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September 25, 2025

The Honorable Robert E. Latta
Chairman
Subcommittee on Energy
2125 Rayburn House Office Building
Washington, DC 20515-6115

Dear Chairman Latta,

Thank you for the opportunity to appear before the Subcommittee on Energy on July 22, 2025 to testify about pipeline safety. Please find my responses to the Questions for the Record I received on September 11, 2025.

Additional Questions for the Record

The Honorable Kathy Castor (D-FL)

1. ***Throughout the hearing, we heard quite a bit about the drop off in PHMSA enforcement actions since the new Administration took office. Could you detail some of your understanding about the amount that enforcement dropped, why this happened, and what has happened in recent months?***

Thank you for this question and the opportunity to follow up. There was a robust discussion about the drop off in enforcement cases initiated by PHMSA at the hearing. However, we witnesses did not have the time to get into the details and nuance about enforcement. One of the other witnesses mentioned, I think correctly, that looking simply at the number of enforcement cases initiated is not the only way to monitor the level of enforcement happening at PHMSA. However, I believe that a deeper analysis of the enforcement data shows a troubling drop in enforcement at the agency.

A critical tool in PHMSA's enforcement toolkit not discussed at the hearing is civil penalties. From 2002 (the start of a data era in PHMSA's enforcement database) to January 20, 2025, there have been 1,033 proposed civil penalties, totaling $133,409,909, which averages to $129,148 per penalty. We can standardize this as 3.7 penalties proposed per 30 days and an average of $475,388.68 in total penalties proposed every 30 days.
Since the inauguration on January 20, 2025, there have been six proposed penalties, with a total of $404,100, and an average of $67,350 per penalty. We can standardize this as 0.73 penalties proposed per 30 days and an average of $8,147.18 per 30 days. These are huge drops from previous administrations. In fact, the average amount of proposed penalties per 30 days has dropped 98% since the inauguration.

Civil Penalties

	2002 – 1/20/25	**1/20/25 – 9/25/25**	**% change**
Average penalty	$129,148	$67,350	-48%

# of penalties proposed per 30 days	3.7	0.73	-80%
$ of penalties proposed per 30 days	$475,389	$8,147	-98%

*Source PHMSA Enforcement Database

Looking at enforcement cases initiated, as discussed at the hearing, we also see troubling decreases. Between 2002 and January 20, 2025, there were 4,876 enforcement cases initiated, which can be standardized to 17.4 cases every 30 days. Since the inauguration, there have been 71 cases, standardized to 8.6 cases per 30 days. This represents a more than 50% drop in cases initiated.

If we break it down to the levels of enforcement, we can group the higher tools of enforcement together (Notice of Probable Violation, Proposed Safety Order, Corrective Action Order) and see that the 30-day average from 2002 – January 20, 2025 is 6.2 and the 30-day average from inauguration through today is 2.9, another more than 50% drop. If we group the lower levels of enforcement together, we see a pre-inauguration rate of 11.2 and a post-inauguration rate of 5.7, just under a 50% drop.

Enforcement Cases Initiated

	2002 – 1/20/25	**1/20/25 – 9/25/25**	**% change**
# of cases per 30 days	17.4	8.6	-51%
# of stronger enforcement cases per 30 days	6.2	2.9	-53%
# of lesser enforcement cases per 30 days	11.2	5.7	-49%

The Honorable Doris Matsui (D-CA)

1. ***I wanted to follow up on a question from the hearing that we ran out of time for you to answer fully. Blending hydrogen into natural gas and running that blended gas through pipelines originally designed for only natural gas can present some unique safety concerns that have to be addressed. Can you describe some of the unique challenges and concerns with running hydrogen blends through pipelines originally only designed for natural gas?***

Thank you for this question and the opportunity to follow up. There are numerous potential safety issues with blending hydrogen into natural gas distribution systems designed, constructed, and maintained for dedicated natural gas. First off, hydrogen is much more flammable than methane, the primary component of natural gas, with a flammability range of 4% - 75%, vs. methane's 5% - 15%[1]. This means that hydrogen is more likely to explode at various concentrations than

[1] https://h2tools.org/bestpractices/gaseous-gh2-and-liquid-h2-fueling-stations/hydrogen-compared-to-other-fuels

methane. Hydrogen can leak at a faster rate than methane, which, combined with the flammability range, could lead to increased safety issues.

Additionally, many pipeline materials are inappropriate for transporting hydrogen due to embrittlement and cracking[2]. The introduction of hydrogen to existing natural gas pipelines could cause systems to fail at higher rates unless operators conducted extensive system surveys and upgrades.

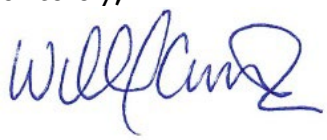
On top of this, there are no pipeline safety regulations specific to hydrogen blends to address these unique risks. In fact, operators are not even required to report the presence of blended hydrogen in their systems to regulators.

Finally, neither PHMSA, state regulators, nor the operators have jurisdiction or control over the pipe on the other side of the meter that goes into people's homes and businesses. We don't know if this pipe is appropriate for hydrogen blends when it is closest to people and can pose the biggest risk.

We need further research and development and rulemaking to ensure that if hydrogen blending were to occur, it will be done safely.

Thank you for your interest and leadership on pipeline safety.

Sincerely,



Bill Caram
Executive Director

[2] https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M493/K760/493760600.PDF