



# New York State Association of Plumbing - Heating - Cooling Contractors, Inc.

P.O. Box 23 • North Tonawanda, NY 14120 • (800) 523-5505 • E-FAX (800) 507-1675  
(716) 216-4360 • dreddy@nysphcc.org • www.nysphcc.org

## Local PHCC Chapters

Associated PHCC of  
Rochester

Broome County PHCC

Nassau County PHCC

Plumbing Contractors  
Association of  
Long Island, Inc.

Plumbing Contractors  
of New York City

Western New York  
Association of  
Plumbing &  
Mechanical  
Contractors

Kathleen Burgess  
Secretary  
New York State Public Service Commission  
Empire State Plaza, Agency Building 3  
Albany, NY 12223-1350

November 9, 2014

*Re: Opposition to Amended Service Line Definition - Case #: 14-G-0357*

Dear Secretary Burgess,

I am writing to express my concern regarding the new Department of Public Service (DPS) proposal that would amend the definition of "service line" gas piping that is already covered in the Fuel Gas Code of New York State. This will put further licensing and qualification requirements on the already licensed Master Plumbers of this State.

Most municipalities in New York State require potential Master Plumbers to complete 10,000 hours of supervised work before they can apply to sit a Master Plumbers Exam. The DPS is attempting to conform to the federal definition of "service line" which will duplicate the regulatory process as this work at present is inspected by the jurisdiction where work is being performed.

These regulations will force licensed master plumbers to become "operator qualified" under contract by the utility to perform work they have done for decades without incident. Although we admire the Department of Public Service and its efforts to create uniform gas safety regulations. The current Master Plumber licensing system, established over 100 years ago has worked and will continue to work and protect the citizens of this State.

We believe that attention should be drawn to unlicensed operatives that are completing work incorrectly, in an unsafe manner that are hurting the natural gas industry and the PHCC contractors respectively.

We are asking for an exemption from the "operator qualification" for all licensed Master Plumbers of State of New York.

Sincerely,

Dorothy Reddy  
Executive Director