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November 22, 2017

TO: Missouri Natural Gas Operators

FROM: Kathleen McNelis, Pipeline Safety Program Manager

SUBJECT: 1) 2017 PHMSA Annual Reports for Gas Distribution and Gas Transmission

- 2) 2017 Missouri PSC Gas Safety Annual Report
- 3) Replacement Program Status
- 4) 2018 Excavator List Update
- 5) Responsibilities of MOCS Members
- 6) Dangers of Abnormal Snow and Ice Build-Up on Gas Related Equipment
- 7) MANGO General Meeting
- 8) PSC Rules Update
- 9) PHMSA Final Rule Amendment to Drug Testing Programs, 49 CFR Part 40

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

1) 2017 PHMSA Annual Reports for Gas Distribution and Gas Transmission

The 2017 Annual Report forms for <u>Gas Distribution</u> (PHMSA F7100.1-1) and <u>Gas Transmission</u> (PHMSA F7100.2-1) must be submitted electronically to the PHMSA Portal by March 15, 2018. Instructions for completing the reports and links to PHMSA Portal login page are located at: https://portal.phmsa.dot.gov/pipeline. **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.

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

Note: Operators who have had mechanical fittings failures resulting in hazardous leaks are reminded to submit a mechanical fitting failure report for each fitting failure that occurred during 2017 not later than March 15, 2018 on Form PHMSA F7100.1-2.

2) 2017 Missouri PSC Gas Safety Annual Report

Please submit your 2017 Missouri PSC Gas Safety Annual Report to this office no later than March 15, 2018. An electronic version of the report form (please be sure to use the form updated for 2017) is available on the MANGO website at: www.mangowp.org or by sending an e-mail request to Evan Neuner at evan.neuner@psc.mo.gov. The Staff encourages you to use the electronic version and email the completed report to Evan Neuner by March 15, 2018, but mailing a completed form to this office by that date is acceptable.

3) 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, 2018. Please provide details and quantities for the 2017 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.

4) 2018 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 2018 excavator education program by MOCS. The participation renewal period will be from **January 5, 2018 to March 16, 2018**. When an operator submits their update online, MOCS will provide an automated email indicating the operator's participation in the 2018 update and MOCS will complete two educational mailings during 2018 to excavators on the updated list as required by MoPSC Pipeline Safety Regulations.

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 2018 excavator education program will be emailed to Missouri operators by December 15, 2017.

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 573-635-1818. The mailings are also available on the MOCS website at: www.mo1call.com

5) 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. The data and information shall be reviewed to the extent feasible, and submitted to MOCS 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/city. 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/city information changes MOCS may not know about it until there is an instance that the MOCS staff needs to reach the 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 will notify their members annually every November to update their maps and contact information 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 4 CSR 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.

6) 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.

PHMSA released an Advisory Bulletin (Federal Register Vol. 76, No. 27) 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. A copy of this can be downloaded from:

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

PHMSA issued an additional advisory bulletin on this in 2016, which can be downloaded from:

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

7) Next MANGO General Meeting

The next MANGO general meeting has been set for 10:00 a.m. on Thursday, March 20, 2018, in Jefferson City. The meeting will be on the 4th floor in the Ballroom (Room 450) of the Governor Office Building (GOB). Coffee and bakery items will be served prior to the meeting (9:30 a.m.) and lunch will be provided. Parking is available in the City Parking Garage directly across the street from the Governor Office Building. However, Staff was not provided any parking passes for this meeting. If you have suggestions for discussion items, please contact a MANGO Board Member or the MO PSC Staff. A preliminary meeting agenda will be mailed out closer to the meeting date.

8) PSC Rules Update

The currently effective pipeline safety regulations official version is available at: https://s1.sos.mo.gov/cmsimages/adrules/csr/current/4csr/4c240-40.pdf

The "unofficial" version (annotated with dates of changes and differences from federal regulations) is available at:

http://mangowp.typepad.com/Unofficial-Version-June-2017.pdf

If you would like a paper copy of either or both versions, please let a Staff member know.

9) PHMSA Final Rule – Amendment to Drug Testing Programs, 49 CFR Part 40

The Department of Transportation is amending its drug-testing program regulation to add hydrocodone, hydromorphone, oxymorphone, and oxycodone to its drug-testing panel; add methylenedioxyamphetamine as an initial test analyte; and remove methylenedioxyethylamphetamine as a confirmatory test analyte. The revision of the drugtesting panel harmonizes DOT regulations with the revised HHS Mandatory Guidelines established by the U.S. Department of Health and Human Services for Federal drug-testing programs for urine testing. This final rule clarifies certain existing drug-testing program provisions and definitions, makes technical amendments, and removes the requirement for employers and Consortium/Third Party Administrators to submit blind specimens. DATES: This rule is effective on January 1, 2018.

Link to final rule:

https://www.gpo.gov/fdsvs/pkg/FR-2017-11-13/pdf/2017-24397.pdf