



Missouri Public Service Commission

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JOHN P. MITCHELL
Commissioner

December 12, 2024

TO: Missouri Natural Gas Operators

FROM: Kathleen McNelis, Pipeline Safety Program Manager

SUBJECT: **1) Calendar Year 2025 Random Drug Testing Rates**
2) PHMSA Advisory Bulletin ADB–2024–01, Identification and Evaluation of Potential Hard Spots—In Line Inspection Tools and Analysis
3) Dangers of Abnormal Snow and Ice Build-Up on Gas Related Equipment
4) Staff Changes

Note: Copies are not sent to all operator personnel. Please forward to the appropriate person(s).

1) Calendar Year 2025 Random Drug Testing Rates

The Pipeline and Hazardous Materials Safety Administration (PHMSA) issued a notification that the Minimum Annual Percentage Rate for Random Drug Testing for covered employees will be 50 percent during calendar year (CY) 2025.

<https://www.govinfo.gov/content/pkg/FR-2024-11-20/pdf/2024-26737.pdf>

The linked notification also explains that for CY 2024 reporting, Multi-Factor Authentication (MFA) login procedures must be used for submitting drug & alcohol (D&A) testing data into the Drug and Alcohol (D&A) Management Information System (DAMIS) database. The notice also explains how pipeline operators and contractors will obtain MFA login information.

2) PHMSA Advisory Bulletin ADB–2024–01, Identification and Evaluation of Potential Hard Spots—In Line Inspection Tools and Analysis

PHMSA issued this advisory bulletin to notify pipeline owners and operators of the importance of evaluating pipeline facilities for the existence and potential threat of hard spots in the pipe body.

<https://www.govinfo.gov/content/pkg/FR-2024-11-18/pdf/2024-26725.pdf>

PHMSA advises that pipeline owners and operators should consider expanding their hard spot threat evaluation to all pipe manufactured prior to 1970, regardless of manufacturer; collecting and analyzing data associated with hard spot magnetic flux leakage in-line inspection tools; and following industry best practices when conducting in-line inspection data analysis.

3) Dangers of Abnormal Snow and Ice Build-Up on Gas Related Equipment

The accumulation of snow and ice increases the potential for damage to meters and regulators and other aboveground pipeline facilities and components. Incidents have occurred in past winters on natural gas distribution system facilities that appear to have been related to either the stress of snow and ice or malfunction of pressure control equipment due to ice blockage of pressure control equipment vents. Exposed piping at metering and pressure regulating stations, at service regulators, and at propane tanks, are at greatest risk. Damage may result from the stresses imposed by the additional loading of the snow or ice. Damage to facilities may also result from the impact of snow or ice falling from roofs, ice forming in or on regulators preventing their proper operation, or shoveling snow from roofs to protect dwellings from abnormal snow accumulation.

PHMSA issued an advisory bulletin in 2016, recommending steps to address the safety risks from accumulated snow and ice on pipeline facilities. Staff encourages each operator to download and read the advisory bulletin.

<https://www.federalregister.gov/documents/2016/02/11/2016-02704/pipeline-safety-dangers-of-abnormal-snow-and-ice-build-up-on-gas-distribution-systems>.

4) Staff Changes

Effective October 1, 2024, Robert Clay has retired from the MO PSC. We wish Robert success in his future endeavors. An updated Staff telephonic notification listing is attached.

TELEPHONE NOTICE OF GAS INCIDENTS (10-1-2024)

20 CSR 4240-40.020, Section 4

A telephone notice is to be made to the answering service or to one of the following Missouri Public Service Commission – Safety Engineering Staff members as soon after the discovery of an incident as is reasonably possible, but not to exceed **one hour** after confirmed discovery for a federally reportable incident, or **two hours** for a Missouri reportable incident, unless emergency efforts would be hindered. The answering service or these personnel may be contacted any time day or night. **The answering service can be used at any time; however, the Staff prefers operators to call the MoPSC office telephone numbers during normal working hours and home phone numbers after hours.**

<u>NAME</u>	<u>HOME PHONE</u>	<u>OFFICE PHONE</u>
Kathleen McNelis (Cellular 573-690-9860)	573-291-0438	573-751-3456
John Kottwitz	573-682-1107	573-751-7352
Greg Williams	573-462-7992	573-751-3411
Evan Neuner	573-552-2034	573-751-7347
Clinton Foster	816-377-2615	816-889-2012
Brian Buchanan	573-298-2488	573-526-3478
Jason Dickneite	573-301-2605	573-751-7074
Trevor Rucker	573-418-0429	573-751-4729
Nicholas O’Neal	573-508-8858	573-751-7468

If you cannot reach a Staff member, the following number is to an answering service that will take a message and go through the Staff call list:

MoPSC Incident Reporting Answering Service 888-299-2788

NOTE: If a Staff member does not contact you promptly following notification to the Answering Service, please re-contact the answering service or one of the Staff members directly.

Telephone Number for Reporting Federal Incidents 1-800-424-8802