

REC - 3 1993

Mr. James J. Malachowski
Administrator
Rhode Island Public Utilities Commission
100 Orange Street
Providence, RI 02903

Dear Mr. Malachowski:

Thank you for your letter of November 19, 1993, regarding the use of mobile Liquefied Natural Gas (LNG) facilities in Rhode Island. You describe Rhode Island Public Utilities Commission (PUC) approval of petition by Providence Gas Company (Petitioner) for waiver of 49 CFR 193 for mobile LNG facilities.

Petitioner states that application of Part 193 to mobile LNG facilities is unduly burdensome and economically inefficient in the provision of service to its customers. In justification of the waiver, Petitioner points to a 27 year history of safe use (without incident) of mobile LNG facilities in Rhode Island and elsewhere. Utilization has been predominately in pipeline maintenance and emergency gas supply capacity. PUC evaluated the petition and determined that use of mobile LNG facilities is necessary and essential for Petitioner to maintain continuous and uninterrupted service during planned operations and maintenance activities, and during emergency conditions. Further, PUC granted Petitioner's request for waiver of Part 193 subject to a list of alternate safety requirements for mobile LNG units as outlined in Petitioner's application. PUC states that such safety provisions have been adopted recently by all New England states. PUC also imposed additional safety parameters in PUC's November 19, 1993 approval letter to Petitioner.

Based on the findings of fact and the alternate safety requirements for mobile LNG units adopted and imposed by PUC, we believe that use of mobile LNG facilities under the alternate safety requirements would not be a danger to public safety. Accordingly, the waiver is not inconsistent with pipeline safety. For this reason, we do not object to the waiver as granted.

Sincerely,

Original signed by

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

cc:

DPS-1/2/10/11/20/24; DCC-1; TSI
DPS-11:JWillcock;jw:366-1640:December 1, 1993
FILE: Rhode Island State Waiver File
C:\wp51: :RI-LNG1.WAV

DPS-93-0245



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

PUBLIC UTILITIES COMMISSION
100 Orange Street
Providence, R.I. 02903
(401-277-3500)

NOV 27 11:11 AM
FAX (401)277-6805
TDD (401)277-3500

Mr. Cesar De Leon
Director, Regulatory Programs
Office of Pipeline Safety
United States Department of Transportation
400 7th Street, S.W.
Washington, D.C. 20590

November 19, 1993

RE: Proposed Mobile Liquified Natural Gas
Facilities in Westerly Rhode Island

Dear Cesar:

I have enclosed a filed petition from a local intrastate gas operator, Providence Gas Company, requesting a waiver from the regulations applicable in the Natural Gas Pipeline Safety Act for the use of a mobile Liquified Natural Gas ("LNG") trailer-mounted vaporizing unit in Westerly, Rhode Island. The mobile operation will be directly connected to the distribution system for use during peak usage periods in the heating season. Our agency finds the necessity of such a mobile LNG operation as being essential to the continuous and uninterrupted service in the affected area.

In the previous 1992-1993 heating season, Providence Gas operated the mobile LNG unit at its Westerly (Canal Street) plant on five to six occasions during high use periods. The relocation of the vaporizer from the former plant area to Airport Road was chosen in order to replenish the most remote portion of the system by the most direct distribution means.

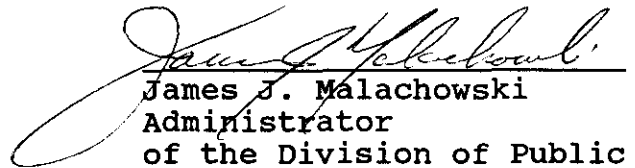
It appears that a major supplementary gas demand influencing this southerly portion of our state will be coming from bordering Connecticut. The newly-constructed Ledyard gambling casino has dramatically increased the natural gas demand in the area and the casino is served from the same interstate gas source as the Westerly area. This additional forecasted load requirement will impact the availability of peak gas in the 1993-1994 heating season for this remote Rhode Island area.

The application consists of safety provisions that have been recently adopted by all New England states for the utilization of portable LNG equipment as a temporary measure until your office can promulgate specific regulations on this matter. In addition to

those safety parameters, our agency has further imposed within its recommendation certain conditions to monitor the safety of the LNG operation.

In reference to 49 U.S.C. App. 1672(d), a waiver may be granted by a certified State agency provided written notice is given to the U. S. Department of Transportation at least sixty days prior to the effective date of the waiver. In regards to the effective date of the request, our affirmative recommendation is contingent upon approval from the USDOT. With the heating season upon us, our office would like to request your immediate attention on this matter in order to prevent any interruption in gas service to affected Rhode Islanders. Your prompt cooperation concerning this matter will be deeply appreciated.

Sincerely,


James J. Malachowski
Administrator
of the Division of Public
Utilities and Carriers



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

DIVISION OF PUBLIC UTILITIES AND CARRIERS

100 Orange Street
Providence, R.I. 02903
(401) 277-3500

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Mr. William Mullin
Vice President, Operations
Providence Gas Company
100 Weybosset Street
Providence, R.I. 02903

November 19, 1993

Dear Bill:

Pursuant to the petition filed October 27, 1993 by your company, the Rhode Island Division of Public Utilities herein grants a waiver to operate and maintain a mobile Liquefied Natural Gas (LNG) unit on Airport Road in Westerly for a one year period. This enclosed approval allows the use of the mobile LNG unit at the proposed location and exempts the Providence Gas Company from the regulatory provisions relating to permanent (immobile) LNG facilities under Title 49 of Code of Federal Regulations (CFR) 193 (Part 193) of the U.S. Department of Transportation (USDOT) Pipeline Safety Regulations.

The current federal LNG safety standards do not address smaller LNG operations that are transportable in nature and exemptions have been allowed to other New England gas operators in the past few years with the concurrence of the USDOT. It is expected that there will be additional safety regulations adopted by federal government pertaining to this seasonal gas process and during the interim, the states of New England have collectively developed specific safety principles associated with this type of operation that has been included in Providence Gas' petition.

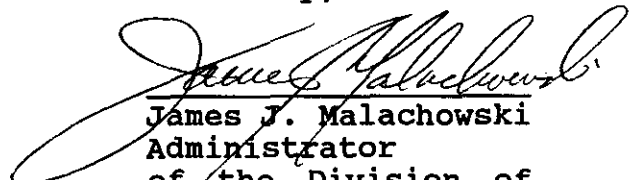
As stated in the waiver from the Division, the exemption will only be effective upon confirmation from the USDOT. The company's petition, our agency's decision and a transmittal letter requesting an expeditious review will be forwarded to appropriate federal regulatory entity. It is expected that the USDOT will provide a decision on this situation within a week from receipt.

The waiver is site specific, in that, the trailer-mounted LNG vaporizer operation which was formerly located at the Canal Street plant in Westerly in the 1992 heating season and will be relocated on leased property on Airport Road in Westerly. Our senior gas safety technician has field reviewed the site on October 22, 1993 prior to the final petition being submitted to our agency. Upon

recommendation from this staff member, the Division finds the waiver proposal to be reasonable and appropriate in view of the past experiences and forecasted circumstances. It also finds the isolated relocation site for the mobile LNG equipment as being conducive to this type of seasonal gas process.

Investigators from our agency will be monitoring this temporary LNG process from time to time during the winter operational period. It will be incumbent on your company to provide advanced notice of the LNG operational time frames for this Westerly mobile plant to Mr. LaChance (277-3500, ext. 124) of our office on a weekly basis, so we may schedule inspections in coordination with other field activities.

Sincerely,



James J. Malachowski
Administrator
of the Division of
Public Utilities and
Carriers

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
RHODE ISLAND DIVISION OF PUBLIC UTILITIES**

**STATE APPROVAL OF A REQUEST FOR WAIVER
FROM THE
PROVIDENCE GAS COMPANY
FROM THE ENFORCEMENT AND APPLICABILITY OF REGULATORY PROVISIONS
OF TITLE 49 C.F.R. 193 (PART 193)
FOR THE OPERATION OF A
MOBILE LIQUEFIED NATURAL GAS FACILITY
TO BE TEMPORARILY LOCATED IN
IN WESTERLY, RHODE ISLAND**

November 19, 1993

I. Application for Waiver

On September 21, 1993, a preliminary meeting was held at the request of Providence Gas Company ("PGC") with engineering and administrative personnel of the Division of Public Utilities and Carriers ("Division") to discuss a draft petition of waiver seeking relief from the regulatory requirements under Title 49 of the Code of Federal Regulations (CFR) 193 (Part 193) to temporarily operate and maintain a mobile Liquefied Natural Gas (LNG) facility in Westerly, Rhode Island.

In the previous 1992-1993 heating season, the mobile LNG vaporizing unit was in operation and was located on utility-owned property at the Canal Street Plant in Westerly. There were about five to six truck transfers of LNG during that time frame. The company has decided to move the mobile unit to a more advantageous location, in which, the most remote portions of the gas system can be supplemented on a more direct basis.

The determination to relocate the mobile unit was also based on the additional forecasted gas demand associated with the recently-constructed Ledyard gambling casino. The gas company purports there will be a greater requirement for supplementing the Westerly system with LNG this year in view of the potential pipeline shortage to be encountered from the new demand. It has been projected that there will be twenty-five to thirty-five truck transfers to the vaporizing unit during the upcoming winter months to augment the additional demand. The gas company is currently evaluating other alternatives to this concern such as extending laterals or a size upgrading of its transmission pipeline but these solutions are long term.

After extensive discussions on the issue, a consensus was reached during this informal meeting that the gas company would file a final petition. That application would be reviewed by this agency and a waiver determination would be rendered. It was also declared by this agency that if approved, the confirmation would be limited to a one year period only at the proposed location on Airport Road in Westerly as stated in the petition..

On October 1, 1993, the PGC filed the petition with the Division. The application did not include, at the time, a final site plan because there was a concern of possible minor modifications from an upcoming October 6, 1993 local zoning hearing in Westerly. The public hearing brought forth opposition from the residential property owners and the zoning decision was tabled. Without local zoning approval, PGC could not proceed with its proposed plan at the proposed site.

The Providence Gas Company subsequently selected an alternate

site to operate and maintain the mobile LNG equipment on Airport Road in Westerly and again filed, on October 27, 1993, a substitute waiver with this agency. The contemplated site is leased property and zoned for industrial use. The gas company received assurances from the local board that there would not be a municipal requirement for special zoning permission to relocate the mobile unit at this new location since it was classified for industrial operations.

The petition stated that specifics of Part 193 concerning the safety codes for LNG were established for permanent larger (immobile) LNG storage facilities and not for smaller mobile units. The application further stated that it would be "unduly burdensome and economically inefficient" in its provision of service to its customers if the company had to comply with safety requirements of permanent LNG equipment. The petitioning party praised the national safety record (for over 27 years) of this type of mobile LNG vaporizer without an incident. The written appeal included the company's sixteen safety provisions to Part 193 that would provide precautionary measures to assure a higher degree of safety.

The Providence Gas Company application containing those safety conditions (summarized below and also in Attachment #1) to Part 193 have been adopted by five New England states and would provide for a balanced security during the gas vaporization process using the mobile LNG equipment.

Those safety stipulations include:

- (1) the transports of the LNG product
- (2) the operators to be qualified by training and experience
- (3) a written training plan
- (4) a maximum of two year retraining of operators
- (5) a preventative leakage control program
- (6) operational provision during transfer
 - (a) Continuous attendance
 - (b) Periodically monitored with leakage detection equipment
 - (c) Restrict public access
 - (d) Portable fire equipment with instructions on site
 - (e) Continuous monitoring of pressure and temperature of the distribution system being served
 - (f) Emergency communications available
 - (g) Training of local fire fighting agencies on LNG and the mobile unit
- (7) minimizing accidental ignition
- (8) required odorization

II. DIVISION RECOMMENDATIONS

On October 22, 1993, the Division's gas engineering personnel visited the area of the planned relocation site for the portable LNG vaporizer. The site inspection of the premise and a review of the submitted site plan has brought about one specific safety concern to the Division. In addition, our approval is also limited to the specific site as proposed on Airport Road in Westerly known as Assessor's Lot 17 on Plat 118 in the Town Hall records and also subject to the conditions set forth in Section II of this document. The proposed site plan did not provide for a containment dike in close proximity to the LNG vaporizer for potential leakage.

In our further discussions with the local utility, the gas company stated that it was an oversight on their part for not including this safety aspect on the proposed site drawing. It was and is the company's intention to construct such an earth barrier to restrain the possible spillage. The barrier will be built as a holding structure and will be erected in the lower elevation areas of the compound near the LNG unit.

The Division is interested in inspecting the completed facility prior to its operation and will be paying close attention to the newly-constructed earth barrier and its control efficiency. The Division proposes the following as conditions of this waiver approval.

- (1) That the Providence Gas Company will notify the agency, prior to the commencement of its LNG vaporizing operation, that the temporary site is available for a field inspection of our agency.
- (2) That the Providence Gas Company provide advanced notice of its first LNG trucking-transfer at the proposed Westerly mobile plant, so that this agency may field review the safety aspects of the operations.

The contact person for the Division will be Mr. Glenn LaChance, Senior Gas Safety Technician at 277-3500, ext. 124.

III. DIVISION'S APPROVAL FOR WAIVER

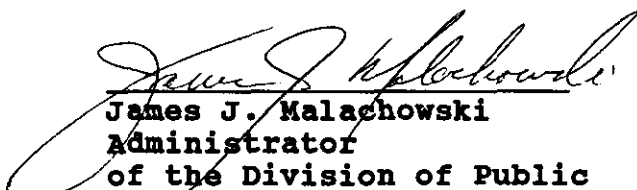
The Division will permit a waiver under the Natural Gas Pipeline Safety Act for the use of mobile Liquefied Natural Gas facilities. Pursuant to 49 U.S.C. App. 1672(d) a waiver may be

granted by a certified State agency. The Rhode Island Division of Public Utilities and Carriers is certified to regulate safety standards and practices of pipeline transportation pursuant to 49 U.S.C. App. 1874(a).

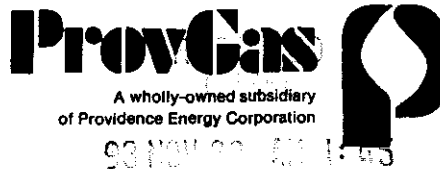
Therefore, the Rhode Island Division of Public Utilities and Carriers grants a waiver of 49 C.F.R. Part 193 for the use of mobile LNG equipment for an annual period from the herein enclosed approval date of the Division. Undoubtedly, this agency's consent is contingent on the USDOT's confirmation and the minimal time delay will reduce the allotted 12 month period slightly.

The Division shall forward this approved waiver to the U. S. Department of Transportation, Office of Pipeline Safety for their review and determination. The application with its exemption will not be in force until the USDOT also affirms the proposed waiver. In view of the heating season upon us and the time delay occurring from the local zoning process, our office would like to request an expeditious review from the Office of Pipeline Safety concerning this matter.

November 19, 1993



James J. Malachowski
Administrator
of the Division of Public
Utilities and Carriers



October 27, 1993

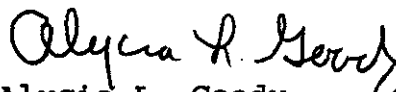
Mr. James Lanni
Associate Administrator for Quality Control
Division of Public Utilities and Carriers
100 Orange Street
Providence, Rhode Island 02903

Dear Mr. Lanni:

Enclosed for filing with the Division of Public Utilities and Carriers is Providence Gas Company's Petition for a waiver from compliance with the requirements of 49 CFR Part 193 as they may relate to mobile LNG facilities. Specifically, Providence Gas Company seeks a waiver from the Division to operate and maintain a mobile LNG facility on leased premises on Airport Road (Plat 118, Lot 17) in Westerly. A blueprint detailing the proposed site plan is being submitted with this petition.

The proposed Airport Road site is located within an industrial park in Westerly and is zoned for industrial use. We have been assured by the Westerly Zoning Board that no special exception will be required for relocation of the mobile LNG facilities to this site. If you require additional information with respect to this petition, please do not hesitate to contact me.

Very truly yours,


Alycia L. Goody
General Counsel

ALG/ms

enclosures

cc: (without blueprint) John Milano, Deputy Administrator
Adrienne Southgate, General Counsel
Luly E. Massaro, Clerk

STATE OF RHODE ISLAND
DIVISION OF PUBLIC UTILITIES AND CARRIERS

PETITION WAIVING ENFORCEMENT OF
REGULATORY PROVISIONS OF TITLE 49 C.F.R.193
FROM APPLICABILITY TO MOBILE LNG FACILITIES
(AS SUGGESTED BY RSPA OPINION LETTER)

October 27, 1993

I. HISTORY AND INTENT

On November 2, 1992, Cesar DeLeon, Director, Pipeline Safety Regulatory Program of the United States Department of Transportation issued an "opinion" stating that Mobile Liquefied Natural Gas (LNG) equipment (or units) were facilities subject to the provision of Title 49 CFR, Part 193 (Part 193). This opinion was then disseminated to various federal O.P.S. regions and state regulatory commissions responsible for the enforcement of Part 193.

As a result of the RSPA opinion and action, Providence Gas Company ("petitioner") a person engaged in the "Transportation of Gas" as defined in Section 2 of the Natural Gas Pipeline Safety Act (NGPSA) of 1968 and its amendments, has filed this petition on September 21, 1993, pursuant to applicable federal or state laws, requesting a waiver from enforcement and applicability of regulatory provisions of Part 193 to equipment that RSPA has designated as "Mobile LNG Facilities".

II. POSITION OF THE PETITIONER

The petitioner has reviewed the RSPA opinion and concluded that applying the requirements of Part 193 to mobile LNG equipment would be unduly burdensome and economically inefficient in the provision of service to its customers. Even RSPA recognizes, in one specific instance, that the "siting requirement of Part 193 may be difficult or overly burdensome for some mobile LNG facilities, considering the temporary nature of their use at particular sites". This regulatory burden is compounded since many subparts and sections of Part 193 are interwoven into the siting requirements, which are particularly suited for permanent (immobile) LNG storage facilities.

In the opinion letter, RSPA "invited comments" that may offer alternative requirements "to lighten the compliance burden without sacrificing safety". This is a welcomed invitation since these units represent a valued pipeline and consumer resource especially when no equivalent or alternative resource is available to the petitioners. It is worth noting that these types of units have been safely operated, without incident, for over 27 years. Utilization has been predominantly in pipeline maintenance and emergency gas supply capacity. Accordingly, the petitioner requests an exemption from the requirements of Part 193 applicable to mobile LNG equipment.

Finally, the petitioner offers a list of alternative safety provisions, when utilizing mobile equipment in Section III of this petition. However, along with addressing a waiver related to an opinion, the petitioner encourages RSPA to consider incorporating these provisions as part a future regulation that distinguishes mobile LNG equipment from permanent LNG storage facilities.

III. ALTERNATIVE SAFETY PROVISIONS

The following provisions are offered as an alternative to Part 193. Incorporated into these provisions are safety aspects from various sections of Part 193 (referenced) that would provide for an equal but reasonable level of safety when utilizing mobile LNG equipment.

1. All LNG transports must be designed, constructed, initially tested, operated and maintained in accordance with applicable federal law and rules.
2. All portable LNG equipment must be operated by at least one person qualified by experience and training in the safe operation of these systems. All other operating personnel, at a minimum, must be qualified by training. To the extent practicable, comply with the following training provisions:
 - (a) Each operator shall utilize for operation of components only those personnel who have demonstrated their capability to perform their assigned functions by:
 - (1) Successful completion of the training required by provision 2c and 12;
 - (2) Experience related to the assigned operation function;
 - (b) All other maintenance and support personnel, who do not meet the requirements of 2a but are qualified by experience or training to perform their assigned functions, may perform their duties while equipment is connected to the pipeline transporting the vaporized LNG only when supervised by an individual who meets the requirements of 2a.
 - (c) Each operator shall provide and implement a written plan of initial training to instruct all designated operating and supervisory personnel:
 - (1) About the characteristics and hazards of LNG used or handled at the site, including, with regard to LNG, low temperatures, flammability of mixtures with air, odorless vapor, boil-off characteristics, and reaction to water and water spray;
 - (2) About the potential hazards involved in

operating activities; and

- (3) To carry out aspects of the operating procedures that relate to their assigned functions; and
- (4) To carry out the emergency procedures that relate to their assigned functions; and
- (5) To understand detailed instructions on the mobile LNG operations.

d) Each operator shall have a written plan of continuing instruction that must be conducted at intervals of not more than two years to keep all operating and supervisory personnel current on the knowledge and skills they gained in the program of initial instruction.

[Reference: 49 CFR Sections 193.2707 and 2713]

3. To the extent practicable, all portable LNG equipment must be sited so as to minimize the possible hazard to the public, and any present or foreseeable hazard to the equipment, consistent with the need to provide the service.

[Reference: 49 CFR Section 193.2071]

4. Portable LNG equipment must be reasonably protected against vehicular damage.

5. Reasonable provision must be made for safely controlling leakage of LNG from valves, pipes, vaporizers, or hoses. To the extent practicable comply with the following pipeline transfer provisions:

- a) Each transfer of LNG fluid must be conducted in accordance with written procedures to provide for safe transfers.
- b) The transfer procedures must include provisions for personnel to, before transfer, verify that the transfer system is ready for use with connections and controls in proper positions.
- c) In addition to the requirements of provision 5b of this section, the procedures for pipeline transfer must be available and include provisions for personnel to:

- (1) Be in constant attendance during all pipeline transfer operations;
- (2) Prohibit the backing of tank trucks in the transfer area, except when a person is positioned at the rear of the truck giving instructions to the driver; and
- (3) Before transfer, verify that:
 - (i) All transfer hoses have been visually inspected for damage and defects;
 - (ii) Each tank truck is properly immobilized with chock wheels and grounded;
 - (iii) Each tank truck engine is shut off unless it is required for transfer operations;
- (4) Prevent a tank truck engine that is off during transfer operations from being restarted until the transfer lines have been disconnected and any released vapors have dissipated;
- (5) Verify that all transfer lines have been disconnected and equipment cleared before the tank truck is moved from the transfer position; and
- (6) Verify that all transfers into a pipeline system will not exceed the pressure or temperature limits of the system.

[Reference: 49 CFR Section 193.2513]

6. Reasonable provision must be made to minimize the possibility of accidental ignition in the event of a leak.
7. Reasonable provisions must be made to ensure that the introduction of vaporized LNG will not, to the extent practicable, reduce the odorization level of the system gas below the level required by applicable federal and state regulations or the authority having jurisdiction.

[Reference: 49 CFR Section 192.625]

8. All portable equipment must be continuously attended during the time LNG transport is connected to the other portable equipment, or other means of continuous monitoring must be maintained.

9. The portable LNG equipment must be periodically monitored for leakage by leakage detection equipment when the LNG transport is connected to the other portable equipment.
10. Reasonable provision must be made to restrict access by the general public when the LNG transport is connected to the mobile LNG equipment.
11. Portable fire fighting equipment must be present at all times and properly maintained to allow for effective control of LNG or natural gas fires at the site. To the extent practicable, portable fire control equipment must have operating instructions. Instructions must be attached to portable fire equipment.

[Reference: 49 CFR Section 193.2817]

12. Personnel operating the portable LNG equipment must be trained in the proper use of such fire fighting equipment. To the extent practicable, each operator shall use sound fire protection engineering principles to minimize the occurrence and consequences of fire.

[Reference: 49 CFR Section 193.2803]

13. Reasonable provision must be made to continuously monitor the portable equipment as to the impact on the distribution system being served to ensure appropriate pressures and temperatures are being maintained.
14. Means of communication must exist between the personnel operating the portable LNG equipment and a manned operating center and local emergency authorities. To the extent practicable, each mobile equipment site must have a primary communication system that provides for verbal communications.

[Reference: 49 CFR Section 193.2519]

15. The State agency having jurisdiction over pipeline safety in the State in which the portable LNG equipment is to be located must be provided with a location description for the installation at least 2 weeks in advance, including, to the extent practicable, the details of siting, leakage containment or control, means to restrict public access and fire fighting equipment, except that in the case of emergency where such notice is not possible, as much advance notice as possible must be provided.

16. To the extent practicable, the operator will provide training pertinent to the mobile LNG equipment and LNG in general, to the local fire fighting agency. The local fire fighting agency must be notified of the installation of the portable LNG equipment at least 48 hours prior to the operation of the equipment, except that in the case of emergency where such notice is not possible, as much notice as possible must be provided.

IV. ACTION REQUEST

Based on the many years of safe operation of mobile LNG equipment, its need, and the recommendation to adopt the alternative safety provisions (which will provide for an equal but reasonable level of safety), the petitioner respectfully requests regulatory relief from the burdensome regulatory treatment and enforcement of Part 193 (as suggested by the RSPA Opinion Letter of November 2, 1992) applicable to mobile (portable) LNG equipment. Furthermore, Part 193 as written, should be applicable to permanent (immobile) LNG storage facilities until such time specific regulations are written to regulate mobile LNG equipment. The sixteen alternative safety provisions are offered and recommended for possible incorporation into Part 193 as regulations governing mobile LNG equipment.

Finally, petitioner reserves the right to address or modify any information or agreements made herein as it pertains to their specific needs and organizational policy, contingent on any regulatory recommendation, requirement or facilities order resulting from this petition.

PROVIDENCE GAS COMPANY

By: William D. Mullin
William D. Mullin
Vice President, Operations
Providence Gas Company
100 Weybosset Street
Providence, RI 02903

THE SOUTHERN CONNECTICUT GAS COMPANY

By: _____

Samuel R. Clammer
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CITY OF NORWICH
DEPARTMENT OF PUBLIC UTILITIES

By: _____

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General Manager
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YANKEE GAS SERVICES COMPANY

By: _____

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