

Decision No. C25-0809

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF COLORADO

PROCEEDING NO. 25M-0026GPS

IN THE MATTER OF THE FILING OF GIS DATA IN ACCORDANCE WITH RULE 4 CCR
723-11-11103(B)(I) BY GAS PIPELINE OPERATORS IN THE STATE OF COLORADO.

**COMMISSION DECISION GRANTING PETITION FOR
DECLARATORY ORDER**

Issued Date: November 12, 2025

Adopted Date: October 29, 2025

I. BY THE COMMISSION

A. Statement

1. By this Decision the Commission grants the Petition for Declaratory Order (“Petition”) filed on June 20, 2025, by Public Service Company of Colorado, Black Hills Colorado Gas, Inc., Atmos Energy Corporation, and Colorado Natural Gas, Inc. (collectively the “Joint Petitioners”). The Petition requests a declaratory order from the Commission clarifying the scale at which Joint Petitioners’ Geographic Information System (“GIS”) pipeline data attributes under Rule 4 *Code of Colorado Regulations* (“CCR”) 723-11100(c)(III)(A) (“Pipeline Data”) will be displayed and made available to the public.

B. Background

2. Through Proceeding No. 22R-0491GPS the Commission adopted rules to comply with § 40-2-115(d)(II)(C), C.R.S., regarding, among other things, pipeline data attributes that would be made available by the Commission’s Pipeline Safety Program (“PSP”) for public and confidential viewing, along with the scale of the mapping of operator facilities to be made

publicly available. The statute directed the Commission's rules addressing pipeline mapping to "incorporate the same standards for confidentiality, security, and public access and limitations on the scale of publicly available images as adopted by the energy and carbon management commission in 2 CCR 404-1, Rule 1101.e."¹

3. Implementing this statutory requirement, Commission Rule 11100(c) requires that pipeline operators submit GIS data containing specific attributes to the PSP. To incorporate standards in the Energy and Carbon Management Commission's ("ECMC") Rule 1101.e, and in recognition of security concerns associated with public disclosure of sensitive pipeline data raised by operators in Proceeding No. 22R-0491GPS, the Commission adopted Rule 11100(c)(III)(A). Rule 11100(c)(III)(A) states: The PSP Chief will make the GIS data in subparagraphs (II)(A)-(F) above available through a publicly accessible online map viewer. Online map viewer data only will be available at scales greater than or equal to 1:6,000. Any person may view spatial data at scales less than 1:6,000 for an individual parcel at the Commission's office, with the exception of map viewer data filed confidentially. Any data provided confidentially must be filed with a publicly accessible version at a scale greater than or equal to 1:24,000.

C. Petition for Declaratory Order

4. The Joint Petitioners state that since Proceeding No. 22R-0491GPS has concluded, they have provided the Pipeline Data to the PSP on a confidential basis. The Joint Petitioners explain that the event giving rise to the need for their Petition is the PSP Staff's apparent intent to provide a demonstration of the online map viewer, with publication of the

¹ 2 CCR 404-1, Rule 1101.e requires that for GIS line attributes of off-location flowlines, crude oil transfer lines, and produced water transfer systems, "[o]nline map viewer data only will be available at scales greater than or equal to 1:6,000. Any person may view spatial data at scales less than 1:6,000 for an individual parcel at the Commission's office."

public online map viewer shortly thereafter. They state that it remains unclear exactly what information the PSP Staff intends to release and whether Staff intends to release the GIS information designated as confidential in a way that can be accessed at a scale less than 1:24,000 by the general public. The Joint Petitioners explain that they are concerned the PSP Staff's plans for the online map viewer will not ensure that the confidential information submitted to them is maintained as required by Commission Rules.

5. The Joint Petitioners state that the Pipeline Data required to be made publicly available under Rule 11100(c)(III)(A) should be at a scale of 1:24,000 to best secure the safety and security of local distribution company systems. To do otherwise, they contend, "would make it very apparent to any public user as to where pipelines converge, where pipeline facilities are accessible, where pipelines are missing, and where the highest risk situations are located throughout the entire pipeline system."² The Joint Petitioners also contend that the GIS information submitted confidentially is also Critical Energy Infrastructure under the definition adopted by the Federal Energy Regulatory Commission³ and that Joint Petitioners have a responsibility at both the state and federal level to safeguard information regarding critical infrastructure.

6. The Joint Petitioners state they seek a declaratory order to maintain the confidentiality of their GIS data filed as confidential and to remove any uncertainty affecting the Joint Petitioners regarding the PSP Staff's handling of this information pursuant to the relevant statute and related Commission rules.

² Petition, at 2.

³ Title 18, C.F.R. Chapter I, Subchapter X, Part 388.113(c)(2).

7. The Commission accepted the Petition through Decision No. C25-0503-I, issued July 18, 2025, and set a notice and comment period. The Commission also granted Joint Petitioners' request for a stay of public disclosure of the Pipeline Data until this matter is decided.

D. Comments of the Colorado Energy and Management Commission

8. The Colorado Energy and Management Commission ("ECMC") timely filed comments on the Petition on July 24, 2025, stating that it supports the Petition's request to re-evaluate the scale at which pipeline data is available to the public. ECMC explains that it regulates flowlines, which are defined as segments of pipe transferring oil, gas, or condensate between a wellhead and processing equipment to a load point or point of delivery to a PHMSA or PUC-regulated gathering line, or a segment of a pipe transferring produced water or geothermal resources between a wellhead and a point of disposal, discharge, or loading. ECMC states that it utilizes a public viewing scale intended to meet the statutory requirements and bring the appropriate level of detail without inadvertently providing information that would allow someone to rely on ECMC data in lieu of calling the Utility Notification Center of Colorado for locates. It further explains that upstream and midstream pipelines regulated by the PUC serve a different purpose and have distinct safety and security risks that are imperative to consider in addition to information transparency.

E. Findings and Conclusions

9. We appreciate the Joint Petitioners' and ECMC's attention to the safety and security risks associated with the pipeline data at issue. We agree that while public transparency is important, publicly sharing sensitive pipeline data poses significant safety and security risks. As ECMC explains, information regarding the pipelines regulated by the PUC carry safety and

security risks that are distinct from pipelines regulated by ECMC. Further, as the Joint Petitioners explain, they have additional federal obligations to safeguard certain pipeline information.

10. Rule 11100(c)(III)(A) states: The PSP Chief will make the GIS data in subparagraphs (II)(A)-(F) above available through a publicly accessible online map viewer. Online map viewer data only will be available at scales greater than or equal to 1:6,000. Any person may view spatial data at scales less than 1:6,000 for an individual parcel at the Commission's office, with the exception of map viewer data filed confidentially. Any data provided confidentially must be filed with a publicly accessible version at a scale greater than or equal to 1:24,000.

11. As explained in Decision No. C24-0058, this rule is intended to take seriously the concerns raised by industry-operators regarding the potential security threats that could be created by having detailed pipeline data available to the public in some circumstances. In recognition of these potential threats, Decision No. C24-0058 states that the rule allows operators to provide detailed mapping confidentially, consistent with the Commission's Rule of Practice and Procedure, so long as they provide a public version at a more appropriate scale. This reasoning accords with the Joint Petitioners' arguments and ECMC's comments. Additionally, we note that § 40-2-115(d)(II)(C), C.R.S., does not demonstrate an intent to override long-standing Commission practices regarding confidential information, nor an intent to undermine federal regulations concerning confidential information and critical infrastructure. We continue to find that potential safety and security threats associated with Pipeline Data are justifications for allowing pipeline operators to protect certain Pipeline Data through

confidentiality designations, despite the fact that ECMC's parallel rule, 2 CCR 404-1, Rule 1101.e, does not expressly provide for confidentially-filed data.

12. During Proceeding No. 22R-0491GPS, it was contemplated that operators would provide separate data sets for public and confidential Pipeline Data intended for the online map viewer. The Petition indicates that in practice, this is not necessarily how the Pipeline Data is provided to PSP Staff. The Petition indicates the Pipeline Data may be provided as one data set for both public and confidential data, with PSP Staff having some control over the scale at which an operator's data is displayed on the online map viewer.

13. In this situation, Rule 11100(c)(III)(A) governs the scale at which PSP Staff may display the Pipeline Data. We agree with Petitioners that under this rule, any Pipeline Data provided to the PSP Chief that is designated as confidential under the Commission's rules must be displayed on the publicly accessible online map viewer at a scale of 1:24,000 or greater. Therefore, we grant the Petition's request concerning confidentially-filed Pipeline Data. PSP Staff preparing the online map viewer must ensure that operators' Pipeline Data will be displayed at a scale of 1:24,000 or greater, if that Pipeline Data is designated as confidential under the Commission's Rules of Practice and Procedure.

14. The stay of public disclosure of the Pipeline Data is lifted. We anticipate that PSP Staff will publish the online map viewer, with the confidentiality protections discussed in this Decision, as soon as practicable but no later than January 1, 2026.

II. ORDER

A. The Commission Orders That:

1. The Petition for Declaratory Order filed by Public Service Company of Colorado, Black Hills Colorado Gas, Inc., Atmos Energy Corporation, and Colorado Natural Gas, Inc. on June 20, 2025, is granted, consistent with the discussion above.

2. This Decision is effective upon its Issued Date.

B. **ADOPTED IN COMMISSIONERS' WEEKLY MEETING October 29, 2025.**



Rebecca E. White,
Director

THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF COLORADO

ERIC BLANK

MEGAN M. GILMAN

TOM PLANT

Commissioners