



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

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

JAN 23 2015

Mr. Joseph P. Como  
Acting Director, Office of Ratepayer Advocates  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

Dear Mr. Como:

In a letter to the Pipeline and Hazardous Materials Safety Administration (PHMSA) dated December 4, 2013, the Office of Ratepayer Advocates (ORA) requested a regulatory interpretation of 49 CFR 192.619 regarding the maximum allowable operating pressure (MAOP) for natural gas pipelines. Specifically, ORA asked if the consideration of design pressure in § 192.619(a)(1) is required for pipelines that were placed in service before July 1, 1970. ORA asked whether an operator must use the design pressure in § 192.619(a)(1) as the MAOP for a segment of pipeline that was placed in service before July 1, 1970, if the design pressure is the lowest pressure from the methods set forth in § 192.619(a). In addition, ORA informed PHMSA that the California Public Utilities Commission (CPUC) no longer permits gas operators within its jurisdiction to rely on the "Grandfather Clause" in § 192.619(c).

ORA attached PHMSA's letter objecting to the Oklahoma Corporation Commission's (OCC) Waiver of Compliance, PHP-08-0074, dated March 17, 2008, and stated that it believes that letter to mean that an operator must calculate and consider the design pressure to determine the MAOP of pipelines installed prior to July 1, 1970, as well as after that date. ORA asked if its understanding is correct. ORA stated that the letter's discussion was about distribution lines and asked PHMSA to confirm that a MAOP calculated under § 192.619(a) cannot exceed design pressure for transmission pipelines installed prior to July 1, 1970.

ORA informed PHMSA that in a recent hearing held by the CPUC, Pacific Gas & Electric Company (PG&E) asserted that it is not required to consider design pressure for a pipeline placed in service before July 1, 1970, that has been subject to a Subpart J strength test. ORA stated that PG&E's reasoning was that "§ 192.619(a)(1) is forward-looking and applies only to segments of new pipeline installed after 1970, the year the Federal regulations became effective." ORA's letter stated that PG&E believes that the regulations allow it to operate a pipeline placed in service prior to July 1, 1970, at a MAOP based on its strength test pressure under § 192.619(a)(2) even if the design pressure is lower.

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.

ORA stated that it disagrees with PG&E's interpretation because:

1. Section 192.619(a) does not state the design pressure is inapplicable to pipelines installed before July 1, 1970;
2. The MAOP requirements under § 192.619 are part of Subpart L, which govern safe operating conditions, and the requirement in § 192.619(a) appears to be a mandatory safety precaution; and
3. ORA believes the above mentioned PHMSA letter to the OCC confirms that the design pressure provision applies to lines placed in operation prior to July 1, 1970.

ORA asks the following questions, and PHMSA's answers are below:

**Question 1:** When validating the MAOP of pipeline segments placed in operation before July 1, 1970, and still in operation today, is the operator required to calculate and consider the design pressure pursuant to § 192.619(a)(1)?

**Response:** Section 192.619(a) states: "No person may operate a segment of steel or plastic pipeline at a pressure that exceeds a MAOP determined under paragraph (c) or (d) of this section, or the lowest of the following: ..." Paragraphs (a)(1) – (a)(4) then specify four pressures which must be calculated in order to determine the MAOP. Therefore, the answer is yes.

The operator of a pipeline that was placed into service before July 1, 1970, must determine MAOP in accordance with § 192.619. If § 192.619(a) is used to determine MAOP, the operator must calculate the design pressure in accordance with § 192.619(a)(1), and use the design pressure or a lower pressure as the MAOP if that is the lowest of the four pressures described in paragraphs (a)(1) – (a)(4). If applicable, an operator may also use the "Grandfather Clause" in § 192.619(c) to determine the pipeline segment's MAOP.

Over time, changes in the population density surrounding a pipeline segment will affect the class location and MAOP of a pipeline. Section 192.613 requires operators to have a procedure for continuing surveillance of its facilities to determine and take appropriate action concerning changes in class location. When there are changes to population density along a pipeline segment, § 192.609 requires the operator to conduct a class location study, and § 192.611 details the requirements for confirming or revising the MAOP according to the new class location.

Paragraph (d) of § 192.611 requires the operator to confirm or revise the MAOP within 24 months of the change in class location. If an operator fails to confirm or revise the MAOP within 24 months of the change in class location, then § 192.611 cannot be used and the pipeline segment MAOP must be calculated in accordance with § 192.619(a), using the design factor that appears in § 192.111 for the new class location.

The CPUC may impose more stringent MAOP regulations by establishing them through state law. PHMSA does not interpret state regulations.

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.

**Question 2:** If the answer to Question 1 is yes, must the operator use its design pressure as the MAOP when the design pressure is the lowest pressure calculation required by § 192.619(a)?

**Response:** Yes, if the Grandfather Clause in § 192.619(c) or the alternative MAOP option in § 192.619(d) is not applicable. If the operator uses § 192.619(a) to determine MAOP, the MAOP would be equal to the lowest value calculated according to paragraphs (a)(1) – (a)(4).

For a pre-July 1, 1970 pipeline segment, the operator must determine the MAOP in accordance with § 192.619(a) unless the operator has documentation that meets the § 192.619(c) requirements for the entire pipeline segment and elects to use it to establish MAOP.

If an operator uses § 192.619(a) to determine the pipeline segment MAOP, the operator must have records to substantiate the calculations required in paragraphs (a)(1) – (a)(4), including the properties of pipe and pipeline components. Paragraph (a)(1) requires that the pipeline design pressure be determined in accordance with Subparts C and D, including § 192.105 which states that the pipeline design pressure must be based upon the current class location design factor and the actual pipe properties which include yield strength (grade), wall thickness, longitudinal joint factor (seam type), maximum operating temperature and pipe diameter. If the pipeline segment contains pipeline components such as bends, fittings, flanges or valves, the operator would need to determine the design pressure of these pipeline components in accordance with applicable sections of Subparts C and D of Part 192.

If an operator uses the Grandfather Clause in § 192.619(c) to establish the MAOP, the operator must have documentation of the pipeline segment's condition and operating and maintenance history, including historical pressure records for the maximum operating pressure to which the entire pipeline segment was subjected during the five years prior to July 1, 1970. The Grandfather Clause in § 192.619(c) cannot be used to determine the MAOP after a change in class location. Section 192.611 can be used to revise the MAOP within 24 months after a class location change; after that deadline, the MAOP must be revised according to § 192.619(a).

Sections 192.517 and 192.603 require that all records regarding the pipeline MAOP determination be kept for the life of the pipeline segment, including records of pipe properties, pipeline component properties, pressure test records, class location studies, current class location designation, and operating history.

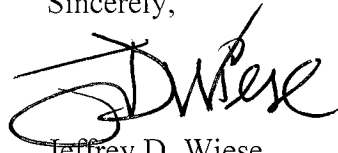
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**Question 3:** Does § 192.619 apply to both transmission lines and distribution lines?

**Response:** Yes. The requirements in § 192.619 apply to both distribution and transmission natural gas pipelines. Section 192.621 contains different standards that apply only to high pressure distribution systems. States that regulate intrastate natural gas transmission pipelines and natural gas distribution pipelines have the right to implement state pipeline regulations that exceed the requirements in Part 192.

If we can be of further assistance, please contact John Gale of my staff at 202-366-0434.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Wiese". The signature is stylized with a large, looping initial "J" and a cursive "Wiese".

Jeffrey D. Wiese  
Associate Administrator for  
Pipeline Safety

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## ORA

Office of Ratepayer Advocates  
California Public Utilities Commission

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**JOSEPH P. COMO**  
Acting Director

December 4, 2013

DEC 11 2013

VIA US MAIL

John Gale  
Director, Standards and Rulemaking  
U.S. Department of Transportation  
Pipeline and Hazardous  
Materials Safety Administration  
East Building, Second Floor  
1200 New Jersey Avenue SE  
Washington, D.C. 20590

Dear Mr. Gale,

The Office of Ratepayer Advocates (ORA) at the California Public Utilities Commission is writing to the Pipeline and Hazardous Materials Safety Administration (PHMSA) to request an interpretation of the regulation on determining maximum allowable operating pressure (MAOP) for natural gas pipelines, 49 C.F.R. § 192.619. Specifically, do the design MAOP requirements of 49 C.F.R. § 192.619(a)(1) apply to pipelines in service today that were placed in service before July 1, 1970?<sup>1</sup> If a segment of pipeline was placed in service before July 1, 1970, and the design MAOP is the lowest MAOP from the allowable methods of calculating MAOP set forth in § 192.619(a), must the operator operate that line under the design MAOP? (Please note that the California Public Utilities Commission (CPUC) no longer permits gas operators within its jurisdiction to rely on § 192.619(c), the “grandfather clause,” to validate MAOP.<sup>2</sup>)

In PHMSA’s Waiver of Compliance Order PHP 08-0074, dated March 17, 2008, PHMSA provided an interpretation of 192.619(a)’s MAOP requirements. Under that interpretation, PHMSA acknowledged that:

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<sup>1</sup> As PHMSA may be aware, in the aftermath of the San Bruno, California pipeline explosion disaster, the California Public Utilities Commission (CPUC) ordered its regulated gas utilities to begin extensive evaluations of records and hydrotesting to verify the safety of natural gas pipelines. In particular, gas operators were ordered to validate the MAOP of their transmission lines without relying on § 192.619(c) (the “grandfather clause”). See California Public Utilities Commission Decision 11-06-017, pp. 18, 31 (June 9, 2011), *available at* [http://docs.cpuc.ca.gov/PublishedDocs/WORD\\_PDF/FINAL\\_DECISION/137309.PDF](http://docs.cpuc.ca.gov/PublishedDocs/WORD_PDF/FINAL_DECISION/137309.PDF).

<sup>2</sup> See California Public Utilities Commission Decision 11-06-017, pp. 18, 31 (June 9, 2011), *available at* [http://docs.cpuc.ca.gov/PublishedDocs/WORD\\_PDF/FINAL\\_DECISION/137309.PDF](http://docs.cpuc.ca.gov/PublishedDocs/WORD_PDF/FINAL_DECISION/137309.PDF).

The Federal pipeline safety regulations in § 192.619(a) limit the MAOP of a pipeline installed prior to July 1, 1970, to **the lowest of** the following four pressures:

- The design pressure of the weakest element in the segment per §192.619(a)(1);
- The pressure obtained by dividing the pressure to which the segment was tested after construction by the applicable factor per § 192.619(a)(2);
- The highest actual operating pressure the segment was subjected to during the 5 years preceding July 1, 1970 per § 192.619(a)(3); or
- The pressure determined by the operator to be the maximum safe pressure after considering the history of the segment per § 192.619(a)(4).

A pipeline operator would need data to support all four pressures listed above to establish the MAOP of a pipeline segment using § 192.619(a).<sup>3</sup>

ORA understands this interpretation to mean that an operator must calculate and consider the design MAOP to determine the MAOP of pipelines installed prior to July 1, 1970 (as well as after that date). Could PHMSA verify that ORA's understanding is correct?

PHMSA's Waiver of Compliance Order PHP 08-0074, cited above, specifically addresses distribution lines. If the answer to the previous question is yes, does the same requirement to calculate design MAOP for pipelines installed prior to July 1, 1970 also apply to transmission lines? ORA's understanding is that the Subpart L requirements regarding how to determine MAOP apply both to distribution and transmission lines. Section 192.601 refers to "the minimum requirements for the operation of *pipeline facilities*" and § 192.603(a) requires that "[n]o person may operate a *segment of pipeline* unless in accordance with this subpart" without making a distinction between transmission lines or distribution lines.

In a recent hearing held by the CPUC, Pacific Gas & Electric Company (PG&E) asserted that it is not required to consider design MAOP for a pipeline placed in service before July 1, 1970 that has been subject to a Subpart J strength test. PG&E states that § 192.619(a)(1) is forward-looking and applies only to segments of new pipeline installed after 1970, the year the federal regulations became effective. In PG&E's opinion, the regulations allow it to operate a line placed in use prior to July 1, 1970 based on its strength test pressure MAOP, under §192.619(a)(2), even when the design MAOP is lower.

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<sup>3</sup> PHP 08-0074, p. 1 (March 17, 2008) (emphasis added).

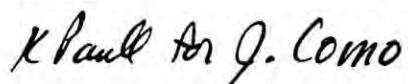
ORA interprets the regulations differently. ORA's understanding is that when an operator is directed to validate the MAOP of a line operating *today*, regardless of when it was installed, it must use the MAOP determined by § 192.619(a); that is, the lowest value of pressure calculated using § 192.619(a)(1), (2), (3) or (4). Thus, if the design MAOP is lower than test MAOP, the design MAOP must be used unless one of the other methods permitted under § 192.619(a) yields a result that is lower. ORA wishes to verify that its understanding is correct.

ORA has taken this position for a number of reasons. First, Section 192.619(a) does not state that the design MAOP method is inapplicable to pipelines installed before July 1, 1970. Second, the MAOP requirements under § 192.619 are part of Subpart L, which governs safe operating conditions. The "operator must use the lower of . . . ." provision of § 192.619(a) appears to be a mandatory safety precaution. Third, PHP 08-0074, referenced above, confirms that the design MAOP provision applies to lines placed in operation prior to July 1, 1970.

In sum, the Office of Ratepayer Advocates asks for the following interpretations:

1. When validating the MAOP of pipeline segments placed in operation before July 1, 1970 that are still operating today, is the operator required to calculate and consider the design MAOP pursuant to § 192.619(a)(1)?
2. If the answer to Question 1 is yes, must the operator use its design MAOP when the design MAOP is the lowest MAOP calculation required by § 192.619(a)?
3. Does § 192.619 apply both to transmission lines as well as distribution lines?

Sincerely,



Joseph P. Como  
Acting Director  
Office of Ratepayer Advocates  
California Public Utilities Commission

Enclosure



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue, SE  
Washington, D.C. 20590

MAR 17 2008

Mr. Dennis Fothergill  
Regulatory Program Manager  
Pipeline Safety Department  
Transportation Division  
Oklahoma Corporation Commission  
P.O. Box 52000  
Oklahoma City, OK 73152-2000

Dear Mr. Fothergill:

The Pipeline and Hazardous Materials Safety Administration (PHMSA) reviewed your letter of January 23, 2008, notifying us that the Oklahoma Corporation Commission (Commission) granted CenterPoint Energy Resources Corp doing business as CenterPoint Energy Oklahoma Gas (CenterPoint) a waiver of compliance from state regulation 49 CFR 192.619(a)(3) [as adopted by the Commission in OAC 165: 20-5-21] for 138 low-pressure distribution system pipeline segments in Oklahoma. The regulations in § 192.619(a)(3) limit the maximum allowable operating pressure (MAOP) of a steel or plastic pipeline segment installed prior to July 1, 1970, to the highest actual operating pressure the segment was subjected to during the 5 years preceding July 1, 1970.

The Federal pipeline safety regulations in § 192.619(a) limit the MAOP of a pipeline installed prior to July 1, 1970, to the lowest of the following four pressures:

- The design pressure of the weakest element in the segment per § 192.619(a)(1);
- The pressure obtained by dividing the pressure to which the segment was tested after construction by the applicable factor per § 192.619(a)(2);
- The highest actual operating pressure the segment was subjected to during the 5 years preceding July 1, 1970 per § 192.619(a)(3); or
- The pressure determined by the operator to be the maximum safe pressure after considering the history of the segment per § 192.619(a)(4).

A pipeline operator would need data to support all four pressures listed above to establish the MAOP of a pipeline segment using § 192.619(a).

When these rules were first promulgated in 1970, PHMSA recognized that an operator may not have all the pressure data needed for existing pipelines. Therefore, we included in the rules a "grandfather clause" to allow pipeline operators to establish the MAOP of an existing pipeline segment in satisfactory condition, and considering its operating and maintenance history, at the highest actual operating pressure to which the segment was subjected during the 5 years prior to July 1, 1970. This "grandfather clause" is codified in § 192.619(c), not § 192.619(a)(3).



The operator at the time the regulations were promulgated in 1970 should have established the MAOP for each of these 138 low-pressure segments by using either § 192.619(a) or § 192.619(c). Moreover, there are additional MAOP restrictions for low-pressure distribution systems in § 192.623. Subsequently, the MAOP of these segments can only be increased in accordance with 49 CFR Part 192, Subpart K- Upgrading, not § 192.619(a) or § 192.619(c), and with consideration of § 192.623. Accordingly, if CenterPoint wishes to increase the existing MAOPs, they should seek relief from the upgrading regulations and the low-pressure distribution system regulations, if required, not from § 192.619(a)(3).

Unfortunately, no data was submitted with the waiver grant to PHMSA regarding the existing MAOPs of these 138 segments. Nor is it clear why CenterPoint is seeking MAOP relief, if as you state in your letter, "*CenterPoint requested the MAOP for these 138 low pressure gas distribution pipeline segments be established at 1.00 psig, which is the current and historical maximum operating pressure for these segments.*" If these segments have been historically operated up to 1.00 psig, then the existing MAOPs must already be at least 1.00 psig or the segments have been historically operated in violation of the pipeline safety regulations. If so, this needs to be addressed before a waiver is granted.

PHMSA is unable to fully evaluate this waiver grant without additional information. For example, why is CenterPoint establishing MAOPs in 2008 for pipeline segments that have been operating for over 50 years? Are there any open enforcement actions regarding the historical operation of these segments up to 1.00 psig? How does CenterPoint propose to meet the requirements in § 192.623, when it is known that many gas appliances are rated for 0.5 psig or less, not 1.00 psig?

For the reasons stated above, PHMSA objects to this waiver and the Commission's order is stayed. The Commission may appeal this matter. However, because the waiver of § 192.619(a)(3) is inappropriate, PHMSA suggests that CenterPoint resubmit its application to the Commission and that the Commission grant a new waiver, if appropriate. The new waiver grant must specifically identify the state pipeline safety regulation the Commission is waiving and must include new information from the petitioner to justify granting the waiver. This new information should include, at a minimum, technical evidence to substantiate that an MAOP of 1.00 psig for these 138 low-pressure distribution pipeline segments would result in equivalent or greater safety than an MAOP established using the methods currently allowed in the Federal pipeline safety regulations in 49 CFR Part 192.

If you wish to discuss this waiver or any other pipeline safety matter, my staff would be pleased to assist you. Please call Barbara Betsock, Acting Director of Regulations at 202-366-4361 for regulatory matters or Alan Mayberry, Director of Engineering and Emergency Support at 202-366-5124 for technical matters.

Sincerely,

*William A. Galt*  
For

Jeffrey D. Wiese  
Associate Administrator  
for Pipeline Safety

corrosion monitoring under § 192.465 for the life of the pipe. Most of these commenters declared that 5 years would be adequate, but did not explain why a longer period is excessive. Lacking any convincing documentation to the contrary, RSPA believes the current rule should stay in effect. In our experience, a history of corrosion monitoring sheds light on the possible causes of a pipeline's condition. Such history has proven to be a valuable resource in deciding the extent and kind of remedial action needed when corrosion problems emerge on a pipeline.

Regarding the proposed 5-year retention time for records other than those required by §§ 192.465 (a) and (e) and 192.475(b), two commenters said the minimum time should be 3 years to coincide with the longest interval between inspections. Two others suggested that instead of a set time, we adopt a performance standard for record retention, basing it on the time needed to observe trends, inquire into compliance, or collect superseding data. All these comments provide a reasonable basis for record retention. However, our main concern is that operators keep records for a period that is compatible with the occurrence of routine compliance investigations. Therefore, for simplicity and uniformity, we have decided to adopt the proposed 5-year minimum retention time.

The state agency that commented objected to the 5-year proposal on grounds that it would sacrifice information about why external or atmospheric corrosion control was not installed on pipelines under §§ 192.455, 192.457, and 192.479. RSPA believes the loss of this information after 5 years would not be significant, because the pipelines involved are covered by requirements for periodic inspections or tests for corrosion under §§ 192.465 and 192.481.

*Section 192.553, General Requirements*  
(See previous discussion under § 192.14).

*Section 192.607, Determination of Class Location and Maximum Allowable Operating Pressure*

Because § 192.607 has no continuing effect and the deadlines for compliance have expired, RSPA proposed to remove § 192.607 from part 192.

Fourteen TPSSC members voted for the proposal and one member abstained.

Five operators, one pipeline-related association, and one state agency commented on the proposed removal of § 192.607. Four operators and the association favored the idea. One

operator and the state agency disagreed with removal, believing the rule is needed to tie a pipeline's maximum allowable operating pressure (MAOP) to its class location. Similarly, the NAPS report recommended that we only remove the past compliance deadlines from § 192.607, leaving the rest of the rule in place to regulate the relation of class location to stress level on high-stress pipelines.

Section 192.607 was a transitional requirement. Its purpose was to establish plans under which operators initially determined class locations and confirmed or revised the MAOPs of their high-stress pipelines commensurate with their class locations. Section 192.607 provides that the plans had to be executed in accordance with § 192.611. This latter section together with § 192.609 are sufficient to require that operators have up-to-date class location determinations for high-stress pipelines, and maintain the MAOPs of those lines commensurate with their class locations.

Accordingly, § 192.607 is removed from part 192.

*Section 192.611, Change in Class Location*

Section 192.611 requires confirmation or revision of a pipeline's MAOP within 18 months after a change in class location. RSPA proposed to reorganize § 192.611 to clarify the requirement that the MAOP resulting from confirmation or revision may not exceed the pipeline's previous MAOP. This requirement is currently set forth in § 192.611(a)(3)(ii), suggesting that it applies only to confirmations or revisions under paragraph (a)(3), which is not the intent.

Fourteen TPSSC members voted for the proposal and one member abstained.

Five operators and one pipeline-related association commented on the proposal; each agreed with the proposal. Section 192.611 is, therefore, adopted as proposed in the NPRM.

*Section 192.614, Damage Prevention Program*

To decrease excavation damage to pipelines, § 192.614(b)(2) requires operators to notify excavators and the public about the need to locate buried pipelines before excavating. The NPRM proposed to amend the rule to clarify that in contrast to the actual notification required for excavators, only general notification is required for the public. General notice can be given through newspapers, radio, television, or other means of mass communication, as appropriate for the public in the vicinity of the pipeline.

Fourteen TPSSC members voted for the proposal and one member abstained.

Six pipeline operators and two pipeline-related organizations commented. Seven commenters gave their full or qualified approval and one commenter opposed the proposal. The qualified and negative comments were that the rule should inform operators of the acceptable means of notification. We do not feel it is necessary for the rule to do so, however, because the available means of giving general public notice are well known. The amendment to paragraph (b)(2) is adopted as proposed.

*Section 192.619, Maximum Allowable Operating Pressure: Steel or Plastic Pipelines*

Section 192.619(a) prescribes six pressure limits for use in determining the MAOP of steel and plastic pipelines, the lowest of which establishes the MAOP. Paragraph (a)(4) limits the MAOP of furnace butt welded pipe to 60 percent of the mill test pressure. Paragraph (a)(5) limits the MAOP of other steel pipe to 85 percent of the highest test pressure to which the pipe has been subjected, whether by mill test or by the post installation test.

RSPA proposed to repeal paragraphs (a)(4) and (a)(5), primarily because mill tests are not an adequate MAOP consideration. However, to assure consideration of longitudinal joint efficiency, RSPA also proposed, in paragraph (a)(2)(iii), that the class location pressure limit under existing paragraph (a)(2)(ii) be reduced for furnace butt welded pipe and lap welded pipe.

Eleven TPSSC members voted for the proposal, one member supported it with a recommended change, two members opposed it, and one abstained. A member recommended that RSPA not adopt proposed paragraph (a)(2)(iii) because design pressure (under paragraph (a)(1)) adequately covers longitudinal joint concerns.

RSPA concurs with this view as explained below in response to public comment.

Thirteen operators, four pipeline-related associations, and one state agency commented on the proposed amendment. Two operators, one pipeline-related association, and one state agency commented that proposed paragraph (a)(2)(iii) could require operators to reduce the operating pressure of some pipelines or test them to higher pressures than they previously were tested, possibly damaging the pipelines. In addition, some commenters stated that proposed paragraph (a)(2)(iii) would duplicate use of longitudinal joint factors.