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EXCELLENCE

Andrews
Mechanical, Inc.

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Response Regarding Proposal R403.1.3 Continuously Burning Pilot Lights

We are against this proposal for the following reasons.

- 1) Continuously burning pilot lights on each meter service is a necessity so the meter regulator won't relief. The over pressure part of the service regulator is set to relieve at 14 inches water column pressure, natural gas is delivered to the home at 7 inches water column. Residential gas valves are not to have a pressure over 14 inches water column. Natural gas and propane are much like refrigerant and as the temperature rises, so does the pressure inside the piping system. This can cause, and has caused, discharges at the meter regulator due a rise in temperature in the gas piping in the house. The gas comes into the house at about 50 degrees and can get to over 90 degrees on a hot day or in Spokane -10 below then warmed up to 70 degrees in the winter. Which can cause the pressure inside the pipe to rise over up to the 14 inches water column. This happens a lot of time when there are no pilots on the system. So, what happens is, the relief part of the regulator opens and bleeds the gas off to the outside and there is an odor outside and the gas company gets a call that there is a leak and they are required to come out see where the odorant/gas came from. Sometimes when this happens dust gets under the regulator seat and the over pressure can happen. This is really bad because if it gets over 14 inches, the gas valves inside the house will fail. Sometimes they fail safe and other times they don't, and the gas appliance now won't shut off and the gas just keeps flowing through the valve until you have a meltdown of the appliance. We have seen this happen, where the furnace was cherry red from heat when we got the call. Continuously burning pilot lights are there so the house gas line doesn't over pressure when gas line warms up. By having one pilot burning when the gas line warms up, the pressure will not increase. This is to stop over pressure from happening most of the time, as long as the regulator works properly, and no dirt gets under the seat of the regulator.
- 2) A much better requirement would be to require one gas appliance to have a pilot for each gas meter set.
- 3) Many gas appliances are still sold with standing pilots on them. These appliances may not need electrical power for the appliances, so a standing pilot has been used. It would be very costly to replace these

appliances with non-piloted systems, it would cost well over \$1,000.00 just to get the electrical power for the ignition system to work on these pilotless system. The recent requirement of the state electrical code for an arc fault circuit has already pushed the price to at least this point.

- 4) For a long time, fireplaces and gas logs have been run on piloted systems because of the high temperatures that happen in the fireplace. What we found is, that you can get pilotless systems, but these systems don't last very long to due the high temperatures of the fireplaces. Thus, the owners are having to pay for the service tech to come out and replace them over and over. So, the small amount of gas that you thought you were saving, you just burned up in gasoline/diesel to get the service technician there with the fuel in his truck.

Edwin Larry Andrews II