

## FREQUENTLY ASKED QUESTIONS

Since the final rule addressing excess flow valve installation has not been issued, several questions have been asked by operators of distribution systems in Tennessee. Questions recently asked by operators and our guidance relative to each issue are as follows:

### Question

*Is it mandatory that the operator begin installing excess flow valves on new or replaced single family residence service lines on and after June 1, 2008?*

The Gas Pipeline Safety Division (GPSD) will enforce the final rule that will be based on the requirement included in the PIPES Act of 2006. It has been determined that the installation of excess flow valves as set forth in the PIPES Act will contribute to the safety of a natural gas distribution system. Therefore, the GPSD will approach this issue with the mindset that each operator has installed and will continue to install excess flow valves on all new and replaced single family service lines installed after June 1, 2008.

The GPSD can only hold an operator in violation if the rule is published and in effect. However, since there is an explicit statutory direction to operators, private litigation would likely consider that a reasonable “standard of care” should include the timely installation, as appropriate, of excess flow valves. In other words, an accident involving a service line installed or replaced to a single family residence after June 1, 2008 without an appropriately designed excess flow valve could result in a litigation decision against the operator.

**GPSD guidance: install excess flow valves on all new or replaced single family residence service lines installed after June 1, 2008.**

### Question

*Is it mandatory that excess flow valves be installed on split services? If so, where is the EFV installed?*

Some operators have requested guidance relative to the requirements of installing excess flow valves on split services. As used in this question, a split service is defined as a single pipe extending some distance from the main then splitting through some type of branch connection and extending to two adjacent or adjoining single family residences.

Since the PIPES Act of 2006 refers to a single family residence service line, it is important to understand how Part 192 defines a service line. Effective October 15, 2003, Amendment 192-93 to Section **192.3** defined a service line as a distribution line that transports gas from a common source of supply to an individual customer, to two adjacent or adjoining residential or small commercial customers, or to multiple residential or small commercial customers served through a meter header or manifold. A service line ends at the outlet of the customer meter or at the connection to a customer's piping,

whichever is further downstream, or at the connection to customer piping if there is no meter.

Considering the above service line definition, a distribution pipe extending from a natural gas main to two adjacent or adjoining residential customers would be a service line and would include the section of pipe extending from the main to the where the pipe splits or 'tees' to extend to each individual customer. However, the PIPES Act of 2006 clearly states that EFVs will be installed on single family residence service lines.

With the above definition in mind and reviewing the section of the PIPES Act of 2006 included above, it does not appear to require that an excess flow valve be installed on a service line providing natural gas to two single family residences (split service). This interpretation has also been discussed with Lane Miller of the Pipeline and Hazardous Materials Safety Administration (PHMSA), Training and Qualifications and he is in agreement. When asked if an EFV had to be installed downstream of the split, Mr. Miller's interpretation was "no". This seems to be consistent with the requirement in Section **192.381** that an EFV be installed as near as practical to the fitting connecting the service line to the main providing the source of natural gas. The branch or tee could be located at any point between the main and the two residences (probably at some point along the property line) thus an EFV placed downstream of the split could provide protection to only a short section of service line.

**GPSD guidance: the purpose of installing excess flow valves is to minimize any resulting fire, explosion or gas migration in the effort to prevent injury and/or property damage as a result of severing or puncturing a service line. Without a final rule to guide a thought process to a decision and considering the position of an operator, our course of action would be as follows:**

- *Limit the installation of split services as much as possible.*
- *Communicate with a manufacturer relative to selection of an EFV designed to operate as intended under split service conditions.*
- *Install excess flow valves on split services as near to the main as practical realizing that if one branch of the service is damaged resulting in closure of the EFV, both residences will lose gas service. **Reasoning** - this policy provides the highest level of protection afforded by installation of an excess flow valve under the scenario of a split service installation. This course of action should also eliminate the concern of what the final rule might contain with respect to installation of excess flow valves in the single family residence services after the split.*