

Outdoor Meter Installations

Con Edison is to provide gas services (pipeline) in accordance with 29 Circuit Federal Rule CFR Part 192

History

- Significant Gas Incidents - Deaths Property Damage in the Millions
- Pipeline Integrity – Federal Requirements
- Aging Gas System – National Issue
- Public Safety – Government Responsibility
- State – Aligned with Federal DOT rules
- Liability – Directly to the Property Owners
- Work – Licensed contractors, AHJ permits, plans reviewed by FDNY-DOB inspections
- NTSB recommendations East Harlem
- Federal (OQ) certified gas mechanic rules



Gas Distribution Engineering September 29, 2016

Purpose: To Clarify Issues Concerning the Gas Service Line/Piping Definition Change and Operator Qualification (OQ).

Background: New York State Public Service Commission (PSC) has required Con Edison to define Gas Service Line/Piping as all piping, tubing and fittings that transport the gas from the main to:

- for inside meter(s) – the outlet of the meter
- for outside meter(s) – outside the building wall

Gas Service Line/Piping is to be installed to Con Edison standards (e.g. Gas Specification [G-8100](#)) by individuals that are Operator Qualified.

However, PSC enforcement of above ground meter piping (for outdoor meters) and meter piping after the head of service valve (for indoor meters) has been stayed pending further action by the PSC.

Federal DOT vs State PSC Service Line Definition

Federal Code: Service line - A distribution line that transports gas from a common source of supply to an individual customer, to two adjacent or adjoining residential or small commercial customers, or to multiple residential or small commercial customers served through a meter header or manifold. ***A service line ends at the outlet of the customer meter or at the connection to a customer's piping, whichever is further downstream,*** or at the connection to customer piping if there is no meter.

State Code: Service line means the piping, including associated metering and pressure reducing appurtenances, that transports gas below grade from a main or transmission line to the outlet of the customer meter or at the connection to a customer's piping, whichever is further *downstream where a meter is located within the building; if a meter is located outside the building, the service line will be deemed to terminate at the outside of the building foundation wall.* – *Two different options in New York State.*

State Regulator Not Aligned with Federal Rule

A pipeline defined by the federal rule is all piping and appurtenances, valves, tees and fittings from the gas main to the outlet of the meter.

State rule “first-fitting” after the building line minimum 2 feet head of service valve.

In order to provide safe, accessible and comply with federal law the utility will protect the public from the unauthorized tampering of company equipment inside buildings.

Con Edison is a first responder to gas leaks , fires and natural gas incidents.

In order to protect our liability and to comply with federal law, we want to limit meter piping inside the building as close as proximity to the point of delivery foundation wall.

Natural gas delivery is a means of transportation, reporting to the regulators every response to an incident and investigating whether the event warrants significant high level response and determine what happened.

Natural Gas not a factor then the liability damage is placed on the owner of the property.

Past Process

- 1, 2 & 3 residential dwellings - Con Edison follows gas rate tariff to place meters outside unless
 - Landmarked
 - Building line / Property line same for existing building
- Commercial / Multi-family ... No formal rate tariff established
Con Edison will rule on a case by case review to determine safety, economically and impracticality of each gas meter and service regulator.

New Process

- Expand practice associated with residential homes to all commercial, multi-dwelling buildings and brand-new and upgrade gas service construction footprint (all meters outside)
- Multiple meter sets (meter banks) refer to G-48:
- When customer gas load has been determined, the cut off for a company meter(s) location the case will be reviewed jointly by Energy Services and Gas Engineering for safety and practicality
- Each project case service layout will identify indoor/outdoor location determination.

Process Going Forward

- Multiple use buildings (residential-commercial) the customer will be asked for a gas load letter and a plot plan for meter(s) location.
- Energy Services will make an assessment to decide safety and practicality of outlet point of delivery.
- Wherever possible meter/regulator sets shall be installed outdoors feasible location
- Indoor as close to the building wall as possible (minimizes interior run of piping).

Process Going Forward

- Con Edison understands the economics, customer expenses and the space issues involved to determine safety and practicality.
- Realize the final decision is made by Con Edison responsible to comply with the DOT federal rule
- Customer/Contractor shall submit plot plan prior to committing a point of entry to a building



Construction scenarios

- Existing building where property line / building line are the same
 - Meters will remain inside.
- Existing building where there is an offset between building line and property line
 - New meters should be placed outside
- Landmark buildings will follow current practice. Should review landmark status (sometimes only for a portion of the building) in order to facilitate meter installation outside.
- Piping inside building will be limited to the frontage space of where the service point of delivery comes from gas main.

New Gas Service Request Ruling

Going forward for all new construction, total gut rehab renovation, change of C of O where all the gas meters are retired the gas meters will go outdoors.

For additional gas service requests, the gas meters will go outdoors.

If unsafe and impractical to do so, Con Edison will make the final ruling on location. Con Edison will provide written communication on decision to customer.

Every major city has outdoor metering and follows federal outlet of meter rule.

Once the customer receives the acknowledgement letter, please provide a plot plan and a gas diagram for proposed point of delivery gas meter(s) plan location should be made available to Energy Service Representative for internal review.

Gas Engineering and Energy Services in tandem in the district operating area will review and team up and push forwarded the MC case, to rule the potential location of Con Edison meter point of delivery.

Energy Services

Energy Services will review all jobs in progress:

1. Jobs already ruled and material work by the customer has been completed we will progress with the job. We will push customers to minimize interior run of piping.
2. Jobs already ruled but no material work has been completed (no designs, construction, etc...) we will push to move meters outside.

Energy Services SME's working with Gas Engineering are coordinating standard communication to our customers through:

- i. Yellow book
- ii. Department of Buildings
- iii. Master Plumbers Councils
- iv. Meeting with Developers

Energy Services Expectation



Our ESR's Will Exceed

- Customer Experience
- Safe Meter Location
- Practical and Feasible
- Consider Cost Factor
- Public Safety Egress
- Follow Federal Rule

Driving Forward - Outdoors

Gas Operations

- Meter Closets
- Alcoves
- Set-Back Recess
- Set Dimensions
- Venting

NYC Design Planners

- Practicality
- Feasibility
- Building Line Limit
- ADA – Space
- Public Egress Safety

Gas Meters and Regulators

Each meter and service regulator must be installed in a readily accessible location and be protected from corrosion and other damage, including any vehicular damage that may be anticipated.

(b) Each service regulator on new and replacement service lines must be installed outside of the building, unless it is impractical or unsafe.

Where the service regulator must be installed within the building, it is to be located as near as practical to the point of service line entrance.

Gas Meter Room ventilation requirements for both Fuel Gas Code and Con Edison G-8100 gas specification.

Summary

- 1. Energy Services has been advised that the Public Service Commission is pushing meters to be located outdoors.**
- 2. This PSC push is prompted by their adoption of the definition of “Service Line”.**
- 3. The PSC adopted and aligned the gas service line definition to make it as comprehensive as the current federal gas service line definition. The recently adopted gas service line definition is intended to extend State jurisdiction, and therefore, utility responsibility over gas “service lines” to the same extent as the current federal rules.**
- 4. Adoption of the gas “service line” definition now requires LDC’s to inspect and leakage survey gas piping into a building up to the outlet of a gas meter. For reasons associated with building access and the potential liability stemming from future leakage surveys, many utilities across the country are implementing policies to relocate meters of existing buildings and require new service meters to be installed at building exteriors.**
- 5. Energy Services BPT Group is being proactive to Gas Measurement to get them ramped up for minimum space requirements by meter types and closets sizes by meter drawing etc.**
- 6. Con Edison will actively pursue with the NYC DOB Planners to consider our responsibility to meet the federal rules requirements on distribution company pipeline integrity of gas transportation.**

1. **Energy Services is monitoring all new business jobs in 2016 :**
 - a) **How many jobs started meters inside?**
 - b) **Total of jobs meters remain inside due to material work completed**
 - c) **Total of jobs where meter location must be changed outside**
 - d) **Those building owners have had the case reviewed and will have to comply**

2. **Guideline Review:**
 - a) **Existing buildings where property line/building line is the same there is no meter location change**
 - b) **New buildings or buildings with space between building line/property line should be reviewed. If our service layout already issued / Gas Engineering ruled for indoor metering and material design/construction work completed, those jobs should continue as planned.**
 - c) **In flight jobs where no material work completed (napkin sketches, no POE, no foundation) Our ESR/CPM 's will review to move meters outside.**
 - d) **Any issues of any job contact your representatives that is attached to the particular project case.**

“Right Answer”



Public Safety – Practical – Readily Accessible

QUESTIONS

