

MEMORANDUM

January 13, 1972

SUBJ: Reporting of leaks on customer-owned service lines
FROM: Office of Regulation, TGC-20
TO: Chief, Technical Division, TSA-32

You have asked for an opinion as to whether or not an operator of a gas distribution system is required under Part 191 to report leaks which occur on customer-owned service lines to which he supplies gas. It is our opinion that an operator must report such leaks.

The Natural Gas Pipeline Safety Act applies to the transportation of gas in or affecting interstate commerce and to pipeline facilities used in that transportation of gas. This jurisdiction includes such facilities as customer meters and customer-owned service lines that are used to transport gas.

The provisions of Part 191, issued under §12 of that Act, require an operator to report leaks occurring on his distribution system. Since an operator's system, as defined in Part 191, includes all pipeline facilities which he uses to transport and distribute gas, customer-owned service lines are part of that system, and, as a consequence, leaks occurring on those service lines must be reported by the operator.

William D. Broderick