

Mr. Larry E. Waldrop  
Utilities Engineer  
Alabama Public Service Commission  
P. O. Box 991  
Montgomery, Alabama 36102

Dear Mr. Waldrop:

This is in reply to the two questions asked in your letter of June 1, 1973.

Question: "...under 192.619 and 192.621. If a gas system is an all steel system and designed and tested for a 100 lb. system and has only operated at 30 lbs. for the last ten years, what is his M.A.O.P.?"

Answer: This system is governed by §192.619(c) which, in effect, allows the pipeline to operate at the highest actual operating pressure to which it was subjected during the 5 years preceding July 1, 1970. In the given case, the system operated only at 30 lbs. in that 5-year period. The M.A.O.P. is, therefore, 30 lbs.

Question: "...where a school is master metered and distributes the gas through its own piping to different buildings and they are ultimate consumers, would they be under gas pipeline safety regulations?"

Answer: One of the characteristics of a master meter system that makes it subject to the regulations is a transfer of the gas from the operator to other persons who are the ultimate consumers of the gas. In the situation described, however, the school taking delivery on gas through the "master" meter is not reselling or distributing any of the gas to any other person. Where the gas is being used entirely by school employees for school purposes on school property, the gas system is not subject to the federal gas pipeline safety regulations.

If you have further questions in this regard, please contact us.

Sincerely,

/signed/

Joseph C. Caldwell  
Director  
Office of Pipeline Safety