



State of Rhode Island and Providence Plantations

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Patrick C. Lynch, Attorney General

August 29, 2006

John Spirito, Esq.
Hearing Officer
Division of Public Utilities and Carriers
89 Jefferson Boulevard
Warwick, RI 02888

**Re: Rules And Regulations Prescribing Standards For Gas
Utilities, Master Meter Systems And Jurisdictional
Propane Systems – Division Docket No. D-06-15**

Dear Mr. Spirito:

In a letter to you dated May 31, 2006, Mr. David Black, Vice President and General Counsel of the New England Gas Company, advised you that the Division of Public Utilities and Carriers (actually, the Advocacy Section of the Division) had prepared a memorandum to you “detailing proposed modifications that are satisfactory to both the Division and NEGC” with respect to spin testing and the appropriate definition of meter. For some reason, it does not appear that the memorandum was forwarded to you.

In order to correct this oversight, I have enclosed two items. The first, a letter dated May 11, 2006, from Mr. Don A. Ledversis, Gas Pipeline Safety Engineer, Rhode Island Division of Public Utilities and Carriers, to Mr. Kevin Penders, Regulatory Affairs, New England Gas Company, details the agreement between the parties with respect to spin testing and the definition of “meter.” The second item is an email dated May 17, 2006, from Mr. Penders to Mr. Ledversis confirming that the May 11, 2006, letter accurately reflects the agreement of the parties on these two issues.

Sincerely,

William K. Lueker (R.I. Bar No. 6334)
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Division of Public Utilities and Carriers
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Encls.

Copy to: Docket No. D-06-15 Service List



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

DIVISION OF PUBLIC UTILITIES AND CARRIERS

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The New England Gas Company
100 Weybosset Street
Providence, R.I. 02903

Attn: Kevin Penders
Regulatory Affairs

May 11, 2006

Revised Rules and Regulations Prescribing Standards for Gas Utilities

As you are aware the Division met with the New England Gas Company on Wednesday May 10th in a technical review meeting to discuss two (2) outstanding issues associated with the proposed 1966 gas regulations. The two (2) outstanding issues include clarification of the definition of **Class A** and **Class B** meters as stated in definition number 20, and the requirement to spin test on a yearly basis any turbine meters as stated in section 15e. The referenced regulations follow:

20. **Meter** means a device, instrument, or any attached device, used by a utility to measure a quantity of gas for billing purposes. The two (2) classes of gas meters consist of:

Class A meter - A meter having a rated capacity of not more than 500 cubic feet per hour at 1/2 inch water column differential pressure and operating at a gauge pressure of not more than 15 pounds per square inch and not greater than the maximum pressure rating of the meter expressed in pounds per square inch.

Class B meter - A meter having a rated capacity of more than 500 cubic feet but not more than 1,500 cubic feet per hour at 1/2 inch water column differential pressure and operating at a gauge pressure of not more than 15 pounds per square inch and not greater than the maximum pressure rating of the meter expressed in pounds per square inch.

15e. **Turbine Meters**

Turbine meters for which the manufacturer has established minimum spin times, may be spin tested to determine their in-service condition. Turbine meters shall be given a spin test at least once every twelve (12) months unless covered under an approved in-service performance testing program, or the operator receives a written waiver from the customer not to conduct the test per their decision. Any meter found to have a spin time less than the manufacturer's recommended minimum and which cannot be brought up to the minimum by cleaning and lubrication shall be changed and replaced with an accurate meter. Turbine type meters shall be tested at not less than fifteen percent (15%) of full rated flow. The meters shall not be more than one half percent (0.5%) fast or more than one and one half percent (1.5%) slow at the points of the test.

After discussion on the clarification of the definition of **Class A** and **Class B** meters the Division has changed the definitions to the following revised definitions.

20. **Meter** means a device, instrument, or any attached device, used by a utility to measure a quantity of gas for billing purposes. The two (2) classes of gas meters consist of:

Class A meter - A meter having a rated capacity of not more than 500 cubic feet per hour at 1/2 inch water column differential pressure and operating at a gauge pressure of not more than 15 pounds per square inch and not greater than the maximum pressure rating of the meter expressed in pounds per square inch.

Class B meter - A meter having a rated capacity of more than 500 cubic feet per hour. The meter shall not operate at a pressure greater than the maximum pressure rating of the meter expressed in pounds per square inch.

Since the revised definition now allows 425 cubic feet per hour commercial meters to be tested in a 15 year test program, the Division would like to note that only meters installed after the effective date of this regulation will be allowed to be tested in the 15-year program: Any existing 425 cubic feet per hour commercial meters, prior to the effective date of the proposed regulation, will continue to be tested to their prior 10-year meter test requirement. After these meters are tested they can then be defaulted to the 15-year testing program.

After discussion on the requirement to spin test on a yearly basis all turbine meters as stated in section 15e, the Division and the company both agreed no addition changes needed to be made to the proposed regulation.

Please provide a confirmation regarding the two aforementioned issues prior to the submission of this correspondence to the Hearing Officer, Mr. Spirito.



Don A. Ledversis
Gas Pipeline Safety Engineer
RIDPUC

CC: Mike Sullivan, NEG
Fred Amaral, NEG
James Lanni
Bill Leuker, Rhode Island Attorney Generals Office

From: "Penders, Kevin" <Kevin.Penders@negasco.com>

To: "Don Ledversis (E-mail 2)" <ri@napsr.net>

cc :

Date: Wed, May 17, 2006, 09:02:00

Subject: FW: 1966 regs update

FYI, here was my response for your records. I'm not sure why that didn't get to you.

Kevin

-----Original Message-----

From: Penders, Kevin
 Sent: Friday, May 12, 2006 3:03 PM
 To: 'ri@napsr.net'
 Cc: Denis, Gary; Amaral, Alfred; Sullivan, Michael; Black, David; Czekanski, Peter
 Subject: RE: 1966 regs update

Don,

I believe that the language provided in this letter accurately reflects the Company and the Division's discussions, and is satisfactory for the Company. Thank you for the opportunity to respond.

Sincerely,

Kevin

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