

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Establishment of a)
Working Case for the Review and)
Consideration of Amending the)
Commission’s Natural Gas Safety Rules) **File No. GW-2021-0272**

STAFF REQUEST FOR COMMENTS

COMES NOW the Staff (“Staff”) of the Missouri Public Service Commission (“Commission”), by and through counsel, and for its *Staff Request for Comments*, states the following:

1. On February 26, 2021, Staff filed a motion asking the Commission to open a working case to review and collect comments to amend the Commission’s gas safety standards. Attached to Staff’s motion were draft rule amendments that Staff asked the Commission to direct stakeholders to respond to. On March 10, 2021, the Commission issued an order opening this working case, directing its data center to provide notice of the working case, and directing stakeholders to provide comments regarding Staff’s draft rule amendments no later than April 9, 2021.

2. Included in Staff’s February 26, 2021 motion was also a request that the Commission’s working case include proposals to reconsider certain customer inspection requirements in 20 CSR 4240-40.030(12)(S)1.B. and include a requirement that operators make certain leak information publicly available. Staff had stated that while not included in Staff’s February 26, 2021 motion, Staff intended to file on a future date in this working case questions for stakeholder consideration and response to assist Staff’s review in consideration of these proposals. The purpose of this instant filing is to pose these questions for stakeholder consideration and comment.

Request for Comments on Proposal to Consider Amending 20 CSR 4240-40.030(12)(S)1.B. and Proposal to Consider Requiring Gas Operators to Make Information Regarding Leaks Publicly Available

3. To facilitate the gathering of additional comments on these proposals, Staff is including the following attachments with this filing:

- Attachment A – During the COVID-19 pandemic, it was brought to Staff's attention that in some circumstances customers were reluctant to allow operators access to homes to perform visual inspections of accessible customer gas piping and connected equipment required by 20 CSR 4240-40.030(12)(S)1.B. The Commission granted a temporary waiver from this requirement in File No. GE-2020-0297, subject to certain conditions. Staff is including with this filing a series of questions for gas operators to comment on, labeled Attachment A, to assist Staff in determining if amendment to 20 CSR 4240-40.030(12)(S)1.B. is needed, and if so, what, if any, fiscal impacts such an amendment would have on gas operators and other stakeholders.
- Attachment B – Staff is considering a proposal that would require Missouri gas utilities to put maps of known active leaks on their websites. In order to gather more input, Staff is including with this filing, labeled as Attachment B, a series of questions for gas operators on gas leak data and the capabilities of gas operators to make leak data publicly available.
- Attachment C – In order to further gather information from the public and public representatives on public leak information, Staff has drafted a series of questions for public stakeholders. The list of questions for public stakeholders is attached to this filing and labeled as Attachment C.

- Attachment D – Staff is attaching a service list of gas operators it requests the Commission direct to respond to Staff’s questions in Attachments A and B. The service list of gas operators is attached to this filing and labeled as Attachment D. This is a working case, so the responses can be submitted by gas operator personnel other than an attorney. Those operators that need assistance submitting responses to the questions in EFIS or using an alternate method may contact Jamie Myers at the contact information below.

4. Staff requests the Commission issue an order that directs all Missouri gas operators in the service list, Attachment D, to respond to Staff’s questions contained in Attachments A and B, no later than 45 days after issuance of said order; and further direct notice of the invitation for public stakeholders to comment on Staff’s questions in Attachment C, no later than 45 days after issuance of said notice.

WHEREFORE, Staff requests that the Commission issue an order that: 1) directs all Missouri gas operators listed in Attachment D to respond to Staff’s questions contained in Attachments A and B, no later than 45 days after issuance of said order and provides contact information should operators require assistance submitting responses; and 2) directs notice of the invitation for public stakeholders to comment on Staff’s questions in Attachment C, no later than 45 days after issuance of said notice.

Respectfully submitted,

/s/ Jamie S. Myers

Jamie S. Myers

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Missouri Public Service Commission

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 19th day of March, 2021, to all counsel of record.

/s/ Jamie S. Myers

ATTACHMENT A

Docket No. GW-2021-0272
Working Case for the Review and Consideration of
Amending the Commission's Natural Gas Safety Rules

Questions Related to Revision of (12)(S)1.B.

Responding Operator:

Name of Person Responding:

Contact Information¹:

A. General

During the COVID-19 pandemic, it was brought to Staff's attention that in some circumstances, customers were reluctant to allow operators access to homes to perform visual inspections of accessible customer gas piping and connected equipment required by 20 CSR 4240-40.030(12)(S)1.B. The Commission granted a temporary waiver from this requirement in File No. GE-2020-0297, subject to certain conditions.

General Questions:

1. Did your City/Company make use of this waiver at any time during the pandemic?
(Yes/No)
If "yes":
 - a. Approximately how many times have you made use of the waiver?
 - b. Please explain any negative consequences that you are aware of as a result of making use of the waiver.
2. Do you foresee any future need to seek relief from the requirements of 20 CSR 4240-40.030(12)(S)1.B. going forward? If "yes", please explain.
3. Do you have any additional comments related to the requirements of 20 CSR 4240-40.030(12)(S)1.B.?

¹ All information provided in comments will be publicly viewable.

ATTACHMENT A

B. Specific

A possible amendment to the requirement of 20 CSR 4240-40.030(12)(S)1.B. would be to extend the existing exemption for large commercial or industrial customers denying access to residential and small commercial customers as drafted below.

(S) Providing Service to Customers.

1. At the time an operator physically turns on the flow of gas to a customer (see requirements in subsection (10)(J) for new fuel line installations)—

A. Each segment of fuel line must be tested for leakage to at least the delivery pressure; and

B. A visual inspection of the exposed, accessible customer gas piping, interior and exterior, and all connected equipment shall be conducted to determine that the requirements of any applicable industry codes, standards, or procedures adopted by the operator to assure safe service are met. This visual inspection need not be met for emergency outages or curtailments. In the event a **[large commercial or industrial]** customer denies an operator access to the customer's premises, the operator does not need to comply with the above requirement if the operator obtains a signed statement from the customer stating that the customer will be responsible for inspecting its exposed, accessible gas piping, and all connected equipment, to determine that the piping and equipment meets any applicable codes, standards, or procedures adopted by the operator to assure safe service. In the event the customer denies an operator access to its premises and refuses to sign a statement as described above, the operator may file with the commission an application for waiver of compliance with this provision.

Specific Questions:

1. Would you be in support of, or opposed to such an amendment to 20 CSR 4240-40.030(12)(S)1.B.? Please explain why you would be in favor of, or opposed.
2. Would you suggest any additional conditions be added to provide an exemption for residential or small commercial customers? If "yes" please explain the additional conditions.

ATTACHMENT A

3. Please provide information on the fiscal impact an amendment to 20 CSR 4240-40.030(12)(S)1.B. would have on the operations of your City/Company.

ATTACHMENT B

Docket No. GW-2021-0272
Working Case for the Review and Consideration of
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Questions for Gas Operators – Public Leak Data

Responding Operator:

Name of Person Responding:

Contact Information¹:

1. Do you currently make information on active leak indications available to the public? (yes/no).
 - a. If “no”, please continue to Question 2.
 - b. If “yes”, please provide input on the following:
 - i. Please provide a description of what information is made public, and provide a recent example.
 - ii. Please explain how the information is provided (e.g., website, mailings, on request).
 - iii. Please explain how frequently the information is updated.
2. Do you currently make information on repaired leaks publically available? (yes/no).
 - a. If “no”, please continue to Question 3.
 - b. If “yes”, please provide input on the following:
 - i. Please provide a description of what information is made public, and provide a recent example.
 - ii. Please explain how the information is provided (e.g., website, mailings, on request).
 - iii. Please explain how frequently the information is updated.
 - iv. Please explain how long the information is retained following the repair date of the leak.
3. If a member of the public contacts you and requests information on active or repaired leaks near a specific location, what information, if any, do you currently provide?
4. What are your current capabilities to make active leak indications publically available?
 - a. Please explain your current process for tracking active leak indications.
 - b. Please explain to what extent active leak indications data is input into an electronic database.
 - c. Please explain to what extent active leak indications are digitized into mapping, or other systems that visually indicate geographic locations.
5. What are your current capabilities to make information on repaired leaks publically available?

¹ All information provided in comments will be publicly viewable.

ATTACHMENT B

- a. Please explain your current process for tracking repaired leaks.
 - b. Please explain to what extent leak repair data is input into an electronic database.
 - c. Please explain to what extent leak repairs are digitized into mapping, or other systems that visually indicate geographic locations.
6. Please describe any benefits you see to making active or repaired leak information publically available.
7. Please describe any concerns you have regarding making active or repaired leak information publically available.
8. If the Commission were to require that active or repaired leak information be made publically available, how often would you be able to update that information for the gas system(s) you operate?

ATTACHMENT C

Docket No. GW-2021-0272
Working Case for the Review and Consideration of
Amending the Commission's Natural Gas Safety Rules

Questions for Public or Public Representatives – Public Leak Data

Name of Person Responding:

Contact Information¹:

1. Are you currently a natural gas customer? If “yes”, please provide the name of the natural gas service provider. If you are an entity representing the public please proceed to Question 5 and answer the remaining questions based on your understanding of your client’s actions.
2. Are you currently aware of any natural gas pipelines in your vicinity?
3. Have you recently received any information from a natural gas service provider regarding what actions to take in the event that you smell gas? If “yes”, please provide the name of the natural service provider that provided the information.
4. Have you ever reported a natural gas odor? If “yes”, please describe the circumstances.
5. Do you think it would be beneficial if natural gas service providers provided information to the public regarding potential indications of active gas leaks? If “yes”, please explain the benefit(s) and how you might use this information.
6. Do you think it would be beneficial if natural gas service providers provided information to the public regarding repaired gas leaks? If “yes”, please explain the benefit(s) and how you might use this information.
7. Do you see any potential drawbacks to natural gas operators providing information to the public regarding locations of potentially active or repaired gas leaks? If “yes”, please explain.
8. If the natural gas service provider in your area made information on active or repaired natural gas leaks publically available, would you check this information prior to reporting a gas odor in your neighborhood?
9. If the natural gas service provider in your area made information on active or repaired natural gas leaks publically available, would you check this information prior to reporting a gas odor in your home?
10. Would you be more or less likely to report a natural gas odor if you had information that indicated a potentially active gas leak nearby? Please explain your reason(s).
11. Would you be more or less likely to report a natural gas odor if you had information that indicated a recently repaired gas leak nearby? Please explain your reason(s).

¹ All information provided in comments will be publicly viewable. Contact information should not include personal or sensitive information that you do not wish to make public.

MISSOURI PUBLIC SERVICE COMMISSION
File/Case No. GW-2021-0272

Albany Municipal Gas System

Albany City Administrator
106 E. Clay Street
Albany, MO 64402
cityadmin@albanymo.net

Altenburg-Frohna Municipal Gas System

Utility Safety & Design, Inc.
#9 Executive Woods Court, Ste. 1
Belleville, IL 62226

Altenburg-Frohna Municipal Gas System

Mayor of Altenburg
9144 Main Street
P.O. Box 22
Altenburg, MO 63732

Altenburg-Frohna Municipal Gas System

Mayor of Frohna
8904 Main Street
Joint Utilities Gas Department
Frohna, MO 63748

Amber Glenn Apartments

Jesse Da Villa
2977 Highway K. Ste. 239
O'Fallon, MO 63368

Ameresco

Manager of Operations
111 Spreen St., Ste. 410
Farmingham, MO 01701
info@ameresco.com

Ashley Energy, LLC

Ashley Operations Manager
One Ashley Street
St. Louis, MO 63102
info@ashleyenergy.com

Bernie Municipal Gas System

Mayor of Bernie
101 W. Main Street
P.O. Box 605
Bernie, MO 63822

Bethany Municipal Gas System

Bethany City Administrator
206 N. 16th Street
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Bethany, MO 64424
admin@bethanymo.com

Bismarck Municipal Gas System

Mayor of Bismarck
924 Center Street
P.O. Box 27
Bethany, MO 63624

City Utilities of Springfield, Missouri

Legal Department
301 E. Central
P.O. Box 551
Springfield, MO 65801
info@cityutilities.net

Clarence Municipal Gas System

Mayor of Clarence
P.O. Box 9
Clarence, MO 63437
MayorKnapp@cityofClarence.com

Cuba Municipal Gas System

Mayor of Cuba
City Hall - 202 N. Smith Street
P.O. Box K
Cuba, MO 65453
canash@ci.cuba.mo.us

Dogwood Energy, LLC

Dogwood EH&S Coordinator
P.O. Box 110
Pleasant Hill, MO 64080

Dogwood Energy, LLC

Dogwood Utility Safety & Design, Inc.
28847 Highway 136
P.O. Box 206
Unionville, MO 63565

Flower Box Motel

Tom Workman
722 West Spring Street
Neosho, MO 64540

Fulton Municipal Gas System
 Fulton Director of Administration
 4th & Market Streets
 P.O. Box 130
 Fulton, MO 65251
 doa@fultonmo.org

Granby Municipal Gas System
 Mayor of Granby
 302 N. Main Street
 P.O. Box 500
 Granby, MO 64844

Grant City Municipal Gas System
 Mayor of Grant City
 101 W. 3rd Street
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 Grant City, MO 64456
 grantcity@grantcity.net

Green City Municipal Gas System
 Utility Safety & Design, Inc.
 28847 Hwy. 136
 P.O. Box 206
 Unionville, MO 63565

Green City Municipal Gas System
 Mayor of Green City
 #4 Green Street
 P.O. Box 235
 Green City, MO 63545
 city@nemr.net

Hermann Municipal Gas System
 Hermann Public Works Director
 1902 Jefferson Street
 Hermann, MO 65041
 hermanncityclerk@centurytel.net

John Knox Village
 Manager of Facilities
 400 NW Murray Rd.
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 cleppert@jkv.org

Kennett Municipal Gas System
 Superintendent of Utilities
 303 S. Anthony
 P.O. Box 40
 Kennett, MO 63857
 cityclerk@clgw.net

Laddonia Ethanol Plant
 CFO and VP of Admin Services
 Missouri Public Utility Alliance
 1808 I-70 Dr. S.W.
 Columbia, MO 65203

Liberal Municipal Gas System
 Mayor of Liberal
 209 S. Main Street
 P.O. Box 67
 Liberal, MO 64762

Liberty (Empire)
 Legal Department
 602 S Joplin Avenue
 P.O. Box 127
 Joplin, MO 64801

Liberty (MNG)
 Legal Department
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Linden Mobile Home Park
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Macon Municipal Gas System
 Mayor of Macon
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 Macon, MO 63552
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Madison Municipal Gas System
 Mayor of Madison
 209 S. Main Street
 P.O. Box 141
 Madison, MO 65263

Marshall Municipal Utilities
 Underground Facilities Director
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Mercer Municipal Gas System
 Mayor of Mercer
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 Mercer, MO 64661

Mid-Missouri Energy
 Ryland Utlaut
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 Malta Bend, MO 65339
 sarahl@midmissourienergy.com

Middletown Municipal Gas System
 Mayor of Middletown
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 Middletown, MO 63359

Milan Municipal Gas System
 Mayor of Milan
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 Milan, MO 63556

Monroe City Municipal Gas System

Mayor of Monroe City
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109 2nd Street
Monroe City, MO 63456
jl.potterfield@gmail.com

Montgomery City Municipal Gas System

Mayor of Montgomery City
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Montgomery City, MO 63361
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New Florence Municipal Gas System

Mayor of New Florence
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P.O. Box 70
New Florence, MO 63363

New Haven and Berger Municipal Gas System

Mayor of Berger
404 Rosalie
Berger, MO 63014

New Haven and Berger Municipal Gas System

Mayor of New Haven
City Hall
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Oakridge Apartments

Deana Breznik
Director of Asset Management
Gardner Capitol
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St. Louis, MO 63105

Omega Pipeline Company

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Admin@omegapipeline.com

Oronogo Municipal Gas System

Mayor of Oronogo
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P.O. Box 201
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mayor@oronogomo.org

Paris Municipal Gas System

Paris City Superintendent
112 S. Main
Paris, MO 65275

Perry Municipal Gas System

Mayor of Perry
127 E. Main Street
P.O. Box 280
Perry, MO 63462

Perryville Municipal Gas System

Perryville City Administrator
215 North West Street
Perryville, MO 63775

Plattsburg Municipal Gas System

Plattsburg City Administrator
114 Maple Street
Plattsburg, MO 64477

Potosi Municipal Gas System

Mayor of Potosi
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Potosi, MO 63664
jblount@potosicityhall.org

Princeton Municipal Gas System

Mayor of Princeton
City Hall
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Princeton, MO 64673
cityprin@grm.net

Richland Municipal Gas System

Mayor of Richland
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Richland, MO 65556
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Roeslein Alternative Energy Services, LLC

Roeslein President
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Saint Louis University

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Shelbina Municipal Gas System

Mayor of Shelbina
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Show-Me Ethanol, LLC

Show-Me General Manager
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Spire

Legal Department
700 Market Street, 6th Floor
St. Louis, MO 63101

St. James Municipal Gas System

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200 N. Bourbeuse Street
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St. James, MO 65559

St. Robert Municipal Gas System

Mayor of St. Robert
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St. Robert, MO 65584
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Stanberry Municipal Gas System

Stanberry City Administrator
130 W. First Street
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stanberryadmin@jagtec.net

Summit Natural Gas of Missouri, Inc.

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Centennial, CO 80112

The Talisman Condominiums

Chris Gripe
Centennial Management & KC
Properties Construction
P.O. Box 15142
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Union Electric Company

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1901 Chouteau Avenue
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Unionville Municipal Gas System

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Unionville Municipal Gas System

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Waynesville Municipal Gas System

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Wheaton Municipal Gas System

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