Rhode Island Energy™
a PPL company

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July 15, 2025

Office of Pipeline Safety, PHMSA
U.S. Department of Transportation
1200 New Jersey Avenue SE.,
Washington, DC 20590-0001

Re: Interpretation Request for 49 CFR § 192.753(b)

To Whom it May Concern,

I am writing on behalf of Rhode Island Energy, a natural gas distribution system operator that functions in compliance with applicable federal pipeline safety regulations. We are seeking PHMSA's formal interpretation of 49 CFR § 192.753(b), pertaining to the actions that need to be taken when a cast iron caulked bell and spigot joint is exposed:

§ 192.753(b) Caulked bell and spigot joints:

"(b) Each cast iron caulked bell and spigot joint that is subject to pressures of 25 psi (172kPa) gage or less and is exposed for any reason must be sealed by a means other than caulking." This particular section of code has not been revised in decades and does not appear to take formal leak prone pipe replacement programs into account.

Question 1:

Does §192.753(b) require immediate sealing upon exposure (if not leaking) or can it be scheduled in a reasonable amount of time to be completed?

Question 2:

If the answer to question 1 is yes, what is a reasonable timeframe to complete the joint sealing?

Question 3:

What if a cast iron joint is exposed as part of an active main replacement project and the pipe will be retired in the short-term? If the exposed joint is not leaking, is there any benefit to the ratepayer for sealing a joint that will be retired when the project is completed? If so, what would be a reasonable timeframe to complete the joint sealing?

Question 4:

If a cast iron joint is exposed, confirmed to have been previously sealed using approved materials and methods, and is not leaking, does that joint need to be stripped down and resealed?

Question 5:

If the answer to question 4 is yes, does the age of the previous seal become a factor? For example, if a joint was previously exposed and sealed using an approved encapsulation kit 6 months earlier, does that encapsulation need to be removed and replaced with a new encapsulation?

Rhode Island Energy would greatly appreciate PHMSA's interpretation on this matter to ensure full compliance with the federal code while also maintaining safe and efficient operation. That meets the needs of our customers.

Please let us know if any additional information or documentation is needed from our side. We would be happy to provide more context.

Respectfully,

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Manager, Gas Pipeline Safety and Compliance

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