

October 11, 1978

Mr. James C. Baker
Vice President
Arkansas Louisiana Gas Company
P.O. Box 751
Little Rock, Arkansas 72203

Dear Mr. Baker:

Your letter of September 1, 1978, requesting an interpretation of §192.727(d) has been forwarded to this Office for response. In your letter you state your position that this part of the regulations does [sic] not apply when a responsible party requests that service be transferred to their name with no actual discontinuance. Your interpretation of this part for this type of situation is correct. The situation you describe is in the nature of an accounting procedure whereby customers are changed for billing purposes but discontinuance of gas service to the premises is not effected. Premises is meant to mean the individual house, apartment, place of business, etc., involved and not necessarily the entire building.

You also ask whether this regulation applies in a situation where an interim period exists when gas service is not requested by another party. In this type of situation, the provisions of §192.757(d) do apply.

Thank you for your interest in matters of pipeline safety.

Sincerely,

Cesar DeLeon
Associate Director for
Pipeline Safety Regulation
Materials Transportation Bureau

September 1, 1978

Mr. Joe De La Funte
U.S. Department of Transportation
Office of Pipeline Safety
6634 Hornwood Drive
Houston, Texas 77036

Dear Mr. De La Funte:

We are requesting your assistance in the interpretation of DOT Regulation 192.727. This regulation, in part reads:

- (d) Whenever service to a customer is discontinued, one of the following must be complied with:
 - (1) The valve that is closed to prevent the flow of gas to the customer must be provided with a locking device or other means designed to prevent the opening of the valve by persons other than those authorized by the operator.
 - (2) A mechanical device or fitting that will prevent the flow of gas must be installed in the service line or in the meter assembly.
 - (3) The customer's piping must be physically disconnected from the gas supply and the open pipe ends sealed.

In our opinion, this regulation clearly states that one or more steps outlined in (1), (2), and (3) must be followed when it is necessary to physically restrict the flow of gas to a customer's premises. We do not envision the implementation of this regulation when a request is initiated to leave the service on for a subsequent user.

The key point is whether this regulation only applies in a situation where an interim period exists when no gas service is requested by another party. Our position is that this was a specific intent of this regulation and it does not apply when a responsible party requests that service be transferred to their name with no actual discontinuance.

We would be most appreciative of your interpretation of this paragraph.

Very truly yours,

ARKANSAS LOUISIANA GAS COMPANY

James C. Baker

Vice President