

MUNICIPAL UTILITIES DEPARTMENT

901 Fourth Avenue Southwest

WATERTOWN, SOUTH DAKOTA 57201-4107

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South Dakota Public Utilities Commission
Ms. Patricia Van Gerpen, Executive Director
Capitol Building, First Floor
500 E Capitol Ave.
Pierre, SD 57501-5070

RE: Watertown Municipal Utilities
Request for Waiver
49 C.F.R *192.285(a)(2) and C.F.R 192.285(c)

Dear Ms. Patricia Van Gerpen,

Watertown Municipal Utilities is respectfully requesting a waiver of 49-C.F.R *192.285*(a)(2) and C.F.R 192.285(c). Thank you for your consideration in this request.

Watertown Municipal Utilities is a municipally owned utility serving approximately 13,000 customers in the Watertown area.

49-C.F.R Part 192 consists of federal safety standards for the transportation of natural gas by pipeline.

49-C.F.R *192.285(a) requires that persons making plastic joints be qualified under the applicable joining procedures. 49 C.F.R *192.285(c) further requires that:

"A person must be re-qualified under an applicable procedure, if during any 12 month period (1) Does not make any joints under that procedure; or (2) has 3 joints or 3 percent of the joints made, whichever is greater, under that procedure that are found unacceptable by testing under 192.513."

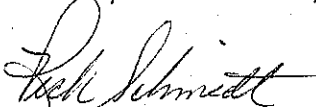
Watertown Municipal Utility requests a waiver of 49 C.F.R *192.285(c) to allow it to re-quality its employees by alternate means of assuring qualifications for persons making joints. Watertown Municipal Utility proposes the following procedure:

"A person must be re-qualified under an applicable procedure at least once each calendar year, but at intervals not exceeding 15 months. In addition, if a joiner has 1 joint made under the procedure that is found to be unacceptable by testing under 49 C.F.R 192.513, that person must re-qualify under that procedure as an initial qualification."

Watertown Municipal Utility requests a permanent waiver since the requirements for testing will be required for the foreseeable future.

The current 12-month retest requirement will result in testing about every 11 months which will eventually result in testing being performed in the middle of the construction season or at the end of the construction season.

Thank you in advance for your consideration.



Rich Schmidt
Gas Superintendent
Watertown Municipal Utilities
605-882-6233