

U.S. Department  
of Transportation

400 Seventh Street, S.W.  
Washington, D.C. 20590

**Research and  
Special Programs  
Administration**

July 3, 1995

Mr. Chuck Hudson  
Utilities Consultant  
Utilities Division  
Arizona Corporation Commission  
1200 W. Washington Street  
Phoenix, AZ 85007

Dear Mr.: Hudson:

We have considered your letter of May 15, 1995, notifying us that the Commission's Office of Pipeline Safety has granted Southwest Gas Corporation a waiver from compliance with 49 CFR § 192.739. This regulation requires operators to annually inspect and test each pressure regulating station to determine the condition of the station and its functional adequacy. The waiver applies to standard service-type regulators installed at multiple-meter manifolds.

Although the regulators covered by the waiver are technically "**regulator stations**," similar regulators installed with only one downstream meter are not subject to § 192.739. We do not think the presence of a multiple-meter manifold warrants application of § 192.739, as this regulation is appropriate for regulator stations that serve a network of piping resembling a distribution system. In view of this distinction, we have no objection to the waiver.

Sincerely,

Cesar DeLeon  
Deputy Associate Administrator  
for Pipeline Safety