

May 6, 1982

Mr. Fred B. Adam, Director
Utilities Division, Kansas State
Corporation Commission
State Office Building
Topeka, Kansas 66812

Dear Mr. Adam:

This refers to your letter of February 23, 1962, to John McLellan, in which you authorized the Peoples Natural, Gas Company to use plastic pipe material designated as PESOS, with a long term hydrostatic design basis of 1600 psi at 23' C, to serve irrigation customers in Class 1 areas.

Since your letter waived the design requirements of 49 CFR 192.131 for plastic pipe, the action is subject to the State agency waiver provisions of 49 U. S.C. 1672(d), which require that the Secretary of Transportation be given at least 60 days to review the matter before the effective date of the waiver. Inasmuch as we have previously authorized a similar waiver action by the Tennessee Public Service Commission for the use of Driscopipe 8000 materials by the Memphis Light Gas, and water Division, and the new PE3403 material is authorized for use under the 1981 edition of the ASTM D2513 specification for plastic pipe (an earlier edition of which is incorporated by reference in part 192), we have no objection to the waiver. Accordingly, the waiver may become effective as planned.

Sincerely,

SIGNED

Melvin A. Judah

Acting Associate Director for Pipeline Safety Regulation
Materials Transportation Bureau

Peoples Natural Gas Company
25 Main Place
Council Bluffs, Iowa 51501

February 4, 1982

Kansas State Corporation Commission
State Office Building 4th Floor
Attn: Ward Salisbury
Topeka, KS 66612

Dear Mr. Salisbury:

Peoples Natural Gas requests that a waiver of existing rules as stated in the Code of Federal Regulations, Part 192, Title 49 relating to transportation of gas by pipeline be issued to allow the use of plastic pipe material designation PE 3408 with a long term hydrostatic design basis of 1600 psi at 73°F.

Regulation Involved - The rule involved is Paragraph 192.7 Incorporation by Reference, and Appendix A, paragraph II.B(21), ASTM Specification D2513.

Why Existing Regulation is Inappropriate - The highest long term hydrostatic design pressure for any of the three currently approved in ASTM D2513 polyethelene piping systems is 1,250 psi of 73°F. This limits the operating pressure to 80 psi for standard dimension ratio 11. Using PE 3408 at a long term hydrostatic strength of 1,600 psi will allow an operating pressure of 100 psi at a standard dimension ratio of 11.

How Public Would Be Served - Peoples plans to utilize the PE 3408 system in the distribution of gas to irrigation customers. The benefit to these customers will be lower cost of service as a result of the initial lower cost of the distribution system, lower maintenance costs, and a corrosion free system.

Why Waiver Would Not Be Inconsistent With Safety - Irrigation customers are rural by nature, and each installation will be in Class 1 locations and therefore, have minimum exposure to the public.

The PE 3408 material has been on the market for more than four years. ASTM has approved the material for use as water distribution pipe, and the material has been sold in the natural gas market as PE 3406 in anticipation of ASTM and DOT allowing it to be used as PE 3408.

The long term hydrostatic strength of 1600 psi for PE 3408 is the result of tests performed according to ASTM standards. It is anticipated that ASTM D2513 will be revised during 1982 to include PE 3408, and that DOT will accept the revision and incorporate it in Appendix A.

Description of Pipeline System - The PE 3408 System will be installed in an agricultural type environment to provide fuel to irrigation pump engines. The source of the gas will be from higher pressure steel lines through a regulator station to the PE 3408. The configuration of a system will typically be a larger diameter line through the service area with small diameter lines to the customer meters.

Suggestions for Rule Change - Peoples believes that because the PE 3408 piping system conforms to the various applicable ASTM specifications and ASTM D2513 will be revised and published this year, Peoples request for a waiver should be granted.

If there are questions regarding any part of this request, please contact me.

Sincerely,
John McLellan
Director
Pipeline & Civil Engineering

See Original for Attached Designation: D 2513-81