Staff Memorandum

Re: PS13-004, PS13-005, and PS13-006

Date: August 7, 2013

Waivers of 49 CFR 192.285(a)(2) and 49 CFR 192.285(c) have been requested by Crooks Municipal Gas, Humboldt Municipal Gas Utilities, and Garretson Municipal Gas Utilities (collectively "Operators"). Based on a review of the pipeline safety regulations, Staff recommends the following permanent waiver of 49 CFR 192.285(a)(2) and 49 CFR 192.285(c) each of these Operators. Pursuant to the requested waivers, the Operators would be subject to the following:

A person must be requalified under the applicable procedure at least once each calendar year, at intervals not exceeding **fifteen months**. In addition, if a joiner has one joint made, under that procedure that is found to be unacceptable by testing under § 192.513, that person must requalify under that procedure as an initial qualification.

If the Commission approves the Operators' request, the waivers will be sent to PHMSA for final approval. Should PHMSA grant approval, these plastic joining requirements must be included in each Operator's Operation and Maintenance manual.