

PI-03-0101

U.S. Department of Transportation  
Research and Special Programs Administration  
400 Seventh Street, S.W.  
Washington, D.C. 20590

February 14, 2003

Mr. Don A. Ledversis  
Pipeline Safety Engineer  
Rhode Island Division of Public Utilities & Carriers  
89 Jefferson Boulevard  
Warwick, RI 02888

Dear Mr. Ledversis:

This is in response to your request of January 25, 2002, for an interpretation of the jurisdictional status of the campus gas distribution system operated by Bryant College in Smithfield, Rhode Island. The question is whether the campus gas piping system is a *Master Meter System* subject to the gas pipeline safety regulations in 49 CFR Parts 191 and 192. The college claims that this system does not meet the definition of *Master Meter System* because it only uses gas to provide heat and hot water to the campus buildings and does not resell the gas.

To conclude that the Bryant College gas distribution pipeline facilities are subject to safety regulation, we need to determine that the system is a pipeline facility and that the gas is being delivered to consumers who, directly or indirectly, pay for the gas. *Master Meter System* is defined in the pipeline safety regulations at 49 CFR § 191.3:

.. a pipeline system for distributing gas within, but not limited to, a definable area, such as a mobile home park, housing project, or apartment complex, where the operator purchases metered gas from an outside source for resale through a gas distribution pipeline system. The gas distribution pipeline system supplies the ultimate consumer who either purchases the gas directly through a meter or by other means, such as by rents.

*Pipeline facility* is defined in the pipeline safety regulations at 49 CFR § 192.3:

...new and existing pipelines, rights-of-way, and any equipment, facility, or building used in the transportation of gas or in the treatment of gas during the course of transportation.

Bryant College's system is clearly a pipeline facility. It distributes gas through underground pipelines to campus buildings. It does not appear to meet the definition of *Master Meter System* because it is using the gas delivered through its pipeline system to provide heat and hot water to campus buildings. In this instance the college would be the consumer of the gas.

However, if the Bryant College gas system provides gas to consumers, such as concessionaires, tenants, or others, it is engaged in the distribution of gas, and the persons to whom it is providing gas would be considered the customers even though they may not be individually metered. In this situation the pipelines downstream of the master meter used to distribute the gas to these ultimate consumers would be considered mains and service lines subject to the Federal pipeline safety regulations. The Bryant College pipeline system would then be a *Master Meter System*.

In conclusion, the Bryant College gas distribution system is a *Master Meter System* subject to pipeline safety regulation under 49 CFR Parts 191 and 192 if it is providing gas to customers in addition to providing heat and hot water to campus buildings.

If you have any further questions about the pipeline safety regulations, please contact me at (202) 366-4565.

Sincerely,  
Richard D. Huriaux, P.E.  
Manager, Regulations  
Office of Pipeline Safety