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Sent: Monday, November 18, 2019 10:53 AM
To: Rules Coordinator

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OPPOSED. LP Gas Safety Rule 9.140. Uniform Protection Standards.

"No" to RRC requiring additional crash protection for 20 lb. cylinder and forklift cylinder storage. The National Propane Gas Association funded extensive testing to determine adequate levels of protection. As a result of the testing, NFPA 58 adopted updated rules confirming locked ventilated cages serves as adequate protection and no further protection is needed.

OPPOSED. Proposed revisions to **LP Gas Safety Rule 9.308 Installation of Piping** would require you to ensure the bonding requirements of NFPA 54 7.12.2 were met when connecting to or supplying a new piping system with corrugated stainless-steel tubing (CSST).

"No" to certifying electrical work was done properly. The Texas RRC does not train and certify any level of electrical work. Texas law does not allow an individual that is not licensed as an electrician to conduct those services. To verify electrical work was performed correctly is outside the scope of knowledge and training.

OPPOSED. The RRC's adoption of the **section 6.29.3.3 of the NFPA 58 2017** requiring a **fire safety analysis**.

"No" to the new requirement of having to have a fire safety analysis. Preserve this exception to NFPA 58 we've had since 2001. The requirement is redundant and not needed!

OPPOSED.LP Gas Safety Rule 9.2 Definitions.

" **No**" to the deletion of the definition of "repair to container," and

"**Yes**" to adding the definition of maintenance, so it is not classified as repair. Follow the DOT definition.

SUPPORT. LP Gas Safety Rule 9.134 Connecting Container to piping.

Say "**Yes**" TPGA's proposal to remove the pressure test requirement and require a leak check instead.

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