STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

March 9, 2009

Mr. Keith Erickson
Manager of Utility Distribution
University of Illinois
1501 S. Oak Street
Champaign, IL 61820

Dear Mr. Erickson:

I received your electronic communication transmitted on February 26, 2009, regarding jurisdictional natural gas facilities located on the property owned and controlled by the University of Illinois. The Illinois Commerce Commission ("ICC") relies on the definitions contained in the Code of Federal Regulations Parts 191 and 192, Code interpretations letters issued by the Department of Transportation and language contained in the Illinois Pipeline Safety Act to define the various types of natural gas system operators and determine jurisdictional facilities. As you are aware, the University of Illinois is considered an Intrastate Transmission operator and a Master Meter System operator.

The diagrams of the Poultry Facility, PTI Facility, Beef-Sheep Facility, Swine Research Facility, NRSA Out Buildings and Athletic Facility were reviewed. I have determined that the natural gas piping beyond the meter set assembly would be considered non-jurisdictional to the pipeline safety regulations. My conclusions regarding jurisdiction are based on the assumption that all of the natural gas delivered to the structures is being used by the University of Illinois for its own purposes. If the cost of the gas consumed is recovered from outside entities such as tenants, concessionaires, etc. via direct billing or included in the rental agreement, the piping would be considered jurisdictional.

Although the piping serving the facilities listed above may not fall under the definition of jurisdictional facilities regulated by the ICC, I highly recommend that all natural gas system piping be installed, tested, inspected and maintained in accordance with the Part 192 requirements. This recommendation is made to ensure that all piping owned and operated by the University of Illinois meets the minimum federal safety standards.

Thank you for providing me the opportunity to comment on this matter. The ICC Pipeline Safety Program appreciates the continued spirit of cooperation and the concern for public safety exhibited by you and your staff.

Sincerely,

Darin R. Burk

Darin R. Burk
Manager – Pipeline Safety

Burk, Darin

From: Erickson, Keith R (Utilities) [krericks@fs.uiuc.edu]
Sent: Thursday, February 26, 2009 4:13 PM
To: Burk, Darin
Cc: Erickson, Keith R (Utilities)
Subject: Discussion on customer owned piping
Attachments: Gas Map Index Document.doc; Gas at Swine Research Facility.pdf; Gas at NRSA Out Buildings.pdf; Gas at Poulty Facility.pdf; Gas at Beef - Sheep Facility.pdf; Gas at Athletics.pdf; Gas at PTI.pdf

Darin,

We spoke at the Champaign-Urbana JULIE breakfast about the question on gas piping on the building or customer side of the meter. The question was based on installations where multiple buildings are supplied from a single gas meter.

I am interested in a definition of jurisdiction piping when on the customer or building side of the gas meter.

When we spoke I agreed to send some diagrams that would explain my questions as they related to gas piping on the campus.

Attached are maps, with notations, of natural gas piping on the campus, in PDF format. I have also attached a word document with a summary of facts about each locations shown on the maps.

<<Gas Map Index Document.doc>> <<Gas at Swine Research Facility.pdf>> <<Gas at NRSA Out Buildings.pdf>> <<Gas at Poulty Facility.pdf>> <<Gas at Beef - Sheep Facility.pdf>> <<Gas at Athletics.pdf>> <<Gas at PTI.pdf>>

The question on each of the maps is whether the piping, on the building or customer side of the gas meter, is jurisdictional or not.

I would be pleased to discuss this with at your convenience or meet with you.

Thanks for you help

Keith

Keith R. Erickson, P. E.
Manager, Utility Distribution
University of Illinois
Utilities Management Group
1501 South Oak Street, MC821
Champaign, IL 61820

217.333.8484 T
217.333.4294 F

email: krericks@illinois.edu

Natural Gas Service to Beef-Sheep Facility

Natural Gas Mains & Main Meter: UI

Natural Gas Piping on Customer side of Meter: UI

Land: All owned by UI

Buildings: All owned by UI

Buildings Served: 10

NO Swine Research Facility

Natural Gas Service & Main Meter: AmerenIP

Natural Gas Piping on Customer side of Meter: UI

Land: All owned by UI

Buildings: All owned by UI

Buildings Served: 6

NO NRSA Out Buildings

Natural Gas Service & Main Meter: AmerenIP

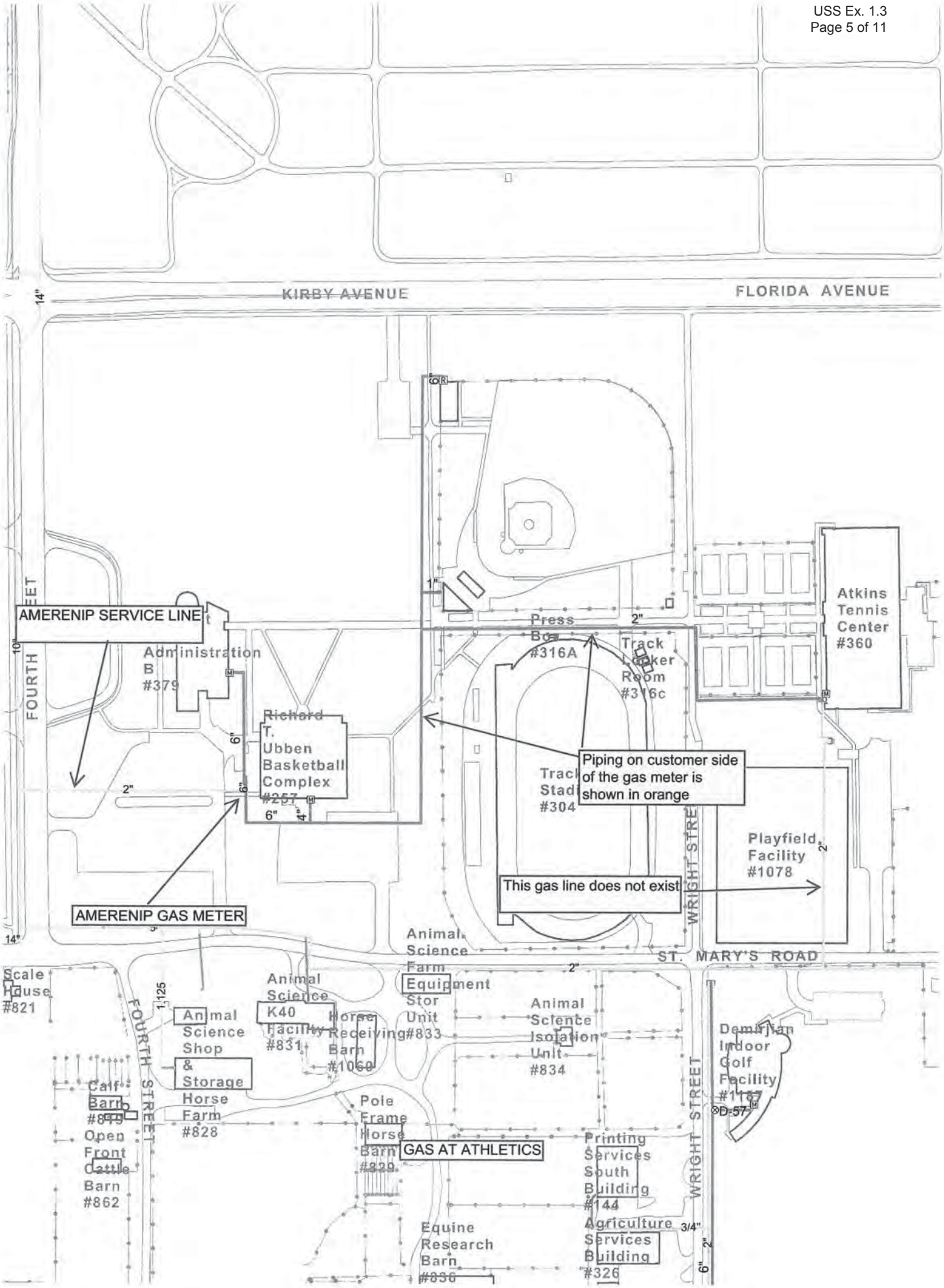
Natural Gas Piping on Customer side of Meter: UI

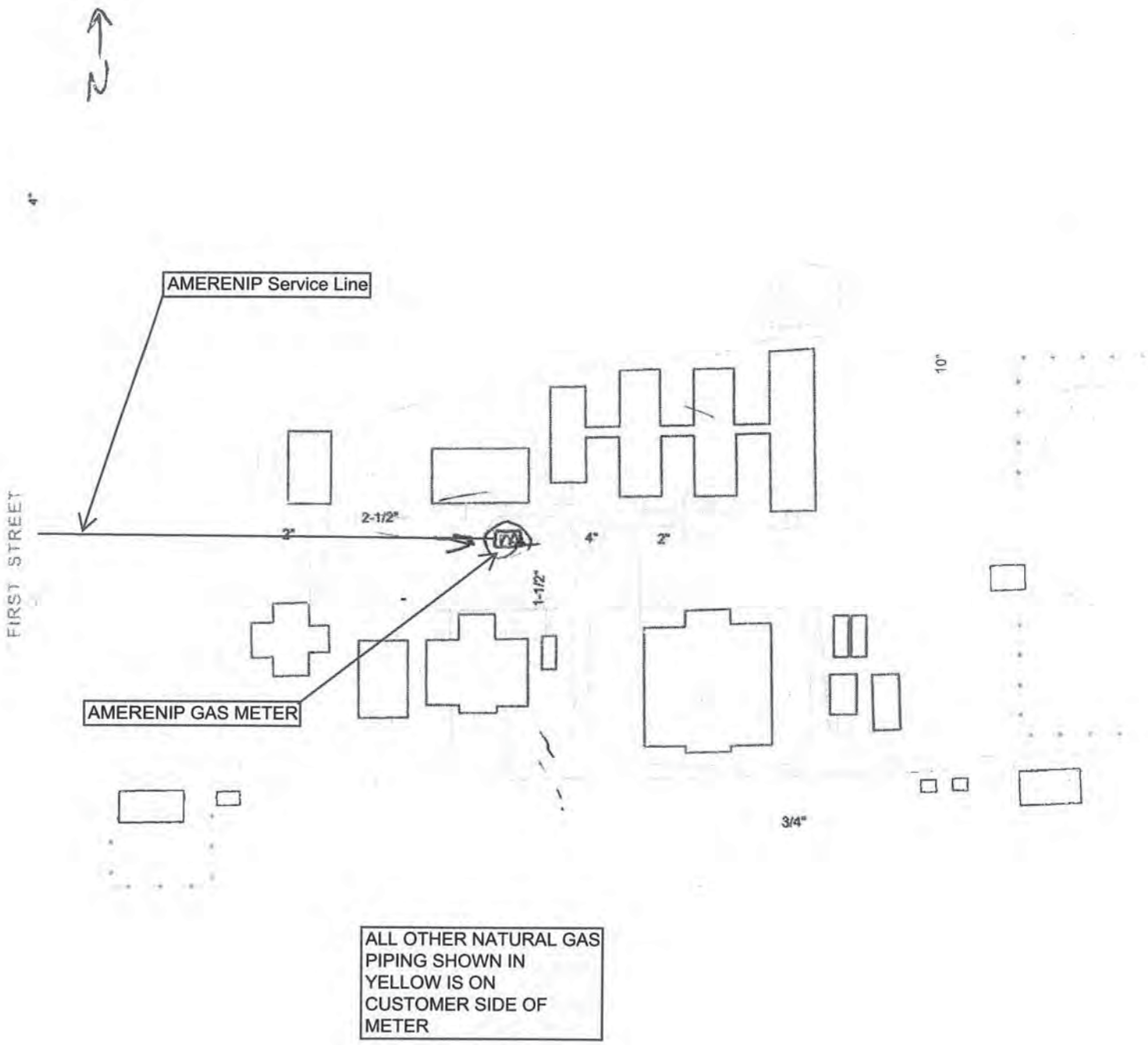
Land: All owned by UI

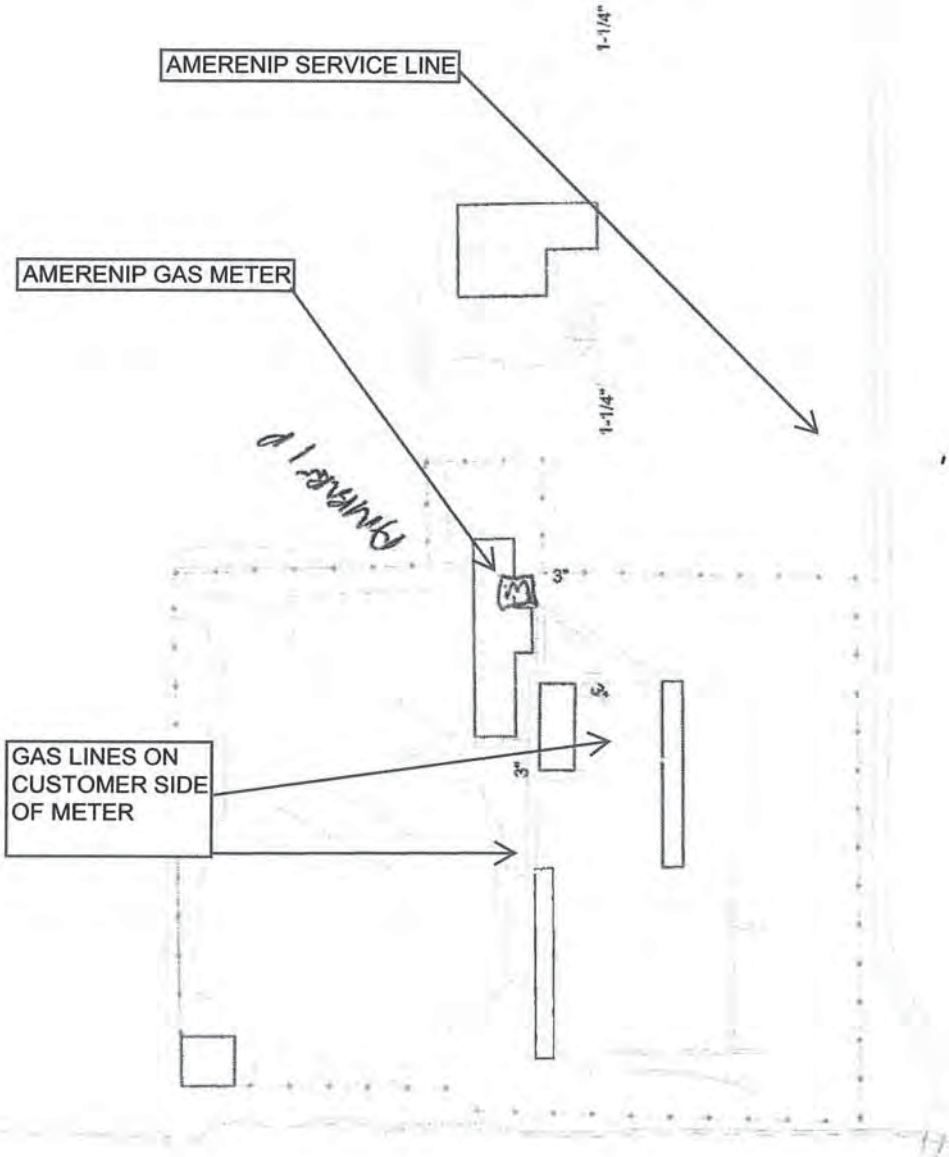
Buildings: All owned by UI

Buildings Served: 2

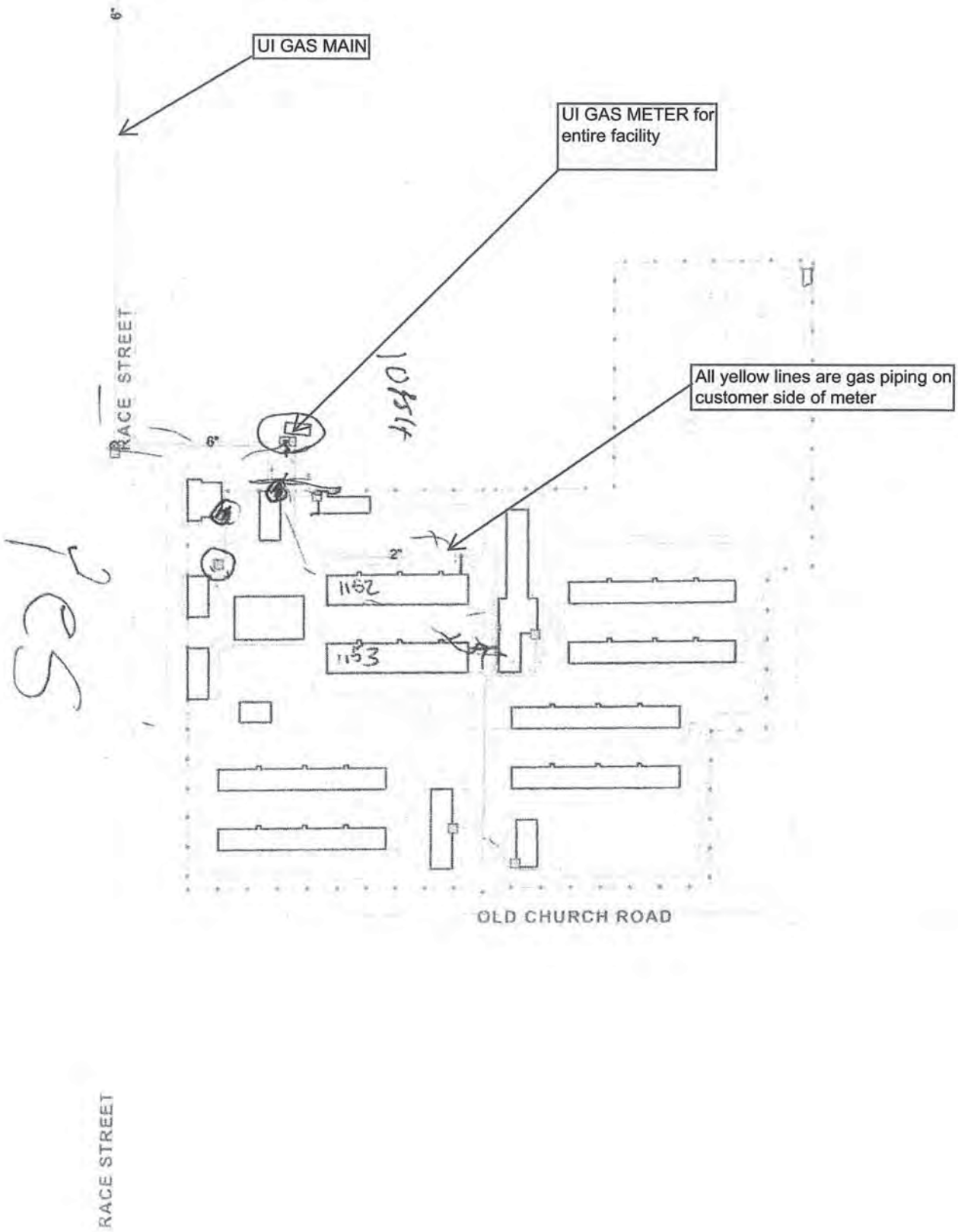
"Master Meter System" means a pipeline system for distributing gas within, but not limited to, a definable area, such as a mobile home park, housing project, or apartment complex, where the operator purchases metered gas from an outside source for resale through a gas distribution pipeline system. The gas distribution pipeline system supplies the ultimate consumer who either purchases the gas directly through a meter or by other means, such as by rents;

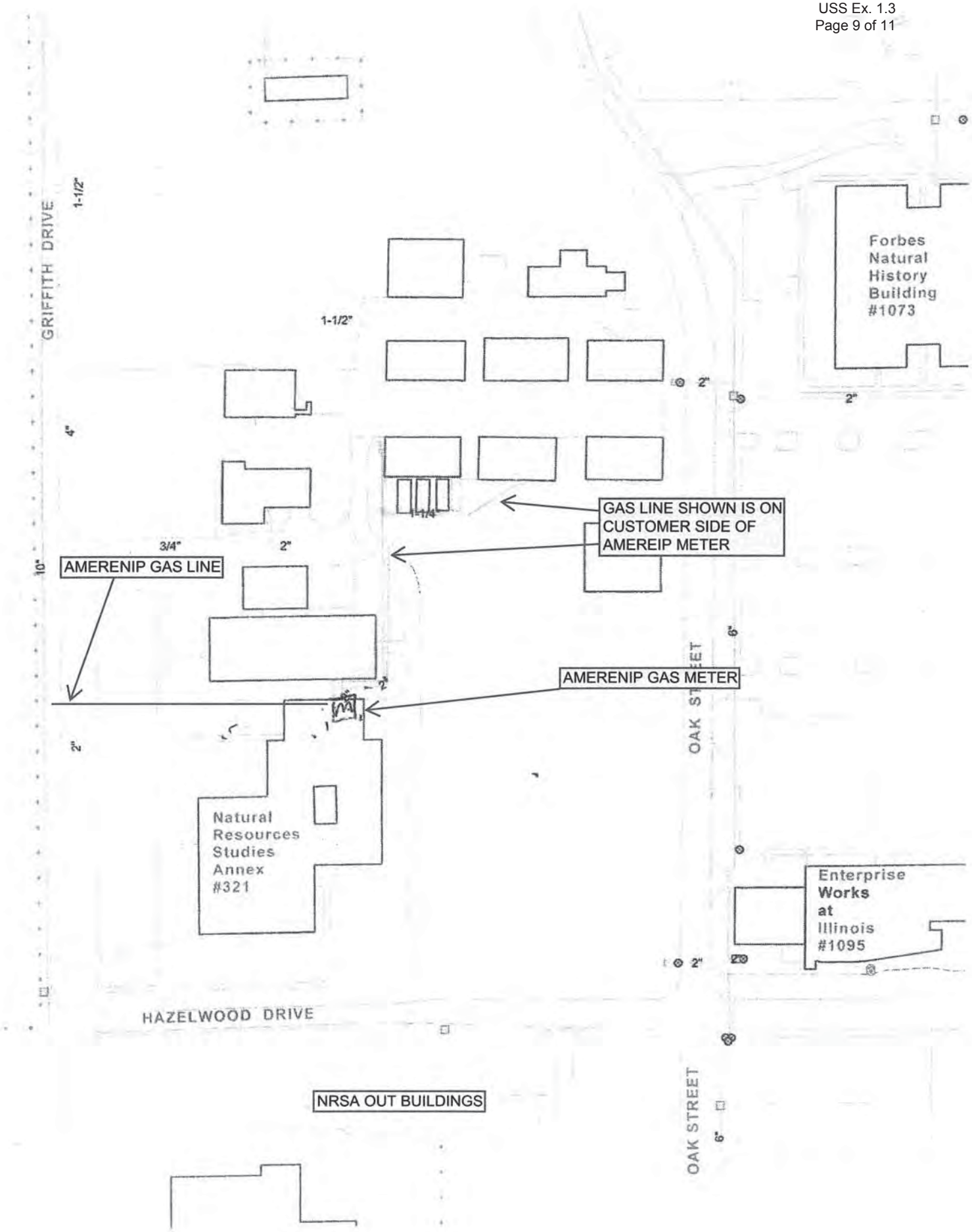

KIRBY AVENUE
FLORIDA AVENUE
AMERENIP SERVICE LINE
Administration B #379
FOURTH
Richard T. Ubben Basketball Complex #257
AMERENIP GAS METER
Press Box #316A
Track Locker Room #316c
Atkins Tennis Center #360
Track Stadium #304
Piping on customer side of the gas meter is shown in orange
This gas line does not exist
Playfield Facility #1078
WRIGHT STREET
ST. MARY'S ROAD
Animal Science Farm
Scale House #821
Animal Science Shop & Storage
Animal Science K40 Facility #831
Horse Receiving Barn #1060
Equipment Stor Unit #833
Animal Science Isolation Unit #834
Demirjian Indoor Golf Facility #1167
D-57
Calf Barn #849
Open Front Cattle Barn #862
Horse Farm #828
Pole Frame Horse Barn #829
GAS AT ATHLETICS
Printing Services South Building #144
Agriculture Services Building #326
Equine Research Barn #836

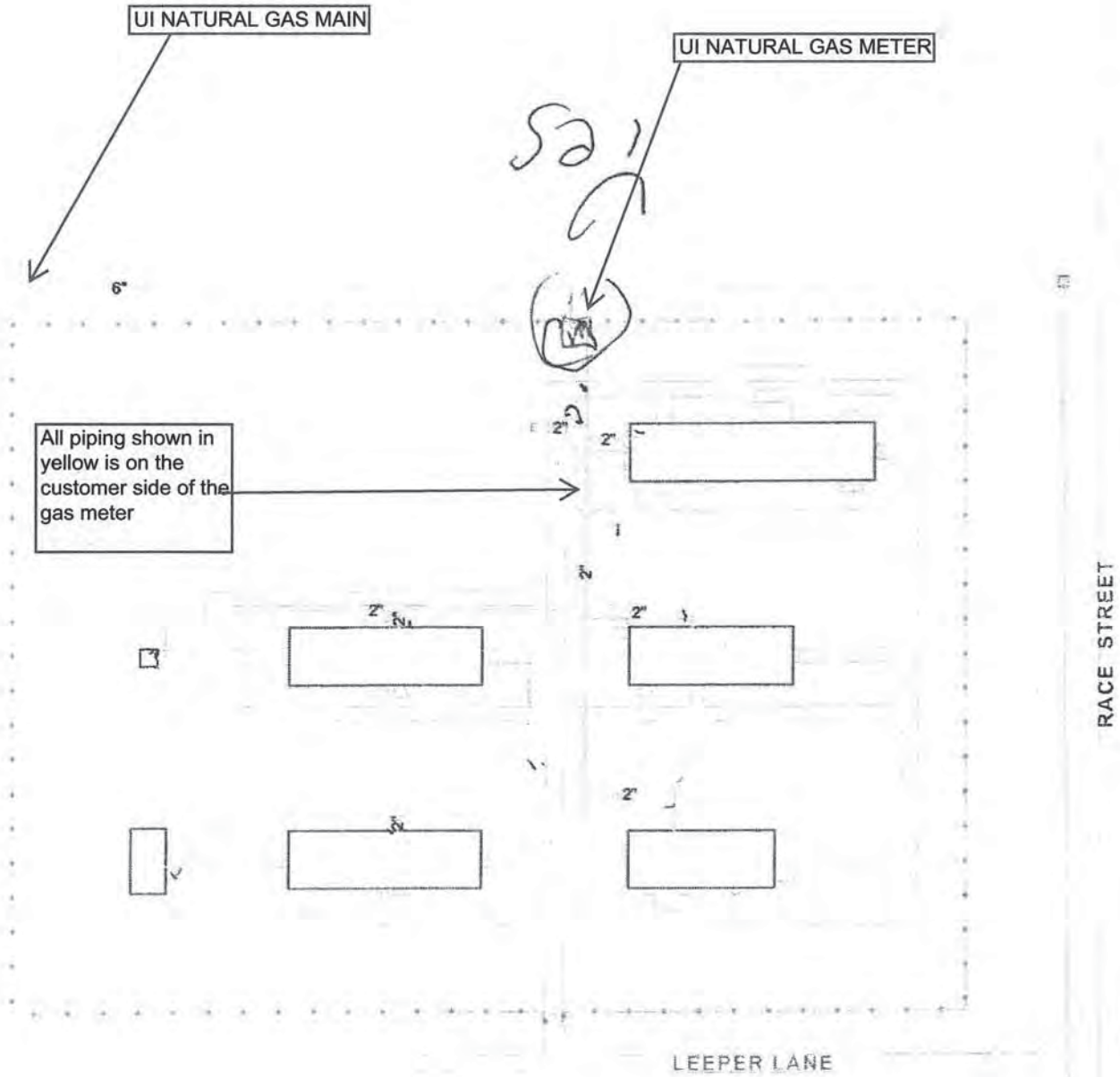

N
AMERENIP Service Line
FIRST STREET
2"
2-1/2"
4"
2"
1-1/2"
10"
AMERENIP GAS METER
3/4"
ALL OTHER NATURAL GAS PIPING SHOWN IN YELLOW IS ON CUSTOMER SIDE OF METER
SWINE RESEARCH FACILITY
CURTIS ROAD
FIRST STREET
10"
10"
16"



GAS AT PTI FACILITY


6"
UI GAS MAIN
UI GAS METER for entire facility
RACE STREET
6"
All yellow lines are gas piping on customer side of meter
2"
1162
1153
OLD CHURCH ROAD
RACE STREET


GRIFFITH DRIVE
1-1/2"
1-1/2"
4"
10"
3/4"
2"
2"
2"
2"
2"
2"
6"
6"
Forbes Natural History Building #1073
GAS LINE SHOWN IS ON CUSTOMER SIDE OF AMEREIP METER
AMERENIP GAS LINE
AMERENIP GAS METER
OAK STREET
Natural Resources Studies Annex #321
Enterprise Works at Illinois #1095
HAZELWOOD DRIVE
NRSA OUT BUILDINGS
OAK STREET



Chicken Farm
south Race St

POULTRY FACILITY

No Poultry Facility

Natural Gas Service & Main Meter: UI

Natural Gas Piping on Customer side of Meter: UI

Land: All owned by UI

Buildings: All owned by UI

Buildings Served: 7

Athletic Facilities

Natural Gas Service & Main Meter: AmerenIP

Natural Gas Piping on Customer side of Meter: UI

Land: All owned by UI

Buildings: All owned by UI

Buildings Served: 5

No PTI FACILITY

Natural Gas Service & Main Meter: AmerenIP

Natural Gas Piping on Customer side of Meter: UI

Land: All owned by UI

Buildings: All owned by UI

Buildings Served: 3