

December 17,1974

Mr. Wayne L. Carlson, Inspector
Utah Public Service Commission
330 East 4th South
Salt Lake City, UT 84111

Dear Mr. Carlson:

This refers to your letter of November 4, 1974, concerning the applicability of Part 192 to master meter systems in trailer parks and apartment complexes.

The master meter systems subject to Part 192 are distribution systems used in the transportation of gas under the Natural Gas Pipeline Safety Act of 1968. We have interpreted this transportation to involve both the sale and delivery of gas through pipelines to where the gas is finally consumed. Where there is both a sale of gas, based either on a meter reading or a flat rate, and a delivery of gas by pipeline to an ultimate consumer, the person distributing the gas is operating a gas distribution system subject to Part 192. For instance, the owner of an apartment complex who furnishes gas to each tenant through pipelines and charges a flat rate for gas as part of the monthly rent is an operator under Part 192. The pipelines subject to Federal jurisdiction are those transporting gas to the downstream side of each meter or to the customer's piping, whichever is farther downstream.

We trust this satisfactorily responds to your inquiry.

Sincerely,

/signed/

Joseph C. Caldwell
Director
Office of Pipeline Safety

November 4, 1974

Mr. Joseph Caldwell, Director
Office of Pipeline Safety
Dept. of Transportation
800 Independence Ave., S. W.
Washington, D. C. 20590

Dear Mr. Caldwell:

In bringing mobile home parks under regulation of Section 192 Mr. Neil Wagstaff, owner of the Trailer City trailer court in Provo, Utah, and also representing the Martin Trailer Court, which is relatively similar to his own, has contested the fact that he should be responsible for compliance with Section 192. He feels that he is the ultimate consumer of all the gas which is burned in his trailer park. He owns thirteen trailers and one duplex which are all master-metered. He controls the turn-off and turn-on of the heat in the spring and fall and also controls the setting of the water temperatures on the water heaters in each of these units. He does have gas stoves, which of course, are under the control of the tenants. I have tried to explain to him that he was the intermediate consumer and not the ultimate consumer, but he feels he should receive a ruling from your office. Would you please give us an answer on this question as soon as possible.

We have also been proceeding on multiple apartment units which are master-metered to require these people to become operators under 192 regulation and furnish the necessary inspection and maintenance plans and perform the required functions. This is not specifically outlined in the discussion of the Amendment 192-15 redefining device lines, but in our discussion at Oklahoma City, it was our understanding that this was the intent of the law to bring all lines which were not regulated by local conditions under the jurisdiction of 192. Would you please comment on a separate page on your reply on this matter.

We enjoyed the visit of your representative, Jim Abbee here in our office last Tuesday and feel that we gained a better understanding of where you want this program to go.

Your truly,

Wayne L. Carlson, Inspector