

December 17, 2012

TO: Missouri Natural Gas Operators

FROM: Robert Leonberger, Missouri Public Service Commission

SUBJECT: 1) Introduction of New Staff Member and Updated Staff Telephone List
2) 2012 PHMSA Annual Reports for Gas Distribution and Gas Transmission
3) 2012 Missouri PSC Gas Safety Annual Report
4) Replacement Program Status
5) 2013 Excavator List Update
6) Responsibilities of MOCS Members
7) Dangers of Abnormal Snow and Ice Build-Up on Gas Related Equipment
8) Option to Receive All Operators Letter electronically

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

1) Introduction of New Staff Member and Updated Staff Telephone List

Please join us in welcoming Evan Neuner to the Safety/Engineering Staff. Evan graduated from Linn State Technical College in May 2012 majoring in electrical distribution systems. Please see the enclosed updated Staff Telephone List.

2) 2012 PHMSA Annual Reports for Gas Distribution and Gas Transmission

The 2012 Annual Report form for Gas Distribution (PHMSA F7100.1-1) must be submitted electronically to the PHMSA Portal by March 15, 2013. Note: The Annual Report form for Gas Transmission (PHMSA F7100.2-1) submission has been extended from March 15, 2013 to June 15, 2013. The PHMSA Portal for submission of the Gas Transmission Annual Report should be enabled no later than March 1, 2013. Instructions for completing the reports and links to PHMSA Portal login page are located at: <http://opsweb.phmsa.dot.gov>. **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 Bob Leonberger, Missouri Public Service Commission, P. O. Box 360, Suite 600, Jefferson City, MO 65102. Operators with transmission pipelines are reminded to submit their National Pipeline Mapping System (NPMS) data concurrently with their gas transmission annual reporting submission.

3) 2012 Missouri PSC Gas Safety Annual Report

Please submit your 2012 Missouri PSC Gas Safety Annual Report to this office no later than March 15, 2013. An electronic version of the report form (be sure to use the form updated for 2010) is available on the MANGO website at: www.mangowp.org or by sending an e-mail request to Kathleen McNelis at: kathleen.mcnelis@psc.mo.gov. The Staff encourages you to use the electronic version and email the completed report to Kathleen McNelis by March 15, 2013, but mailing a completed form to this office by that date is acceptable.

4) 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, 2013. Please provide details and quantities for the 2012 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.

5) 2013 Excavator List Update

The Staff would like to remind operators to review, update, and submit their revised excavator list (or indicate "no additions") to the Missouri One Call System (MOCS) in order to participate in the 2013 excavator education program by MOCS. The participation renewal period is from January 4, 2013 to March 1, 2013. When an operator submits their update/no change, online, MOCS will provide an automated email indicating the operator's participation in the 2013 update and that MOCS will complete two educational mailings during 2013 to excavators on the updated list as required by MoPSC Pipeline Safety Regulations. Even if you have no changes to the list, you should choose the "no additions" form online and submit it to MOCS. Operators should print and retain a copy of the automated email from MOCS to verify compliance with the annual excavator list update requirement [(12)(I)2.A]. Natural gas operators without internet capability may fax their excavator list to MOCS (Becky Harbaugh at fax # 573/635-8402). Instructions to participate in MOCS 2013 excavator education program were emailed to Missouri operators on December 11, 2012. These instructions are also available on the MOCS website at: www.mo1call.com

MoPSC Regulation 4 CSR 240-40.030(12)(I)2.E.(I), requires operators to maintain the 4 most recent semiannual notifications sent to excavators, the Staff suggests that operators maintain the twice per year excavator mailings they should be receiving from MOCS to comply. If an operator is not receiving the excavator mailings, please notify MOCS at the above-noted telephone numbers. The mailings are also available on the MOCS website at: www.mo1call.com

6) Responsibilities of MOCS Members

One of the responsibilities of MOCS members is to annually ensure that all data and information furnished to MOCS is accurate and shall be completed to the extent feasible, no later than March 31st of each year. This process helps ensure your lines are properly protected and provides the Call Center with the most current information for your company. 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 in the state of Missouri. Often, when company information changes MOCS may not know about it until there is an instance that the MOCS staff needs to reach the company-

designated representative on file and the contact or the telephone number has been disconnected or has been changed. When this occurs the operator's underground facilities could be at risk for damages, especially if the Call Center is unable to transmit locate notifications because the email address or fax number changed and they weren't notified. In particular, the Gas Safety Staff encourages you to make sure the "after hours" contact information is completed in full.

Another vital part of the member information is the mapping data that reflects the general location of the operator's buried facilities. If this information is not correct and does not show facilities in an area, the operator may not be notified and the operator's facilities will be in jeopardy of being damaged. There are two methods to update your maps. One is by requesting paper maps and the second is to use MOCS online mapping application called IMAP.

MOCS notified their members a request to update their maps in November 2012 and reminds their members on a continual basis for the need to update their membership information.

The MoPSC Staff would like to remind operators of the importance to comply with this annual request from MOCS. Updated contact information and mapping data are needed for the operator to meet the requirements contained in Chapter 319 and in 240-40.030(12)(I). It is vitally important that the Call Center be provided with the most current operator contact information and underground facility maps. Staff proposes to review documentation verifying that the operator has reviewed and updated their membership information and mapping during the operator's annual safety inspections. Included with MOCS annual request for updated membership and mapping information, are procedures for submitting the updated information. Hard copies of emails or other hard copies documenting the operator's review and information update would be sufficient for Staff review.

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

In the past, Missouri has experienced some natural gas incidents, as well as, non-reportable incidents that involved an over-pressure condition of downstream fuel line piping that was caused by the accumulation of ice on residential service regulator equipment. Please be aware of possible situations or scenarios that may be conducive to ice build-up on pressure regulating and relieving equipment during the winter months.

Also, PHMSA released an Advisory Bulletin (Federal Register Vol. 76, No. 27) <http://www.gpo.gov/fdsys/pkg/FR-2011-02-09/pdf/2011-2837.pdf> on February 9, 2011 advising owners and operators of petroleum gas and natural gas facilities of the need to take the appropriate steps to prevent damage to pipeline facilities from accumulated snow or ice.

8) Option to receive All Operators Letter electronically

In an effort to save both paper and postage, Staff would like to begin emailing All Operator Letters as PDF files in place of standard mail to those operators that are willing. If you would prefer to receive all operator letters by email, please indicate so to Kathleen McNelis

at Kathleen.mcnelis@psc.mo.gov or to any other Staff member. Staff will continue sending All Operator Letters by standard mail until such notification.

If you have any questions concerning any of these topics, please contact Bob Leonberger at 573/751-3456.

RF, KM; RRL