

PI-71-0103

March 8, 1971

Mr. Robin H. Harbin
Attorney-Adviser
Department of Housing
& Urban Development
Daniel Bldg., 15 South 20th Street
Birmingham, Alabama 35233

Dear Mr. Harbin:

This is in reply to your letter of February 24, 1971, concerning the applicability of 49 CFR, Part 192 to gas lines owned by a public housing authority of a municipality.

This office considers the mains and service lines downstream from the master meter to be a distribution system that is subject to the Natural Gas Pipeline Safety Act. The master meter is analogous to a meter at the city gate, where there are no separate meters for individual users in the distribution system downstream from the meter at the city gate, and a flat rate is charged. The municipality, in the case of the housing complex, is an operator under our regulations. Section 192.3 of the new Federal Minimum Safety Standards defines "operator" as a person (including a municipality) who engages in the transportation of gas.

Under §192.3 of the regulations, a service line is defined as a distribution line that transports gas to a customer meter set assembly from a common source of supply. In the usual case involving individual customer meters, the distribution system is regulated to the outlet side of each customer meter set assembly. However, where there is no individual customer meter at the point where the gas is delivered for consumption by the utilization equipment, the Office of Pipeline Safety applies the regulations up to the point where the customer meter would normally be - i.e. at the building wall, and the operator has the burden of compliance with the regulations in assuring a safe condition to this point.

If you have any further questions, do not hesitate to ask.

Sincerely,

Joseph C. Caldwell
Director
Office of Pipeline Safety