

because operators may call these assemblies either meter headers or meter manifolds. RSPA/OPS agrees that a single term is appropriate and, because of this comment, used "meter header or manifold" in the final definition of "service line."

ConEd opposed the proposed definition of "service line" because, like the present definition, it includes interior piping that leads to meters in individual apartments or to meters in basements. Primarily because of the difficulty of checking such piping for leaks, ConEd suggested that RSPA/OPS exclude interior piping from the final definition. This comment, however, addresses an issue the NPRM did not cover. RSPA/OPS proposed to broaden the present service line definition, not limit it to outside piping. Therefore, RSPA/OPS has not considered the comment in developing the final definition.

ARPSC commented that, in its experience, lines serving multiple customers are the lines most frequently damaged by third parties, with most damage occurring at burial depths between four and 18 inches. Consequently, ARPSC suggested the burial depth of service lines supplying gas to multiple customers be at least 24 inches. RSPA/OPS did not adopt this comment because increasing burial depth is not generally recognized as one of the best ways to reduce excavation damage to buried utilities. According to a report RSPA/OPS prepared for Congress, *Common Ground: Study of One-Call Systems and Damage Prevention Best Practices*, the key elements in prevention of excavation damage involve the use of one-call systems, accurate utility mapping, advance notice of excavation, accurate temporary surface marking before excavation, and safe excavation practices.

Regarding the proposed "service line" definition, RSPA/OPS asked how it might define the term "small commercial customers." In response, ARPSC said volume should be limited to 10 percent above the volume used by a normal residential customer. Iowa recommended the definitions that operators include in tariffs established under utility regulations. MichCon proposed meter capacity or type or regulator size or type as possible bases for a definition. Finally, NiSource suggested that volume be limited to no more than twice the volume used by the operator's largest residential customer.

Upon further consideration, RSPA/OPS decided not to define "small commercial customers." As the Iowa comment suggests, distribution

operators commonly use this term to refer to a class of service offered for sale under state or municipal rate regulations. Because different definitions of the term may be in use, a separate part 192 definition could lead to confusion in identifying a pipeline as a service line. So, without a part 192 definition, the term will apply in part 192 as it does in the industry, to those customers each operator defines as "small commercial customers" for tariff purposes.

*Section 192.123, Design Limitations for Plastic Pipe.* RSPA/OPS proposed to delete the second sentence of § 192.123(b)(2)(i) as obsolete. This sentence allows operators to use plastic pipe manufactured before May 18, 1978, and strength rated at 73 °F at temperatures up to 100 °F. RSPA/OPS also invited operators to tell us whether they still have any stockpiles of this pipe that they plan to use at temperatures above 73 °F. Only one operator responded. NiSource stated that it does not have stockpiles of plastic pipe intended for use at temperatures greater than 73 °F. Since RSPA/OPS received no adverse comment on the proposed rule change, RSPA/OPS adopted it as final.

*Section 192.321, Installation of Plastic Pipe; Section 192.361, Service Lines: Installation.* Section 192.321(e) requires that in transmission lines and mains, buried plastic pipe that is not encased must have an electrically conductive wire or other means of finding the pipe. Because of reported lightning damage to buried plastic pipe, RSPA/OPS proposed to add the following new requirements to this rule, and to establish similar requirements in § 192.361(g) for plastic service lines:

Tracer wire may not be wrapped around the pipe and contact with the pipe must be minimized. Tracer wire or other metallic elements installed for pipe locating purposes must be resistant to corrosion damage, either by use of coated copper wire or by other means.

Regarding proposed § 192.321(e), AGA, NiSource, Oleksa, Southwest, and Yankee were concerned that government inspectors might interpret "contact with the pipe must be minimized" too stringently. AGA and NiSource thought inspectors might interpret the term to prohibit contact with the pipe. These commenters also speculated inspectors might interpret the term to preclude trenchless installation of plastic pipe. Oleksa was concerned the proposed wording would require separation of wire from pipe even where total separation is not practicable, as in trenchless installations. Yankee wanted the final

rule to state specifically that incidental contact between tracer wire and plastic pipe is all right.

RSPA/OPS thinks these proffered interpretations may be unrealistic because minimized contact implies some contact is permissible. Still, in view of the commenters' concerns, RSPA/OPS has used the following wording in the final rule: "contact with the pipe must be minimized but is not prohibited." RSPA/OPS wants to ensure the rule does not deter the common practice in trenchless installations of randomly taping tracer wire to the pipe to control separation during installation.

AGA, GPTC, Peoples, PSE&G, and Dominion Resources thought proposed § 192.361(g) would require that steel service lines have tracer wire, because the wording was not limited to plastic pipe. To remove this potentiality, RSPA/OPS added the word "nonmetallic" to final § 192.361(g).

City Utilities and Southwest were concerned that trying to reduce the risk of lightning damage by separating tracer wire from pipe could lead to inaccurate pipe location and excavation damage. The purpose of tracer wire, as § 192.321(e) states, is to provide a means of locating buried plastic pipe. Neither present nor proposed § 192.321(e) would permit installation of tracer wire so far away from the pipe that it hampers attempts to accurately find the pipe.

MichCon suggested removing "copper" from "coated copper wire" so the rule would not preclude the installation of other types of corrosion resistant wire. RSPA/OPS did not adopt this comment because the proposed rule would allow operators to use "other means" to provide corrosion resistant wire.

*Section 192.353, Customer Meters and Regulators: Location.* RSPA/OPS proposed to amend § 192.353(a) to emphasize that operators must protect meters and service regulators from vehicular damage. Under the present rule, protection from vehicular damage falls under the general requirement to protect meters and service regulators from "corrosion and other damage."

AGA, GPTC, Dominion Resources, Oleksa, Peoples, PSE&G, MichCon, and Yankee were concerned the proposed rule would apply to meters or service regulators installed indoors or other places where there is only a remote chance of vehicular damage. As stated below under the "Advisory Committee" heading, the Technical Pipeline Safety Standards Committee had a similar concern about the proposal. The committee recommended RSPA/OPS limit the requirement to outdoor