

December 1, 1976

Ms. E. A. Hamilton  
1724 Minnewawa Springs  
Clovis, California 93612

Dear Ms. Hamilton:

Thank you for your letter dated October 25, 1976, concerning the application of the Federal gas pipeline safety standards (copy enclosed) to gas pipeline distribution systems in mobile home parks.

The standards are established under the Natural Gas Pipeline Safety Act of 1968 (the Act), and apply to the gathering, transmission, and distribution of gas by pipeline. Gas pipelines in a mobile home park are covered by the standards if they are used to deliver gas to the persons who consume it, normally the tenants in the park.

This Office is responsible for enforcing compliance with the standards in California against systems in mobile home parks which are not operated by public utilities. In order to maximize the public benefit from our limited resources, however, our enforcement activities are primarily directed toward the major systems under our jurisdiction and to a far lesser degree systems in mobile home parks.

At present we have under consideration a petition for rulemaking to exclude systems in mobile home parks from the jurisdiction of the Federal standards because of alleged difficulties in compliance. Our main concern is whether this proposal would have an adverse effect on the public's interest in pipeline safety. We do not yet have enough information to reach a conclusion and have requested the advice of the Technical Pipeline Safety Standards committee, a Federal Advisory Committee established under the Act. The Committee will address the subject at its next meeting on December 16 and 17, 1976.

This Office does not have statutory authority over the charges made by operators of gas systems to recover the costs of operating and maintaining the systems.

We appreciate your concern over this matter.

Sincerely,

Cesar DeLeon  
Acting Director  
Office of Pipeline  
Safety Operations

Enclosure

October 25, 1976

Department of Transportation  
Material Transportation Bureau  
Office of Pipeline Safety Operation  
Washington, D.C. 20590

Gentlemen:

This is with reference to enforcing your regulation "Federal Gas Pipeline Regulation", that compels Mobile Home Park Owners to spend, thru [sic] out the United States, millions of dollars, for which most people can see no earthly reason.

In the case of the park in which we live the owners, "Travelodge", were compelled to increase our rent by \$12.50 per month to recover this added expense. Our Park, as no doubt most Mobile Home Parks, are occupied by a large percentage of Senior Citizens living on a fixed income, many on just their Social Security. This added monthly cost will make it just that much more difficult for them to get by.

May I suggest you give serious consideration to recinding [sic] the enforcing this regulation which will increase inflation, and will add an extra burden to those living on fixed incomes. No doubt our Park owners, as well as other Park owners would reduce this rental increase if you cancel the enforcement of this regulation.

Sincerely yours,

E A Hamilton  
1724 Minnewawa Springs  
Clovis CA 93612

P.S. I will appreciate your reaction to this letter.