



## *Missouri Public Service Commission*

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**GLEN KOLKMEYER**  
Commissioner

December 29, 2021

TO: Missouri Natural Gas Operators

FROM: Kathleen McNelis, Pipeline Safety Program Manager

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

- SUBJECT:
- 1) **Option to receive Inspection Summary Letters electronically**
  - 2) **Spring MANGO General Meeting (March 30, 2022) Scheduled**
  - 3) **Random Drug Testing Rate for 2022**
  - 4) **PHMSA Final Rule for Gathering Pipelines**
  - 5) **PHMSA (ADB-2021-01): Eliminating Hazardous Leaks and Minimizing Releases from Natural Gas Pipeline Facilities**
  - 6) **3G Wireless Network Discontinuance-Could Impact Certain SCADA Systems**
  - 7) **2021 PHMSA Annual Reports for Gas Distribution and Gas Transmission**
  - 8) **2021 Missouri PSC Gas Safety Annual Report**
  - 9) **Replacement Programs for Service/Yard Lines and/or Mains**
  - 10) **Excavator List Update**
  - 11) **Contact and Mapping Updates to MOCS**
  - 12) **Dangers of Abnormal Snow and Ice Build-Up on Gas Related Equipment**
  - 13) **Upcoming Inspections – DIMP, PAP, and OQ**
  - 14) **GX-2021-0406 Rulemaking update**

### **1) Option to receive Inspection Summary Letters electronically**

In an effort to save both paper and postage, Staff has been providing an option to send Inspection Summary Letters via email. If you are not currently receiving the letters by email and would like to, please indicate so to Clinton Foster at [Clinton.Foster@psc.mo.gov](mailto:Clinton.Foster@psc.mo.gov).

## **2) Spring MANGO General Meeting (March 30, 2022) Scheduled**

The Spring MANGO General Meeting has been scheduled for March 30, 2022, beginning at 9:30 AM in Jefferson City. The meeting will be on the 4th floor in the Ballroom (Room 450) of the Governor Office Building (GOB). The PSC Staff and MANGO board members look forward to seeing you then.

Note –in the event of changes such as to a remote meeting platform, the PSC will provide a follow-up notification.

## **3) Random Drug Testing Rate for 2022**

PHMSA announced in the December 21, 2021 Federal Register that the minimum annual random drug testing rate for calendar year 2022 is 50%. A website link for the applicable Federal Register is located at <https://www.govinfo.gov/content/pkg/FR-2021-12-21/pdf/2021-27504.pdf>

## **4) PHMSA Final Rule for Gathering Pipelines**

PHMSA issued a final rule on November 15, 2021 (*Federal Register*/Vol. 86, No. 217, pages 63266-63299) that expands Federal pipeline safety oversight to improve the safety of all onshore gas gathering pipelines. The final rule expands the definition of a “regulated” gas gathering pipeline and will extend reporting requirements to all gas gathering operators and apply a set of minimum safety requirements to certain gas gathering pipelines with large diameters and high operating pressures. The final rule has an effective date of May 16, 2022 and the applicable *Federal Register* can be viewed at <https://www.govinfo.gov/content/pkg/FR-2021-11-15/pdf/2021-24240.pdf>

## **5) PHMSA (ADB-2021-01): Eliminating Hazardous Leaks and Minimizing Releases from Natural Gas Pipeline Facilities**

As discussed in the Staff’s June 18, 2021 All Operator’s Letter, PHMSA issued ADB-2021-01 in the June 10, 2021 *Federal Register* (link at <https://www.govinfo.gov/content/pkg/FR-2021-06-10/pdf/2021-12155.pdf>) to advise natural gas operators of a statutory mandate to update inspection and maintenance plans to address eliminating hazardous leaks and minimizing releases from natural gas pipeline facilities in the PIPES Act of 2020.

PHMSA states that the PIPES Act of 2020 requires that before December 27, 2021, pipeline facility operators must update their inspection and maintenance plans to address the elimination

of hazardous leaks and minimizing releases from natural gas pipeline facilities. PHMSA further states that its expectation is that operators will comply with this requirement by amending Operations and Maintenance (O&M) Plans required by 49 CFR 192.605 and 193.2017. The *Federal Register* notice provides a list of considerations for the content of such plans, including but not limited to minimizing fugitive and vented emissions, and replacement or remediation of pipelines constructed of materials known to leak (e.g. cast iron, unprotected steel, and plastics with known issues).

In order to verify that operators have complied with the requirements to update plans before December 27, 2021, Staff requests that copies of plan updates be provided to Staff no later than January 15, 2022. The PIPES Act of 2020 additionally requires PHMSA and state inspections of these plan provisions by December 27, 2022. Staff anticipates conducting these inspections in calendar year 2022.

### **6) 3G Wireless Network Discontinuance-Could Impact Certain SCADA Systems**

The Federal Communications Commission (FCC) recently reported that most 3G cellular networks will shut down by the end of calendar year 2022. This shut down could potentially impact gas operators that have Remote Terminal Units (RTU's) and Supervisory Control and Data Acquisition (SCADA) systems that currently rely on a 3G cellular network. Staff encourages any operators using SCADA to proactively review their systems to determine if the 3G network shut-down would create any data transmitting or receiving issues and to take appropriate measures when required. For more information, please see the FCC web site link located below:

<https://www.fcc.gov/consumers/guides/plan-ahead-phase-out-3g-cellular-networks-and-service>

### **7) 2021 PHMSA Annual Reports for Gas Distribution and Gas Transmission**

The 2021 Annual Report forms for Gas Distribution (PHMSA F7100.1-1) and Gas Transmission (PHMSA F7100.2-1) must be submitted electronically to the PHMSA Portal by March 15, 2022. After the reports are submitted on the PHMSA Portal, please provide a copy to Staff. This copy may be downloaded as a PDF and emailed to Staff at:

PipelineSafetyProgramManager@psc.mo.gov, or may be sent as a paper copy to Kathleen McNelis, Missouri Public Service Commission, P. O. Box 360, Suite 600, Jefferson City, MO 65102.

Transmission pipeline operators are reminded to submit National Pipeline Mapping System (NPMS) data concurrently with their gas transmission annual reporting submission.

### **8) 2021 Missouri PSC Gas Safety Annual Report**

Please submit your 2021 Missouri PSC Gas Safety Annual Report to this office no later than March 15, 2022. An electronic version of the report form (please be sure to use the form updated for 2017) is available by selecting “Download MO Annual Report” on the MANGO website located at <https://mangowp.org/>. The Staff encourages you to use the electronic version and email the completed report to Evan Neuner at [evan.neuner@psc.mo.gov](mailto:evan.neuner@psc.mo.gov) by March 15, 2022, but mailing a completed form to this office by that date is acceptable.

### **9) Operators with Replacement Programs for Service/Yard Lines and/or Mains**

Please submit information regarding the status of your replacement program(s) to this office no later than March 15, 2022. Please provide details and quantities for the 2021 calendar year (or fiscal year for some main programs approved by the Commission) and the entire program to date. Include the numbers of service lines and yard lines replaced.

### **10) Excavator List Update**

Operators choosing to comply with the excavator education provisions of 20 CSR 4240-40.030(12)(I)3.B. and C. through the Missouri One Call System (MOCS) are reminded to review, update, and submit revised excavator lists (or indicate “no additions”) to the Missouri One Call System (MOCS). It is our understanding that for 2022, the MOCS participation renewal period will be from January 3, 2022 through March 15, 2022. Additional details and instructions will be provided by MOCS. A copy of the automated email from MOCS may be used to demonstrate compliance with the annual excavator list update requirement [(12)(I)2.A.].

### **11) Contact and Mapping Updates to MOCS**

The Missouri PSC Staff would like to remind operators of the importance of complying with the requests from MOCS to update maps and contact data as required by 20 CSR 4240-40.030(12)(I). This data and information is used to develop, maintain and update the member’s site files used by the Call Center to accurately notify the member utilities when excavation is taking place.

## **12) 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. If you are unable to access the advisory bulletin at the link below, please notify Staff and we will provide a copy. The advisory bulletin may be downloaded at:

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

## **13) Upcoming Inspections – DIMP, PAP, and OQ**

PSC Staff conducts inspections for Distribution Integrity Management Programs (DIMP), Public Awareness Program (PAP), and Operator Qualification (OQ) Plans at intervals not exceeding 5 years. PSC Staff members will be contacting operators due for DIMP, PAP, and OQ inspections to schedule beginning in January 2022.

As reminders:

- Commission rules for DIMP require that an operator must conduct complete program reevaluations based on the complexity of the systems and changes in factors affecting risk of failure at intervals not exceeding 5 years (20 CSR 4240-40.030(17)(D)6.)
- Commission rules for PAP require that an operator develop and implement a written continuing public education program that follows the guidance provided in the American Petroleum Institute's (API) Recommended Practice (RP) 1162 (20 CSR 4240-40.030(12)(K)1.) The API RP 1162 requires evaluation of the program effectiveness at intervals not exceeding 4 years (API RP 1162, Section 8).

- Commission rules for OQ require that each operator must have and follow a written qualification program that includes provisions that comply with 20 CSR 4240-40.030(12)(D)3.A. through (12)(D)3.K. Additionally, 20 CSR 4240-40.030(12)(D)5. requires an operator to meet the training and annual review requirements regarding the operator's emergency procedures in subparagraph (12)(J)2.B. to ensure operating personnel are knowledgeable of emergency procedures and verify that the training is effective.
- Commission rules additionally require that each operator shall submit all plans and programs including DIMP, public education program and OQ to designated commission personnel within 20 days after a change is made (20 CSR 4240-40.030(1)(J)). Please ensure that the DIMP program reevaluations and public awareness program effectiveness evaluations are completed as scheduled and provide a copy (preferably electronic) to Staff.

#### **14) GX-2021-0406 Rulemaking update**

In GX-2021-0406, the Commission incorporated into Missouri rules applicable federal rule amendment: Pipeline Safety: Safety of Gas Transmission Pipelines: MAOP Reconfirmation, Expansion of Assessment Requirements, and Other Related Amendments (Docket No. PHMSA–2011–0023; Amdt. Nos. 191–26; 192–125).

The final orders of rulemaking for amendments to 20 CSR 4240-40 were published in the Missouri Register on 12/1/21. They will be published in the Code of State Regulations on 12/31/21, and will be effective on 1/30/22. Once published, the amended rules will be available at: [Missouri Secretary of State: Code of State Regulations \(mo.gov\)](https://www.mo.gov)