

PI-83-0102

February 9, 1983

Mr. Milt Schneider  
Gas Pipeline Safety Engineer  
Department of Regulatory Agencies  
Colorado Public Utilities Commission  
500 State Services Building  
1525 Sherman Street  
Denver, Colorado 80203

Dear Mr. Schneider:

Your letter to me of January 28, 1993, asks three questions relating to the responsibility of a master meter operator versus a supplier for certain facilities used to supply gas to a master meter operator. Your questions and the OPR response are as follows:

Case 1: The gas supplier (municipal) requires the property developer to provide gas service piping to the property line. The activity requires a permit from the regional building department and is subject to inspector and approval by a regional building department inspection. The installation must meet the requirements of the gas supplier (a different of branch government). Upon completion and acceptance, the gas supplier installs a master meter at (1) a convenient location; or (2) at the building(s).

Question: At which point on the service line does the supplier responsibility end 192.13(c) and the master meter operator responsibility begin? Does the property line have any significance?

Response: Compliance with 49 CFR Part 192 is the responsibility of the pipeline operator. Since the supplier would have operational control of the gas through the meter and piping upstream of the master meter, the supplier would be responsible for that piping. The property line has no significance in this determination.

Case: The supplier in Case I performs leak surveys on service lines to the meter but has no records as to the location of service lines. Leaks are red tagged and the customer is required to have same repaired by a licensed plumber.

Question: Does this leak survey satisfy the minimum requirements of part 192.723 for the supplier? Does the survey satisfy the requirement for the master meter operator if the meters are at the building?

Response: For the supplier the answer is yes, provided leakage surveys meet all applicable provisions of §192.723. From the information you provided, it is not possible to determine whether the leakage survey would meet any obligation the master meter operator might have.

Final Question: The "Guidance Manual For Operators of Small Gas Systems" shows a drawing of a master meter piping system showing master meter operator's responsibility. Does this drawing have an official interpretation status?

Response: The drawing referred to is not an official interpretation by Materials Transportation Bureau, but rather should be considered as advisory material or as a training aid.

Sincerely,  
Original signed by  
Richard L. Beam  
Associate Director for  
Pipeline Safety Regulation



State of Colorado  
The Public Utilities Commission  
Department of Regulatory Agencies  
500 State Service Building  
1525 Sherman Street  
Denver, Colorado 80203

January 28, 1983

Richard L. Beam, Associate Director  
Pipeline Safety Regulation  
Materials Transportation Bureau, DOT  
700 7<sup>th</sup> Street Southwest  
Washington, D.C. 20590

Subject: Master Meter/Supplier Responsibilities

Case 1:           The gas supplier (municipal) requires the property developer to provide gas service piping to the property line. The activity requires a permit from the regional building department and is subject to inspection and approval by a regional building department inspector. The installation must meet the requirements of the gas supplier (a different branch of government). Upon completion and acceptance, the gas supplier installs a master meter at (1) a convenient location; or (2) at the building(s).

Question:        At which point on the service line does the supplier responsibility end 192.13 (c) and the master meter operator responsibility begin? Does the property line have any significance?

Case 2:           The supplier in Case 1 performs leak surveys on service lines to the meter but has no records as to the location of service lines. Leaks are red tagged and the customer is required to have same repaired by a licensed plumber.

Question:        Does this leak survey satisfy the minimum requirements of part 192.723 for the supplier? Does the survey satisfy the requirement for the master meter operator if the meters are at the building?

Final Question: The "Guidance Manual for Operators of Small Gas Systems" shows a drawing of a master meter piping system showing master meter operator's responsibility. (page vi). Does this drawing have an official interpretation status?

Milt Schneider, P.E.  
Gas Pipeline Safety Engineer