PI-98-0103

9/14/98

Mr. Jordan R. Janak
Director, Regulatory Compliance
All American Pipeline Company
PO Box 40160
Bakersfield CA 93384-0160

Dear Mr. Janak:

Thank you for your letter of April 8, 1998, regarding a low-stress 6-inch, 6.5-mile pipeline owned by your company that transports gas from a meter at an intrastate transmission line solely for use at your company's Cadiz pump station. You asked if the line, which you consider customer piping, must be reclassified as a transmission line.

The question arises because the line was the subject of a Final Order (CPF 52006), which found that it did not meet the pre-1996 definition of "transmission line" under 49 CFR 192.3. But the order suggested the line would meet the revised definition because the line links a transmission line to a power plant.

Under the present definition of "transmission line," the only relevant consideration in classifying the line as transmission is whether the Cadiz pump station is a large volume customer. The definition describes such a customer as one that receives a volume of gas similar to that received by a distribution center, and gives as examples factories, power plants, and institutional users of gas. While we agree that the Cadiz pump station is not a power plant, the data you furnished about the volume of gas the line transported last year (23 mcfd on average, maximum 60 mcfd) indicate that the station receives volumes similar to that received by a distribution center serving a small community. Although these volumes may be far less than volumes received by towns and plants in the area of the Cadiz pump station, the transmission line definition refers to distribution centers in general. Therefore, as long as the line continues to transport gas in volumes similar to that received by a distribution center, the line must be classified as a transmission line.

Sincerely,

Richard D. Huriaux, P.E.
Regulations Manager
Office of Pipeline Safety
LMFurrow:jmd:64046:8-13-98
cc: DPS-1,2,10,20,TSI.,StateMailing