

June 29, 1992

Mr. Philip Sher  
Gas Pipeline Safety Unit  
State of Connecticut  
Department of Public Utility Control  
One Central Park Plaza  
New Britain, CT 06051

Dear Mr. Sher:

This responds to your letter of March 17, 1992, regarding natural gas vehicles (NGV) and NGV fueling stations. You asked several questions related to whether NGV fueling stations come under the Natural Gas Pipeline Safety Act of 1968 (NGPSA) (49 App. U.S.C. 1671 et seq.) and the safety standards in 49 CFR Part 192.

The NGPSA and Part 192 standards apply to facilities used in a system of pipeline transportation of gas to consumers. Based on the legislative history, we believe Congress intended the NGPSA to cover the traditional pipeline transportation of gas to consumers. This transportation involves the delivery of gas through piping permanently attached to consumer premises.

An NGV fueling station is a non-traditional means of delivering gas to consumers. Delivery is not done through piping attached to consumer premises. Rather consumers receive gas in their vehicles at a dispensary akin to a gasoline filling station. We do not consider such non-traditional means of delivering gas as part of a pipeline transportation system neither to the NGPSA. Thus, NGV fueling stations are subject neither to the NGPSA nor 49 CFR Part 192. The limit of jurisdiction of Part 192 over a pipeline supplying an NGV fueling station would be the boundary of the station or the outlet of any device necessary to control pressure in the pipeline, whichever is farther downstream.

I apologize for the delay in answering your letter. Please call me if there are any questions.

Sincerely,

Cesar De Leon  
Director, Regulatory Programs  
Office of Pipeline Safety