

James M. Thweatt, P.E.
Operations Manager – O&M



August 25, 2014

Annette S. Ponds, Chief
Tennessee Regulatory Authority
Gas Pipeline Safety Division
Andrew Jackson State Office Building
502 Deaderick Street, 4th Floor
Nashville, TN 37243

Re: Waiver of Sections 192.121 and 192.123(a) of Part 192 of U.S.C Title 49
Docket No. 01-01133, June 17, 2002

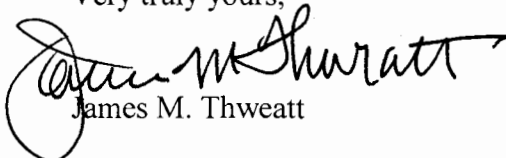
Dear Ms. Ponds:

On June 17, 2002, Piedmont Natural Gas Company, Inc, d/b/a Nashville Gas Company, was granted a waiver of Sections 192.121 and 192.123(a) of Part 192 of U.S.C. Title 49 to permit the use of polyamide resin (also known as Nylon 11, PA11, or Rilsan™) as a piping material to distribute natural gas at operating pressure up to 200 psig as limited by its approved Plastic Pipe Hydrostatic Design Basis design factor of 0.40 and the use of design formula contained within Section 192.121. In cooperation with the Gas Technology Institute (GTI), Nashville Gas installed 5,723 feet of 2 inch PA11 main line along Rutland Road NW and Hunting Hills Road in Mt Juliet, TN. This main was installed on a project that began on March 31, 2003 and was completed on May 14, 2003. Under terms of the waiver, sample sections of the pipe were removed on May 18, 2004 and May 20, 2005 and sent to GTI for testing.

During 2006 it was reported by the manufacturer that there was an issue with a compound used in the colorant that caused the pipe to oxidize. The manufacturer recommended that the pipe be replaced and offered to provide pipe to Nashville Gas for that purpose. However, after internal discussion, Nashville Gas decided to withdraw from the test program and replaced the mains and services within the project area with Nashville Gas's standard material - medium density polyethylene pipe. The new piping was installed between October 31, 2006 and January 9, 2007. All PA11 piping materials were retired from service at that date.

Because PA11 pipe is no longer in service anywhere in Piedmont Natural Gas's system, please close the above referenced waiver.

Very truly yours,



James M. Thweatt

cc: Deborah Edwards, Farris Berry, Keith Napier

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AUG 28 2014

**TN REGULATORY AUTHORITY
GAS PIPELINE SAFETY**