

Shane Fillman  
416 N. 8<sup>th</sup> Street  
Allentown, PA 18102  
610-774-0460

June 16, 2012

Public Utility Commission  
Attention: Rosemary Chiavetta – Secretary  
P.O. Box 3265  
Harrisburg, PA 17105-3265

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JUN 16 2012

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

L-2009-210 7155

**RE: Regulation #57-277 IRRC Number 2950 (Gas meter and regulator location)**

Dear Rosemary Chiavetta:

I live in Allentown, PA in the Old Allentown Historic District and would greatly appreciate if the PUC Commissioners would allow gas meters and regulators to remain in the basements of properties located at least in the Historic Districts for the following reasons that I will outline in this letter and packet of information included. Many residents are still not happy with the idea of having a gas regulator in the front of their property even though the gas meters would remain in the basements. While speaking with Paul Metro from the PUC at a public meeting on 9/14/2011, his main concern with a gas vent in front of a property instead of a gas regulator being placed outside being able to discharge directly into the atmosphere was a concern of bees or something blocking the gas vent or even someone tampering with the vent.....which makes no sense because the gas vent has a protective screen preventing bees or other foreign objects from entering and potentially blocking the vent plus if the property service line is high pressure (60psi) that alone would blow out any insects / nest in a hurry. Also, what is to prevent the same type of things from happening to the discharge outlet on the gas regulator vs. a gas vent?

Our community residents would ideally like to see all equipment remain in the basement and have a gas vent installed to allow any discharge from the regulator when high pressure gas is being supplied to a property to be vented to the outside atmosphere safely, or would like to have a buried vault on the outside of the property concealing all of the equipment in a safe and corrosion free manner.

The residents of my community are opposed to having the gas meters and regulators in front of their properties for the following reasons:

- **Vehicular damage to units**- I have included 12 articles from our local newspaper that printed stories about vehicles hitting and even driving through properties within our City over the past 2 years, and 8 photos of properties that were damaged within a few blocks of my home that did not receive media attention.
- **Snow Issues**- Living in an urban area always presents a problem with where to put your snow during inclement weather. When you live on a home that is only 15'-20' wide and you have a front door or steps in the front of your home taking some of the overall available width away

from the front of your home...residents have no choice but to pile the snow in front of their homes which will block and potentially damage or freeze-up the meter set as these issues are cautioned of in §59.18 (a) (4) (iv) "falling objects, such as packed snow or ice from a roof" and (c) (1) (ii) "Protection from ambient temperatures is necessary to avoid meter freeze-ups". I would also like to mention residents are prohibited from just shoveling all of the snow into the street, so they have no choice but to pile it up in front of their homes.

- **Trip Hazards**- I have included several photos that illustrate how this equipment in many cases can be tripped on or have someone pushing a stroller or something hit these units.
- **Corrosion Issues**- All of the photos I have included in this packet showing gas meter sets were just installed by UGI within the last year and are already rusting, showing signs of corrosion. Unfortunately over 60% of Allentown's properties are currently non-owner occupied building (rentals) many of which will not bother to paint the hardware to keep it in sound shape. The City has been working feverishly to de-convert and promote single family owner occupied ownership...but this process doesn't happen overnight.
- **Vandalism**- Living in an urban community where people constantly walk on the sidewalks....this will always pose a risk of having someone "monkey" with the equipment or at least always make the resident fearful that someone will tamper with the equipment.
- **Misuses of the equipment**- I have included two photos showing that people are chaining trash receptacles and commercial display racks to the gas hardware. I have also seen people securing their bicycles and motorcycles and other items to the equipment as well.
- **Shut off valves on pipe with regulator attached to it**- Almost all of the units I have seen UGI install have no locking mechanism on the valve leaving the property owner extremely vulnerable that anyone could walk by their property with a wrench and shut their gas service off, potentially causing a pipe freezing issue in their home if nobody was home to identify a problem with the heating system. Also most of the properties already have curb shut off valves in the sidewalk that are protected from unauthorized people from tampering with them, and if a property doesn't have a curb valve, UGI should be installing one. Also, what if someone turns an unlocked gas valve off/on...if pilot lights are not relighted, the house can begin to fill up with gas and could cause an explosion itself.
- **Aesthetics**- Not only do the residents feel vulnerable for the other reasons I just mentioned... but many people take great pride in maintaining and restoring properties within our Historic Districts and this equipment is just downright ugly directly in the front of people's homes. Keep in mind most of the properties that this will impact range between 15' -20' in total width and have no garden area in front of their property to be able to camouflage this equipment.

After reading the proposed changes Docket# L-2009-2107155 Annex A Title 52. Public Utilities Part I Public Utilities Commission Subpart C. Fixed Service Utilities Chapter 59. Gas Service §59.18 {Location of Meters.} Meter and Regulator location I would like to point out a few things that I think need to be clarified to avoid confusion:

( C ) Inside meter locations shall be considered only when:

- (1) ( I ) An acceptable outside location is not available due to the restrictions in federally approved Historic Districts or in high risk vandalism districts.

First I would hope that this language could be changed to read just "Historic Districts" because many Historic Districts throughout Pennsylvania are not federally recognized, but state recognized. Allentown currently has (3) historic districts (Old Allentown, Old Fairgrounds and West Park) which are all recognized by the state of Pennsylvania as a CLG (Certified Local Government) and follow the Secretary of Interior's Standards. Allentown is the third largest city in the Commonwealth.

The (PHMC) Pennsylvania Historical and Museum Commission under the Municipalities Planning Code: which emphatically states in §603. (g) (2) {that} "zoning ordinances shall provide the protection of natural and historic features and resources" and the Historic District Act which authorizes municipalities to create historic districts....to protect the distinctive historical character of these districts and to regulate the erection, reconstruction, alteration, restoration, demolition or razing of buildings within the historic district.

In regards to "high risk vandalism districts" – what constitutes "high risk"? In my opinion any property located within an urban area is high risk based on the information I provided in this packet i.e. chained items to gas pipes, vehicular damage risk, trip hazards, potential vandalism, snow being piled against building facades, corrosion issues, unsecured gas valves being tampered with etc...

( C ) (1) (ii) Protection from ambient temperatures is necessary to avoid meter freeze-ups.

I have yet to see UGI "protect" any outside meter set they have installed, and would think that if there is any chance of a meter freezing up, this supports the idea of keeping meters in the basements of properties regardless if they're located within a historic district or not.

- (a) (9) Meters and service regulators may not be installed in the following locations:
  - (i) Directly beneath or in front of windows or other building openings which may be used as an emergency fire exit.

This alone would rule out any meter or regulator in front of 99% of the properties located in downtown Allentown, PA because most buildings range from 15' to 20' wide and obviously have a front door and anywhere from at least 1-2 windows (on average) on the first floor elevation and typically have 1-2 basement windows and most have a grocer's alley door that leads between the town homes.... That being said we're not talking about a lot of real estate here, and a gas meter or regulator is virtually impossible to place under these conditions considering the size and layout of these properties. If someone needed to crawl out of their first floor window to escape a fire...they would be exposed to this equipment while exiting the burning building.

I have included in this packet for your review:

- Twelve articles from our local newspaper that ran stories of cars hitting and even driving through buildings in our area within the last 2 years, and 8 photos of properties damaged by vehicles that never received media attention.
- Seven articles concerning the gas meter issue that was published in the local newspaper.
- A letter from CAMP (**Citizens for Appropriate Meter Placement**) was sent out to hundreds of people and also created a website [www.campnow.org](http://www.campnow.org)
- CAMP Poster (**Citizens for Appropriate Meter Placement**) (smaller version) of what many residents placed on their home to protest UGI from placing this equipment on the façade of their home.
- Many photos illustrating the issues I described with the gas hardware .
- (2) Letters that the mayor sent to the PUC regarding this gas meter issue.
- A copy of the public notice sent to residents regarding the public meeting on September 14<sup>th</sup> 2011 concerning the gas meter issue.
- A copy of the changes Docket# L-2009-2107155 Annex A Title 52. Public Utilities Part I Public Utilities Commission Subpart C. Fixed Service Utilities Chapter 59. Gas Service §59.18 {Location of Meters.} Meter and Regulator location

In closing I would thank you for your time and consideration and hope that you find this information helpful and ultimately rule that the gas meters and regulators can remain either in the basements with a gas vent which would allow the gas to vent in the atmosphere in the case of an emergency or in a buried vault outside.

Sincerely,



Shane Fillman

Enclosures included

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Pictures - car crashes into house

As a result of an accident a car crashes into house at 8th and Walnut, Allentown

Image 1 of 7

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Pictures - car crashes into house

( Donna Fisher / The Morning Call / August 6, 2011 )

A car hit the west side of a house in the 700 block of Walnut Street in the northeast corner of 8th and Walnut Streets Saturday afternoon. Two damaged cars were in the lot at 8th and Walnut as Allentown police officers and firefighters worked at the scene. Five people were injured in the accident.

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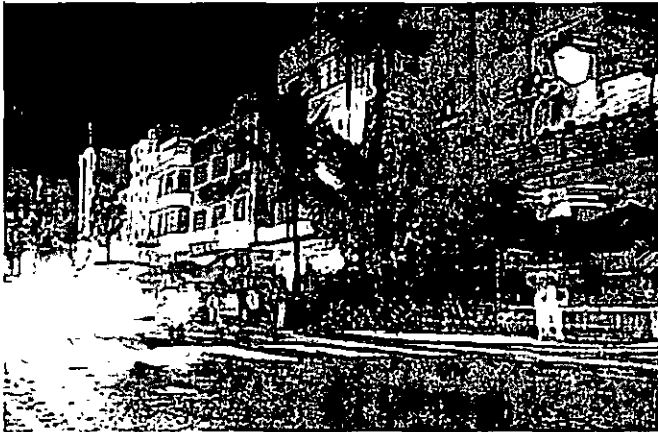
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/ Car destroys downtown Allentown in wreck!

# Car destroys downtown Allentown in wreck!

2009-08-28 04:02:15 (GMT) (JusticeNewsFlash.com - Auto Accident, Justice News Flash)



Legal news for Pennsylvania automobile accident attorneys. Audi slams into several buildings in a early morning wreck.

Pennsylvania automobile accident lawyers alert- Car crash involving an Audi tore up downtown Allentown, Pennsylvania.

Allentown, PA—An out-of-control Audi sedan traveling in the wrong direction smashed into several buildings before coming to a stop on its roof in the early hours of Wednesday, August 26, 2009. The crash left one man dead, and one woman seriously injured. The fatal accident occurred on Linden Street at 3:15 a.m., as reported by The Morning Call.

The driver of the Audi, Manuel Jose Ortiz, 20, and his unidentified passenger, slammed into the PPL parking garage, then careened into the Jarabacoa City restaurant, catapulted into another building, then continued to hit a traffic light and a newspaper box, and finally came to a stop after the car flipped over onto its roof. Witnesses stated the passenger was found lying unconscious in the road a few feet from the car, and the driver was still inside the wrecked vehicle. Ortiz was pronounced dead at the scene of the fatal accident by responding emergency medical services (EMS) crews. The unidentified passenger was transported by EMS professionals to a local hospital for treatment. The trail of destruction the car crash left everything inside the Jarabacoa City restaurant broken, smashed at least eight windows of the restaurant, collapsed Grecian-style columns, and knocked bricks off of buildings. The owner of Jarabacoa City restaurant reportedly was not able to open for business on Wednesday due to the destruction. It is unknown what caused the fatal crash. Investigators are currently conducting a full investigation and are reconstructing the crash.

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# Car hits 5 vehicles in Allentown before driver flees

August 24, 2011 | By Frank Warner, Of The Morning Call

A car sideswiped another vehicle in downtown Allentown on Wednesday evening, and after a brief police pursuit, the hit-and-run driver crashed into four parked cars before fleeing on foot, city police said.

The first crash happened about 7:15 p.m. in the 800 block of Hamilton Street, police Capt. Dean Schwartz said. As a police officer tried to stop the sideswiping car, it turned north on Eighth Street.

"A short time later the vehicle had hit some parked vehicles on Eighth Street and the driver fled the scene," Schwartz said. "There's no injuries that we're aware of."

The hit-and-run driver had not been found late Wednesday night.

Schwartz said the officer who witnessed the first collision followed the hit-and-run car for a few blocks before cutting off the pursuit, and then police received a report the car had hit several cars near Eighth and Gordon streets.

Schwartz said police are checking into whether the hit-and-run car was stolen. Three young men may have been in the car, according to police radio reports.

Barricades were put up around Eighth and Gordon as police investigated the crash and other emergency workers cleaned up the debris.

— Frank Warner

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## Car Hits House, Causes Gas Leak

5 months ago on WFMZ News

Many couldn't believe their eyes when they saw a white Pontiac in the side of a home on Florin Avenue near Kutztown Road in Muhlenberg Township Friday.

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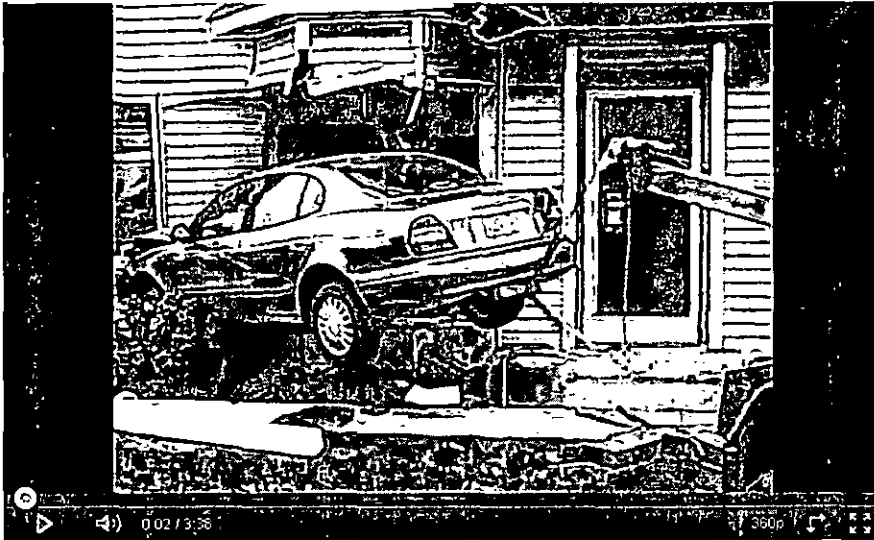
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A car driven by a 17-year-old girl hit a home in the 14300 block of Peninsula

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I get my lisenca in a year or two... Gulp.

No seriously thier should be tougher driving classes.  
MSNIMSM 2 years ago

that would be funny if the family in the house was eating dinner  
ckmacboy 2 years ago

This happened to my grandparents house too. A 14 year old girl went into panic and stepped on the gas pedal instead of the brake while backing out of her driveway. She did that while her parents were gone, i can only imagine how bad she felt.  
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## Allentown police investigating why driver, passengers fled accident

16 months ago on The Morning Call Police News

Police still are searching for one person. Allentown police have tracked down two of the three people who they say fled from a vehicle that flipped over and struck two parked cars in the 700 block of Gordon Street early this morning.

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# Car Hits Front Porch After 2-car Crash Allentown



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August 01, 1999 | The Morning Call

A car ran into the front porch of a residence at 802 N. 8th St. after a two-car crash Friday at Washington and N. 8th streets, Allentown police said.

Everett J. Prince of Whitehall was driving west on Washington Street shortly after 2 p.m. when he failed to stop at a stop sign and collided with a vehicle going north on N. 8th St.

The northbound vehicle, driven by Richard A. Peters, hit the front end of Prince's vehicle and then crashed into the porch on the northwest corner of N. 8th St.

Neither driver was seriously injured, but Prince was cited for several traffic violations, according to police.

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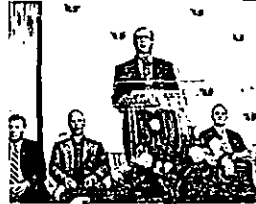
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## Four-vehicle accident ties up Tilghman

Author: 69 News, [news@wfmz.com](mailto:news@wfmz.com)

Posted: Oct 27 2011 10:38 AM



**ALLENTOWN, Pa. -**

A four-car pileup has closed several blocks on Tilghman Street in Allentown.

The accident occurred Thursday morning near the intersection of Tilghman and Jordan streets.

One SUV landed on its roof.

Police said there were no serious injuries.

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**mcall.com**

## Allentown man crashes ATV into garage, dies

By Frank Warner, Of The Morning Call

9:34 PM EDT, September 22, 2011

An Allentown man was killed Thursday evening when he crashed an all-terrain vehicle into an alley garage, police said.

Francisco J. Herrera, 38, of N. Jefferson Street, was riding the four-wheel ATV in the neighborhood of 14th and Chew streets at 6:35 p.m. when he hit the building along Emmett Street, authorities said.

Herrera was taken by Allentown EMS to Lehigh Valley Hospital-Cedar Crest, where he was pronounced dead in the emergency room. City police Capt. Daryl Hendricks said it wasn't clear how the accident occurred.

Herrera died of multiple traumatic injuries, Lehigh County First Deputy Coroner Paul Hoffman said.

The garage is at the rear of a home at 1422 Chew St. The accident left a hole in the garage about the size of the ATV.

Witnesses told police that Herrera was riding the ATV in the neighborhood earlier in the day.

— Frank Warner

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# Car hits building, damages gas pipe

Full story: [The Morning Call](#)

Four people were chased from their Bethlehem home yesterday afternoon when a vehicle crashed into the apartment and damaged a gas pipe, said police and officials from the American Red Cross of the Greater Lehigh Valley.

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# Allentown woman hurt when car hits apartment

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11:19 P.M. EDT, OCTOBER 16, 2011

A woman was injured when her car crashed into her neighbor's apartment early Sunday, Allentown fire officials said.

Takia Young, of 246 Lehigh St., told authorities she tried to jump in her car when it began rolling in the parking lot of her apartment complex. Instead, the vehicle hit the apartment at 244 Lehigh St., badly damaging the structure and pinning Young's foot beneath a rear tire.

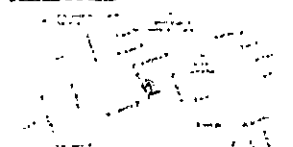
The accident happened around 1:30 a.m. Firefighters used air bags to lift the vehicle and free Young, who was taken to a hospital for treatment of her leg injury. Her condition was unavailable.

The damaged apartment was uninhabitable. The [American Red Cross](#) of the Greater Lehigh Valley provided lodging, meals and toiletry items to its three tenants.

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The accident remains under investigation.

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## Head-on crash sends car into house

Author: [69 News, news@wfmz.com](#)

Posted: Nov 09 2011 11:26 AM



**ALLENTOWN, Pa. -**

Someone got an unexpected wakeup call early Wednesday morning.

A head-on accident between two cars sent one of them into a house at Tilghman and New streets in Allentown.

It happened around 7 a.m.

Officials have not said whether anyone was injured.

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## 'Moving gas meters a matter of safety and show'

Posted on Feb 22, 2011 | [1 comment](#)

And now, as Monty Python used to proclaim, for something completely different. A terrific, must-read [Call story](#) on UGI's new exterior-meter placement policy. The [piece](#) is pegged to the grassroots citizens group CAMP, [which I've written about before](#).

Chris Baxter, whose brand-new Allentown beat has been nothing but natural gas, built his story around some impressive shoe-leather reporting. He resists the he-said, she-said frame that a fly-by story would no doubt employ. And he opens with the best lead I've seen this year:

The city dwellers who cast aside perceptions of crime and urban decay to move to this historic district of downtown Allentown care more than most about the face of their community, and they have the charming brick facades and old-fashioned window shutters to prove it.

That's one of the first upbeat mentions of the vibrant Old Allentown community I've seen from the *Call* in a long time. The story continues:

So two years ago, when the local utility company began upgrading gas lines on streets just outside the confines of the historic district, residents attuned to the tiniest of details took notice. Spider-like pipes and boxy gas meters, once hidden in basements, were showing up in front of homes.

Though none have yet to appear in Old Allentown — bounded by N. Hall Street to the east and N 12th Street to the west, W. Liberty Street to the north and roughly W. Linden Street to the south — the residents fear their prized district will be next.

"It really detracts from what we're trying to do in the neighborhoods," said Morrison, founder of Citizens for Appropriate Meter Placement, a committee of concerned residents. "When a utility comes around and says, 'We're doing this for your safety,' who's going to question them?"

The Baxter story proceeds to give UGI a fair airing, but doesn't let the utility giant's safety claims go unchallenged:

The utilities say they have no choice but to move the equipment, a change they argue benefits the customer by eliminating a serious indoor threat, and by making the meters more readily available to workers who must perform mandated leak and corrosion surveys.

Those conveniences also happen to save companies a lot of time and money. [Ed: crucial point!]

Morrison and other detractors of meter relocation, including those in other states, call the safety argument disingenuous. They note that moving the equipment outdoors opens it up to a whole host of new dangers, including ice, snow, corrosion, traffic and vandalism.

Left there, the story would fall into he-said, she-said territory. But Baxter points to similar efforts across the northeast, including the case of Rhode Island where homeowner-consulting legislation was passed. And he called up a third-party expert:

Mark McDonald, president of the New England Gas Workers Association, said regulators and vents connected to higher-pressure lines should be kept outside a home, even if that means in front. But the large meter boxes, he said, do not need to be outside.

“That’s not a benefit for the customer,” McDonald said. “That’s for the company.”

I’m feeling less depressed about the departure of crack *Call* reporter Jarrett Renshaw. Baxter is for real.

## One Response to “Moving gas meters a matter of safety and show”

1. *Tweets that mention 'Moving gas meters a matter of safety and show' | Allentown Afterthoughts -- Topsy.com* says:  
February 22, 2011 at 4:18 pm

[...] This post was mentioned on Twitter by The Morning Call, AEDC, Morning Call Mobile, Tom Coombe, Jeff Pooley and others. Jeff Pooley said: Superb @mcall story on gas meter placement. New #Allentown beat reporter Chris Baxter is for real <http://t.co/mEVvAOU> [...]

2. *Allentown taxpayer* says:  
February 24, 2011 at 6:21 am

This week I had UGI restore service to a rowhome I just purchased and am renovating, outside the Historic area, and the gas meter is in the basement ... The UGI crew had to tear up the street and sidewalk to reconnect service that was shut off more than a year ago after the house had been abandoned. I asked whether the meter in the basement would be moved outdoors. No, I was told. Placing the meter in the front of the house at the sidewalk would be dangerous and expose the meter to possible damage. “It’s a knee-banger,” the UGI guy said. “We’re just placing the regulator outside.”

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## Moving gas meters a matter of safety?

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Sun Feb 20, 2011 4:31 pm

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**Moving gas meters a matter of safety and show****Utilities say they must relocate meters outside of homes when upgrading lines. Residents call the equipment 'blight'.**Carl Weimer <carl@...>  
cmweimerjr  
Offline  
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By Christopher Baxter, OF THE MORNING CALL

8:56 p.m. EST, February 19, 2011

The city dwellers who cast aside perceptions of crime and urban decay to move to this historic district of downtown Allentown care more than most about the face of their community, and they have the charming brick facades and old-fashioned window shutters to prove it.

Just ask Edward Morrison, who picked garbage from a melting snow bank last week in front of 815 W. Gordon St. He came to Old Allentown six years ago and restored a 2 1/2-story row home, one piece of a living time capsule that stands out in a city vastly different from its early days.

"Character here means everything," Morrison said.

So two years ago, when the local utility company began upgrading gas lines on streets just outside the confines of the historic district, residents attuned to the tiniest of details took notice. Spider-like pipes and boxy gas meters, once hidden in basements, were showing up in front of homes.

Though none have yet to appear in Old Allentown — bounded by N. Hall Street to the east and N 12<sup>th</sup> Street to the west, W. Liberty Street to the north and roughly W. Linden Street to the south — the residents fear their prized district will be next.

"It really detracts from what we're trying to do in the neighborhoods," said Morrison, founder of Citizens for Appropriate Meter Placement, a committee of concerned residents. "When a utility comes around and says, 'We're doing this for your safety,' who's going to question them?"

In light of this month's gas explosion on the southwest corner of 13<sup>th</sup> and Allen streets, which killed five people and destroyed eight homes, homeowners across Allentown have a nagging uneasiness about the city's aging infrastructure and the instantaneous havoc it *can wreak*.

Utilities here and across the country, pressured to expedite upgrades, are using that work to justify the relocation of meters from inside homes to the outside. Hardly an aesthetic ideal, they admit, the move is necessary to keep new, higher-pressured gas lines from quickly filling a home in the case of a leak.

"We all have to recognize people are concerned about their property, property value and investment," said J. Michael Love, vice president of government affairs for UGI Utilities, which serves about 340,000 gas customers in Pennsylvania. "But we'd all agree to be concerned about safety as well."

Many urban areas are served by old, cast-iron pipes that carry low-pressure gas to customers. As utilities such as UGI replace those pipes — identical to the one thought to have caused the explosion Feb. 9 — they install smaller, plastic lines that increase the gas pressure.

As a result, the companies must install a regulator and vent that lower the pressure before it enters a meter and flows into a home to service a stove or heater. Love said UGI is also installing outdoor equipment for any new gas customers.

The utilities say they have no choice but to move the equipment, a change they argue benefits the customer by eliminating a serious indoor threat, and by making the meters more readily available to workers who must perform mandated leak and corrosion surveys.

Those conveniences also happen to save companies a lot of time and money.

Morrison and other detractors of meter relocation, including those in other states, call the safety argument disingenuous. They note that moving the equipment outdoors opens it up to a whole host of new dangers, including ice, snow, corrosion, traffic and vandalism.

"All I'd have to do is walk up with a pair of pliers and I could do some serious mischief," said Morrison, walking past an outdoor meter set protruding from a porch. "We truly feel this is safer inside."

Utilities across the country acknowledge there is danger with outdoor meters. National Grid, which serves about 3.5 million customers in the Northeast, warns in news releases that the buildup of ice and snow around or over outdoor meters, regulators, pipes and vents poses a "serious safety risk."

This month, piles of snow on top of a National Grid gas meter in Billerica, Mass. cracked a pipe and caused a leak, forcing the evacuation of 29 residents, according to published reports. But despite the outdoor risks, National Grid's policy is to move meters to the outside of homes.

"We feel outside placement, net benefit, outweighs inside placement," spokesman David Graves said.

Problems, aesthetic and otherwise, are more pronounced in historic and urban areas such as Allentown, where utilities often have no option but to place a meter and its regulator in front of a building and along a busy street because there are no usable side or rear locations.

Mark McDonald, president of the New England Gas Workers Association, said regulators and vents connected to higher-pressure

lines should be kept outside a home, even if that means in front. But the large meter boxes, he said, do not need to be outside.

"That's not a benefit for the customer," McDonald said. "That's for the company."

And that sparked complaints in 2008 from a group of homeowners in the historic Broadway-Armory neighborhood of Providence, R.I. Jessica Jennings, former board member of the West Broadway Neighborhood Association there, said the fight meant more than aesthetics.

"No one should be told by a utility company where they are going to put their big equipment, regardless if they are in a historic district or not," Jennings said. "It became a private property rights issue."

Rhode Island legislators in 2009 passed a law requiring gas utilities to consult with homeowners before moving a meter, something Jennings said had not been done in the past. The bill also bans meters or regulators in front of a home in a historic district without owners' consent.

Tom Yuracka of Allentown's West Park Historic District said it was pure luck that he was home to stop UGI from moving meters out in front of his two properties. His concern, beyond the historic districts, is that other people who care about their homes will not know to question the policy.

"It varies from house to house depending on how adamant the owner is," Yuracka said. "Anyone who's concerned about the appearance of their house would not want a meter plastered out front. And there's nothing that's convinced me one way or another that having the meter outside is safer."

Residents met with UGI and the Pennsylvania Utility Commission recently to complain that meter sets were being moved without homeowners' consent.

The utility agreed to consider alternatives to moving both the meter and the regulator outside in historic districts. For example, UGI said it may be able to move just the regulator outside and leave the meters inside. Mayor Ed Pawlowski said that compromise would do a lot to solve the problem.

But Morrison says that option should be available to every neighborhood, not just historic districts.

"It looks like urban blight," he said. "It's no different than all those satellite dishes on buildings."

Love, the spokesman for UGI, said the company also is considering much smaller meters that are new to the market. But at the same time he pledges flexibility, at least in historic areas, he said it's the company's position that residents really have no choice in the matter.

"Ultimately, this is going to be decided by the PUC," said Love, who noted that an audit by the commission criticized some utilities that had too many meters inside. "Right now our policy is to put the equipment outside."

The PUC has asked the state's 10 largest gas utilities for information on leaks related to inside meter sets as well as the number of inside and outside meters and regulators, spokeswoman Denise McCracken said. She declined to provide the information, saying it's proprietary.

Jennifer Kocher, another spokeswoman for PUC, said earlier this month that utilities reported more than 4,000 leaks on inside meter sets over a five-year period. But without more statistics, it is impossible to know what percentage of indoor meters that represents.

It also says nothing about the risks of indoor meters versus outdoor meters.

As it stands now, the commission requires meters be installed either inside the building in a dry, well-ventilated place not subject to excessive heat, and as near as possible to the point of entrance of the pipe supplying service to the building, or outside the building at a location selected by the utility.

The PUC is drafting new rules to further regulate the equipment's placement, McCracken said, and staff will take into consideration alternatives to relocating and replacing inside meter sets. She did not specify what options homeowners may have under the proposal.

Federal regulations require that meters and regulators, whether inside or outside a building, be installed in an accessible location protected from corrosion and other damage, including — if installed outside a building — damage that may be caused by vehicles.



Shane Fillman, member of the city's Historical Architectural Review Board, says UGI should worry more about replacing its old piping than moving meters. But because the regulation of gas utilities lies with the state, there's nothing the review board or even city officials can do but pressure UGI.

"It's very nauseating seeing how they've destroyed properties," Fillman said.

*christopher.baxter@...*

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## Moving gas meters a matter of safety and show

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**Utilities say they must relocate meters outside of homes when upgrading lines. Residents call the equipment 'blight'.**

February 18, 2011 | By Christopher Baxter, OF THE MORNING CALL

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"It's very nauseating seeing how they've destroyed properties," Fillman said.

christopher.baxter@mcall.com

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**The issue:** Moving gas meters and regulators from inside homes to outside.

**Gas companies and regulators say:**

- Promotes safety by preventing a medium- or high-pressure line from leaking directly into a building.
- Saves money and time by allowing crews easy access to equipment for service and leak inspection.

**Residents and historic preservationists say:**

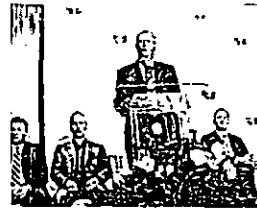
- No statistics prove that outdoor meters, exposed to different dangers, are safer than indoor meters.
- Relocation to the front of buildings in urban areas looks like blight and damages neighborhood character.

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## Mayor to PUC: Explain meter rules

State hasn't followed up with Allentown residents on outside gas meters, he says.

July 12, 2011 | By Devon Lash, Of The Morning Call

Allentown Mayor Ed Pawlowski wants the Pennsylvania Public Utility Commission back in Allentown to discuss its recommendations for outdoor gas meter placement before UGI moves the spider-like pipes and boxy, plastic meters into the city's historic neighborhoods.

As a safety measure, the natural gas company has been installing the meters on some city streets since 2009, when gas lines switched from cast-iron low-pressure lines — the kind thought to have caused a massive explosion in Allentown in February that killed five people — to plastic medium-pressure lines.

But residents said without statistics proving that outdoor meters are safer than those indoors, there's no reason to blight the city's neighborhoods, especially not historic areas.

It's been months since PUC and UGI representatives met with city homeowners, who are awaiting the new, promised regulations on outdoor meters. Since the October 2010 meeting, the city has heard nothing from the state regulatory commission, Pawlowski wrote in a June 27 letter to PUC Chairman Robert Powelson.

Although the commission's chief gas safety officer said last October a proposed rule change was coming in the "near future," Pawlowski wrote, "there has been no follow-up action with our residents."

But his strongly worded letter seems to have changed that.

Spokespeople for the city and the commission both said Tuesday another meeting is imminent.

On top of the long-awaited discussion, J. Michael Love, UGI's vice president of government affairs, said he expects the PUC's official position on meter placement to be released this month.

The utility that serves 45,000 customers in the Lehigh Valley will continue to install outdoors meters and regulators for new customers and those undergoing replacement work, because that's what PUC has preferred, Love said.

In 2010, UGI installed 2,300 natural gas services, including new customers and households that had meters moved because of gas main replacement service.

The outside feature is safer and more convenient for homeowners, allowing UGI easier access for inspections, said UGI spokesman Daniel Adamo. It also minimizes the potential for customers to tamper and illegally bypass natural gas meters, which creates a serious safety risk, Adamo said.

The historic district has so far been spared installation of the outside meters. But as the process drags on, homeowners like Gregory Shamp, who has poured tens of thousands of dollars into restoring his 19<sup>th</sup>-century Eighth Street home, eagerly wait to comment on the new regulations.

"It's totally irresponsible not to consider the fact this will have a fiduciary effect on homeowners," Shamp said.

The meters will hurt the overall look of the historic district and damage resale values, he said.

In Old Allentown, outdoor meters would mean a large meter every 20 to 30 feet along the street within four feet of the sidewalk, resident Edward Morrison said.

That change would prove to be more convenient for the utility company but not necessarily safer, because gas meters will now face outdoor hazards, such as weather, Morrison said.

Right now, both state and federal building code regulations say meters can be placed indoors, he said.



"This is troubling because the state and federal regulations require leak surveys up to the meter," Kocher said in an e-mail. "By not having access to the meter sets, the utilities cannot comply with the state and federal regulations and cannot detect inside leaks."

She said the PUC is "concerned about the number of reportable incidents resulting, at least partially, from locating meters and regulators inside structures."

Gas companies reported more than 4,000 leaks occurring on inside meters over a five-year period. While the meters and regulators were not always the primary factor for accidents, inside meters contributed through the release of natural gas.

"Inside meter sets with inside regulators are a concern due to the possibility of high-pressure gas flowing into a structure if the inside meter or inside regulator are detached from the service line," Kocher said. "Pennsylvania has experienced several catastrophic explosions due to steel service lines pulling away from inside meter sets and inside regulators."

In Allentown, UGI is replacing inside meters with outside ones on homes in several older neighborhoods. While some residents aren't happy with how they look, UGI has said they are necessary for safety, and it has been working with residents to address concerns.

How do you know if there's a gas problem inside your house, and what should you do if you find one?

Everyone I talked to said the smell of gas should be your first warning. They all advised leaving your home immediately and not doing anything to cause a spark on your way out, such as turning off or on lights or using a phone. Call 911 from outside, and authorities will contact your gas company, Kocher said.

More information is on my blog at <http://blogs.mcall.com/watchdog/>.

*The Watchdog is published Thursdays and Sundays. Contact me by e-mail at [watchdog@mcall.com](mailto:watchdog@mcall.com), by phone at 610-841-2364 (ADOG), by fax at 610-820-6693, or by mail at The Morning Call, 101 N. Sixth St., Allentown, PA, 18101. Follow me on Twitter at [mcwatchdog](https://twitter.com/mcwatchdog).*

**Natural gas safety**

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- Call 811 before you dig to avoid striking lines

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## Historic districts may be spared outdoor gas meters

But for safety, UGI would relocate other meters and regulators from indoors.

July 28, 2011 | By Devon Lash, Of The Morning Call

The state utility commission proposed new regulations Thursday that would move most boxy gas meters and their tentacle-like pipes from the basement to home fronts.

But with a nod to the residents of historic neighborhoods who have said the meter relocation would blight their homes, the Public Utility Commission said utilities could exempt those neighborhoods in the interest of preservation.

Areas that pose a high risk for vandalism would also be exempt from the new regulations.

The proposal would make state regulations more consistent with federal rules and allow gas utilities the final say based on safety concerns.

The proposal noted several safety concerns with indoor meters.

More than 4,000 leaks occurred on inside meters during a five-year period. Meter location was not always the primary cause for the leaks, but it "certainly contributed to these incidents through a release of natural gas," according to the proposal.

It contained no data about leaks that occurred with outdoor meters.

The commission's proposal will also require gas distribution companies to relocate indoor regulators that are connected to steel service lines within 10 years, though not in historic districts.

Several gas explosions related to steel service lines being hit and pulled up from their stable position and the inside meter and regulator have occurred in the state.

"The combination of steel service line and inside meter set is a high risk factor for natural gas incidents," according to the proposal. That isn't a danger with plastic lines, because the lines sever immediately when struck.

If the proposed rule is adopted, it would refocus some of UGI's pipe replacement efforts on steel, as opposed to cast iron, said J. Michael Love, vice president of government affairs for UGI Utilities.

A cast-iron pipe, not a steel pipe, was involved in the February explosion that killed five people in Allentown.

The report also notes it is cheaper to move the meter — about \$500 — than to replace a steel line with a plastic one — about \$4,000.

Love said UGI is working to determine how many steel pipes are attached to indoor regulators this week.

If adopted, the change would significantly affect the western part of the state, which has "twice as many steel pipes" as UGI, he added.

The new ruling satisfies historic district homeowners, who decried the meters that they said would ruin the look of the neighborhood and damage resale values.

The proposed ruling acknowledges the historical architecture of the commonwealth and will help preserve it, Old Allentown resident Gregory Shamp said.

"There's a happy medium between safety and aesthetics," he said.

The placement of the meters ignited an intense debate between some Allentown residents and UGI when the company began moving some indoor meters outdoors in 2009.

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"And we can't do anything about it until it's officially proposed," he said.



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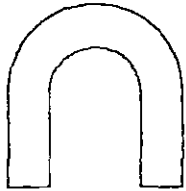
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Allentown  
City without limits.

**Mike Moore**  
Communications Coordinator  
Office of the Mayor  
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## NEWS RELEASE

September 1, 2011

For Additional Information Please Contact:

**Mike Moore**  
Communications Coordinator  
610-437-7653

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## GAS METERS SUBJECT OF PUBLIC MEETING

The City of Allentown will host an informational meeting on a Pennsylvania Public Utility Commission proposed rule governing the placement of natural gas meters. The meeting will be held on Wednesday, September 14 at 6pm in City Council Chambers. Members of the PUC staff will attend. UGI Corporation representatives have also been invited.

The Commission voted unanimously in late July to issue the proposed rulemaking for comment. It includes language that allows the natural gas utilities to have sole determination for meter set (meter and regulator) location, and that the determination should be based upon public safety. The proposed language also requires natural gas distribution companies (NGDCs) to relocate current inside regulators that are connected to steel service lines to the outside with the exception of historic districts and high risk vandalism districts within 10 years.

Following an investigation, the PUC's Bureau of Transportation, Gas Safety Division concluded that the Commission's existing regulation is vague, inadequate and out-of-date with respect to the federal standards which the PUC has adopted. The proposed regulations are more consistent with the federal regulations.

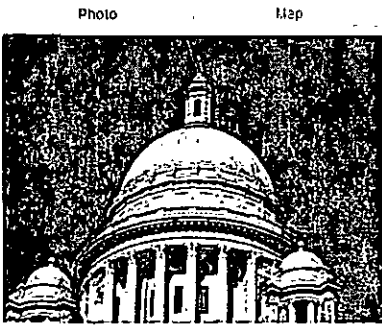
The meeting will allow for an informational discussion on the proposed rulemaking order and will give those in attendance a clear understanding of proposed rules and regulations. Representatives will also explain the PUC rulemaking process and inform residents how they can participate in the process.

The City of Allentown Department of Community & Economic Development is facilitating the meeting. All interested persons are urged to attend.

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### Gas meter ban inching towards law

Bill bans gas meter placement at front of home

Updated: Thursday, 14 May 2008, 8:00 PM EDT  
Published: Thursday, 14 May 2008, 8:00 PM EDT

PROVIDENCE, R.I. (WPRI) - Lawmakers in the House have overwhelmingly voted to approve a bill that will ban utility companies from installing unsightly gas meters on the facades of homes.

The bill, sponsored by state Rep. Steven Constantino, was proposed after National Grid began installing new high-pressure gas lines in the Broadway-Armory neighborhood in Providence.

More than 250 homes, most historical, had their meters moved from the basement to the exterior to make meter readings and shutoffs easier. Because most of the homes are so close, the only place the meter could be attached was the front.

Before the bill can become law, it must now be passed by the senate, then be signed by the Governor.

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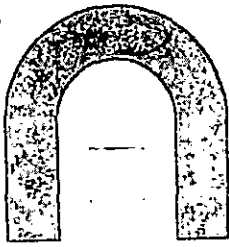
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Allentown  
City without limits.

**Ed Pawlowski, Mayor**  
City of Allentown  
435 Hamilton Street  
Allentown, PA 18101-1699  
Office 610.437.7546  
fax 610.437.8730  
pawlowski@allentowncity.org

July 21, 2011

Robert F. Powelson, Chairman  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
3rd Floor, Room N-304

**Subject: Thank you and follow-up to 7/19/11 Gas Meter Placement Meeting**

Dear Chairman Powelson:

Thank you for taking the time out of your and the PUC's staff's busy schedules to meet with us and discuss our concerns about the placement of gas meters. I found the discussion helpful and have a better understanding of the current rules and regulations in place. The following is meant to be a brief summary of the major items discussed and any necessary follow-up actions.

- Current rules around the placement of gas meters allow for their placement on the inside of structures. UGI's tariff dictates what they are obligated to do and what could be done at the expense of the homeowner.
- The "proposed rule change" is only a PUC staff recommendation at this time. The commissioners have not seen the proposed rule change nor have they decided if this is an issue they want to act on. The rule change is being distributed to the commissioners for their review and the earliest they could formally act on it would be at their 7/28/11 public meeting. The PUC will keep the city apprised of the status of the staff recommendation.
- As mutually agreed upon UGI should be providing better notice to property owners when they are working in an area and do a better job explaining what the property owners are allowed under the current rules and regulations. You are going to contact UGI personally to discuss.
- You encouraged us to forward complaints to the PUC regarding these issues and said that if the situation does not improve there is an option of filing formal complaints.

In closing, the City of Allentown is truly appreciative of your attention and help regarding this issue. I strongly encourage the PUC to make a decision on whether or not to pursue the proposed staff rule change expeditiously so that the promised follow-up public meeting with our residents can be held. Our residents deserve the opportunity to have a clear understanding of what the rules and regulations are.

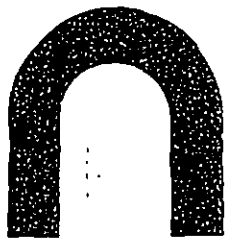
Sincerely,

ED PAWLOWSKI  
Mayor



Page Two  
July 22, 2011

xc: Robert F. Young, Deputy Chief Council, PUC  
Michael E. Hoffman, Bureau of Transportation & Safety Director, PUC  
Paul Metro, Gas Safety Chief, PUC  
Ken Bennington, Managing Director, City of Allentown  
Mark Hartney, Planner II  
Mike Moore, Communications Coordinator  
Mike Hanlon, City Clerk  
The Honorable Michael D'Amore, President, City Council  
Mike Hefele, Director, Planning  
Mike Love, Vice President of Government Affairs, UGI  
Sara Hailstone, Director, DCED  
The Honorable Pat Browne, State Senator  
The Honorable Jennifer Mann, State Representative  
The Honorable Joe Brennan, State Representative  
The Honorable Steve Samuelson, State Representative  
The Honorable Justin Simmons, State Representative



Allentown  
City without limits.

Ed Pawlowski, Mayor  
City of Allentown  
435 Hamilton Street  
Allentown, PA 18101-1699  
Office 610.437.7546  
fax 610.437.8730  
pawlowski@allentowncity.org

June 27, 2011

Robert F. Powelson, Chairman  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building, 3<sup>rd</sup> Floor, N-304, 400 North St.  
Harrisburg, Pa 17120

**Subject: Gas Meter and Regulator Placement in Historic Districts Follow-up Meeting.**

Dear Chairman Powelson:

On October 18, 2010 the City of Allentown facilitated a public meeting for our residents with representatives from the PUC and UGI to review the placement of gas meters and regulators in our historic districts and surrounding neighborhoods. This meeting was organized in response to UGI performing upgrades to their existing gas mains and moving existing gas meters and regulators from the inside of properties to the exterior. UGI made these changes in anticipation of proposed PUC rule changes. Paul Metro, PUC Gas Safety Chief, confirmed this change at the public meeting and said the state was in the process of updating the state regulations to both eliminate ambiguity and also improve safety. He went on to explain that the proposed rule changes would be available for public comment in the "near future" and that he would recommend public hearings on the matter. He also agreed to a follow-up public meeting in Allentown to explain the proposed rule changes once officially introduced to the PUC. It was our understanding that this process would take place prior to the 2011 construction season; which has already begun.

Since February the City has been trying to schedule the agreed upon follow-up meeting regarding this issue with the PUC in order to keep our residents informed. It has been (8) months since the first public meeting and to date there has been no follow-up action with our residents. UGI is again preparing for construction and our citizens have been left out as to what the PUC's policies will be with regard to the placement of gas meters and regulators. I urge you to address this issue as soon as possible and open up the process so the public can comment on proposed rule changes. I also urge you to expeditiously schedule the agreed upon follow up public meeting in Allentown in order to inform our citizens.

Sincerely,

ED PAWLOWSKI

Mayor

June 27, 2011  
Page Two

cc: Ken Bennington, Managing Director  
Paul Metro, Gas Safety Chief, PUC  
Mark Hartney, Planner II  
Mike Moore, Communications Coordinator  
Mike Hanlon, City Clerk  
The Honorable Michael D'Amore, President, City Council  
Mike Hefele, Director, Planning  
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## Gas Meters Subject of Public Meeting

Last updated: 09/01/2011 11:53



The City of Allentown will host an informational meeting on a Pennsylvania Public Utility Commission proposed rule governing the placement of natural gas meters. The meeting will be held on Wednesday, September 14 at 6pm in City Council Chambers. Members of the PUC staff will attend. UGI Corporation representatives have also been invited.

The Commission voted unanimously in late July to issue the proposed rulemaking for comment. It includes language that allows the natural gas utilities to have sole determination for meter set (meter and regulator) location, and that the determination should be based upon public safety. The proposed language also requires natural gas distribution companies (NGDCs) to relocate current inside regulators that are connected to steel service lines to the outside with the exception of historic districts and high risk vandalism districts within 10 years.

Following an investigation, the PUC's Bureau of Transportation, Gas Safety Division concluded that the Commission's existing regulation is vague, inadequate and out-of-date with respect to the federal standards which the PUC has adopted. The proposed regulations are more consistent with the federal regulations.

The meeting will allow for an informational discussion on the proposed rulemaking order and will give those in attendance a clear understanding of proposed rules and regulations. Representatives will also explain the PUC rulemaking process and inform residents how they can participate in the process.

The City of Allentown Department of Community & Economic Development is facilitating the meeting. All interested persons are urged to attend.


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Hello Everyone,

I wanted to make you aware of CAMP [www.campnow.org](http://www.campnow.org) (Citizens for Appropriate Meter Placement). CAMP is a grassroots community effort to address homeowner concerns regarding utility infrastructure projects that are having a negative impact in some neighborhoods and giving an impression of urban blight. Our keynote issue is the policy of moving gas meters and related equipment to the exterior of homes where there is insufficient setback or landscaping to hide the installation.

CAMP was founded in December of 2010 in Allentown Pennsylvania by a cooperative effort of various neighborhood associations. This effort was initiated in response to the apparent lack of concern shown to homeowners in the recent move to upgrade the gas delivery system infrastructure by the Public Utility Commission and UGI.

Our goal is to bring public awareness to the issue and pressure the PUC and local utility providers to adopt safe and appropriate installation guidelines that preserve the historic and aesthetic nature of our homes.

Please forward this e-mail message to your fellow neighborhood residents to make them aware of this situation and I encourage everyone to sign our online petition at [www.campnow.org](http://www.campnow.org)

Also, please let us know if your neighborhood organization would be willing to be listed as a CAMP "Supporter" on our website. If you're willing to be listed as a supporter, kindly send an e-mail with your Organization's name as you would like it to appear on the website and a statement if you so choose, to: [info@campnow.org](mailto:info@campnow.org)

We will let you know when our next meeting will be held (please feel free to pass the invite among your neighborhood groups). The meetings are typically held on a monthly basis at the Old Allentown Preservation Association office located at 147 N. 10<sup>th</sup> Street in Allentown at 7pm and typically last about 45 minutes. Hope to see you at our next meeting! ☺

Regards,

CAMP Committee

**PENNSYLVANIA  
PUBLIC UTILITY COMMISSION  
Harrisburg, PA 17105-3265**

Public Meeting held July 28, 2011

Commissioners Present:

Robert F. Powelson, Chairman  
John F. Coleman, Jr., Vice Chairman  
Wayne E. Gardner  
James H. Cawley  
Pamela A. Witmer

Rulemaking Re Amendment to  
52 Pa. Code §59.18 Meter Location

Docket No. L-2009-2107155

**PROPOSED RULEMAKING ORDER**

**BY THE COMMISSION:**

In accordance with Section 501 of the Public Utility Code, 66 Pa.C.S. § 501, the Commission formally commences its rulemaking process to amend its existing regulations at 52 Pa. Code § 59.18 "Meter Location" to the proposed language attached in Annex A.

**Background and Procedural History**

On August 21, 2008, the Commission directed the Bureau of Transportation, Gas Safety Division, to institute an investigation into the issue of gas meter placement and relocation in the context of service disputes between gas distribution companies and their customers. Pursuant to the Commission's directive, the Gas Safety Division reviewed existing regulations and tariff language on meter location. The Gas Safety Division concluded that the Commission's existing regulation is vague, inadequate, and out-of-date with respect to the federal standards which the PUC has adopted.

The issue of gas meter placement and relocation in the context of service disputes between NGDCs and their customers came before the Commission in two cases. *Mitchell v. Equitable Gas Company*, Docket No. C-20077457 (Final Opinion and Order Entered January 22, 2009); *Lucas v. Columbia Gas Company of Pennsylvania, Inc.*, Docket No. C-20065830 (Order entered June 3, 2008). In both cases, the meter relocation occurred due to a discovery and repair of leaking service lines. Each case involved a customer complaint filed after the utility charged for relocating the meter.

Specifically, customers had objected to being charged for the relocation of meters from inside their residences to an exterior location, and sought reimbursement of associated costs. The gas line from the meter outlet valve is considered customer owned property. Therefore, when the meters were relocated outside, the customer line was lengthened. Normally, a homeowner would have to contract with an Operator Qualified plumber to extend the house line outside to the meter. In the instances where the customers objected to the relocation of the meters, the NGDC required the meter to be relocated due to safety concerns.

After reviewing these and other cases, the PUC approved a motion offered by Commissioner Pizzigrilli finding that its regulations and the tariff provisions of gas utilities vary significantly:

[I]t is evident that there is ambiguity with respect to meter placement and relocation...[and] it is critically important that our regulations and company tariffs provide clear direction on meter location issues to ensure safe and reliable service.

As much of Pennsylvania's natural gas infrastructure is aging and a number of gas utilities are in the process of embarking on significant infrastructure replacement initiatives, it is an opportune time to assess the meter relocation policy to enable gas utilities to more efficiently address this issue in the

context of these programs and to ensure safe and reliable service.<sup>1</sup>

The Commission then directed the Gas Safety Division to undertake a review of the regulations and to prepare a report with any recommendations.

## DISCUSSION

Before discussing the Gas Safety Division's report, it is noteworthy, that the Commission's only regulation governing gas meter location reads:

52 Pa. Code § 59.18 Location of meters.

Meters shall be installed in either of the following locations:

1. Inside the building, preferably in a dry, well-ventilated place not subject to excessive heat, and as near as possible to the point of entrance of the pipe supplying service to the building.
2. Outside the building at a location selected by the utility. A meter cover or housing is required if, in the judgment of the utility, conditions require the physical protection for the meter installation.

The U.S. Department of Transportation (“DOT”) regulations, which the Commission has adopted<sup>2</sup> and has an agreement with the Pipeline and Hazardous Material Safety Administration (“PHMSA”) to enforce, include the following:

49 CFR § 192.353 Customer meters and regulators: Location.

- (a) Each meter and service regulator, whether inside or outside a building, must be installed in a readily accessible location and be protected from corrosion and other damage, including, if installed outside a building, vehicular damage that may be anticipated. However, the upstream regulator in a series may be buried.

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<sup>1</sup> *Gas Meter Location*, Docket No. M-2008-2058386, Motion of Commissioner Kim Pizzingrilli (August 21, 2008).

<sup>2</sup> *See Ratification and Adoption of Amendments to Part 192 of Title 49 of the Code of Federal Regulations*, Docket No. M- 00001347, Order entered March 16, 2000, 2000 Pa. PUC LEXIS 4; 52 Pa. Code § 59.33, safety.



(b) Each service regulator installed within a building must be located as near as practical to the point of service line entrance.

(c) Each meter installed within a building must be located in a ventilated place and not less than 3 feet (914 millimeters) from any source of ignition or any source of heat which might damage the meter.

(d) Where feasible, the upstream regulator in a series must be located outside the building, unless it is located in a separate metering or regulating building.

49 CFR §192.357 - Customer meters and regulators:  
Installation.

(a) Each meter and each regulator must be installed so as to minimize anticipated stresses upon the connecting piping and the meter.

(b) When close all-thread nipples are used, the wall thickness remaining after the threads are cut must meet the minimum wall thickness requirements of this part.

(c) Connections made of lead or other easily damaged material may not be used in the installation of meters or regulators.

(d) Each regulator that might release gas in its operation must be vented to the outside atmosphere.

The Commission's Gas Safety Division, in conjunction with the Law Bureau, implemented an investigation regarding meter set (meter and regulator) location. The Gas Safety Division issued ten data requests to the ten largest gas utilities under PUC jurisdiction. The data requests included questions related to the number of inside/outside meter sets, inside regulators, tariff language, inside meter set leak calls, reportable incidents associated with inside meter sets, meter relocation charges, inside leak surveys, and local ordinances requiring certain meter locations. All ten gas utilities responded. The data revealed that the Pennsylvania natural gas industry has approximately 27% of

all meter sets located inside of residential dwellings. This average has been consistent over the last five years.

All the tariffs for the solicited utilities have tariff rules governing the location of meter sets. Each tariff states that the utility will make the ultimate siting determination. The basis for the utility decision for meter and regulator location is safety. The majority of the tariffs include language that allows for exceptions to outside siting. Allowance for inside meter and regulator sets are based upon historic area prohibitions and areas that have high amounts of vandalism.

The Commission is also concerned about the number of reportable incidents resulting, at least partially, from locating meters and regulators inside structures. The gas distribution utilities reported more than 4,000 leaks occurring on inside meter sets over a five year period. The number of reportable incidents<sup>3</sup> (65) over the past forty years, however, is more alarming. While it appears from the data that the inside meter and regulators were not always the primary factor for accidents, locating meters and regulators inside certainly contributed to these incidents through a release of natural gas. State and federal gas safety regulations require gas utilities to perform leak surveys over service lines periodically; however, several of the utilities reported that they could not comply with the leak survey requirements when the meter and regulator are inside a building, which prevents access. This is troubling because the state and federal regulations require leak surveys up to the meter. By not having access to the meter sets, the NGDCs cannot comply with the state and federal regulations and cannot detect inside leaks.

The state has experienced several gas explosions related to steel service lines being struck and pulled up from their stable position and subsequently pulling the service

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<sup>3</sup> A reportable incident exists where there was a release of gas and (1) greater than \$50,000 in damages; (2) death or injury; or (3) a significant event in the determination of the distribution utility.

line from the inside meter set. Plastic service lines with inside meter sets do not pull away since the excavation equipment usually severs the line immediately after being struck. The combination of steel service line and inside meter set is a high risk factor for natural gas incidents.

The responding NGDCs also addressed the cost of moving meter sets from the inside to the outside. In most instances, if the customer requests a meter set relocation, the customer pays for the extension of the customer piping up to the outlet valve of the meter set. But the utilities have multiple exceptions as to who pays. Under federal regulations, Operator Qualified plumbers are the only plumbers who may perform work on service lines and meters. The Operator Qualified plumbers are certified and tested by the specific gas utility.

If a meter set is to be moved outside and the meter set was connected to a steel service line, the NGDC would replace the steel service line and move the meter set outside where practical. The cost of replacing the steel service line and moving the meter set outside is approximately \$4,000 per unit. The average cost of moving only a meter set from inside to outside is approximately \$500. UGI opined that most of the steel service lines with inside meter sets were connected to bare steel or unprotected steel mains which would also need to be replaced and would increase the cost.

Therefore, if an NGDC is replacing a natural gas main in accordance with its main replacement program, NGDC's should make all reasonable efforts to replace the bare or unprotected steel service lines in addition to relocating the meter set. In 2008, Columbia Gas of Pennsylvania, Inc. requested limited waivers of the tariff rules relating to customer service line replacement.<sup>4</sup> According to Columbia's existing tariff, certain

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<sup>4</sup> Petition of Columbia Gas of Pennsylvania, Inc. for Limited Waivers of Certain Tariff Rules Related to Customer Service Line Replacement, Docket No. P-00072337.

customers are responsible for the installation, maintenance and replacement of their service lines. We agreed it would be inequitable to require these customers to replace their service lines at the customers' expense when the replacement was required by Columbia's main replacement and upgrade project. Thus, it would be prudent and more cost effective for NGDCs to coordinate their meter set relocation program (including steel service line replacement when necessary) with their main replacement program.

There are several alternatives, however, to relocating and replacement of inside meter sets and steel service lines. One alternative is to retrofit existing service lines with Excess Flow Valves. Excess Flow Valves (EFV) are currently mandated for all new and replaced service lines by federal law. *See* 49 U.S.C. 60110, 49 CFR § 192.381. The cost of retrofitting a steel service line with EFV is approximately \$1,500. Another alternative to relocation and replacement is to relocate the inside regulator to the outside. The majority of gas distribution utilities do not allow inside regulators, however the companies that do allow them include UGI, PECO, and PGW. The relocation of the *inside regulator costs approximately \$450.*

Finally, several utilities provide service in historic districts where municipal laws require the meter set to be located inside structures. In many of these instances, the utilities are able to locate the regulator outside; however, there are instances when the utility must locate the entire meter set inside due to zoning ordinances. In addition, some utilities must locate meter sets inside due to vandalism concerns.

After review of the state and federal regulations pertaining to meter set location, gas distribution tariffs, and after meeting with the gas utilities, the Gas Safety Section concluded:

1. The Pennsylvania regulations at §59.18 are silent as to reimbursement costs related to relocation of meters.

2. The Commission has adopted provisions of the Code of Federal Regulations, which address the safety issues related to meter set location and installation and thus are in conflict with the existing Pennsylvania regulations.
3. The collected data show that Pennsylvania has experienced 65 reportable incidents associated with inside meter sets and inside regulators over the last 40 years.
4. The gas distribution utilities have had more than 4,000 leaks related to inside meter sets over the last five years.
5. Several of the gas distribution utilities cannot comply with the state and federal regulations pertaining to leakage surveys because they cannot get access to inside meter sets.
6. Inside meter sets with inside regulators are a major concern due to the possibility of high pressure gas flowing into a structure if the inside meter or inside regulator is detached from the service line. Three gas distribution utilities have high numbers of inside meter sets with inside regulators that are at higher risk for failure because the inside meter and regulator are connected to a steel service line. Steel service lines are susceptible to pulling from excavation equipment. Pennsylvania has experienced several catastrophic explosions due to steel service lines pulling away from inside meter sets and inside regulators.

## **CONCLUSION**

The Commission, therefore, formally commences its rulemaking process to amend its existing regulations by amending 52 Pa. Code § 59.18 consistent with Annex A to this Order, so that the state regulations are consistent with the federal regulations that the Commission has adopted. The new regulation includes language that allows the natural gas utilities to have sole determination for meter set (meter and regulator) location. The determination should be based upon the interest of public safety. The proposed language also requires NGDCs to relocate current inside regulators, which are connected to steel service lines, to the outside with the exception of historic districts and high risk vandalism districts within 10 years.

The proposed amended language also provides for alternatives to relocating inside meter sets outside. These alternatives include installation of an Excess Flow Valve on steel service lines or relocating inside regulators to the outside if the meter set is connected to a steel service line. The proposed amended language imposes no additional regulatory requirements upon NGDCs that these utilities are not already subject to under the federal regulations. The Commission seeks comments from all interested parties on this proposed regulation amendment, which is found at Annex A to this Order.

Accordingly, under sections 501 and 1501 of the Public Utility Code, 66 Pa.C.S. § 501 and 1501; sections 201 and 202 of the Act of July 31, 1968, P.L. 769 No. 240, 45 P.S. §§ 1201-1202, and the regulations promulgated thereunder at 1 Pa. Code §§ 7.1, 7.2, and 7.5; section 204(b) of the Commonwealth Attorneys Act, 71 P.S. 732.204(b); section 745.5 of the Regulatory Review Act, 71 P.S. § 745.5; and section 612 of the Administrative Code of 1929, 71 P.S. § 232, and the regulations promulgated thereunder at 4 Pa. Code §§ 7.231-7.234, we are considering adopting the proposed regulations set forth in Annex A, attached hereto; **THEREFORE,**

**IT IS ORDERED:**

1. That a proposed rulemaking be opened to consider the regulations set forth in Annex A.
2. That the Secretary shall submit this proposed rulemaking Order and Annex A to the Office of Attorney General for review as to form and legality and to the Governor's Budget Office for review of fiscal impact.
3. That the Secretary shall submit this proposed rulemaking Order and Annex A for review and comments to the Independent Regulatory Review Commission and the Legislative Standing Committees.

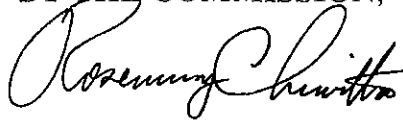
4. That the Secretary shall certify this proposed rulemaking Order and Annex A and deposit them with the Legislative Reference Bureau to be published in the *Pennsylvania Bulletin*.

5. That an original and 15 copies of any written comments referencing the docket number of the proposed regulations be submitted within 30 days of publication in the *Pennsylvania Bulletin* to the Pennsylvania Public Utility Commission, Attn: Secretary, P.O. Box 3265, Harrisburg, PA 17105-3265.

6. That a copy of this proposed rulemaking Order and Annex A shall be served on the Office of Trial Staff, the Office of Consumer Advocate, and The Office of Small Business Advocate, and all Natural Gas Distribution Companies.

7. That the contact person for this proposed rulemaking is Adam D. Young, Assistant Counsel, Law Bureau, (717) 787-5000. Alternate formats of this document are available to persons with disabilities and may be obtained by contacting Sherri DelBiondo, Regulatory Coordinator, Law Bureau, 717-772-4579.

**BY THE COMMISSION,**



Rosemary Chiavetta  
Secretary

(SEAL)

ORDER ADOPTED: July 28, 2011

ORDER ENTERED: July 28, 2011

ANNEX A  
TITLE 52. PUBLIC UTILITIES  
PART I. PUBLIC UTILITY COMMISSION  
Subpart C. FIXED SERVICE UTILITIES  
CHAPTER 59. GAS SERVICE

\* \* \* \* \*

§ 59.18. [Location of meters.] Meter and regulator location.

[Meters shall be installed in either of the following locations:

- (1) Inside the building, preferably in a dry, well-ventilated place not subject to excessive heat, and as near as possible to the point of entrance of the pipe supplying service to the building.
- (2) Outside the building at a location selected by the utility. A meter cover or housing is required if, in the judgment of the utility, conditions require the physical protection for the meter installation.]

(a) General requirements.

- (1) When practical, a building may not have more than one service line. Service lines must terminate in the building in which the service line enters.
- (2) Meters shall be installed at the service regulator. When more than one meter is set on a particular premises, they shall be set at one location. When it is necessary to install meters at multiple locations on the premises, the utility operator shall provide a tag or other means to indicate there are multiple meter locations.
- (3) An outside, above-ground meter location shall be used when availability of space and other conditions permit.
- (4) When selecting a meter or service regulator location, a utility shall consider potential damage by outside forces, including:
  - (i) Vehicles.
  - (ii) Construction equipment.
  - (iii) Tools or other materials which could be placed on the meter.
  - (iv) Falling objects, such as packed snow or ice from a roof.
- (5) When potential damage is evident, the meter or service regulator shall be protected or an alternate location selected.



(6) Meters and service regulators may not be installed in contact with the soil or other potentially corrosive materials. A utility shall consider the potential for shorting out the insulating fitting when choosing a location.

(7) The meter location must accommodate access for meter reading, inspection, repairs, testing, changing, and operation of the gas shut-off valve.

(8) The meter location must accommodate for the installation of the service line in a straight line perpendicular to the main.

(9) Meters and service regulators may not be installed in the following locations:

- (i) Directly beneath or in front of windows or other building openings which may be used as emergency fire exits.
- (ii) Under interior or exterior stairways.
- (iii) A crawl space with limited clearance.
- (iv) Near building air intakes.

(10) When the Commission or a utility determines that a meter or regulator must be moved for safety reasons, all costs associated with the relocation of such meter or regulator shall be borne by the utility. When a utility moves a meter in addition to the regulator, pursuant to this section, the cost of extending customer-owned facilities to the new meter location shall be borne by the utility.

(11) A customer requesting that a meter or regulator be moved shall pay the costs associated with such relocation when the meter and regulator are currently situated in a suitable location pursuant to state and federal guidelines.

(12) Utilities shall address meter location in their tariffs.

(b) *Outside meter or service regulator locations.* Outside meters or service regulators shall be installed in the following locations:

(1) Above ground in a protected location, adjacent to the building served.

(2) In a properly designed buried vault or meter box.

- (i) The vault or meter box shall be located on a customer's property, either adjacent to the building served or near the gas main.

(ii) Vaults may be located in a public right of way. Consent of local jurisdictions may be required.

(3) A utility shall consider proper design and location criteria for a meter box, including the following:

- (i) Ventilation.
- (ii) Vehicular traffic.
- (iii) Potential for soil accumulation.
- (iv) Surface water runoff.
- (v) High water table.
- (vi) Proximity to building air intakes or openings.
- (vii) Proximity to an excessive heat source.

(4) Piping installed through vault walls shall be properly coated to protect from corrosion.

(5) Vaults containing gas piping may not be connected by means of a drain connection to any other underground structure.

(6) When a meter box is located outside a paved surface, a utility shall consider the potential for fill, topsoil, or sod being placed over the vault, and when practical, choose an alternate location.

(7) A utility shall refer to the guide material under 49 C.F.R. § 192.355 (relating to considerations involving service regulator and relief vents in vaults).

(c) *Inside meter or service regulator locations.*

(1) Inside meter locations shall be considered only when:

- (i) An acceptable outside location is not available due to restrictions in Federally approved Historic Districts or in high risk vandalism districts.
- (ii) Protection from ambient temperatures is necessary to avoid meter freeze-ups.

(2) Regulators shall be located outside when a meter is located inside.

(3) All installed inside meters shall be attached to an operable outside shut off valve.

(4) All regulators, connected to steel service lines, shall be relocated to the outside by year end 2020.

(6) Meters and service regulators may not be located in engine, boiler, heater, or electrical equipment rooms, living quarters, closets, restrooms, bathrooms, or similar confined locations.

(7) Each service regulator installed within a building shall be located as near as practical to the service line entry point. When selecting the service regulator location, venting requirements and the vent piping location and length shall be considered.

(8) When a meter or service regulator is located inside a building, a utility shall comply with 49 CFR §192.365 (relating to valve locations). A utility shall install a readily accessible shut-off valve outside the building.

(d) *Other meter or service regulator locations.* A utility may consider a specially constructed cabinet recessed in the building wall, sealed from inside the building and vented to, and accessible from, outside the building.

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## **GAS UTILITIES**

### **INTRODUCTION**

Natural gas is the product of nature's action on organic material over millions of years. It is a common source of heat in buildings due to its convenience, abundance, and relatively low cost. Almost every structure in the City of Los Angeles has natural gas delivered to the property, via underground service pipes. Firefighters respond to natural gas incidents every day. This product is considered safe, due to its relatively small window of flammability. However, if we refuse to give it the proper attention, it will take advantage of our complacency. *We must train ourselves to be vigilant, and on the alert, for situations that can injure or kill firefighters and/or the public that we serve.*

### **PROPERTIES OF NATURAL GAS**

Pure natural gas is completely odorless. For the purpose of leak detection, odorant is added so that as little as one-percent of natural gas in the air can be detected. The common odorant is a Mercapitan/Thiophane mix, which is used in solution of one pint per million cubic feet of gas. Natural gas is non-toxic and is not considered hazardous when inhaled in limited concentrations. However, in quantities large enough to displace oxygen, asphyxiation can occur.

Natural gas is lighter than air, which results in escaping natural gas rising and rapidly dissipating. This is a distinct safety advantage over heavier fuels such as butane and propane, which are heavier than air; and when escaping, it will collect in low areas. Escaping natural gas can be hazardous when trapped by confined spaces such as structures, hollow walls, etc. Natural gas also has an ignition temperature of 1100 degrees, and has a flammable range between 4 and 14 percent.

### **TRANSMISSION AND STORAGE**

Most natural gas is initially distributed through over 30,000 miles of transmission lines from Texas, Kansas, New Mexico, Oklahoma, Arizona, and the Rocky Mountain area. Transmission lines maintain pressures up to 1000 psi and use pressure booster compressor stations, at specific intervals, to maintain appropriate flow and pressures. To compensate for fluctuating demands, gas companies can maintain underground or above ground storage facilities. Natural gas is generally distributed by a combination of transmission lines and distribution mains. Transmission lines bring natural gas into the Southern California area and vary in diameter from 12 to 36 inches. Natural gas is then distributed to Gas Company customers by distribution mains. The gas is carried by service lines, as medium pressure, which normally does not exceed 60 psi. At

the service meter (Meter Set Assembly), the pressure is reduced to a low pressure (approximately 1/3 psi.). Distribution mains are generally polyethylene and account for a high percentage of the mains in use today. Older existing distribution mains are made of steel or copper, but are rare to find. Polyethylene mains are color coded to identify the pipe as transporting natural gas. These pipes are yellow, which is the national color code for newer installations. Older installations of plastic pipe can be pink (salmon beige), or orange in color. Polyethylene will have a wire running the length of the pipe, for locating plastic gas lines, below ground. Above ground gas lines must be made of steel and cannot be plastic. Distribution mains are normally located underneath city streets, parallel to curbs, under grassy parkways, between the curb and sidewalk, and occasionally in alleys.

## **GAS EQUIPMENT AND METERS**

### **METER SET ASSEMBLIES**

Natural gas is distributed from a distribution main to the customer by a service line. Service lines run from distribution mains to structures, via an outside riser, where pressure regulators and meters are located. The pressure inside a customer line (inside the structure) is low pressure (approximately 1/3 psi) and is regulated and measured by a regulator and gas meter. Gas companies refer to gas meters as Meter Set Assemblies (MSA's). MSA's can be found in the following three locations:

- Outside Sets..... MSA's are located outside the structures.
- Underneath Sets.....MSA's are located underneath structures, stairs, etc.
- Curb Meter Box..... MSA's are located in a vault underneath a sidewalk.
- Cabinet Set..... MSA's are located in an enclosure on the exterior of the structure.

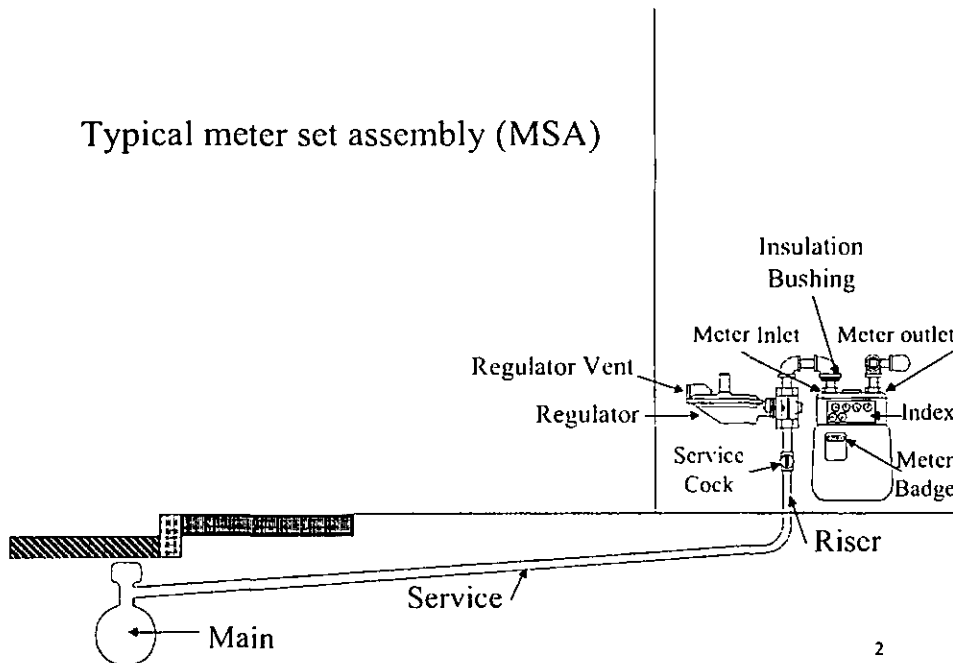
Additionally, MSA's can be categorized as follows:

- Residential
- Industrial
- Multiple Gas Meter

### **RESIDENTIAL METER SET ASSEMBLIES**

The basic MSA consists of piping, a shut-off valve, regulator, and gas meter. The pipe rising vertically from the ground, close to the exterior wall of a structure is called a riser. Tracing the riser up from the ground, the first fitting is the shut-off valve called a stopcock or service cock. This valve is usually of primary concern to the personnel responsible for shutting off the gas to a structure. Of particular interest is the following:

- A ring on the stopcock valve indicates a branch service.
- A flat washer on the stopcock valve indicates that the service line is a plastic pipe inserted inside an older metal pipe.
- A band on the stopcock valve indicates the service line is plastic.
- Next, up the riser, is a flat circular device called a "regulator" that reduces medium gas pressure (up to 60 psi) to a relatively low level of approximately 1/3 psi.
- Next are pipes and fittings, leading to the gas meter. The meter measures the amount of gas that is used. After the meter, gas flows through pipes and fittings into the structure.



2

Shutoff valves can be located by finding the MSA since they are always adjacent to each other. Initially, look for a "G" that is either chiseled or painted on the curb. A "G", required by Cal-OSHA, marks the location where the service line passes beneath the curb and indicates which side of the building the MSA is located. If a "G" cannot be quickly found, do not waste time looking for one.

Next, look along the foundation of the structure. MSA's and shut-off valves are normally located on an outside wall of a structure, in a location that is easily accessible to gas company personnel who read the meters for billing purposes.

If an MSA is not visible along an outside wall, it is usually found in the following location:

- In a crawl space, under the building.
- Beneath an outside staircase.
- In an outdoor cabinet, particularly new condos.
- In an underground garage.
- In a sidewalk or parkway vault, at the side of a building.
- In a basement, with the shut-off valve usually accessible from the outside of the building.
- Subsurface, in the parkway or sidewalk.

Some MSA's may be equipped with an emergency vibration-sensitive shut off device known as an earthquake valve. These valves are marketed by private industry and are normally mounted on the discharge side, right side as you face the meter, of an MSA. Earthquake valves take on various shapes and sizes and can easily be mistaken for any number of gas appliances. Personnel should recognize and understand that a swift-kick may possibly shut off the flow of gas, but only in the event of a damaged or frozen stopcock; never done in lieu of a normal shut-off procedure. Turning a reset button, one-quarter turn, completes reset of this device.

### INDUSTRIAL METER SET ASSEMBLIES

Industrial MSA's are similar to, and larger than, residential MSA's due to the increased flow of gas (volume) that is necessary for commercial/industrial applications. Industrial MSA's can be characterized by any of the following features:

- A curb valve and curb valve extension handle can be utilized to control the flow of gas in the service main.
- Industrial shut-off valves, known as Nordstrom valves, are used for high pressure applications. They are larger than standard shut-off valves, and may require more effort and larger tools to shut off the flow of gas. Some industrial installations have gate valves with wheel handles that may be turned clockwise to close.
- Industrial applications that are high pressure can use two regulators in series to regulate the gas pressure. A rotary meter is used, instead of a conventional MSA, to regulate the high pressure and handle quick surges.
- Meters under the sidewalk, called curb meters, are common in commercial areas. The lid over the curb meter space is made of lightweight concrete, or fiberglass set in a metal frame, and is easily identified by its gas company markings.



- Industrial MSA's are physically larger than MSA's used for residential applications.

### MULTIPLE METER SET ASSEMBLIES

Multiple habitational or commercial occupancies are often equipped with multiple MSA's, which provide a master stopcock and a separate meter and stopcock for each unit. Past the riser, and master stopcock, is a horizontal header that feeds multiple stopcocks and MSAs. Master stopcocks shut off the entire building and individual meters/stopcocks can control the flow of gas to individual occupancies in one structure. The Gas Company is required to identify the individual MSA's, as to which unit or building they serve. If the identification has worn away, notify The Gas Company to have the meters properly marked.

### BRANCH SERVICE

In some commercial areas, multiple structures may be commonly serviced by a single service pipe called a standard service main. A metal ring identifies this branch service. The occupancy that is further from the supply main is a standard service, and the other occupancies are branch services. All MSA's that are served from the branch main will be identified by a ring at the stopcock.

### SHUTOFF VALVES

#### • STOPCOCKS

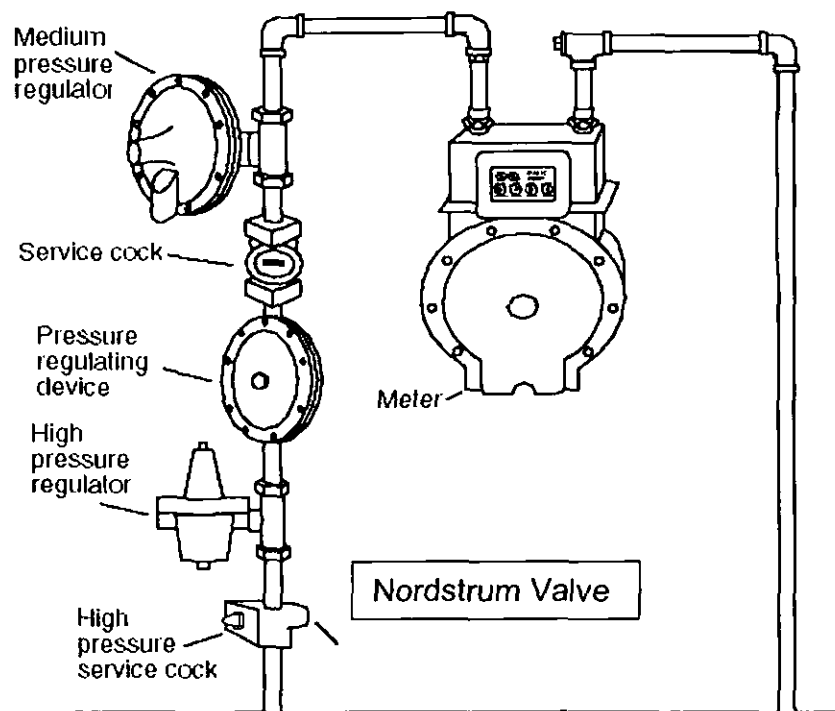
To turn off the flow of gas, turn the tang, crosswise, to the flow of gas; crosswise to the pipe. The tang on some stopcocks can be square. Turn the tang, so the line on the tang is crosswise to the pipe. Tangs can be easily turned with a crescent wrench.

If a tang appears to be stuck, do not apply too much pressure. If the tang breaks off, it will be difficult to stop the flow of gas. It is recommended that The Gas Company service a stuck tang. However, stuck tangs can be approached in EMERGENCY CONDITIONS as follows:

1. Use two wrenches, one on the tang and the other on the backing nut. Holding the tang steady, loosen the backing nut one-quarter turn only! If the backing nut is loosened too far, the core can fly out, leaking medium pressure gas, 40 to 60 psi. It is nearly impossible to replace the core while gas is leaking. NOTE: Newer stopcocks have a pin driven into the backing nut, and bolt, and cannot be loosened.
2. Give the backing nut a tap with a non-metallic hammer, freeing the core.
3. Turn the tang, one-quarter turn, to stop the flow of gas; a half-turn will continue to let the gas flow.
4. Tighten the backing nut to lock the core in the "OFF" position.

- NORDSTRUM VALVE

The Nordstrum Valve is a larger version of a residential stopcock. It is used on high-pressure risers and piping, at industrial/ commercial sites, and comes in various sizes to fit different diameter pipes. The tang on a Nordstrum valve can only be turned one-quarter turn, in either direction, ensuring the "ON" and "OFF" positions are easy to locate. Depending on the size of the valve, large wrenches may be necessary to turn this valve.



- GATE VALVES

Some industrial meters are equipped with a gate valve that has a wheel handle (similar to an OS&Y). Turning the handle clockwise several revolutions will shut off the gas.

- CURB VALVES

Also referred to as an Emergency Shutoff Valve. These valves can be installed in addition to stopcocks at public assembly occupancies such as schools, hospitals, churches, etc. They are normally located near the property line, by a sidewalk. They are two to three feet underground and under a small metal, concrete or fiberglass lid; with "Gas Company" markings in raised letters. To gain access to this valve, lift the lid with a common utility tool, screwdriver, in the hole. If the lid is stuck, and additional leverage is necessary, insert the point of a pickhead axe in the hole and apply the proper leverage. This valve is an ordinary gate valve with a "faucet" type handle. Turn the handle CLOCKWISE to stop the flow of gas. If the valve is too deep to reach with the hand, a sprinkler key can be used for extra reach. Remember that if this valve is present, either turning the gas off at the curb valve or meter stopcock can eliminate the flow of gas.

### **LEAKS INSIDE STRUCTURES**

Natural gas emergencies can be divided into the three following categories:

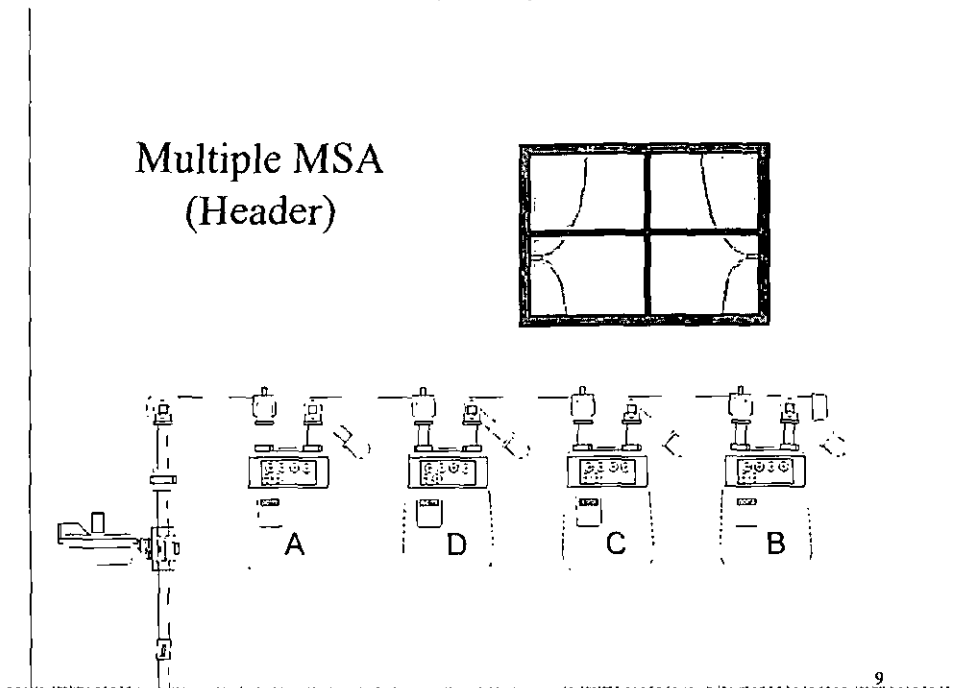
- Inside leaks
- Outside leaks
- Leaks resulting in fires

While each leak has its own dangers and concerns, the greatest danger results from gas leaks inside structures, due to the potential for ignition and explosion.

The first priority upon arrival on the scene of a reported leaking natural gas incident is safety. If a heavy odor of "gas" occurs, expect the worst. Expose as few people as possible, meaning prompt evacuation where necessary. A faint whiff of "gas" or a leak, which has "come and gone" for the past few days, may allow more leeway to perform a leak examination.

For faint odors, always check the condition of pilot lights as a first action. If a leak is suspected, pouring soapy water over the suspected area can confirm its presence. When a leak is found, always try to isolate the area as close to the leak as possible. Sometimes, turning the appliance valve near the problem one-quarter turn, the leak can be stopped leaving the rest of the premises unaffected. If that is not possible, move back along the supply piping to the next point of control; generally, another stopcock at the MSA.

Multi-meter service is often present in multiple-tenant occupancies, such as apartment houses, or shopping centers. Each tenant has a meter and stopcock. Additionally, where the service pipe comes through the slab, prior to the MSA's, there will be a "master" valve called the isolation valve stopcock; which stops the flow to all tenants in the building on the service pipe. This valve should be used with discretion, a minor leak at an appliance does not warrant shutting off 20 or 30 apartments. Conversely, if there is a major leak and difficulty is experienced in determining which meter controls the appropriate apartment, the main service stopcock provides the fastest means of control.



Tactical considerations at an inside leak should include the following considerations:

- Determining necessity and extent of evacuation.
- Remove all sources of ignition. Avoid operating electrical switches. Turning a switch "ON" or "OFF", can cause sparking. Also, avoid walking on carpets in dry weather to prevent sparks from static electricity.
- Turn off appliance valve located at the connection from the appliance to the customer house line.
- Open windows after all sources of ignition have been eliminated. This ventilation can bring the gas into the proper explosive mixture with air.

- Searching for occupants who may be overcome by gas.
- If it is determined to be unsafe to enter the structure, consider the following:
  - Turn off gas at the meter.
  - Spot apparatus in safe zones.
  - Establish a water supply and prepare for fire suppression operations.

### **LEAKS OUTSIDE STRUCTURES**

Outside leaks can be just as dangerous as inside leaks because gas can take the path of least resistance, as it tries to escape to the atmosphere. Quite often, that path is along the gas service pipe or other underground lines into buildings or manholes. This migration may not be apparent because, as the gas travels through the ground, it tends to deodorize as the soil filters out the odorant. The best immediate procedure for responding to an outside leak should include the following considerations:

- Call The Gas Company. Allow The Gas Company representative the opportunity to assess the situation and call for equipment. In large emergencies, The Gas Company will send a management representative as a liaison and spokesperson for the company. Only The Gas Company can shut down a transmission or distribution line.
- The Fire Department's role at the site is to maintain public safety. This usually means eliminating potential sources of ignition until the leak is stopped. Place apparatus upwind of the leak and away from manhole covers, storm drains, or structures that can contain trapped gas. Evacuate when appropriate and maintain site security. It can take several hours for The Gas Company to shut off gas in a large, high-pressure, pipeline.
- The only sure way to safely check suspected areas are to use a combustible gas indicator. Currently, hazardous material squads carry equipment that can be used to detect the presence of natural gas and its lower explosive limit (LEL).
- If the leak is adjacent to structure(s), close doors and windows to prevent gas from entering.
- If gas ignites, protect exposures close enough to be damaged.
- Previously, The Gas Company used to teach its members a technique, known as the bend-back method, for controlling the flow of gas in small diameter pipes. This method is now against The Gas Company's policy,

due to a recognized danger to their employees. There is an extremely high potential for creating a static charge that usually accompanies the increased pressure of gas flowing from the restricted opening as the pipe is bent over.

- Crimping plastic pipe is acceptable as long as all tools used to work on plastic pipe are grounded.
- Redwood plugs can be driven into various diameter steel pipes with a rubber mallet. This method, redwood plugs, does not work with polyethylene pipe.
- Be aware that, on rare occasions, pipelines may contain hazardous contaminants such as Polychlorinated Biphenyls. The Gas Company states that its product is 97percent free from impurities. However, if any liquid flows from a natural gas pipe, do not let it touch your body. Treat the liquid as a hazardous material and notify the hazardous material squad.
- Whenever a gas travels through piping, it can create a static electric charge on the pipe. On steel pipe, the current is drawn off and safely dissipated to the ground by the conductive pipe itself. Plastic pipe is an insulator and it is probable that the pipe will have a static charge. A person grabbing the pipe to apply a plug will likely discharge this current, creating spark. Fog down the plastic pipe with a wetting agent such as wet water to prevent ignition from static electricity. Water alone tends to bead up and run off of polyethylene pipe, thus reducing the effectiveness of water. A wetting agent such as wet water will add an adhesive quality to water that helps insure that a static charge cannot form. (Use water judiciously and avoid flooding as mud hampers utility crews working at the break). Some plastic pipes are equipped with a wire that is used to help work crews locate the pipe from above ground. This wire provides no electrical charge. Additionally, it should not be relied upon to provide an adequate ground to eliminate the potential for a static spark.
- Newer installations of pipeline have fiberoptics installed inside the pipe. The rupture of pipe and damage to fiberoptic wires can disrupt bussiness over a wide area.

### **LEAKS WITH FIRE**

Considerations at a natural gas fire should include:

- Protect exposures.
- Generally, let the gas burn until the supply is shut off.
- If necessary, control evacuation and maintain site security.

- Notify The Gas Company.

Small fires may be extinguished with dry chemical, or CO<sup>2</sup> if necessary, to approach a shut off valve. For larger fires, fog streams can be used to approach any valves. Use care when placing hose streams where excavations have ruptured a gas line. Try to keep unnecessary water out of the pit. Utility crews may have to work in that area to stop the leak, and water could compound their problem.

## **GLOSSARY**

- **APPLIANCE VALVE:** A hand-operated valve on the pipe connecting a gas *appliance to a customer house line. Turning this valve will shut off gas to the appliance.*
- **BACKING NUT:** The nut on a stopcock, located opposite the tang. This nut should never be loosened except in an emergency.
- **CORE:** The cylinder inside a stopcock that allows or blocks the flow of gas. It is connected to the tang and rotated by turning the tang. It is held in place by the backing nut.
- **CURB MARKER:** The letter "G" painted or chiseled on a curb. It marks where a service line passes under the curb. It, also, indicates on which side of a structure a meter is located.
- **CURB VAULT:** A small concrete compartment containing an emergency gas shutoff valve. Usually located under a sidewalk or parkway. It is accessible through a removable lid.
- **CUSTOMER HOUSE LINE:** Gas pipe within a structure, usually running inside walls and floors. It is the line from the meter to which appliances are connected.
- **DISTRIBUTION PIPELINE SYSTEM:** Part of the system that carries gas from large transmission pipelines to individual customers. Sometimes referred to as a gas main. Normally, the pressure in these mains is between 40 and 60 psi.
- **EMERGENCY SHUTOFF VALVE:** A gate valve, with a wheel type handle, located in a curb vault at a sidewalk or parkway. Turning the handle clockwise will shut off the gas to the structure. These valves are usually located at public assembly buildings, schools, churches, hospitals and theaters.

- **FLASH POINT:** The temperature at which ignition or explosion will occur. For natural gas it is 1100 degrees Fahrenheit. However, natural gas will only ignite when its concentration in air is between four and 14 percent.
- **HIGH PRESSURE LEAK:** A leak in either a transmission line or distribution main. Only The Gas Company has the capability of shutting down these leaks.
- **HYDROGEN SULFIDE:** A toxic gas that, on rare occasions, is present in leaks at natural gas compressor stations or at underground storage fields.
- **LOW PRESSURE LEAK:** A leak in a customer house line, on the outlet side of the meter, approximately 1/3 psi. Using a redwood plug, or even by pressing a finger against the leak, can temporarily stop such leaks.
- **MAIN:** Gas pipe running under a street or parkway; part of the distribution system.
- **MANAGEMENT REPRESENTATIVE:** The Gas Company sends a liaison to the scene of a major gas emergency that remains until the hazard is eliminated. This person will maintain communication with The Gas Company, the Fire Department, the Police Department, and the public.
- **MASTER METER:** A meter that serves more than one unit, e.g., an apartment complex or mobile home park.
- **MIGRATING GAS:** Gas from an underground leak. It may travel along pipes and rise through ground openings, or it may become concentrated in sewers and spaces under structures.
- **METER SET ASSEMBLY (MSA):** This is the term The Gas Company uses to describe the meter and all the surrounding fittings, including the pressure regulator, the riser pipe, and the stopcock.
- **MULTIPLE METERS (HEADERS):** A row of meters connected to a common riser. Each meter is connected to a separate customer house line. These meters can be turned off together or individually.
- **NATURAL GAS EMERGENCY:** An incident involving a natural gas leak from a damaged pipeline or appliance.
- **NON-SPARKING MALLETT:** The type of mallet that should be used to drive a plug into the end of a broken pipe. Wooden, rubber, plastic or brass mallets



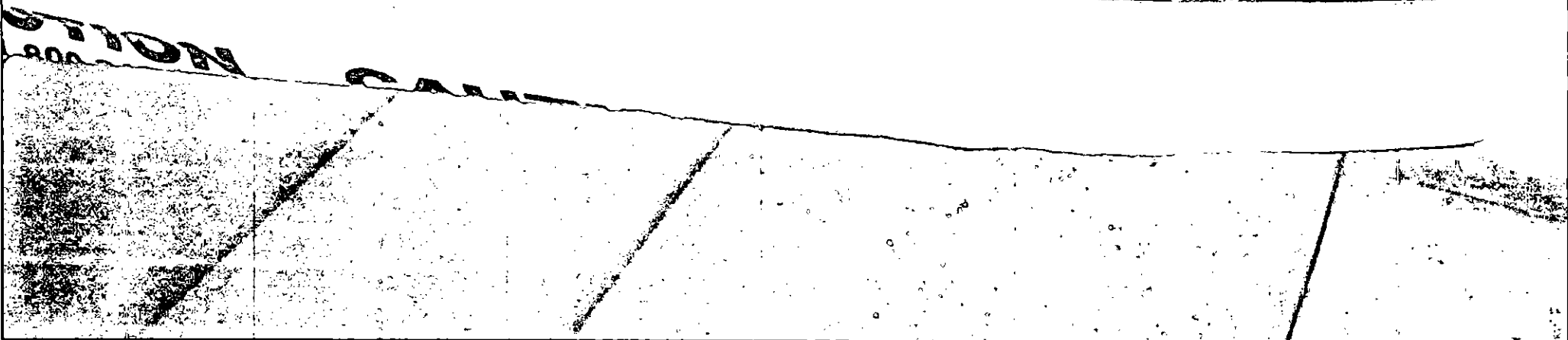
will not cause an igniting spark if they strike the pipe.

- **ODORANT:** Substances known as Mercapitan and Thiophene. They have a distinct odor that is added to natural gas. Since natural gas is odorless, this substance makes it possible to identify the presence of a leak.
- **PLASTIC PIPE:** An increasing number of gas distribution pipelines are made of plastic. Gas escaping from a break in these pipes can create a static electric charge. Fogging the pipe with wet water reduces this hazard.
- **REDWOOD PLUG:** Wooden plug that is driven into a broken, low-pressure, pipe to stop the flow of gas.
- **REGULATOR:** A fixture shaped like a disc installed in the gas line, above the riser and before the meter. It reduces gas pressure to approximately 1/3 psi.
- **REROUTING:** When there is a leak in a high-pressure pipeline, The Gas Company will shift the flow of gas into an alternate line. Because of the large amount of gas involved, it can take several hours for the gas to be purged from the damaged line.
- **RISER:** A vertical pipe that carries natural gas from an underground service main to the MSA. It is the pipe on which the stopcock is located.
- **SERVICE LINE:** The gas line that runs under a customer's property from the main, to the riser.
- **STOPCOCK:** A gas shutoff valve located on the riser; occasionally referred to as a "service shutoff valve".
- **TANG:** The grip on the stopcock. When its long side is turned crosswise to the riser, the flow of gas is stopped; if square, a raised line on the tang is turned crosswise when the flow of gas is stopped.
- **TRANSMISSION PIPELINE SYSTEM:** Large size pipeline, up to 36 inches in diameter, used to move gas over long distances to local distribution areas. Pressure in such a pipeline can be as high as 1,000 psi.

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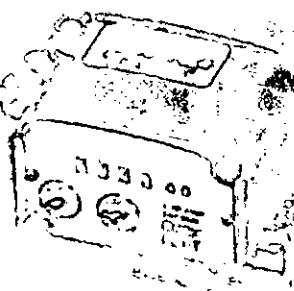
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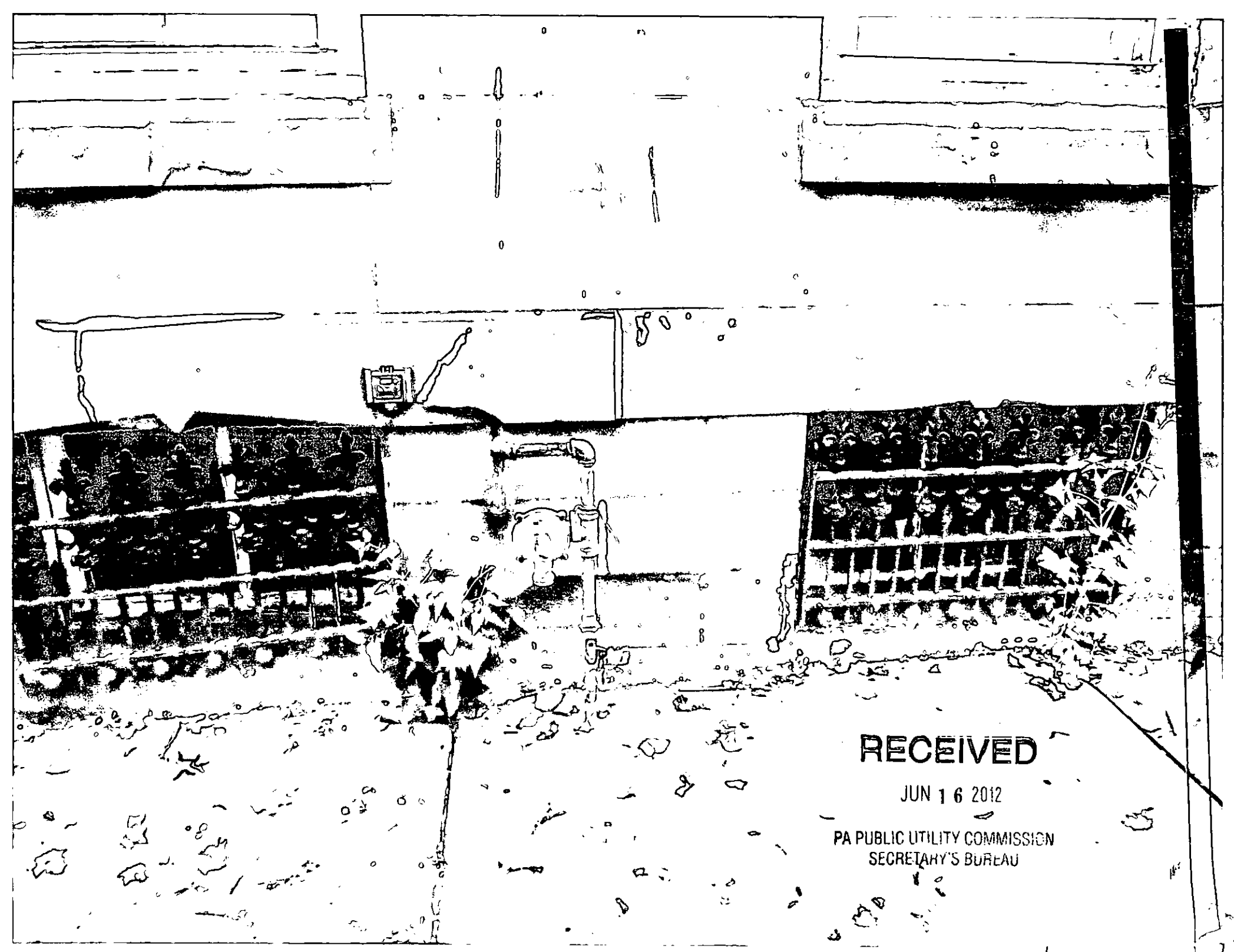


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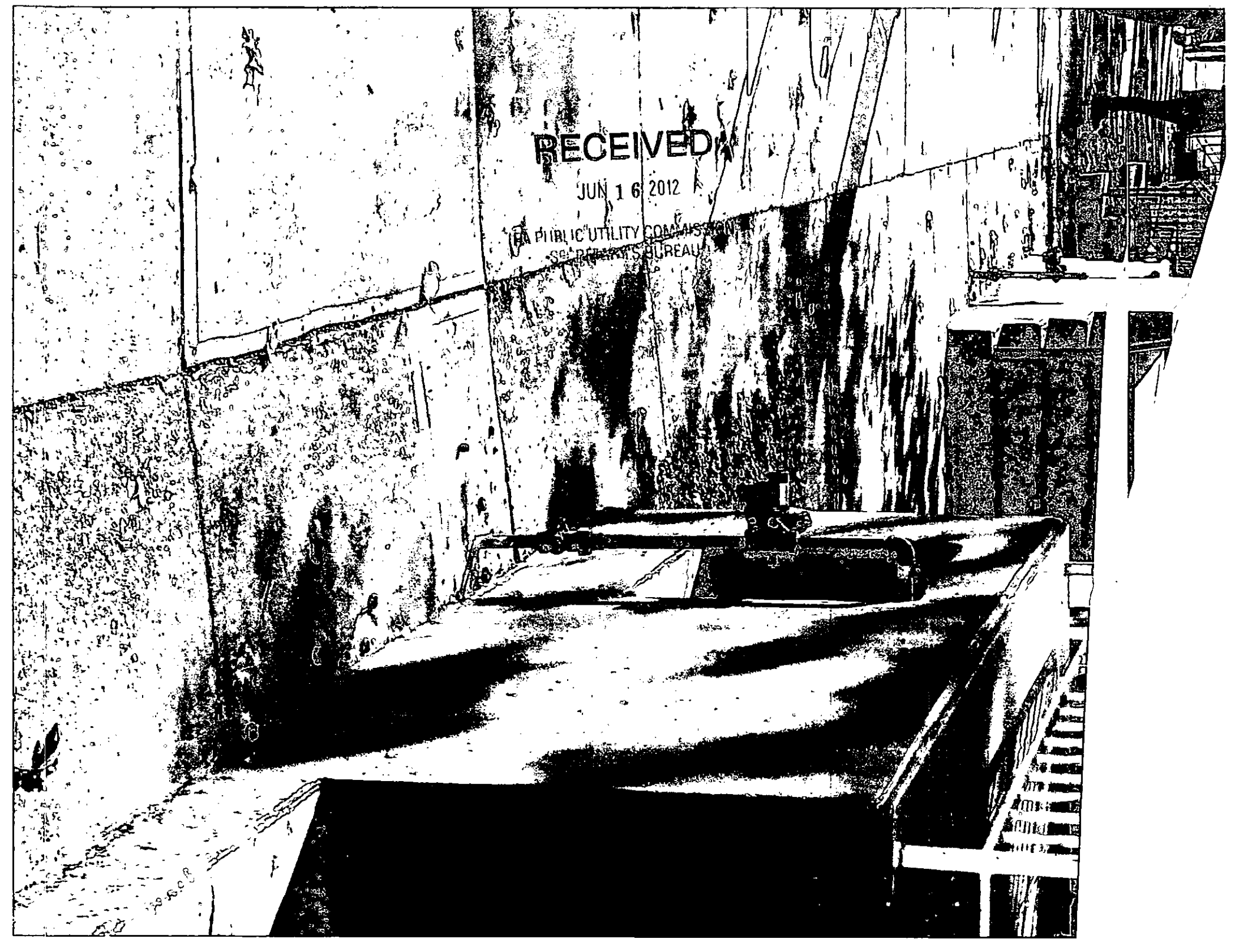
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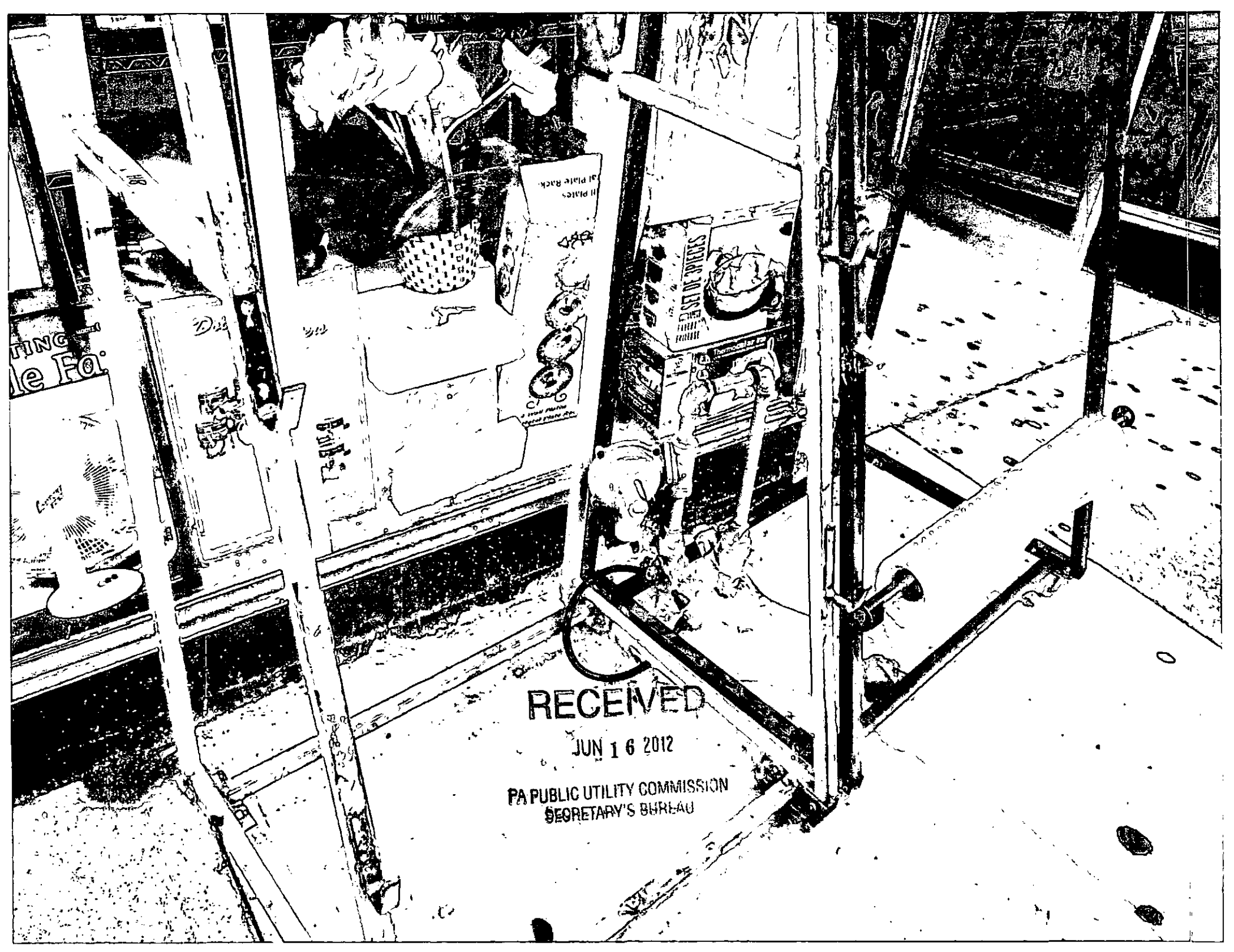


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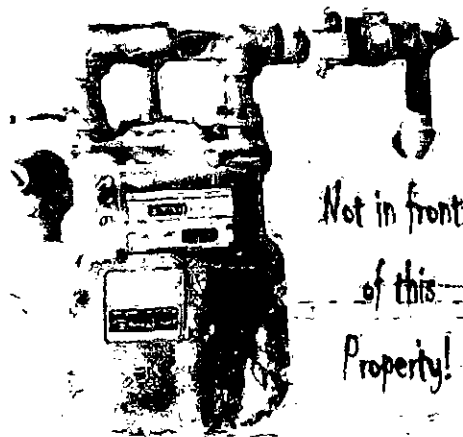
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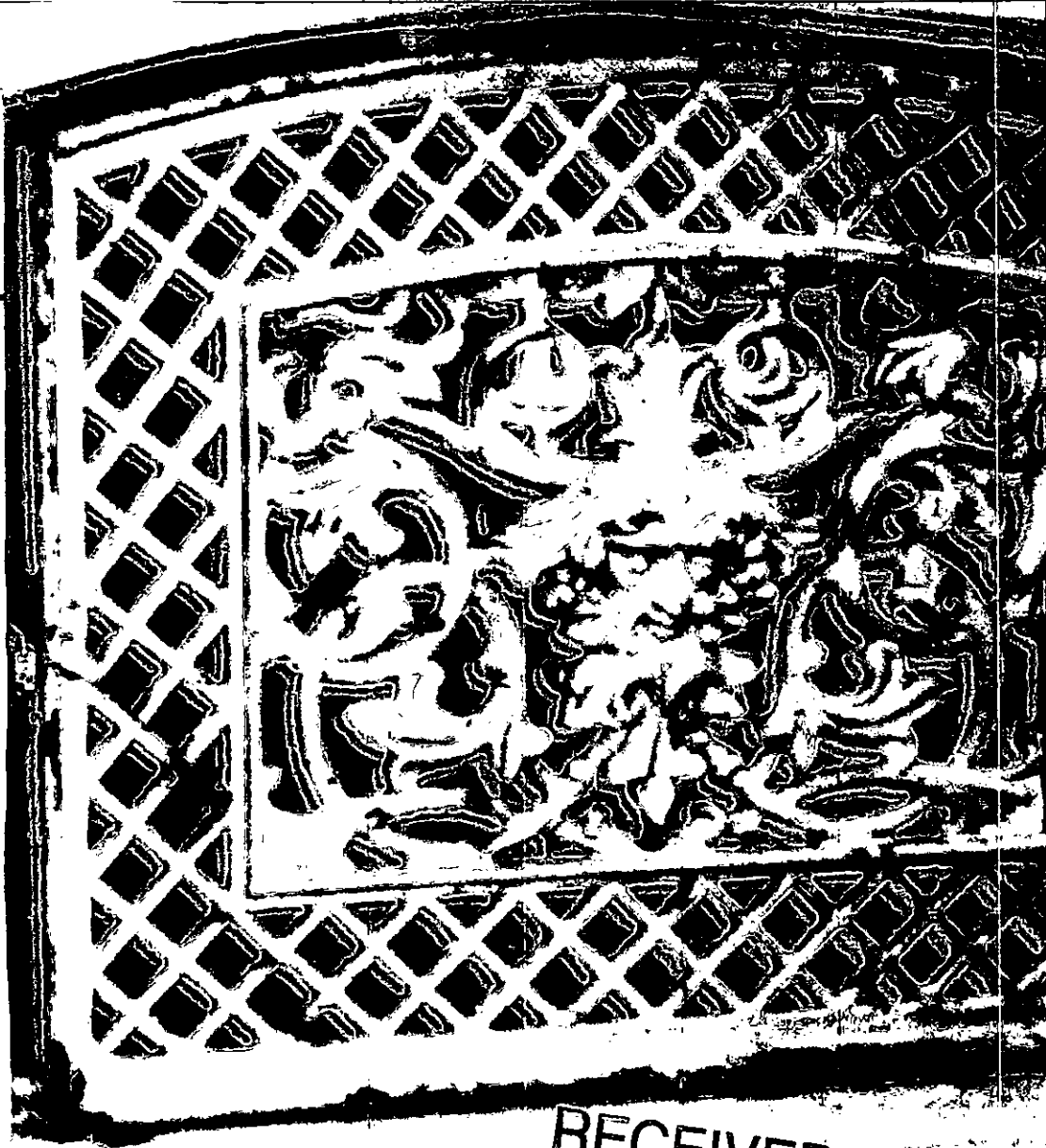
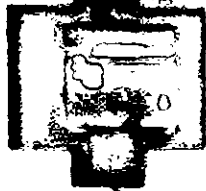
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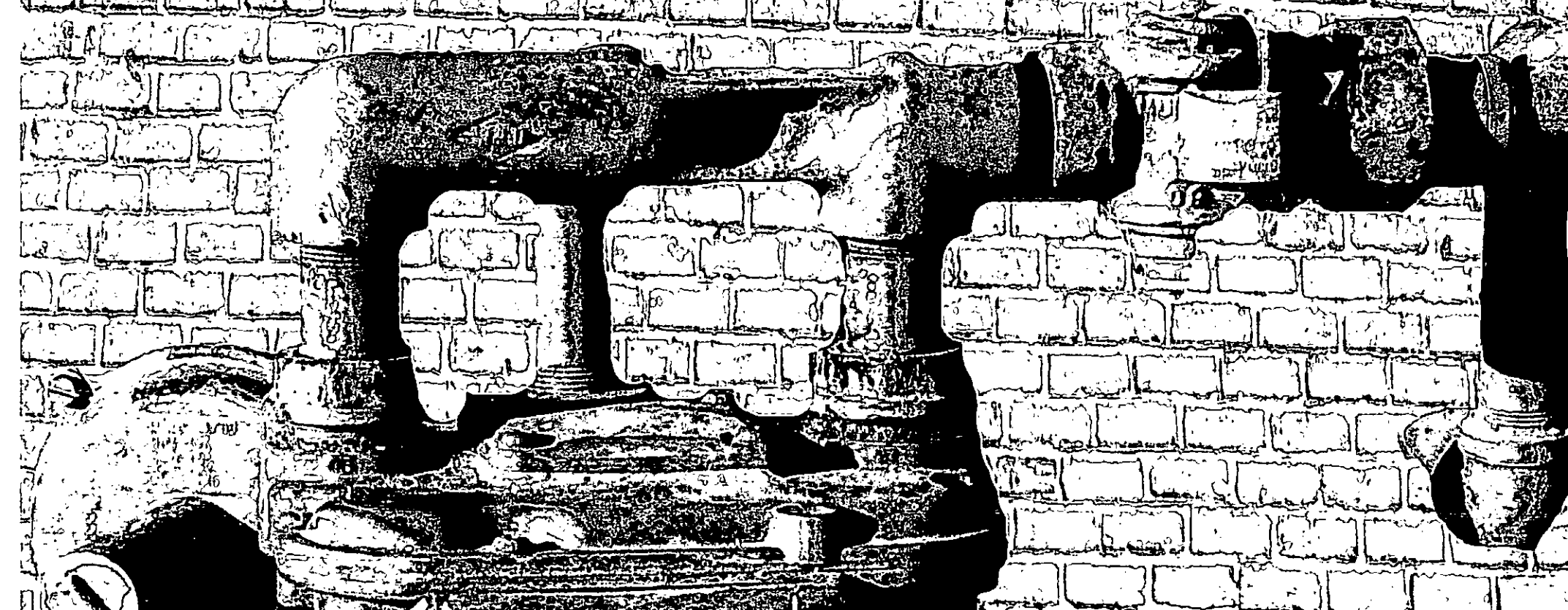
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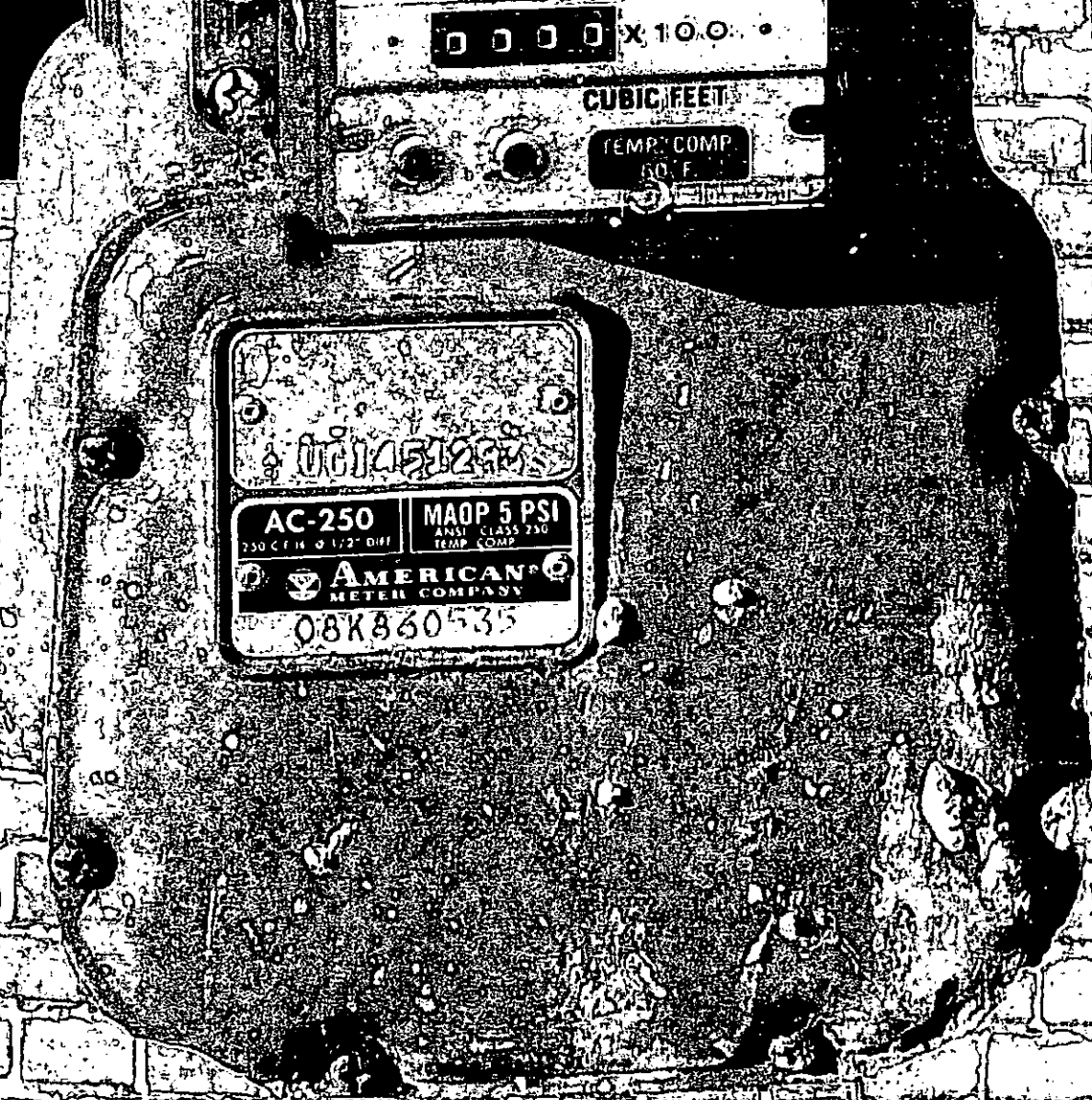
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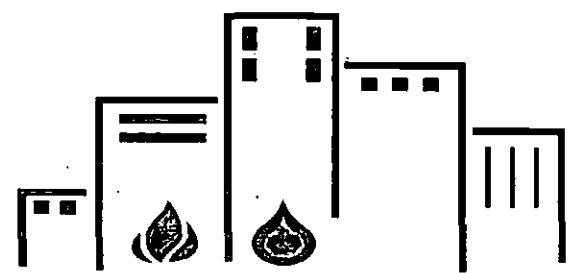
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