



## *Missouri Public Service Commission*

**WILLIAM P. KENNEY**  
Commissioner

**RYAN A. SILVEY**  
Chairman

**SCOTT T. RUPP**  
Commissioner

**MAIDA J. COLEMAN**  
Commissioner

POST OFFICE BOX 360  
JEFFERSON CITY, MISSOURI 65102  
573-751-3234  
573-751-1847 (Fax Number)  
<http://psc.mo.gov>

**JASON R. HOLSMAN**  
Commissioner

August 19, 2020

TO: Missouri Natural Gas Operators  
FROM: Kathleen McNelis, Pipeline Safety Program Manager  
SUBJECT: **1) Inside Meters**

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

### **1) Inside Meters**

The Pipeline and Hazardous Materials Safety Administration (PHMSA) has asked state programs to remind all operators that have meters located inside customer premises of the findings and recommendations from the NTSB investigation of the Silver Springs Maryland incident.

The attached document "PAR1901" is a copy of the National Transportation Safety Board (NTSB) investigation report. In this report, the NTSB summarizes the causes of the August 10, 2016 explosion and fire at a 14-unit apartment building in Silver Spring, Maryland. In the report, the NTSB states that as a result of this incident, 7 residents died, 65 residents were transported to the hospital, and 3 firefighters were treated and released from the hospital. The report further states that the investigation focused on the following safety issues: the location and inspection of service regulators within a structure; the inspection of the gas meter assembly; the notification of the natural gas odor to Washington Gas Light Company; and the detection of natural gas through odorants and methane. The NTSB findings are summarized beginning on page 40 of this report. The probable cause of the incident is stated on page 41, and recommendations begin on page 42.

The attached document "NTSB Recommendations Silver Springs MD Incident 2020 3-11-2020 PowerPoint" is a copy of a presentation PHMA provided. It summarizes the findings and recommendations from the NTSB investigation, identifies enforcement implications, and provides guidance on areas to consider when inspecting inside service regulators.

PHMSA lists the two NTSB recommendations that were made to PHMSA:

- Require that all new service regulators be installed outside occupied structures. (P-19-001)
- Require existing interior service regulators be relocated outside occupied structures whenever the gas service line, meter, or regulator is replaced. In addition, multifamily structures should be prioritized over single-family dwellings. (P-19-002)

Additionally, PHMSA lists enforcement implications, including how to address inside meters with respect to Distribution Integrity Management Programs (DIMP). PHMSA notes that under 192.1007(f) [In Missouri rules... 20 CSR 4240-40.030(17)(D)6.], an operator must re-evaluate threats and risks, and that incidents must be considered in threat identification under 192.1007(b) [In Missouri rules... 20 CSR 4240-40.030(17)(D)2.].

PHMSA also provides guidance in this presentation on areas to consider when inspecting inside service meters and regulators.

PSC Staff will be contacting representatives at each City/Company with questions related to inside service meters and regulators.