

May 15, 1995

Mr. Cesar De Leon
Acting Associate Administrator
Office of Pipeline Safety
U. S. Department of Transportation
400 Seventh Street, S.W.
Washington, D.C. 20509

RE: WAIVER REQUEST PART 192.739

Dear Mr. De Leon:

Enclosed find a copy of Southwest Gas Corporation's request for waiver from the inspection and testing requirements as defined in Part 192.739. When a service type regulator is utilized in a main to reduce and control the delivery pressure to a multiple meter manifold of standard delivery pressure of seven inch water column to the customer.

Staff knows of no history of failures of the service type regulator when utilized as a pressure reduction and control device at a multiple meter manifold when used to reduce pressure from a 60 pounds or less pressure to a seven inch water column.

The Arizona Corporation Commission's (Commission) Pipeline Safety Staff has reviewed this request and feels that there will be no compromise of safety in granting this waiver; therefore, the Commission's Office of Pipeline Safety has approved this waiver request and is forwarding it to the Federal Office of Pipeline Safety for review.

The Commission's Office of Pipeline Safety has advised SWG of our approval at this level. We have also advised SWG that this waiver must be forwarded to the Federal Office of Pipeline Safety for review and that the Federal Office of Pipeline Safety has 60 days from receipt of the request to either approve or reject the waiver request.

Should you have any questions in this matter, please contact me at (602) 542-3316.

Sincerely,

Chuck Hudson
Utilities Consultant
Utilities Division

CH:mc

Enclosure

cc: Terri Binns

April 6, 1995

Mr. Terry Fronterhouse
Chief, Pipeline Safety Group
Arizona Corporation Commission
1200 W. Washington
Phoenix, AZ 85007

RE: Request for Waiver: 49 CFR 192.739 Multiple Meter Manifold

Dear Mr. Fronterhouse:

Southwest Gas Corporation hereby requests a waiver from the requirements of 49 CFR 192.739 as they apply to certain multiple meter manifold facilities. This waiver request is in regard to the annual inspection requirements for standard delivery pressure (7" w.c.) service-type regulators supplying multiple meter manifolds.

Southwest Gas agrees that these multiple meter manifold sets are "technically" regulator stations, but the regulator in use is a meter service regulator which we believe are not subject to Section 192.739.

Consequently, we request a waiver be granted to allow standard delivery pressure (7" w.c.) service-type regulators, as defined in 49 CFR 192.197 paragraph (a), installed on multiple meter manifolds to be exempt from the annual inspection requirements in Section 192.739. We believe that the intent of Section 192.739 is not to include standard delivery pressure (7" w.c.) service type regulators that contain those characteristics as spelled out in 49 CFR 192.197 paragraph (a).

These standard delivery pressure (7" w.c.) service-type regulators have no requirement for inspection or maintenance. The historical safety record of these devices has precluded the necessity for such a requirement. Southwest believes that it is the device itself that should be considered, not what the device serves. We see no commensurate safety benefit resulting from requiring inspections on service-type regulators serving multiple meter manifolds.

It is the intent of Southwest Gas to operate its distribution system in strict accordance with State and Federal regulations and we are committed to providing safe and reliable natural gas service to our customers. When areas of a regulation appear to require interpretation based upon the reasonableness of that law, we seek your consideration and guidance in assisting us in meeting the spirit of the intent set forth by a particular regulation.

If you and your staff agree with this request, please forward this letter to the appropriate person at the Office of Pipeline Safety for Federal approval.

Please feel free to contact me with any questions or comments you may have concerning this waiver request.

Sincerely,

James F. Wunderlin, P.E.
Director/Engineering Staff

cc: D. McDuel
M. Marek
D. Sondeno
K. Stewart

July 3, 1995

Mr. Chuck Hudson
Utilities Consultant
Utilities Division
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, AZ 85007

Dear Mr. Hudson:

We have considered your letter of May 15, 1995, notifying us that the Commission's Office of Pipeline Safety has granted Southwest Gas Corporation a waiver from compliance with 49 CFR 192.739. This regulation requires operators to annually inspect and test each pressure regulating station to determine the condition of the station and its functional adequacy. The waiver applies to standard service-type regulators installed at multiple-meter manifolds.

Although the regulators covered by the waiver are technically "regulator stations," similar regulators installed with only one downstream meter are not subject to 192.739. We do not think the presence of a multiple-meter manifold warrants application of 192.739, as this regulation is appropriate for regulator stations that serve a network of piping resembling a distribution system. In view of this distinction, we have no objection to the waiver.

Sincerely,

Cesar DeLeon
Deputy Associate Administrator
for Pipeline Safety

LFurrow:jmd:64046:6-26-95
cc: DPS-1, 2, 10, 24, 25, 26, 27, 28, TSI
RdgFile, AMJ

Mr. Dan H. Weaklend
Chief, Pipeline Safety Group
Utilities Division
Arizona Corporation Commission
1200 W. Washington street
Phoenix, AZ 85007

Dear Mr. Weaklend:

We have considered your letter of December 7, 1993, notifying us that the Commission has granted Citizens Utilities Company a waiver from 49 CFR 192.739. This rule requires operators to inspect and

test their regulator stations annually. The waiver applies to service-type regulators that control the pressure supplied to multiple-meter manifolds, where each meter serves a single residence.

Although the regulators covered by the waiver are technically "regulator stations," the regulators function more like residential service regulators, which are not subject to 192.739. In view of this distinction, we have no objection to the waiver with respect to Citizens' installations in Arizona. The waiver has no effect on any similar installations Citizens may operate in other States.

Sincerely,

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

cc:

DPS-11/10/20/2/1/27; DCC-1

DPS-11:lmfurrow: