

SUMMARY OF NAPSRS MEMBER INPUT ON USE OF EFVs FOR MORE THAN SINGLE FAMILY RESIDENCES

1. Installation of EFVs for commercial, multi-family, master meter and industrial customers will have to be carefully decided upon because of the variability in loads that can occur at such establishments. The variability can come from:
 - a. In commercial establishments, change in gas load because of expansion or contraction of the business or change in commercial operation on the premises (e.g. from one that uses gas for space heating to one that uses gas for heating and intensive cooking)
 - b. In multi-family buildings, it will be the peak loads that occur in the mornings and evenings
 - c. In master meters, it could be a combination of both.
 - d. In industrial plants, there will likely be very large variations, such as for example high-fire on startup, and on low-fire or pilot when production drops off. It is commonly believed that industrial customers will be difficult to protect using EFVs.
2. A drastic change in gas load downward, can cause the EFV to become oversized and not to protect when needed; a change in gas load upward can result in an unplanned shutoff, which would be intolerable for many commercial and industrial establishments.
3. EFVs could probably be installed to protect small commercial establishments of certain categories (e.g. offices that only use gas for space heating and hot water) but the system operator would have to monitor the load profile and be prepared to change out the EFV if the load suddenly changes so as to potentially cause the valve to trip. This may present a further problem if there is wall-to-wall paving.
4. Before installing an EFV for other than a residential single-family customer, a study should be done on the best location for the valve, including considerations such as the impact of a possible valve change out and the likelihood that it will trip when needed.
5. Installation of EFVs based on risk is an acceptable idea. Examples of higher threats would be locations with high level of construction activity, wall to wall paving, history of previous hits, etc.
6. Data should be collected about the effect of residential EFVs on safety statistics before mandating EFVs on other classes of customers.
7. Installation of EFVs should not be retroactively mandated.
8. Before mandating the use of EFVs for other classes of customers PHMSA should conduct a cost-benefit analysis of such use for each customer class. Considerations should also include who will bear the costs of potentially expensive EFV installations for other classes of customers. It hardly seems fair that residential ratepayers should subsidize non-residential customers.