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JUL 10 2012

Gary Pierce
Chairman

(602) 542-3999

ARIZONA CORPORATION COMMISSION

July 2, 2012

Jeffery D. Wiese
Associate Administrator for Pipeline Safety
Pipeline and Hazardous Materials Safety Administration
1200 New Jersey Avenue, SE
Washington, D.C. 20590

Dear Mr. Wiese:

Thank you for your letter of June 13, 2012, regarding cast iron pipelines. The Arizona Corporation Commission ("ACC") shares your concerns over high risk pipelines currently in operation throughout the states. Fortunately Arizona does not have any cast iron pipelines in service within our state. During the past several decades the ACC Pipeline Safety Section ("PSS") has taken a very aggressive and proactive approach to high risk pipelines. Working in conjunction with our pipeline operators we have been very successful in eliminating or greatly reducing the amount of high risk pipeline within our state. For example; all ABS pipeline has been eliminated, and other vintage plastic material such as PVC and known high risk PE subject to brittle type failures are in the process of being eliminated.

Additionally the elevated temperature studies conducted by the ACC PSS assisted in establishing national elevated temperature testing requirements for all plastic pipelines used in the transportation of natural gas. As an example of this work I would offer the study initiated and conducted by the ACC PSS that demonstrated the need to test plastic pipeline at higher temperatures based on the studies they conducted. The requirement for testing plastic pipe at elevated temperatures is now a national standard.

The ACC's efforts with plastic pipelines have also been successful in eliminating all uncoated and cathodically unprotected steel pipelines in Arizona. With corrosion being one of the leading causes of pipeline failures we aggressively engaged and challenged our operators to eliminate these potentially high risk pipelines.

With the ACC's active enforcement of the Code of Federal Regulation, coupled with the Arizona Administrative Rules which serve to enhance the federal regulations, we believe that Arizona has proven itself to be a leader in addressing high risk pipelines operating within our state.

The ACC appreciates the work being conducted by PHMSA. We look forward to maintaining our cooperative partnership and working with PHMSA in the future.

Sincerely,

A handwritten signature in black ink that reads "Gary Pierce".

Gary Pierce, Chairman

cc: David Appelbaum, PHMSA Office of Pipeline Safety
East Building, Room E22-321
1200 New Jersey Ave., SE
Washington, D.C. 20590

Bob Stump, Commissioner
Sandra D. Kennedy, Commissioner
Paul Newman, Commissioner
Breda Burns, Commissioner
Ernest G. Johnson, Executive Director
Robert Miller, ACC Pipeline Safety Section
Leisa Brug