

07/09/96

Mr. Greg Scoby, P.E.
Senior Engineer
City of Palo Alto Utilities Department
P.O. Box, 10250
Palo Alto, CA 94303

Dear Mr. Scoby:

We are responding to your letter requesting waivers for the Palo Alto municipal gas system pursuant to our authority under Section 60106(a) Agreement (1). The waiver requests apply to 49 CFR §§ 192.375 and 192.3.

Section 192.375 - The request is to allow an anodeless riser, connected at the end of an underground plastic gas supply line, to make an aboveground transition to metallic piping that runs up the outside building wall.

This installation appears typical for an anodeless riser. While inside the riser casing, the aboveground segment of plastic pipe is protected from deterioration and external damage as required by § 192.375(a)(1). As long as the encased plastic pipe is not supporting external loads in violation of § 192.375(a)(2), there is no conflict with this section.

Section 192.3 - The request is to allow a main on private property that transports gas from another main (located in a public street or in a utility easement) to a privately-owned manifold with multiple customer meters, to be treated and operated as a service line.

The installation appears similar to an approval for a waiver we issued to the Kansas Corporation Commission on July 3, 1995. However, in the near future, your municipal gas system is expected to come under the authority of the California Public Utilities Commission. Subsequent to that change of authority, we feel it would be more appropriate to submit this matter to Mr. Harry Strahl at the California Public Utilities Commission.

Sincerely,

Richard B. Felder
Associate Administrator
for Pipeline Safety