

PI-70-0103

Louisville Gas and Electric Company
P.O. Box 354
Louisville, KY 40201

September 29, 1970

Mr. Frank E. Fulton
Chief of Office of Pipeline Safety Technical Division
Department of Transportation
Washington, D. C.

Dear Mr. Fulton:

I wish to thank you for your assistance when I called you on September 25, 1970, to discuss the new Federal regulations with respect to gas service lines. As I pointed out, we wanted to know if rule 192.371 required that all components of steel service lines, that are to operate at less than 100 psig, be designed for 100 psig or more. We were primarily inquiring about the shut off valve, or stop cock, that is located on the upstream side of the meter and regulator connections.

In our area the customer owns the service line from the property line to the meter and is responsible for its installation. We inspect the customer's service line and test it to make sure it meets all applicable rules and regulations. At present, we require a service valve, at the meter connections, that is good for a minimum of 60 psig on service lines that are designed to operate at a pressure up through 60 psig, as per the requirements of specification X50664 as published by the AGA. This valve is installed by the customer's contractor. A change in this requirement to 100 psig valves would require that numerous plumbing supply houses in our area stock such valves in large quantities.

On the portion of the service which our Company installs and owns, from our main to the customer's portion of the service at his property line, we install a buried valve with a valve stand on it. This is called the curb stop. It would not be a problem for us to change this valve to one with at least 100 psig rating.

It was my understanding from our conversation that it has already come to the attention of the OPS that many gas distribution companies have similarly been using shut off valves rated at 60 psig, and that the OPS is going to bring out a revision of this rule number 192.371.

Our plans, in view of this, are to continue our present policy of requiring the 60 psig rated shut off valves on services which are to operate at pressures up through 60 psig. On services to operate at pressures over 60 psig, we plan to continue to require shut off valves of the proper rating to correspond to the maximum operating pressure of the service line. We assume that it would be permissible for us to continue the practice we have described - unless we hear from you to the effect that a revision or correction will not be forthcoming.

Sincerely,
James R. Nelson
Senior gas Engineer Gas
Distribution Dept.
James R. Nelson