



AGA Webinar: PHMSA's EFV Final Rule

EFV Customer Notification & Cost Recovery

February 13, 2017



PHMSA Gas Distribution Annual Report: *EFV Questions*

PART E – EXCESS FLOW VALVE (EFV) AND SERVICE VALVE DATA
Total Number Of Services with EFV Installed During Year _____
Estimated Number of Services with EFV In the System At End Of Year _____
Total Number of Manual Service Line Shut-off Valves Installed During Year _____
Estimated Number of Services with Manual Service Line Shut-off Valves Installed in the System at End of Year _____

- PHMSA will be posting this updated Gas Distribution Annual Report & associated instructions in the coming days:
<http://www.phmsa.dot.gov/pipeline/library/forms>
- This new form is to be used for the March 15, 2018 submission of 2017 data for the Gas Distribution Annual Report.
- OMB Action: https://www.reginfo.gov/public/do/PRAViewICR?ref_nbr=201609-2137-003

§192.383 (b) - Installation required. An EFV installation must comply with the performance standards in 192.381. After April 14, 2017, each operator must install an EFV on any new or replaced service line serving the following types of services before the line is activated:

- (1) A single service line to one SFR;
- (2) A branched service line to a SFR installed concurrently with the primary SFR service line (i.e., a single EFV may be installed to protect both service lines);
- (3) A branched service line to a SFR installed off a previously installed SFR service line that does not contain an EFV;
- (4) Multifamily residences with known customer loads not exceeding 1,000 SCFH per service, at time of service installation based on installed meter capacity.
- (5) A single, small commercial customer served by a single service line with a known customer load not exceeding 1,000 SCFH, at the time meter installation, based on installed meter capacity.

Q: PHMSA provides exceptions for Multifamily Residences (*see §192.383(b)(4)*) and Single, Small Commercial Customers (*see §192.383(b)(5)*), but not for Single-Family Residences or Branched Service Lines. Is it PHMSA's intent that SFR or branched service lines with loads exceeding 1,000 SCFH to have an exception as well?

A: The regulatory text does not provide for an exception for SFRs or branched service lines with loads exceeding 1,000 SCFH. There is not an option on SFRs or branched service lines to install a service line shut-off valve in lieu of an EFV.

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Q: PHMSA references two criteria (192.383(b)(4) & (5)): Customer Load & Meter Capacity. Which criteria does PHMSA intend operators to use?

A: Meter Capacity

§192.383(c) Exceptions to excess flow valve installation requirement. An operator need not install an excess flow valve if one or more of the following conditions are present:

- (1) The service line does not operate at a pressure of 10 psig or greater throughout the year;
- (2) The operator has prior experience with contaminants in the gas stream that could interfere with the EFV's operation or cause loss of service to a customer;
- (3) An EFV could interfere with necessary operation or maintenance activities, such as blowing liquids from the line; or
- (4) An EFV meeting the performance standards in 192.381 is not commercially available to the operator.

Q: What is PHMSA's intent when it states that an EFV "could interfere with necessary operation or maintenance activities"?

For Example: Does PHMSA intend to exempt service lines that are longer than the manufacturer's recommendation for the length of a service line?

A: The substantive requirements for operations and maintenance did not change with the publication of this Final Rule. Section 192.383(c) is meant to ensure that EFVs is not a detriment to operations and maintenance activities.

§192.383(e) Operator notification of customers concerning EFV installation. Operators must notify customers of their right to request an EFV in the following manner:

- (1) Except as specified in paragraphs (c) and (e)(5) of this section, each operator must provide written or electronic notification to customers of their right to request the installation of an EFV. Electronic notification can include emails, Web site postings, and e-billing notices.
- (2) The notification must include an explanation for the service line customer of the potential safety benefits that may be derived from installing an EFV. The explanation must include information that an EFV is designed to shut off the flow of natural gas automatically if the service line breaks.
- (3) The notification must include a description of EFV installation and replacement costs. The notice must alert the customer that the costs for maintaining and replacing an EFV may later be incurred, and what those costs will be to the extent known.
- (4) The notification must indicate that if a service line customer requests installation of an EFV and the load does not exceed 1,000 SCFH and the conditions of paragraph (c) are not present, the operator must install an EFV at a mutually agreeable date.
- (5) Operators of master-meter systems and liquefied petroleum gas (LPG) operators with fewer than 100 customers may continuously post general notification in a prominent location frequented by customers.

Q: Are operators required to make notification to customers by April 14th, 2017? Or by the end of 2017? Or some other date?

A: By the end of the day on April 14, 2017.

Q: Is a web posting notification by April 14th acceptable? (The operator may decide to follow-up with other communications later.)

A: The notification must meet all of the regulatory requirements and reach all customers.

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- (4) The notification must indicate that if a service line customer requests installation of an EFV and the load does not exceed 1,000 SCFH and the conditions of paragraph (c) are not present, the operator must install an EFV at a mutually agreeable date.
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Q: What is the “frequency” to which you must notify customers under §192.383(e)?

A: The regulations do not require that operators re-notify customers once the initial notification is provided. However, all new customers must be notified.

§192.385(a) Definitions. As used in this section:

Manual service line shut-off valves means a curb valve or other manually operated valve located near the service line that is safely accessible to operator personnel or other personnel authorized by the operator to manually shut off gas flow to the service line, if needed.

Q: What is the expected location of this service line shut-off valve? As close as possible to the main? What is meant by “located near the service line”?

A: The service line shut-off valve should be installed as close as practicable to the main, while ensuring accessibility to the valve. This requirement is closely linked to the existing installation requirements for EFVs in 192.383. The valves should be installed on the service line where there is a common source of supply for the customer and should protect as much of the service line as possible.

§192.385(c) Accessibility and maintenance. Manual service line shut-off valves for any new or replaced service line must be installed in such a way as to allow accessibility during emergencies. Manual service shut-off valves installed under this section are subject to regular scheduled maintenance, as documented by the operator and consistent with the valve manufacturer's specification.

Q: What items can be expected to be covered during “regular scheduled maintenance”?

For Example: Find, locate, and make accessible valve box; and ensure “wrench/tool” can be placed on valve to enable turning if needed.

A: PHMSA pointed operators to the language in the Preamble of the Final Rule. The operator should ensure that the valve is accessible, free of debris and is able to be turned and operated. PHMSA suggested that manufacturers could add additional maintenance requirements that should be incorporated in the maintenance activities.