

WATERTOWN MUNICIPAL UTILITIES

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April 22, 2020

Ms. Patricia Van Gerpen
Executive Director
South Dakota Public Utilities Commission
State Capitol Building
500 East Capitol
Pierre, SD 57501

Re: Docket No. PS14-001 Removal of Waiver of 49 CFR Sections 192.285(a)(2) and 192.285(c)

Watertown Municipal Utilities submits this request to remove the waiver of 49 CFR Section 192.285(a) (2) and 192.285(c) granted by the South Dakota Public Utilities Commission on July 8, 2014 in Docket No. PS14-001. Watertown Municipal Utilities requesting the Commission remove this waiver as it is no longer necessary and is void by irrelevance due to a change in Pipeline Safety Regulations effective October 1, 2015.

Effective as of October 1, 2015, 49 CFR 192.285 Plastic Pipe: Qualifying persons to make joints. 192.285 (c) states:

A person must be re-qualified under an applicable procedure once each calendar year at intervals not exceeding 15 months, or after "any" production joint is found unacceptable by testing under 192.513.

Watertown Municipal Utilities request for a waiver, in Docket No. PS14-001, as authorized by the Commission allowed for the following:

- 1. A person must be re-qualified under an applicable procedure, at least once each calendar year, at intervals not exceeding 15-months.
 - If a joiner has one joint made under this procedure that is found unacceptable by testing under 49 CFR 192.513, that person must be requalified under the applicable joining procedure as an initial qualification.
- 2. The plastic joining requirements must be included within Watertown Municipal Utilities Operations and Maintenance Manual.

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Mary Zanter, the Commission's Pipeline Safety Program Manager, requested that because the federal pipeline safety regulation is now consistent with Watertown Municipal Utilities' practices authorized in Docket No. PS14-001, the Utilities should make this request because the waiver allowing for an alternative requalification schedule is no longer necessary.

This filing has been electronically submitted to the Commission in accordance with ARSD 20: 10:01:02:05. Please contact me at 605-882-6233 or jlunde@watertownmu.com with any questions.

Sincerely,

John Lunde

Gas Superintendent