

TENNESSEE REGULATORY AUTHORITY



Eddie Roberson, Chairman
Tre Hargett, Director
Sara Kyle, Director
Ron Jones, Director

460 James Robertson Parkway
Nashville, Tennessee 37243-0505

February 25, 2008

Mr. Ernie B. Napier, P.E.
Vice President – Technical Services
Atmos Energy
810 Crescent Centre Drive, Suite 600
Franklin, Tennessee 37067-6226

Re: Docket 07-00251, Petition of Atmos Energy
Corporation for a Waiver to Permit the Limited
Use of Polyethylene Piping

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2008 FEB 25 PM 12:07
T.R.A. DOCKET ROOM

Dear Mr. Napier:

The Tennessee Regulatory Authority through its Gas Pipeline Safety Division (GPSD) staff has reviewed the petition for a special permit (waiver) relative to an increase in the design factor. Based on the review of the information included in the petition for a special permit, the GPSD staff requests clarification on issues as follows:

1. Definite locations for installations may not have been finalized at this time. However, what operating pressures are anticipated for pipe installations under this special permit?
2. Will any segment(s) of pipe operate at an internal pressure exceeding the maximum design pressure calculated for the segment(s) when using a design factor equal to 0.32 in the equation in §192.121? *The response to this question is needed prior to the evaluation of the request under Item 10 of the petition relative to "continued satisfactory operation of these systems at the installed pressures until such time, if any, that PHMSA adopts an increased design factor."*
3. Relative to the request in Item 10 (see above), what additional operation and maintenance steps will Atmos take to insure the safe continued operation of these systems at the installed pressure?
4. The table included under Item 12 indicates that the minimum wall thickness and maximum Standard Dimension Ratio (SDR) for 2-inch diameter pipe will be 0.216 inches and 11, respectively. However, the first sentence after the table references 2-inch diameter IPS SDR 13.5. What is the SDR limit?
5. After the initial Item 12, item numbering is incorrect.
6. Can a trench detail for a typical installation be supplied to the GPSD staff?
7. What criteria will Atmos use to measure the success of the in-service operating experience?

We look forward to working with Atmos Energy in this endeavor and appreciate your assistance in clarifying the above issues. Should you have any questions, please contact us.

Sincerely,

A handwritten signature in black ink, reading "Larry K. Borum". The signature is fluid and cursive, with the first name "Larry" and last name "Borum" clearly legible.

Larry Borum, Chief
Gas Pipeline Safety Division

cc: Docket 07-00251