



## OFFICE OF THE COUNTY EXECUTIVE

**Marc Elrich**  
*County Executive*

February 13, 2020

The Honorable Dereck E. Davis  
Chair, Economic Matters Committee  
House Office Building, Room 231  
Annapolis, Maryland 21401

Re: House Bill 408 – *Public Utilities - Gas Service Regulator Safety*  
(*Flower Branch Act*)

Dear Chairman Davis:

This bill aims to move natural gas distribution infrastructure in occupied structures from indoors to outdoors. The bill requires a gas regulator to be installed outdoors when: (1) gas service is first installed at an occupied structure; and (2) an existing gas regulator installed in the interior of an occupied structure is replaced. The bill also requires all existing interior gas regulators that service a multifamily residential structure to be relocated outdoors by October 1, 2025.

Montgomery County has experienced the terrible consequences that can occur when indoor natural gas infrastructure fails. On August 10, 2016, seven residents, including two children, were killed in an explosion at the Flower Branch Apartments in Silver Spring. The National Transportation Safety Board determined that the probable cause of the explosion was the failure of an indoor mercury service regulator with an unconnected vent line that allowed natural gas into the meter room where it accumulated and ignited from an unknown ignition source. While the specific circumstances of what happened in Silver Spring provide numerous lessons learned about mercury regulators, routine inspection regimes, and preventive maintenance, it was also determined that the location of the gas distribution infrastructure contributed to this tragic event.

Flammable gases and vapors, including the primary component of natural gas, methane, have Lower and Upper Explosive Limits (LEL/UELs). LELs and UELs represent the concentration range in which those gases can, when ignited, cause an explosion. For natural gas leaks, these concentrations are nearly impossible to reach unless the gas is released into an enclosed space. By moving the natural gas infrastructure outdoors, we can ensure that leaks or

The Honorable Dereck E. Davis  
Re: House Bill 408  
February 13, 2020  
Page 2

failures result only in environmental release as opposed to explosive conditions. In addition, fire department personnel routinely respond to 911 calls that report natural gas leaks. When the associated infrastructure is located indoors, it can be more challenging for first responders to access that infrastructure to effectively test for leaks. Outdoor meters can also be more readily accessed for maintenance and repairs.

Today, gas regulator infrastructure is more commonly installed outdoors as a general practice because of the risks of failure and the benefits associated for easy access. However, this practice should not just be more common, it should be expected. Marylanders who happen to live in older buildings should be entitled to the same expectation of safety from gas regulator failure. For this reason, I support House Bill 408 and respectfully request that the House Economic Matters Committee give the bill a favorable report.

Sincerely,

A handwritten signature in black ink, appearing to read "Marc Elrich". The signature is fluid and cursive, with the first name "Marc" written in a larger, more prominent script than the last name "Elrich".

Marc Elrich