

TENNESSEE REGULATORY AUTHORITY

Tre Hargett, Chairman
Eddie Roberson, Director
Sara Kyle, Director
Mary Freeman, Director



460 James Robertson Parkway
Nashville, Tennessee 37243-0505

January 7, 2009

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T.R.A. DOCKET ROOM

Mr. Brent Haywood, P.E.
Vice President – Technical Services
Memphis Light, Gas, and Water
220 South Main Street
Memphis, Tennessee 38103

Re: Docket 08-00124, Petition of Memphis Light
Gas and Water for a Waiver to Permit the Continued
Use of Plastic Piping, which is in service and had a
Storage Period in Excess of 2 Years prior to Installation.

Dear Mr. Haywood:

The Tennessee Regulatory Authority through its Gas Pipeline Safety Division (GPSD) staff has reviewed the petition for a special permit (waiver) relative to the continued use of polyethylene (PE) pipe that has been exposed to UV rays for more than 2 years. Based on the review of the information included in the petition for a special permit, the GPSD staff requests information and proposed actions on issues as follows:

1. Provide a map(s) showing the location of all installations of polyethylene pipe receiving in excess of two years exposure to UV rays prior to installation. For each installation please provide pipe size, approximate footage, pipe classification (e.g. 2406 or 3408) and manufacturer; operating pressure; installation date; UV exposure period (years); and data from the three most recent leak surveys for installations located in business areas and two most recent leak surveys for installations located outside business areas.
2. It is our understanding that material tests have been performed on some of the subject pipe. Please provide a list of the tests performed; history of the pipe samples (installed or from stock, installation date, operating pressure, UV exposure time, etc.); pipe classification, diameter and wall thickness; and test results.
3. What is the operator's proposed process for selecting pipe from installed and stocked pipe for testing?
4. Based on the test results in your waiver, it does not appear that any long term testing was performed. Please specify how the tests performed fulfill the requirements of ASTM D 2513 – 99.

5. Describe the construction details used in the installation of subject pipe relative to pipe bedding and envelope.
6. Was the installation of subject pipe accomplished in accordance with operator qualifications and was each section of the subject pipe installed using consistently good construction practices?
7. What joining procedures were used for the installed pipe?
8. According to your waiver, it does not appear that MLGW intends to perform any long term monitoring or reporting on the installed pipe outside of the current requirements in the Minimum Federal Safety Standard. Please specify if this is correct.

We look forward to working with Memphis Light, Gas, and Water in this endeavor and appreciate your assistance in clarifying the above issues. Should you have any questions or wish to discuss any issues or concerns, please contact us.

Sincerely,

A handwritten signature in black ink, appearing to read "Larry R. Borum". The signature is fluid and cursive, with the first name "Larry" and last name "Borum" clearly distinguishable.

Larry Borum, Chief
Gas Pipeline Safety Division

cc: Docket 08-00124