

PI-82-0100

January 19, 1982

Mr. James S. Stites
Chief, Gas Department/Utilities Division
South Carolina Public Service Commission
O.O. Drawer 11649
Columbia, South Carolina 29211

Dear Mr. Stites:

Thank you for your letter of December 29, 1981, commenting on our recent interpretation of §192.727 (d).

We recognize the potential for harm when customer stop valves can be reopened by an impatient customer following a service outage. Nevertheless, it is our opinion that the protective measures called for by §192.727(d) were not intended to apply to temporary interruptions of gas flow that do not involve termination of service to a customer. In making this interpretation, we were constrained by the record of the original proceeding (docket no. OPS-10), and our reading of that record does not lead us to conclude that §192.727(d) was intended to cover all situations in which a customer's stop valve is closed.

Sincerely,
Melvin A. Judah
Acting Associate Director for
Pipeline Safety Regulation
Materials Transportation Bureau

State of South Carolina
The Public Service Commission
P.O. Drawer 11649
Columbia, South Carolina 29211

December 29, 1981

Mr. Melvin A. Judah
Acting Associate Director for Pipeline Safety Regulation
Material Transportation Bureau
Washington, D.C. 20590

Dear Mr. Judah:

This is in reference to your recent letter to Mr. H. R. Garabrant, Public Utility Commission of Oregon, concerning an interpretation of Paragraph 192.727 (d). It is my understanding, in reviewing your letter, that your office is of the opinion that stop valves need not be protected against unauthorized operation in the event the valves are closed because of an outage. I assume your reference to an outage could be an interruption of service involving the loss of pressure to several customers.

If my understanding is correct, I am unable to see that your interpretation of 192.727 (d) meets the intent of the Regulation. As stated above system outages can involve the loss of service to several customers. In this event it would be necessary for the operator to close the stop valves to the affected customers before service is restored to the *system*. Because of various circumstances, such as the inability of the operator to gain access to relight customer appliances, the loss of service to individual customers could involve several hours or days. Based on my experience, because of an incident such as this, it is not uncommon for customers to open stop valves and relight appliances. Situations such as this can result in injuries, loss of life or property damage.

In summary we are unable to substantiate that your interpretation takes into account the above situation and we would expect our operators to invoke the requirements of 192.727 (d) in the event the above situation occurs. We would appreciate your reconsideration of your interpretation of this Regulation.

Yours very truly,
James S. Stites, Chief
Gas Department
Utilities Division