

To: Wahoo Board of Public Works  
From: J.M. Gibney, Jr. General Manager

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Since 2010 the National Pipe Line Safety rules have required Excessive Flow Valves (EFV) be installed on new natural gas services if system pressure exceeds 10psi. Wahoo has 2 different pressure zones at our regulator stations, 9psi and 60 psi.

A new National Pipeline regulation will require all natural gas utilities to notify customers about Excess Flow Valves (EFV) and install an EFV if the customer requests one. The new regulation at 49 CFR 192.383(e) reads as follows:

(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 49CFR 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, website 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 49CFR paragraph (c)] are not present, the operator must install an EFV at a mutually agreeable date.

Notification can be either written or electronic. The regulation specifically lists emails, web site postings, and e-billing notices as acceptable electronic notification methods. In the preamble to the rule, PHMSA provides the following guidance:

"When outlining the proposal in the NPRM, PHMSA did not intend to suggest that customer EFV notifications needed to be non-electronic or otherwise individually carried out. PHMSA has no objection to the method by which operators notify their customers as long as the operator can be sure of reaching all customers who have a right to request an EFV. Therefore, a combination of methods, including Internet Web site postings, bill stuffers, new customer packets, statements on billing materials, et cetera, can be used to notify all customers.

PHMSA has determined that, as many of the commenter-proposed methods would theoretically notify, on a regular basis, all customers about their potential right to request an EFV, a broad, electronic method of communication would meet the intent of the regulation and be acceptable."

In addition, the regulation states that operators "must make a copy of the notice or notices currently in use available during PHMSA inspections or State inspections." The regulation does not require the operator to produce records that any individual customer was notified.

**Language to use for the notification:**

**A new National Pipeline regulation require all natural gas utilities to notify customers about excess flow valves (EFV) and install an EFV if the customer requests one. The new regulation is in 49 CFR 192.383(e).**

**1. Explanation of the potential benefits of EFVs**

a) EFV is designed to shut off gas if the service line is severed:

You may request that Wahoo Utility install an Excess Flow Valve (EFV) on the gas line to your property. EFVs are mechanical shut-off devices that can be installed in the gas pipe running to the gas meter at your property (the "service line"). An EFV is designed to shut off the flow of natural gas automatically if the service line breaks, for example, by an excavation accident. Stopping the flow of gas from a broken service line significantly reduces the risk of natural gas fire, explosion, personal injury and/or property damage.

b) What won't an EFV do?

EFVs are **NOT** designed to stop the flow if a leak occurs beyond the gas meter (on house piping or appliances). EFVs also may not close if the leak on the service line is small. If you add additional gas appliances, for example, a pool heater, a second furnace, Emergency generator, etc., the increased gas flow may cause the EFV to close.

c) If you notify us that you want an EFV we will contact you to set up a mutually agreeable date when we will install an EFV on your service line.

**Cost recovery for maintaining and replacing the EFV**

a) Wahoo Utility's charge for installing an EFV is \$520, payable in lump sum prior to installation. This cost does not include paving removal/replacement if applicable.

b) Maintenance and replacement cost recovery

Individual Customer pays no cost of EFV maintenance and replacement.

c) What might trigger need to replace: EFV replacement may be necessary if you add additional gas appliances, such as a pool heater, additional furnace or emergency generator that exceeds the capacity of the EFV.

EFV replacement may be necessary if the EFV malfunctions (sticks open or closed). Industry experience is that EFVs rarely malfunction.

2. If a service line customer requests installation of an EFV and the load does not exceed 1,000 SCFH and the conditions listed below are not present, the operator will install an EFV at a mutually agreeable date.
  - a. An EFV meeting the performance standards in § 192.381 is not commercially available to the operator
  - b. EFVs cannot be installed on some service lines due to high gas flow, low pressure or other factors.
  - c. If you request an EFV we will inform you if your service line cannot accommodate an EFV.
3. EFVs will not be installed on your service lines if:
  - a. The service line does not operate at a pressure of 10psig or greater throughout the year;
  - b. The EFV could interfere with proper operation or cause loss of service;
  - c. An EFV could interfere with necessary operation or maintenance activities; or
  - d. The capacity of the meter on the service line exceeds 1,000\* cubic feet per hour

If you request an EFV we will inform you if your service line meets any of these conditions

4. Call 811 before digging

For your safety always call 811 to have gas lines and other buried utilities marked before allowing anyone to dig in your yard

5. Diagram to illustrate EFVs (Courtesy of Hubbell):

