

**ORIGINAL**

Decision No. 67958

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

JOE B. PAULETTO and PINE TREE  
TRAILER PARK,  
  
Complainants,

vs.

SAN DIEGO GAS & ELECTRIC  
COMPANY, a corporation,  
  
Defendant.

Case No. 7884  
(Filed April 28, 1964)

Oscar E. Knappe, Employers' Association of  
Northern San Diego County, Inc., for  
complainants.

Chickering & Gregory, by Sherman Chickering  
and C. Hayden Ames, and Stanley Jewell,  
for defendant.

Arch Main, for the Commission staff.

O P I N I O N

This matter was heard and submitted before Examiner  
Patterson in San Diego on July 10, 1964.

Complainants request an order requiring defendant to  
supply high pressure gas service at 5 psi to the Pine Tree Trailer  
Park in Escondido. The complainants' case, in substance, is that  
Joe B. Pauletto, a general contractor, installed in a new  
portion of the Pine Tree Trailer Park a gas piping feeder system  
to receive high pressure gas at 5 psi and distribute it through  
pressure regulators and low pressure lines to the trailer  
locations; that the high pressure portion of the system was placed

in a common utility trench; that the entire system was installed in accordance with the City of Escondido's requirements and was approved by a City plumbing inspector; that defendant refused to serve 5 psi service, alleging that the pipe location is hazardous, and instead is supplying 7-inch water column low pressure service, which is not adequate for the trailer occupants' needs. It is complainants' position that defendant has no authority to refuse service because of a condition on the customer's side of the meter which was approved by the City of Escondido.

A City of Escondido plumbing inspector testified that at the time he made the inspection on October 15, 1963, he was satisfied that the installation met the City's code requirements for gas piping, and he approved it. He presented a letter, dated January 3, 1964, Exhibit 1, signed by him stating that the gas line was tested at 50 plus pounds pressure.

The record shows that the City of Escondido's code requirements for gas piping include, in addition to the Uniform Plumbing Code of 1961, Rules and Regulations for Plumbing and Gas Equipment and Installations in Mobilehome Parks, California Administrative Code Title 8, Chapter 9, Article 3, as adopted April 19, 1961, by City Ordinance No. 758. Section 16357.5 of Article 3 provides that piping carrying gas pressures in excess of 15 inches water column pressure shall be tested at not less than 60 pounds per square inch gauge pressure.

Defendant's superintendent of commercial gas and steam sales testified that the gas piping system in question does not

meet defendant's requirements for 5 psi service to trailer parks, and that in his opinion it constitutes a potential hazard. Said witness, who has been responsible for developing defendant's criteria for high pressure service to trailer parks and has participated with various official organizations concerned with such service, testified that defendant's basic requirements are that the gas lines be weld jointed and be placed only beneath permanent roadways or walkways. He explained that such requirements for location of high pressure piping reflect the company's experience with deterioration of gas lines when they are placed in close proximity to other utility lines, because of electrolysis under the extremely unfavorable local soil conditions, and physical damage which can result from maintenance work on the other lines, and that they also lessen the likelihood that a mobile trailer structure will be placed directly over a gas line. The potential hazard in such cases arises from the fact that dangerous quantities of gas can accumulate more quickly from a leak in a high pressure system than in a low pressure system. He testified further that one of the trailers in the park is located over, or nearly over, the high pressure line; that the trailer park's application, made October 12, 1963, was for low pressure gas service to a water heater in a utility building, and that the request for high pressure service was not made until December 2, 1963. This witness also testified that if the regulators installed on complainants' system were removed and if the restrictions which exist because of the condition of the tubing connections to some of the trailers

were eliminated, satisfactory service would be received by the trailer occupants from the present low pressure system.

Defendant will supply high pressure service if the section of the gas line located in the common utility ditch is rerouted under the roadway as shown on Exhibit 4. The cost of such rerouting was estimated by the trailer park owner-partner to be between \$400 and \$500.

The record shows that about April, 1962, the owner-partner of the Pine Tree Trailer Park, upon his request, was supplied with a gas distribution design prepared by defendant for supplying high pressure service to an older portion of the trailer park from a meter location on Broadway. This design, Exhibit 3, specified defendant's requirements for high pressure service including the placing of such lines under permanent roadways and walkways. Said design was never utilized, however, and the older portion of the trailer park is presently receiving low pressure service. Defendant received no request for a gas distribution system design for service to the new section of the trailer park.

It is defendant's position that gas is normally served at low pressure, high pressure service being considered unusual, and in this regard pointed out its filed Rule 2(b), "Pressure" which provides, in part,

"Gas supplied at the outlet of a meter will normally be at "low pressure." The standard for "low pressure" shall be an average pressure equivalent to 7 inches of water column. ..."

"Gas will be supplied at "high pressure," upon approval of the Company, when and where such service is available from existing high pressure mains. ..."

The record shows that defendant serves high pressure gas to approximately 800 installations, which is less than one-half of one per cent of the total number of gas meters served. Approximately 160 mobilehome parks are served with gas, of which approximately 120 are served at high pressure. Defendant's witness testified that all of these 120 have complied with the requirements of placing the high pressure piping underneath roadways or walkways.

It seems clear from the record that although the owner-partner of Pine Tree Trailer Park was aware of defendant's requirements for high pressure gas service, he proceeded to have a gas piping system installed which did not meet those requirements.

Defendant's Rule 9 provides that the utility has the right to refuse or cease the delivery of gas to a customer if any part of the customer's service, appliances or apparatus is unsafe.

In view of all of the evidence, the more important elements of which are discussed above, the Commission makes the following findings:

1. The gas piping system installed in the Pine Tree Trailer Park does not meet defendant's minimum requirements for high pressure gas service.
2. Said gas piping system would constitute a potential hazard if high pressure 5 psi gas service were to be rendered.
3. The evidence does not establish that the gas piping system in question was tested in accordance with the requirements.

of Part 7 of the California Administrative Code Title 3, Chapter 9, Article 3, Section 16357.5.

Based upon the above findings we conclude that the complaint should be dismissed.

O R D E R

IT IS ORDERED that the relief sought by complainants is denied and the complaint is dismissed.

The effective date of this order shall be twenty days after the date hereof.

Dated at San Francisco, California, this 6<sup>th</sup> day of OCTOBER, 1964.

Fredrick B. Halaloff  
President  
Richard S. [unclear]  
George C. Grover  
William M. Bennett

Commissioners

Commissioner Everett C. McKeage, being necessarily absent, did not participate in the disposition of this proceeding.