



Panhandle Eastern Pipe Line
Trunkline Gas
Trunkline LNG
Sea Robin Pipeline
Florida Gas Transmission
Transwestern Pipeline

5444 Westheimer Road
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U.S. Department of Transportation
Dockets Facility
Plaza 401
400 7th Street, S.W.
Washington, DC 20590

Re: Docket No. RSPA-04-19856
Pipeline Safety: Drug and Alcohol Testing

Panhandle Energy (PE) is the operator of the natural gas facilities listed above, comprising approximately 17,000 miles of natural gas transmission pipelines and related facilities subject to the Pipeline Safety Regulations, including 49 CFR Part 199, and is therefore interested in this proposed advisory and corresponding change in reporting practices.

PE understands the OPS requirement to monitor performance and compliance in this area, and generally supports the Proposed Method. PE would like to offer the following comments and recommendations in implementing this reporting requirement:

1. Reporting by the contractors, agents for pipeline operators, or testing and monitoring consortia acting as such agents in this capacity is preferable to reporting by individual operators.
2. Each contractor and any other entity filing reports, such as an agent or consortium operator, should be assigned a unique identifier, such as the entity's tax identification number.
3. OPS should understand that there may be multiple reports for any given contractor, and use the unique identifiers to ensure, to the extent possible, that their final analysis of results eliminates this duplication.
4. The reporting, analysis of results, and determination of required testing rates should be performed separately for contractors and for operators' personnel.
5. Operators should have access to any data submitted to OPS on the operator's behalf.

Panhandle Energy appreciates the opportunity to comment on this matter, and will continue to work with the Office of Pipeline Safety on this matter, as well as other matters affecting pipeline safety and integrity and compliance with the Pipeline Safety Regulations.

Respectfully submitted,

David L. Johnson