

TENNESSEE REGULATORY AUTHORITY



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460 James Robertson Parkway
Nashville, Tennessee 37243-0505

June 22, 2009

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.

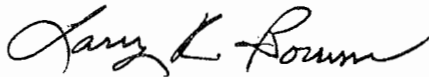
Dear Mr. Haywood:

The Tennessee Regulatory Authority Gas Pipeline Safety Division (GPSD) has reviewed the additional information submitted by Memphis Light Gas and Water on March 23, 2009. This additional information is in response to questions asked by the GPSD concerning 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 this information and further review of your petition for a special permit, the GPSD staff requests information and proposed actions on issues as follows:

1. Please provide a copy of the actual laboratory test data on the three (3) sections of pipe mentioned in your response.
2. In your document you state that some of the 12 inch pipe has been exposed for 10 years. It is unclear if this pipe was exposed for 9 years and some months, exactly 10 years, or 10 years and some months. Please provide information relative to the amount (length) of this 12 inch diameter pipe that has been exposed to UV rays for exactly 10 years or longer.
3. Give definitive evidence of the Melt Pattern Test's validity based on scientific testing.

We look forward to continue 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, reading "Larry L. 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 08-00124