

U.S. Department of Transportation  
Research and Special Programs Administration  
400 Seventh Street, S.W.  
Washington, D.C. 20590

December 29, 1999

Mr. Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge Missouri Public Service Commission  
PO Box 360  
Jefferson City MO 65102

Dear Mr. Roberts:

This concerns your order in Case No. GO-2000-279, which involves the City of Fulton's petition for a finding under 49 CFR 192.150(b) (8) that 640 feet of the City's 15.5-mile, 8-inch steel transmission line is impracticable to design and construct to accommodate the passage of instrumented internal inspection devices. We have considered your order as a recommendation under 49 CFR 190.9 that we grant the City's petition.

According to the petition, the 640-foot section was relocated to accommodate the construction of a lake and minimize the risk of damage to the line. Bottom-out stopper fittings, which contain 90° elbows that impede the passage of internal inspection devices, were used instead of alternative relocation methods that involved shutting down the line. Because the line is the City's only source of gas, shutting it down would have caused an interruption of gas service to the City's 4000 customers and subsequent re-lighting difficulties.

We agree that under the circumstances it was impracticable to design and construct the 640-foot section to accommodate the passage of instrumented internal inspection devices. Therefore, the City's petition is granted.

Sincerely,  
Richard B. Felder  
Associate Administrator for Pipeline Safety