



U.S. Department
of Transportation

Pipeline and Hazardous Materials
Safety Administration

1200 New Jersey Avenue SE
Washington DC 20590

OCT 22 2019

Mr. Karl H. Baker
Public Utilities Supervisor of Technical Analysis
Connecticut Public Utilities Regulatory Authority
10 Franklin Square
New Britain, CT 06051

Dear Mr. Baker:

In a July 24, 2019, letter to the Pipeline and Hazardous Materials Safety Administration (PHMSA), the Gas Pipeline Safety Unit (GPSU) of the State of Connecticut Public Utilities Regulatory Authority requested an interpretation of the 49 CFR Part 192 requirements for maximum allowable operating pressure (MAOP) for gas distribution pipelines during maintenance operations.

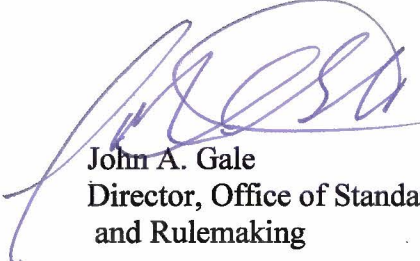
You stated that PHMSA's interpretation letter dated April 21, 2015, sent to Mr. Christopher LeBlanc of Northern Utilities, Inc., doing business as Unitil, discussed MAOP under normal and emergency operations; however, it was not clear to you whether activities during maintenance are included in this interpretation. Specifically, you asked that "since the maintenance requirements contained in 49 CFR 192.739(a)(3) require operators to set overpressure protective devices at pressures consistent with the pressure limits of 49 CFR 192.201(a), is it permissible for an operator to exceed the MAOP when setting the overpressure protective device at a pressure limiting station?"

The overpressure protective device, pressure limiting or regulator station that limits overpressure beyond the MAOP must be isolated from the system prior to any testing of buildup and set points. Operators can exceed the MAOP during maintenance of the isolated overpressure protection equipment as specified under § 192.739(a) consistent with the pressure limits of § 192.201(a), if the MAOP limits are met during a system maintenance and the pipeline meets all Subpart D requirements of 49 CFR Part 192. The overpressure protective device (pressure limiting or regulator station) that limits overpressure beyond the MAOP must be isolated from the system prior to any testing.

Maintenance operations that may result in overpressure conditions are only allowed for the time interval required under § 192.739(a) to activate the overpressure protection device and are not meant for long term or frequently-occurring normal operating or maintenance conditions.

If we can be of further assistance, please contact Tewabe Asebe at 202-366-5523.

Sincerely,

A handwritten signature in blue ink, appearing to read "John A. Gale", is written over the typed name and title.

John A. Gale
Director, Office of Standards
and Rulemaking



STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

July 24, 2019

Mr. John Gale
Director, Standards and Rulemaking Division
Office of Pipeline Safety (PHP-30)
Pipeline and Hazardous Materials Safety Administration
U.S. Department of Transportation
1200 New Jersey Avenue SE
Washington, DC. 20590

Dear Mr. Gale,

The Gas Pipeline Safety Unit (GPSU) of the State of Connecticut Public Utilities Regulatory Authority seeks clarification on exceeding the maximum allowable operating pressure (MAOP) during maintenance operations. Your interpretation letter dated April 21, 2015, sent to Mr. Christopher LeBlanc of Unitil Corporation, clearly discusses MAOP under normal and emergency operations; however, it is not clear whether maintenance operations are included in this interpretation.

Therefore, the GPSU requests an answer to the following question:

Since the maintenance requirements contained in 49 CFR 192.739(a)(3) require operators to set to overpressure protective devices at pressures consistent with the pressure limits of 49 CFR 192.201(a), is it permissible for an operator to exceed the MAOP when setting the overpressure protective device at a pressure limiting station?

Thank you for your consideration in this matter. Please do not hesitate to contact me at 860-827-2661 or by email at karl.baker@ct.gov if there are any questions or if you require any additional information.

Sincerely,

A handwritten signature in blue ink, appearing to read "Karl H. Baker".

Karl H. Baker
Public Utilities Supervisor of Technical Analysis