

PI-73-0111

06-18-73

Mr. R. J. Bartol, Utilities Engineer
Utilities Division
Arizona Corporation Commission
1688 West Adams
Phoenix, Arizona 85007

Dear Mr. Bartol:

Your letter of May 3, 1973, requests clarification as to responsibility for safety of a gas system downstream of a master meter. Specially you ask if inspection and reporting of master meter systems for compliance become reporting of master meter systems for compliance become the responsibility of the State office as a result of the recently amended definition of "service line."

Amendment 192-13 (38 F.R. 9083) redefined "service line" so that the term now includes operator-owned piping downstream of the customer meter. The preamble to Amendment 192-13 explained that service lines exist within a master meter system and, as newly defined, are subject to the regulations. That amendment, however, did not have the effect of bringing any master meter system within the regulations that was not previously subject to the regulations nor did it grant jurisdiction over master meter systems to any State agency that did not already have that jurisdiction under State law.

The information submitted along with you Commission's 1863 certification under section 5(a) of the Natural Gas Pipeline Safety Act indicates that intrastate master meter systems do not come within the safety regulatory jurisdiction of your commission under State law. Responsibility for such systems, therefore, remains with the office of Pipeline Safety. Any chance to bring these systems under the Commission's safety jurisdiction can be effected only in accordance with State law and not as a result of regulations issued by this office.

I hope this letter clarifies the matter for you, and I urge your Commission to seek appropriate State legislation to have the master meter systems brought under its safety regulatory jurisdiction. Please call on us if we may be of further assistance.

Sincerely,

/signed/

Joseph C. Caldwell
Director
Office of Pipeline Safety