

May 14, 1976

Mr. Stan Mahon
Staff Assistant
Office of Honorable Richard Nolan
House of Representatives
Washington, D.C. 20515

Dear Mr. Mahon:

This responds to your letter dated April 5, 1976, to Mr. Don Ruby of the Office of Congressional Relations, requesting the Department's views on Mrs. Fred Junker's inquiry about a service charge made for maintaining an odorizer installed as required by Section 192.625 of Title 49 of the Code of Federal Regulations.

Section 192.625 requires that gas transported in a pipeline used to distribute gas to a customer must be odorized so that a person with a normal sense of smell can detect the gas before an explosive concentration is reached. Each operator of a distribution line is legally responsible for compliance with this odorization requirement.

We have discussed the service charge issue with the Minnesota State Fire Marshal's office which is certified under the Natural Gas Pipeline Safety Act of 1968 to enforce the Federal safety regulations against intrastate gas facilities in Minnesota. The Fire Marshal's office said that many customers are receiving gas from an interstate transmission line that is not required to carry odorized gas. As a condition of the agreement to obtain the gas service, the customers have agreed to pay the cost of the required odorization. Since the operator is responsible for odorization, and maintenance and service of the odorizer is a matter for a trained technician, the operator has elected to do this work with its personnel.

The Department has no authority over the charge which an operator bills its customers to meet the cost of complying with the Federal safety regulations. We suggest that you contact the

Minnesota Public Service Commission as to the reasonableness of the charges involved.

We are enclosing one copy of Part 192, including recent amendments.

Thank you for your interest in pipeline safety.

Sincerely,

James T. Curtis, Jr.

Enclosure