

11/10/98

Mahendra Jhala
Chief, Utilities Safety Branch
Consumer Services Division
California Public Utilities Commission
505 Van Ness Avenue, 2nd Floor
San Francisco, CA 94102-3298

Dear Mr. Jhala:

We have considered the Commission's Resolution SU-47, dated June 4, 1998, which waived the requirements of 49 CFR 192.321(a) for all investor-owned gas utilities in California. The waiver allows the utilities to install plastic pipe above ground across bridges if the plastic pipe is encased in plastic pipe internal to the bridge structure and meets certain other safety conditions. Under these conditions, the gas pipe will be protected against mechanical damage, ultraviolet radiation, and meet all applicable thermal stress limits.

We have no objection to the waiver. The safety considerations are comparable to those of previous state waivers we have approved permitting the installation of plastic pipe above ground on bridges.

Sincerely,

Richard B. Felder
Associate Administrator for Pipeline Safety