



**Testimony of Sarah C. Miller
President & CEO
GPA Midstream Association
before the
Subcommittee on Energy
of the Committee on Energy and Commerce
of the U.S. House of Representatives**

Hearing on “Strengthening American Energy: A Review of Pipeline Safety Policy”

July 22, 2025

Chairman Latta, Ranking Member Castor, and Members of the Subcommittee:

Thank you for the opportunity to testify today on behalf of GPA Midstream Association. My name is Sarah Miller, and I serve as President and CEO of GPA Midstream, an organization that has represented the U.S. midstream energy sector since 1921.

Safety – of employees, contractors, and communities – is the highest priority for GPA Midstream member companies. Our nearly 50 corporate members are responsible for the safe and efficient gathering, processing, transporting, and marketing of natural gas, natural gas liquids, crude oil, and refined products. Our members directly employ over 57,000 individuals and indirectly support more than 600,000 jobs across the U.S. economy. In 2023, GPA Midstream members contributed over \$206 billion in economic impact, operating more than 506,000 miles of pipelines and over 365 natural gas processing facilities. Our members are an invisible link between raw natural gas and crude oil produced at the wellhead and the distribution of products to consumers for heating, electricity production, transportation, steelmaking, fertilizer production, plastics, high-tech devices, cosmetics, pharmaceuticals, and much more.

The U.S. Energy Information Administration projects that U.S. production and consumption of natural gas and petroleum (including natural gas liquids) will remain strong through at least 2050. Similarly, Rice University's Baker Institute projects natural gas and crude oil will sustain a steady share of the global energy mix through 2050. That is to say that it remains essential to continue our focus on pipeline safety for existing and new pipeline infrastructure to assure we can meet energy demands in the U.S. and around the world.

GPA Midstream members support reauthorization of the pipeline safety programs of the Pipeline and Hazardous Materials Safety Administration (PHMSA) with the goal to ensure pipelines remain the safest method for transporting affordable, reliable, and sustainable energy, while also facilitating innovation and efficiency. We seek legislative and regulatory predictability and certainty, to enable prudent investment decisions for the benefit of communities and investors alike.

Our members advocate many goals for reauthorization of PHMSA's pipeline safety programs, including several reflected in this Committee's bill from the last congressional session. Specifically, our members appreciate improved due process in enforcement matters, reform of the special permit program, strengthening penalties for those damaging infrastructure, and recognition of opportunities for innovation and alternative technologies. In the interest of time, I focus my message today by offering three recommendations especially meaningful to our members:

First, we urge elimination of duplicative oversight of in-plant gas piping. Hazardous liquid in-plant piping is exempt by law from PHMSA regulation, but regulation of gas in-plant piping has lacked similar clarity. In-plant pipeline systems are typically low risk, operate at lower pressures, and are confined within plant boundaries or in short sections between adjacent plants.

They are also within the jurisdiction of other robust safety programs, such as the Occupational Safety and Health Administration's Process Safety Management standards. Aligning the treatment of gas and liquid in-plant piping would eliminate regulatory redundancy without compromising safety. We are grateful to PHMSA for recognizing such redundancy and recently issuing a Notice of Proposed Rulemaking to codify an exception for in-plant piping systems into the gas pipeline safety regulations. We also seek legislative certainty for the elimination of such unnecessary redundancy.

Second, with regard to the Gas Pipeline Advisory Committee (GPAC), we request representation with knowledge of the unique aspects of gathering pipelines. PHMSA's advisory committees play a vital role in shaping pipeline safety rules. In recent years there have been more rulemakings aimed at gathering lines. The physical and commercial operations of gathering pipelines can differ greatly from transmission pipelines. Therefore, we request that GPAC facilitate greater input from gathering pipeline operators for more effective gathering pipeline safety regulations.

Third, we encourage the use of more performance-based measures, and less prescriptive regulations, to achieve safety goals. Performance-based measures consider relevant operating conditions and assessed risks to achieve meaningful safety priorities. Performance-based measures will also facilitate a longer-term reauthorization period for PHMSA's programs, as they allow for evolving technological advancement and best practices proven by time and experience to achieve safety. For example, advanced in-line inspection tools can better assess pipeline anomalies, limiting the need for pipe excavation for inspection and replacement. Performance-based integrity management with insights from advanced tools can achieve the safety priorities

with efficient use of resources, less interruption of service, cost savings, and fewer blowdowns. Regulations should not prescribe the unnecessary replacement of safe pipelines.

In conclusion, GPA Midstream is committed to working with Congress and PHMSA to ensure the continued safety and reliability of our nation's energy infrastructure. We appreciate your leadership on this important issue and stand ready to serve as a resource as you move forward with reauthorization.

Thank you for your time, and I look forward to your questions.