

STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION

Docket No. DG 18-xxx

Liberty Utilities (EnergyNorth Natural Gas) Corp.

Petition for Waiver of Puc 506.01(n), Clearance for Gas Regulators

Liberty Utilities (EnergyNorth Natural Gas) Corp. d/b/a Liberty Utilities, through counsel, respectfully petitions the Commission pursuant to Puc 201.05 for a limited waiver of Puc 506.01(n), which requires a 3-foot clearance for gas regulators, so that the Company may install the Pietro Fiorentini FE Model Regulator, where appropriate, which device is a safe and industry-accepted “zero clearance” regulator.

In support of this petition, Liberty states as follows:

1. Puc 506.01(n) states as follows:

(n) Utilities shall not install or operate a gas regulator that could release gas closer than 3 feet to a source of ignition, an opening into a building, an air intake into a building or any electrical source not intrinsically safe, as follows:

(1) The 3-foot clearance from a source of ignition shall be measured from the vent or source of release (discharge port), not from the physical location of the meter set assembly; and

(2) For encroachment within the required 3-foot clearance caused by an action of the property owner or occupant after the initial installation, the encroachment shall be resolved by extending the regulator vent to meet this requirement within 90 days of discovery.

2. The 3-foot clearance required by this rule serves the safety goal of making sure that any gas released from a regulator vent is at a safe distance from sources of ignition, openings into buildings, air intakes into buildings, or electrical sources.

3. The problem giving rise to this waiver request is that it is occasionally difficult to maintain this 3-foot clearance given the amount and type of equipment installed on customer buildings, the design of decks and large windows, homeowner landscaping concerns, etc. Sometimes there is simply not enough room to maintain the 3-foot clearance when installing the standard regulator.
4. The solution when this problem arises is the FE Model regulator. It is a more technologically advanced regulator with design features that allow for its installation adjacent to such building openings and potential sources of ignition. Specifically,
 - i. If the working diaphragm of the FE Model Regulator breaks, its double safety diaphragm with internal vent limiter ensures a controlled, and safe, leak rate of less than 1.35 standard cubic feet per hour (“SCFH”).
 - ii. The overpressure shut off design of the FE Model regulator provides sufficient protection against downstream equipment in case of regulator failure.
 - iii. If an FE Regulator is installed inside a dwelling it will vent less than 1.35 SCFH, whereas other approved inside regulators are permitted to vent at 2.5 SCFH. The FE Model Regulator also allows for up to a 35 foot long ¼-inch vent line when installed inside, providing more installation flexibility.
5. Thus, the FE Model Regulator provides options for new installations and relocating existing meter sets in the relatively infrequent situations where it is impossible or impracticable to satisfy the 3-foot clearance required by Puc 506.01(n).
6. The FE Model Regulator is made of a two stage pressure cut regulator, an internal safety diaphragm with a vent limiter (in addition to the primary diaphragm), an over pressure shut off valve, and a token internal relief valve, as opposed to in the more commonly used regulators which are single stage pressure cut regulators with a primary

diaphragm (no safety diaphragm) and a full internal relief which will flow up to about 2751 SCFH in the event of a regulator failure.

7. The cost to purchase a FE Model Regulator is approximately \$106.80, compared to approximately \$17.51 for the standard regulator. Installation costs for both models are about the same
8. The Company would *not* use the FE Model Regulator when its standard regulator can be used or when short vent lines can be installed in a way that does not affect the customer's building appearance.
9. Use of the FE Model Regulator is permitted under 42 C.F.R part 192, as well as local codes and regulations.
10. The FE Model Regulator is currently being used by a number of gas distribution utilities including the following which, combined, serve about 6 million customers: City of Richmond Gas Company, Columbia Gas of Pennsylvania, Columbia Gas of Virginia, National Grid; Roanoke Gas, Summit Natural Gas of Maine, Virginia Natural Gas, and Washington Gas Company.
11. Addressing the requirements of Puc 201.05(a), waiver of the 3-foot clearance requirement for the FE Model Regulator is in the public interest as it will allow the Company to better and more safely serve its customers in locations where the 3-foot clearance of Puc 506.01(n) cannot be met. The requested waiver will improve the reliability and safety of the Company's system; it will have no adverse impact on customers. And the waiver will not disrupt the orderly and efficient resolution of any matter currently before the Commission.

WHEREFORE, the Company respectfully asks that the Commission:

- A. Grant a limited waiver of Puc 506.01(n) so that Liberty may install the FE Model Regulator where appropriate; and
- B. Grant such other and further relief as the Commission deems necessary and just.

Respectfully submitted,

Liberty Utilities (EnergyNorth Natural Gas) Corp., d/b/a
Liberty Utilities

By its Attorney,



Date: July 25, 2018

By: _____
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Certificate of Service

I hereby certify that on July 25, 2018, a copy of this Petition has been forwarded to the Office of the Consumer Advocate.



Michael J. Sheehan