



January 15, 2021

Jose R., Romero, MD
Chair of the Advisory Committee on Immunization Practices
Center for Disease Control and Prevention
Department of Health and Human Services
395 E Street SW
Suite 9100
Washington, DC 20201

Re: Vaccine Distribution Priority for Essential Pipeline Control Room Operators

Dear Mr. Romero,

I am writing on behalf of GPA Midstream Association¹ (GPA Midstream) to request that the Advisory Committee on Immunization Practices (ACIP) update its current definition of frontline essential workers to include pipeline control room operators within Phase 1b of the COVID-19 vaccination program.² GPA Midstream is urging ACIP to classify pipeline control room operators as frontline essential workers because their work-related duties (controlling, monitoring, and operating our nation's pipelines) must be performed on-site and in close-proximity to others. As a result, these critical energy infrastructure workers are at high risk for work-related COVID-19 exposure.

The energy sector has taken steps to mitigate the exposure of its workers to COVID-19, but pipeline controllers are a small subset of workers that cannot work remotely (due to cyber security concerns) or in a socially distanced environment. Pipeline control rooms are enclosed, indoor spaces containing high-tech monitoring and communication equipment. A positive

¹ GPA Midstream Association has served the U.S. energy industry since 1921 and has nearly 70 corporate members that directly employ more than 75,000 employees that are engaged in a wide variety of services that move vital energy products such as natural gas, natural gas liquids (NGLs), refined products and crude oil from production areas to markets across the United States, commonly referred to as "midstream activities". The work of our members indirectly creates or impacts an additional 450,000 jobs across the U.S. economy. GPA Midstream members recover more than 90% of the NGLs such as ethane, propane, butane and natural gasoline produced in the United States from more than 400 natural gas processing facilities. In 2017-2019 period, GPA Midstream members spent over \$105 billion in capital improvements to serve the country's needs for reliable and affordable energy.

² The Advisory Committee on Immunization Practices' Updated Interim Recommendation for Allocation of COVID-19 Vaccine — United States (December 2020), <https://www.cdc.gov/mmwr/volumes/69/wr/pdfs/mm695152e2-H.pdf>.

COVID-19 test or COVID-19 outbreak within a pipeline control room could quickly deplete the personnel that are qualified to perform these critical pipeline monitoring and operational functions.

In developing its December 2020 Updated Interim Recommendation, ACIP explained that it used the Cybersecurity and Infrastructure Security Agency (CISA) “guidance to define frontline essential workers as the subset of essential workers likely at highest risk for work-related exposure to SARS-CoV-2, the virus that causes COVID-19, because their work-related duties must be performed on-site and involve being in close proximity (<6 feet) to the public or to coworkers.”³ Although CISA identified workers that staff petroleum and natural gas control rooms as “essential critical infrastructure workers”, ACIP did not identify any of these workers as “frontline essential workers” in the December 2020 Updated Interim Recommendation.⁴ GPA Midstream believes that pipeline control room operators should be included in the definition of “frontline essential workers” given the considerations listed by ACIP and CISA in identifying critical infrastructure workers.

Our nation’s pipeline network supplies fuel for the transportation sector, provides power to heat households and business, and serves as the primary energy source for many hospitals and essential business. The health and safety of pipeline control room operators is paramount in ensuring there are no disruptions to our nation’s energy supply. For these reasons, GPA Midstream is respectfully requesting that ACIP consider listing pipeline control room operators as “frontline essential workers” to be prioritized for the vaccine during Phase 1b.

If you have any questions, please feel free to contact me at 202-279-1664 or mhite@gpamidstream.org.

Sincerely,



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³ *Id.*

⁴ Advisory Memorandum on Ensuring Essential Critical Infrastructure Workers' Ability to Work During the Covid-19 Response, Brandon Wales (Dec. 16, 2020) at 1, 13-14, https://www.cisa.gov/sites/default/files/publications/ECIW_4.0_Guidance_on_Essential_Critical_Infrastructure_Workers_Final3_508_0.pdf; The Advisory Committee on Immunization Practices' Updated Interim Recommendation for Allocation of COVID-19 Vaccine — United States (December 2020), <https://www.cdc.gov/mmwr/volumes/69/wr/pdfs/mm695152e2-H.pdf>.