

Mr. Massoud Tahamtani  
Utilities Manager  
Division of Energy Regulation  
Virginia State Corporation Commission  
P.O. Box 1197  
Richmond, VA 23209

Dear Mr. Tahamtani:

I am responding to your letter about three distribution piping systems. You requested our opinion on whether the systems are subject to Part 192.

The definition of "service line," in § 192.3, represents the limit of Part 192 jurisdiction over gas distribution piping. Under this definition, Part 192 jurisdiction ends at the outlet of a meter that measures the transfer of gas to a consumer, or at the connection to piping not owned by an operator through which a consumer receives gas, whichever point is farther downstream.

The first system you described begins at a transmission line and distributes gas to a farm house and outbuildings, including the residence of a farm worker who receives gas as part of his pay. Under these circumstances, it is reasonable to assume that the worker's residence and associated personal consumption of gas is an intrinsic part of the farming business. Thus, all gas transferred to the farm is consumed by the farm, and the farm is not an operator. If the transmission line delivers metered gas to farm piping, the jurisdiction of Part 192 ends at the outlet of the meter. If there is no meter, jurisdiction ends where the operator's piping connects to farm piping.

The second system transports gas to a public school, which has multiple buildings and buried gas piping. The school charges community organizations a fee to occasionally use the school cafeteria and gas cooking appliances under the supervision of a school employee. In this case, both the school and the organizations consume gas through the same equipment. But the school is by far the largest and most frequent consumer of gas through that equipment. As such, for purposes of determining Part 192 jurisdiction, it is reasonable to consider the school solely as a consumer, and not as an operator. Assuming the operator delivers metered gas to the school, Part 192 jurisdiction ends at the outlet of the meter.

The third system fuels street and entrance lighting in a planned community. The community association maintains the system and pays a flat fee to the local gas company for all the gas consumed. Because nobody other than the association is consuming any of the gas, the association is the consumer for purposes of determining Part 192 jurisdiction. Thus, in the absence of a meter, Part 192 jurisdiction ends where the gas company's piping connects to the community association's piping.

I hope you find these opinions useful. If you need any further assistance, please call me at (202) 366-4565.

05/06/99

191.3 (Master Meter)  
192.3 (Service Line)  
96-02-13.doc

Sincerely,

Richard D. Hurliaux, P.E.  
Director for Technology and Regulations  
Office of Pipeline Safety

cc:  
DPS-11, 10, 20; DCC-1; DPS-2, 1, 24; TSI  
DPS-11:LMFurrow:366-2392:2/13/96  
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