

June 25, 1993

This is in response to correspondence dated April 30, 1993, concerning a client of your consortium. The client is a major gas and electric utility who sub-contracts work to be done on natural gas pipelines within residential (homes) property and is requesting an interpretation to determine whether such work would subject the contractor's employees to the drug testing provisions under Part 199?

Your correspondence further indicated that the contractor will be hired to repair and replace current (live) pipes as well as lay new pipe within the home.

Based on the limited information supplied in your correspondence, it is difficult to determine if the repair and replacement of these gas pipelines also includes work on pipelines outside the residence. In most cases, the Federal and/or state jurisdiction over service line does not include piping within the home since the extent of the Federal and/or state jurisdiction ends at the meter, which is usually located at the outside wall of a residence.

We suggest that you contact Russell Copeland, Program Manager, California Public Utilities Commission, 1145 Market Street, Second Floor, San Francisco, CA 94103, phone number (415) 557-3304, to discuss in detail the nature of the work to be completed by the contractor.

Thank you for your inquiry. Please let me know if you need any more information about our drug testing requirements.

Sincerely,

Richard L. Rippert  
Drug Compliance Coordinator  
Office of Pipeline Safety  
Compliance