is currently challenged by in the text field.

16. Are you maintaining a method to evaluate PSMS maturity?

For a description of the PSMS maturity model, see <https://pipelinesms.org/pipeline-sms-maturity-model/>

PREPARER

The Preparer is the person who compiled the data and prepared the responses to the report and who is to be contacted for more information (preferably the person most knowledgeable about the information in the report or who knows how to contact the person or persons most knowledgeable). Enter the Preparer’s e-mail address and the phone number of the Preparer.

AUTHORIZED PERSON

The Authorized Person is responsible for assuring the accuracy and completeness of the reported data. In addition to their name, include a phone number and email address.