

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

Dear Mr. Fronterhouse:

We have considered your letter of April 19, 1996, concerning a waiver granted to Citizens Utilities by the Arizona Corporation Commission, Office of Pipeline Safety. Citizens Utilities requested a waiver from the requirements of 49 CFR 192.707(c) to place line markers at mains and transmission lines that are located aboveground in areas accessible to the public. Specifically, Citizens Utilities requested a waiver of the requirements to place line markers at aboveground multi-meter manifolds that do not serve a "master meter" nor deliver pressure in excess of a normal set pressure of 7 inch W.C.

This is substantially the same as a waiver granted by the Commission to Black Mountain Gas Company and forwarded to us for review by letter dated April 18, 1996. In our letter to you dated June 14, 1996, in which we took no objection to the waiver, we indicated that we had conducted an analysis of Docket Number OPS-18 in which paragraph 192.707 (c) was proposed.

The reason for the analysis of Docket Number OPS-18 was to determine if aboveground multi-meter manifolds were addressed during the proceedings. We found no reference to such installations.

Based on this analysis and your conclusion that granting the waiver will not compromise safety, we have no objection to the waiver.

Sincerely,

Richard D. Huriaux
Director for Technology and Standards
Office of Pipeline Safety

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