

PI-71-0117

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Mr. R. W. McIntosh
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Product Manager
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O. O. Box 876
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Thank you for your letter of August 31, 1971, requesting information on who has the regulatory authority for gas systems, especially in mobile home parks.

It is not possible to answer your letter with specificity with the limited information supplied. As presented it appears to be a question that involves service lines. As you are aware there is a pending notice of Proposed Rulemaking on the definition of "service line." The time for comments ended July 23, 1971, and these comments are now being analyzed.

Under Section 192.3 of the regulations, as presently promulgated, a service line is defined as a distribution line that transports gas to a customer meter set assembly for a common source of supply. In the usual case involving individual customer meters, the distribution system is regulated to the outlet side of each customer meter set assembly. However, where there is no individual customer meter at the point where the gas is delivered for consumption by the utilization equipment, the Office of Pipeline Safety applies the regulations up to the point where the customer meter would normally be, e.g., at the building wall, and the operator has the burden of compliance with the regulations in assuring a safe condition to this point.

Until the rulemaking procedure regarding service lines definition is completed, this office considers the mains and service lines downstream from the master meter of a mobile home park to be a distribution system that is subject to the Natural Gas Pipeline Safety Act. The master meter can be considered analogous to a meter at a city gate, where there are no separate meters for individual users in the distribution system downstream from the meter, and a flat rate is charged. The city is an operator under our regulations. In like manner the landlord, in the case of the mobile home park, is an operator. Section 192.3 of the new Federal minimum safety standards defines "Operator" as a person who engages in the transportation of gas.

We trust that this information will be of assistance to you. If you have any further question please feel free to contact us.

Sincerely,

Joseph C. Caldwell, Director