Research and Special Programs Administration 400 Seventh Street, S.W. Washington, D.C. 20590

February 14, 1995

Mr. Glenn D. Smith Chief of Gas Operations and Rates Utilities Division Kansas Corporation Commission 1500 S.W. Arrowhead Rd. Topeka, KS 66604-4027

Dear Mr. Smith:

We have considered the Commission's Order dated December 19, 1994, granting Peoples Natural Gas (Peoples) a waiver from compliance with the scheduling of welder qualification test, referenced in the Order as 49 CFR 192.227(a). Peoples sought approval to have it's welders remain qualified by having one weld tested and found acceptable within the preceding 7 1/2 months, but at least twice each calendar year, in lieu of the requirement [in 49 CFR 192.229(c)] that the welder have one weld tested in the previous 6 calendar months.

In view of the justification set forth in the Order, we have no objection to the waiver, and it may take effect as scheduled.

Sincerely,

George W. Tenley, Jr. Associate Administrator for Pipeline Safety