



U.S. Department of Transportation
**Pipeline and Hazardous Materials
Safety Administration**

1200 New Jersey Ave, S.E.
Washington, D.C. 20590

OCT 30 2013

Mr. Mason Parsaye
General Manager
Colorado Springs Utilities
1521 Hancock Expressway
Colorado Springs, CO 80947-1814

Dear Mr. Parsaye:

In a letter to the Pipeline and Hazardous Materials Safety Administration (PHMSA) dated June 26, 2013, you requested an interpretation of the applicability of the Federal pipeline safety regulations at 49 CFR Part 192. Specifically, you requested clarification regarding the exemption to install an excess flow valve (EFV) on a service line per § 192.383(b)(1).

You stated that you have several pressure districts that are designed to operate as low as 5 psig and could operate at this pressure if load is high enough. You ask if all of the service lines in these pressure districts are exempted from EFV installation because your service lines are designed to operate below 10 psig?

Also, you asked for clarification of the definition of "replaced service line." You asked whether a repair and/or replacement of a portion of a service line piping that is downstream of the tapping tee and the piping that is not physically attached to the tapping tee would require installation of an EFV.

PHMSA's response to your first question is that performance standards have been established for EFVs that are installed on a service line that operates at or above 10 psig continuously during the year. However, service line pressure could be at its lowest level during the coldest weather, especially in colder climates. Therefore, pressure drop below 10 psig in the service line due to restriction of gas flow caused by an EFV could possibly cause a reduction in safety or loss of service.

If your service lines are operating below 10 psig throughout the year, you are not required to install EFVs on those lines. Section 192.383(b)(1) states:

§ 192.383 Excess flow valve installation.

...

(b) Installation required. An excess flow valve (EFV) installation must comply with the performance standards in § 192.381. The operator must install an EFV on any new or

The Pipeline and Hazardous Materials Safety Administration, Office of Pipeline Safety provides written clarifications of the Regulations (49 CFR Parts 190-199) in the form of interpretation letters. These letters reflect the agency's current application of the regulations to the specific facts presented by the person requesting the clarification. Interpretations do not create legally-enforceable rights or obligations and are provided to help the public understand how to comply with the regulations.

replaced service line serving a single-family residence after February 12, 2010, unless one or more of the following conditions is present:

(1) The service line does not operate at a pressure of 10 psig or greater throughout the year;

Regarding your second question, the definition for “replaced service line” in § 192.383(a) states:

§ 192.383 Excess flow valve installation.

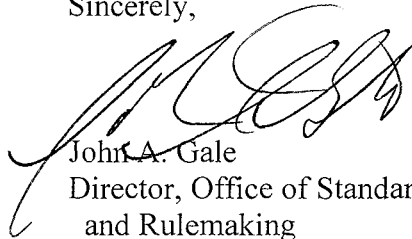
(a) Definitions. As used in this section:

Replaced service line means a gas service line where the fitting that connects the service line to the main is replaced or the piping connected to this fitting is replaced.

PHMSA does not mandate additional excavation to install an EFV when another portion of the service line is excavated. However, PHMSA considers it is appropriate to require installation when the area near the connection to the main has been exposed and an opportunity to install an EFV exists.

If we can be of further assistance, please contact Tewabe Asebe of my staff at (202) 366-5523.

Sincerely,



John A. Gale
Director, Office of Standards
and Rulemaking

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June 26, 2013

JUL 02 2013

Jeff Weise, Associate Administrator for Pipeline Safety, PHP-1
Office of Pipeline Safety
Pipeline and Hazardous Material Safety Administration
U.S. Department of Transportation
1200 New Jersey Ave., SE
Washington, DC 20590

RE: Clarification of §192.383, Excess flow valve installation

Dear Mr. Weise:

Colorado Springs Utilities (CSU) would like to seek clarification regarding the first exemption to installing an Excess Flow Valve (EFV) on a service line per § 192.383 (b)(1).

Code reads as follows:

(b) *Installation required.* An EFV installation must comply with the performance standards in §192.381. The operator must install an EFV on any new or replaced service line serving a single-family residence after February 12, 2010, unless one or more of the following conditions is present:

(1) The service line does not operate at a pressure of 10 psig or greater throughout the year;

CSU has several pressure districts that are designed to operate as low as 5 psig and could operate at this pressure if load is high enough. Are all of the service lines in these pressure districts exempted because they are designed to operate below 10 psig?

Also, CSU would like clarification of the definition of "Replaced service line".

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Jeff Weise, Associate Administrator for Pipeline Safety, PHP-1

June 26, 2013

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Code reads as follows:

Replaced service line means a gas service line where the fitting that connects the service line to the main is replaced or the piping connected to this fitting is replaced.

Does this mean if we make a repair and/or replace a portion of a service line piping that is downstream of the tapping tee AND the piping is not physically attached to the tapping tee, we are not required to install an EFV?

Please provide clarification regarding these service lines.

Best regards,

A handwritten signature in blue ink, appearing to read "M Parsaye".

Mason Parsaye, General Manager
Energy Construction, Operations & Maintenance Dept.

c: Jessica Nesvold
Stephan Pott, P.E.