

August 2, 1979

Mr. E. Scott Smith
Chief Engineer, Gas Section
Energy Regulatory Commission
Post Office Box 615
Frankfort, Kentucky 40602

Dear Mr. Smith:

Thank you for your letter of June 8, 1979, requesting an interpretation of the term "uprating." You inquire if increasing the pressure in a distribution line to 17 psi which had been in operation for 48 years at a pressure of 5 1/2 ounces can be classified as an "uprating."

The regulations prescribing requirements for uprating (Sections 192.555 and 192.557) are applicable to pipelines which are intended to operate at a pressure higher than the current maximum allowable operating pressure established under 49 CFR 192.619. Therefore, if the established maximum allowable operating pressure for the line in question is less than 17 psi, then the line is subject to the uprating regulations of Subpart K.

I trust that this responds adequately to your inquiry.

Sincerely,

Cesar DeLeon
Associate Director for
Pipeline Safety Regulation
Materials Transportation Bureau

June 8, 1979

Cesar DeLeon
Associate Director for
Pipeline Safety Regulations
DMT-30
2100 2nd Street S.W.
Washington, D.C. 20590

Dear Sir:

Would you please provide the Kentucky Energy Regulatory Commission with an interpretation of uprating a natural gas distribution system. This is per a telephone conversation with our gas section representative on June 8, 1979.

The incident in question related to a local distribution company increasing pressure from approximately 5 1/2 ounces on a line that had been in service for 48 years to 17 pounds.

An early response to this request would be greatly appreciated and very beneficial for our efforts to set this case for a hearing within the next 3 or 4 weeks.

Yours very truly,

ENERGY REGULATORY COMMISSION

E. Scott Smith
Chief Engineer, Gas Section