



U.S. Department
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Research and
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MAY 26 2000

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MICHIGAN PUBLIC SERVICE COMMISSION

JUN 02 2000

GAS DIVISION

Mr. Paul Proudfoot
Supervisor
Gas Safety Section
Michigan Public Service Commission
P.O. Box 30221
Lansing, MI 48909-7721

Dear Mr. Proudfoot:

We have considered your letter of March 28, 2000, notifying us the Commission granted Consumers Energy Company a waiver from complying with certain leakage survey requirements of 49 CFR 192.723(b)(2). The waiver extends the maximum leakage survey interval from 3 years to, 5 years for the yard portions of about 215,000 bare copper service lines that are not cathodically protected.

Under § 192.723(b)(2), 5 years is the maximum interval permitted for leakage surveys on distribution lines located outside business districts, except that intervals may not exceed 3 years for cathodically unprotected lines on which electrical surveys for corrosion are impractical. In waiving this 3-year requirement for the yard portions of copper service lines, the Commission considered company leak records for the period 1987-1998. These records show that the corrosion leak rate for copper service lines is comparable to that of coated and wrapped steel service lines that generally are surveyed for leaks at intervals not exceeding 5 years. In addition, the Commission considered company work order records for the 1994-1998 period showing that a majority of the corrosion leaks on copper service lines occurred within road rights-of-way as opposed to the yard portions of the lines. Given these considerations, it appears the waiver is not inconsistent with pipeline safety, and we have no objection to it.

Sincerely,

Richard B. Felder
Associate Administrator for Pipeline Safety