

**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) **File No. GW-2023-XXXX**
the Commission's Natural Gas Safety Rules)

STAFF MOTION TO ESTABLISH WORKING CASE

COMES NOW the Staff of the Missouri Public Service Commission, by and through undersigned counsel, and for its *Staff Motion to Establish Working Case* states as follows:

1. Staff requests the Commission open a working docket for the purpose of updating the Commission's gas safety rules to reflect recent U.S. Department of Transportation rule changes and reflect certain clarifications and editorial revisions.

2. Federal law requires that the State of Missouri take measures to adopt each applicable federal pipeline safety standard within a prescribed period of time.¹ Goals are set for state programs by the Pipeline and Hazardous Materials Administration (PHMSA) and enforcement of those goals is by reductions in federal grant-in-aid funding and the potential loss of federal certification if those goals are not met.²

3. The recent amendments to Commission Rules 20 CSR 4240-40.020 and 20 CSR 4240-40.030, proposed in Case Nos. GW-2022-0237 and GX-2022-0340, will become effective on February 28, 2023. Staff has considered the Federal Rule

¹ 49 U.S. Code § 60105 requires, among other things, that the state authority adopt each applicable federal pipeline safety standard by the date of its annual certification, or in the event a standard was established within 120 days before the date of the certification, be taking steps to adopt that standard.

² The Commission's Safety Engineering Department Staff is granted authority to implement the state pipeline safety program by annual certification from the U.S. Department of Transportation (DOT). The annual certification contemplates that a state agency may adopt a safety standard that is additional to or more stringent than the applicable federal standards.

amendments published as final rules subsequent to the draft rule amendments filed in Case No. GW-2022-0237 and subsequently promulgated in Case No. GX-2022-0340. Staff is proposing to adopt these Federal Rule amendments into the Commission's rules except as described in Attachment A.

4. Staff is also proposing additional amendments to correct, clarify and update certain provisions of 20 CSR 4240-40.020 and 20 CSR 4240-40.030 as described in Attachments B and C.

5. Staff's Motion further requests the Commission invite stakeholders to respond with comments regarding the proposed gas safety rule amendments in Attachments A, B, and C, and the cost impact, if any, of the proposed gas safety rule amendments by April 3, 2023.

6. Attached is an updated service list of all stakeholders from the previous gas safety rules working docket, Case No. GW-2022-0237, attached hereto and labeled as Attachment D. Staff requests the Commission direct its data center to provide notice of this working case and invitation to comment to all stakeholders listed on Attachment D.

WHEREFORE, Staff respectfully requests the Commission to issue an order that: 1) opens a working docket to address the attached proposed natural gas safety rule amendments with notice provided to those in the attached service list; and 2) invites stakeholders in this docket to submit comments regarding the proposed rule amendments and their cost impact, if any, and to do so by April 3, 2023.

Respectfully submitted,

/s/ Jamie S. Myers

Jamie S. Myers

Deputy Counsel

Mo. Bar No. 68291

200 Madison St, Ste. 800

P.O. Box 360

Jefferson City, MO 65102

Phone: 573-526-6036

Fax: 573-751-9285

E-mail: jamie.myers@psc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record as reflected on the certified service list maintained by the Commission in its Electronic Filing Information System this 27th day of February, 2023.

/s/ Jamie S. Myers

Attachment A
Proposed Adoption of Recent Federal Amendments

Federal law requires that the State of Missouri take measures to adopt each applicable federal pipeline safety standard within a prescribed period of time.¹ Goals are set for state programs by the Pipeline and Hazardous Materials Administration (PHMSA) and enforcement of those goals is by reductions in federal grant-in-aid funding and the potential loss of federal certification if those goals are not met.²

The Missouri Public Service Commission Staff (“Staff”) has considered the Federal Rule amendments published as final rules subsequent to the draft rule amendments filed in Case No. GW-2022-0237, and subsequently promulgated in Case No. GX-2022-0340. Staff is proposing to adopt these Federal Rule amendments into the Commission’s rules:

1. United States, Department of Transportation, Pipeline and Hazardous Materials Safety Administration. “Pipeline Safety: Requirement of Valve Installation and Minimum Rupture Detection Standards.” [Docket No. PHMSA-2013-0255; Amdt. Nos. 192-130; 195-105]. 87 FR 20940 (April 8, 2022).

Staff proposes to adopt the amendments to 49 CFR 192 in 20 CSR 4240-40.030, except as stated below.

These amendments are in the currently effective federal regulations at 49 CFR:

- 192.3 Definitions.
- 192.9 What requirements apply to gathering lines?
- 192.18 How to notify PHMSA.
- 192.179 Transmission line valves.
- 192.610 Change in class location: Change in valve spacing.
- 192.615 Emergency plans.
- 192.617 Investigation of failures and incidents.
- 192.634 Transmission lines: Onshore valve shut-off for rupture mitigation.
- 192.635 Notification of potential rupture.
- 192.636 Transmission lines: Response to a rupture; capabilities of rupture-mitigation valves (RMVs) or alternative equivalent technologies.
- 192.745 Valve maintenance: Transmission lines.
- 192.935 What additional preventive and mitigative measures must an operator take?

¹ 49 U.S. Code § 60105 requires, among other things, that the state authority adopt each applicable federal pipeline safety standard by the date of its annual certification, or in the event a standard was established within 120 days before the date of the certification, be taking steps to adopt that standard.

² The Commission’s Safety Engineering Department Staff is granted authority to implement the state pipeline safety program by annual certification from the U.S. Department of Transportation (DOT). The annual certification contemplates that a state agency may adopt a safety standard that is additional to or more stringent than the applicable federal standards.

Attachment A
Proposed Adoption of Recent Federal Amendments

Exceptions: Staff proposes the following changes when adopting the federal regulations into 20 CSR 4240-40.030:

- Staff proposes changing the reference in 192.18: “the appropriate State or local pipeline safety authority” to “designated commission personnel”.

2. United States, Department of Transportation, Pipeline and Hazardous Materials Safety Administration. “Pipeline Safety: Safety of Gas Gathering Pipelines, Extension of Reporting Requirements, Regulation of Large, High Pressure Lines, and Other related Amendments: Response to a Petition for Reconsideration; Technical Corrections; Issuance of Limited Enforcement Discretion.” [Docket No. PHMSA-2011-0023; Amdt. Nos. 191-31; 192-131]. 87 FR 26296 (May 4, 2022).

Staff proposes to adopt the technical correction to 49 CFR Parts 191 in 20 CSR 4240-40.020, and to adopt the technical correction to 49 CFR 192.8 in 20 CSR 4240-40.030. These amendments are in the currently effective federal regulations at 49 CFR:

- 191.23 Reporting safety-related conditions.
- 192.8 How are onshore gathering pipelines and regulated onshore gathering pipelines determined?

3. United States, Department of Transportation, Pipeline and Hazardous Materials Safety Administration. “Pipeline Safety: Safety of Gas Transmission Pipelines: Repair Criteria, Integrity Management Improvements, Cathodic Protection, Management of Change, and Other Related Amendments.” [Docket No. PHMSA-2011-0023; Amdt. No. 192-132]. 87 FR 52224 (August 24, 2022).

Staff proposes to adopt the amendments to 49 CFR 192 in 20 CSR 4240-40.030, except as stated below.

These amendments are in the federal regulations at 49 CFR:

- 192.3 Definitions.
- 192.7 What documents are incorporated by reference partly or wholly in this part?
- 192.9 What requirements apply to gathering pipelines?
- 192.13 What general requirements apply to pipelines regulated under this part?
- 192.18 How to notify PHMSA.
- 192.319 Installation of pipe in a ditch.
- 192.461 External corrosion control: Protective coating.
- 192.465 External corrosion control: Monitoring and remediation.
- 192.473 External corrosion control: Interference currents.
- 192.478 Internal corrosion control: Onshore transmission monitoring and mitigation.
- 192.613 Continuing surveillance.
- 192.710 Transmission lines: Assessments outside of high consequence areas.

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- 192.711 Transmission lines: General requirements for repair procedures.
- 192.712 Analysis of predicted failure pressure and critical strain level.
- 192.714 Transmission lines: Repair criteria for onshore transmission pipelines.
- 192.911 What are the elements of an integrity management program?
- 192.917 How does an operator identify potential threats to pipeline integrity and use the threat identification in its integrity program?
- 192.923 How is direct assessment used and for what threats?
- 192.927 What are the requirements for using Internal Corrosion Direct Assessment (ICDA)?
- 192.933 What actions must be taken to address integrity issues?
- 192.935 What additional preventive and mitigative measures must an operator take?
- 192.941 What is a low stress reassessment?

Exceptions: Staff proposes the following changes when adopting the federal regulations into 20 CSR 4240-40.030:

- Because the Commission’s rule does not adopt the Alternative Maximum Allowable Operating Pressure (MAOP) as provided in 49 CFR 192.620, Staff proposes to modify the text of 49 CFR 192.714 to exclude mention of pipelines operating under an alternative MAOP.
- The Commission’s rule does not apply to offshore gas transmission pipelines, so previously when the term “onshore transmission pipeline” or “onshore gas transmission pipeline” was included in 49 CFR 192 amendments, the word “onshore” has been excluded when adopting those amendments. Staff proposes to use the wording “gas transmission pipeline” in place of the term “onshore gas transmission pipeline” when adopting these 49 CFR 192 amendments.
- Staff proposes to adopt the amendments to 49 CFR 192.465(d) related to maximum extension times to correct cathodic protection deficiencies on transmission lines, while maintaining the Commission’s requirement of a six month interval. Staff’s proposed amendment to 20 CSR 4240-40.030(9)(I)4. is as follows:
 - 4. Each operator **[shall take] must promptly [remedial action to]** correct any deficiencies indicated by the **[monitoring set forth in] inspection and testing required by** paragraphs (9)(I)1.–3. Corrective measures must be completed within six (6) months unless otherwise approved by designated commission personnel. **For gas transmission pipelines, no extension for corrective measures may exceed the earliest of the following:**
 - A. Prior to the next inspection or test interval required by this subsection;**
 - B. Within one (1) year, not to exceed fifteen (15) months, of the inspection or test that identified the deficiency; or**
 - C. As soon as practicable, not to exceed six (6) months, after obtaining any necessary permits. Permits necessary to complete corrective actions must be applied for within six (6) months of completing the inspection or testing that identified the deficiency.**

Attachment A
Proposed Adoption of Recent Federal Amendments

4. **United States, Department of Transportation, Pipeline and Hazardous Materials Safety Administration. “Pipeline Safety: Safety of Gas Transmission Pipelines: Repair Criteria, Integrity Management Improvements, Cathodic Protection, Management of Change, and Other Related Amendments.” [Docket No. PHMSA-2011-0023; Amdt. No. 192-132]. 87 FR 64384 (October 25, 2022).**

Staff proposes to adopt the technical correction to 49 CFR 192.3(2)(i) in 20 CSR 4240-40.030. This amendment is in the federal regulations at 49 CFR:

- 192.3 Definitions.

Attachment B
Staff Proposed Amendments to 20 CSR 4240-40.020

In addition to the proposed amendment discussed in Attachment A to adopt the technical correction in Federal Rule 49 CFR 191.23, the Missouri Public Service Commission Staff are proposing the following amendments to 20 CSR 4240-40.020:

1. Adjust the reporting threshold for Missouri Incidents as defined in 20 CSR 4240-40.020 (4)(A)1. for inflation.

In Commission Case No. GW-2022-0237, commenters requested adjustment of the \$10,000 reporting threshold for Missouri Incidents for inflation. Staff agreed, and proposed adjusting to \$17,500 to account for inflation between November 30, 1998 and March 2022. Staff is now proposing to adjust for inflation through December 2022, using the same methodology described in the June 3, 2022, Case No. GW-2022-0237 workshop whitepaper. Specifically:

$$\text{Estimated damage cost present} = \text{Estimated damage cost in 1998} * \frac{(\text{CPI} - \text{U, December 2022})}{(\text{CPI} - \text{U, November 1998})}$$

Where CPI-U is Consumer Price Index – Urban. Using a data set of Consumer Price Index US City Average (1982-1984 = 100) from the U.S. Bureau of Labor Statistics:

- CPI-U, November 1998 = 164.0, and
- CPI-U, December 2022 = 296.797.

Substituting into the equation:

$$\text{Estimated damage cost present} = \$10,000 * \frac{(296.797)}{(164.0)}$$

$$\text{Estimated damage cost present} = \$18,097.38$$

Rounding the result of \$18,097.38 to the nearest \$100 results in a value of \$18,100.

Staff is proposing to revise the currently effective \$17,500 value to \$18,100 to adjust for inflation. A draft of this proposed revision is shown below in Item 2 with Staff's additional proposed amendments to the definition of Missouri incidents.

2. Additional Proposed Amendments to the Definition of Missouri Incident.

In Commission Case No. GW-2022-0237, commenters stated that the cost of gas lost should be excluded from the reporting threshold due to spot price fluctuations in natural gas costs. Commenters recommended adding an additional threshold of an unintentional estimated gas loss of three (3) million cubic feet or more in lieu of including the cost of gas lost in the property damage cost.

Staff did not agree with commenters that in lieu of including the cost of gas lost, the rule should be amended by adding a requirement to report an unintentional gas loss of three million cubic feet or more. Staff noted that an unintentional gas loss of three million cubic feet or more is already required to be reported as a federal incident in 20 CSR 4240-40.020(3) per the definition of "Federal incident" in 20 CSR 4240-40.020(2). Staff recognizes that volatility in the market price for natural gas could potentially affect whether or not an incident meets the reporting

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threshold as the rule is currently written. However, Staff also recognizes that a higher cost of gas lost is often associated with larger gas volumes. Staff proposed to continue to include the cost of gas lost in the reporting threshold until it could evaluate alternative reporting criteria to address incident consequences.

Additionally, because it can be difficult to obtain information regarding the level of medical care an individual receives, Staff is proposing to amend the language: “A personal injury involving medical care administered in an emergency room or health care facility, whether inpatient or outpatient, beyond initial treatment and prompt release after evaluation by a health care professional”, to “A personal injury involving medical care”.

To address both replacement of gas cost with incident consequences, and to simplify the criteria for reporting an incident based on personal injury, Staff is proposing the following changes to the definition of “Missouri Incidents” in 20 CSR 4240-40.020(4)(A):

(A) Within two (2) hours following discovery by the operator, or as soon thereafter as practicable if emergency efforts to protect life and property would be hindered, each gas operator must notify designated commission personnel by telephone of the following events within areas served by the operator:

1. An event that involves a release of gas involving the operator’s actions or pipeline system, or where there is a suspicion by the operator that the event may involve a release of gas involving the operator’s actions or pipeline system, and results in one (1) or more of the following consequences:

A. A death;

B. A personal injury *[involving]* **necessitating** medical care *[administered in an emergency room or health care facility, whether inpatient or outpatient, beyond initial treatment and prompt release after evaluation by a health care professional]; [or]*

C. Estimated property damage of *[seventeen thousand five hundred dollars (\$17,500)]* **eighteen thousand one hundred dollars (\$18,100)** or more, including loss to the gas operator or others, or both *[, and including the cost of gas lost];*

D. Evacuation of two (2) or more buildings;

E. Evacuation of ten (10) or more people;

F. A fire or explosion in one or more buildings; or

G. A gas release, which, due to its location or magnitude, constitutes an immediate hazard to a building or the general public and which has not been made safe within 8 hours after discovery by the operator;

2. An event that is significant, in the judgement of the operator, even though it did not meet the criteria of paragraph (4)(A)1.; or

3. An event that is reported as a Federal incident under section (3).

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3. Update References to Current Reporting Form Revisions.

Staff proposes to update the references to PHMSA form numbers and revision dates to the currently available forms at the time proposed amendments are filed. Additionally, Staff will propose amendments for consistency purpose when referring to the forms. For example, in (5)(G)1.J. – L. the letter “F” will be added to the PHMSA forms referenced.

Attachment C
Staff Proposed Amendments to 20 CSR 4240-40.030

In addition to the proposed amendment discussed in Attachment A to adopt recent federal amendments to 49 CFR 192, the Missouri Public Service Commission Staff are proposing the following amendments to 20 CSR 4240-40.030:

1. Modification of Delivery of Excavator Education Mailings to Include First Class Mail

20 CSR 4240-40.030(12)(I)3.B. requires each operator to provide certain information to persons who normally engage in excavation activities as identified in subparagraph (12)(I)3.A. Currently this rule requires that at least once each calendar year at intervals not exceeding fifteen (15) months each operator provide the required information by registered or certified mail, or notification through participation in an excavator education program of a one-call notification center meeting the requirements of subparagraph (12)(I)3.C. The provisions in subparagraph (12)(I)3.C.II allow the one call system's excavator education program to provide educational mailings to excavators by first class mail. For this reason, Staff is proposing to add the option of first class mail to the excavator education material delivery methods available to operators. Staff proposes the following revisions to 20 CSR 4240-40.030(12)(I)3.B.:

B. Provide for at least a semiannual general notification of the public in the vicinity of the pipeline. Provide for actual notification of the persons identified in subparagraph (12) (I)3.A., at least once each calendar year at intervals not exceeding fifteen (15) months by **first class**, registered or certified mail, or notification through participation in an excavator education program of a one-call notification center meeting the requirements of subparagraph (12)(I)3.C. Mailings to excavators shall include a copy of the applicable sections of Chapter 319, RSMo, or a summary of the provisions of Chapter 319, RSMo, approved by designated commission personnel, concerning underground facility safety and damage prevention pertaining to excavators. The operator's public notifications and excavator notifications shall include information concerning the existence and purpose of the operator's damage prevention program, as well as information on how to learn the location of underground pipelines before excavation activities are begun;

2. Reorganization and Clarification of 20 CSR 4240-40.030(2)(B)

Staff proposes to reorganize 20 CSR 4240-40.030(2)(B) to improve clarity, and to provide references to existing rule citations regarding the use of composite materials as follows:

(B) General. (192.53)

1. Materials for pipe and components must be **[1]**:

[1/A]. Able to maintain the structural integrity of the pipeline under temperature and other environmental conditions that may be anticipated;

[2/B]. Chemically compatible with any gas that they transport and with any other material in the pipeline with which they are in contact;

[3/C]. Qualified in accordance with the applicable requirements of this section; **and**

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Staff Proposed Amendments to 20 CSR 4240-40.030

[4]D. Only of steel or polyethylene for pipe for the underground construction of pipelines, except: *[that other previously]*

(I) Previously qualified materials may be used for repair of pipe constructed of the same material; and

(II) Composite materials as defined in subsection (1)(B) may be used for pipe in Type C gathering lines when permitted by subsection (1)(E) (192.9) and subject to prior notifications to PHMSA and designated commission personnel in accordance with subsections (1)(E) and (1)(M).

[5]2. Other piping materials may be used with approval of the commission.

3. Clarification of Information Required in Public Awareness Notifications

Staff proposes to amend 20 CSR 4240-40.030(12)(K)1. to provide additional clarity by separating requirements to provide customers notifications semiannually by mailings or hand-delivered messages from the requirement for notifications nine (9) times each calendar year by billing messages. Currently, these requirements are listed in the same subparagraph, however different actions are required to comply with each requirement. Staff additionally proposes to revise 20 CSR 4240-40.030(12)(K)1. to clarify the information required to be included in each required public awareness notification. Staff proposes the following revisions to 20 CSR 4240-40.030(12)(K)1.:

(K) Public Awareness. (192.616)

1. Except for an operator of a master meter system covered under paragraph (12)(K)10., each pipeline operator must 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* (incorporated by reference in 49 CFR 192.7 and adopted in subsection (1)(D)). In addition, the program must provide for notification of the intended groups **[on]** **according to** the following **[schedule]**:

- A. Appropriate government organizations and persons engaged in excavation related activities must be notified at least annually;
- B. The public must be notified at least semiannually; **[and]**
- C. Customers must be notified at least semiannually by mailings or hand-delivered messages; **[and]**
- D. Customers must be notified** at least nine (9) times **[a]** **each** calendar year by billing messages; **[.]**

E. Notifications required by subparagraphs (12)(K)1.A. – (12)(K)1.C. must as a minimum include the information required by paragraphs (12)(K)4. and (12)(K)5.; and

F. Notifications required by subparagraph (12)(K)1.D. must as a minimum include information required by subparagraphs (12)(K)4.A. and (12)(K)4.E.

4. Addition of Language in Paragraph (8)(Q)2. to Reference the Definition for “replaced service line” in Paragraph (8)(P)1.

The term “replaced service line” is defined in paragraph (8)(P)1. for subsection (8)(P). The term “replaced service line” is also used in paragraph (8)(Q)2. Staff proposes to add language to paragraph (8)(Q)2. to reference the definition of a “replaced service line” in (8)(P)1. Staff proposes the following revision to 20 CSR 4240-40.030(8)(Q)2.:

(Q) Manual Service Line Shut-Off Valve Installation (192.385)

2. *Installation requirement.* The operator must install either a manual service line shut-off valve or, if possible, based on sound engineering analysis and availability, an EFV for any new or replaced service line with installed meter capacity exceeding 1,000 SCFH, **where replaced service line is defined in paragraph (8)(P)1.**

5. Addition of Test Durations to Record Requirements for Tests of Service Lines and Record Requirements for Tests under Paragraph (10)(B)4.

Currently, operators are required to document the “test pressure, leaks, and failures and their disposition and the date” for tests performed on service lines under subsections (10)(F) and (G). Staff believes that the test duration is pertinent information that should also be documented. Staff also believes that leak tests required by paragraph (10)(B)4. should be documented by operators. Staff proposes the following revision to 20 CSR 4240-40.030(10)(I):

(I) Records. (192.517)

.....

2. For service lines, each operator shall make and retain for the useful life of the pipeline, a record of each test performed under subsections (10)(F) and (G) (192.511 and 192.513). Where applicable to the test performed, the record must contain the test pressure, **test duration**, leaks, and failures noted and their disposition and the date.

3. Each operator shall make and retain for the useful life of the pipeline, a record of each test performed under paragraph (10)(B)4.

6. Typographical Error Corrections to 20 CSR 4240-40.030(12)(M)1.C.

The table under 20 CSR 4240-40.030(12)(M)1.C. contains typographical errors. Staff proposes the following revisions to the table under 20 CSR 4240-40.030(12)(M)1.C. to correct the typographical errors:

Pipeline Segment	Pressure Date	Test Date
Onshore regulated gathering pipeline (Type A under 49 CFR 192.9(c) or Type B under 49 CFR 192. 9(d[b]))	March 15, 2006, or date line becomes subject to this rule, whichever is later.	Five (5) years preceding applicable date in second column.

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Staff Proposed Amendments to 20 CSR 4240-40.030

that first became subject to this rule after April 13, 2006 (see subsection (1)(E)).		
Onshore regulated gathering pipeline (Type C under 49 CFR 192.9(e[d])) that first became subject to this rule on or after May 16, 2022.	May 16, 2023, or date pipeline becomes subject to this rule, whichever is later.	Five (5) years preceding applicable date in second column.
Onshore transmission pipeline that was a gathering line not subject to this rule before March 15, 2006 (see subsection (1)(E)).	March 15, 2006, or date line becomes subject to this rule, whichever is later.	Five (5) years preceding applicable date in second column.
All other pipelines.	July 1, 1970	July 1, 1965

Attachment D

MISSOURI PUBLIC SERVICE COMMISSION
Service List

Missouri Public Service Commission

Staff Counsel Department 200
Madison Street, Suite 800
P.O. Box 360
Jefferson City, MO 65102
staffcounsel@psc.mo.gov

Office of the Public Counsel

Marc Poston
200 Madison Street, Suite 650
P.O. Box 2230
Jefferson City, MO 65102
opcservice@opc.mo.gov

City Utilities of Springfield, Missouri

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

Dogwood Energy, LLC

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

Empire District Gas Company, The

Legal Department
P.O. Box 127
602 S. Joplin Avenue
Joplin, MO 64802

Liberty Utilities (MNG)

Legal Department
2751 North High Street
Jackson, MO 63755

Spire, Inc.

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

Summit Natural Gas of Missouri, Inc.

Legal Department
2 Delorme Drive, Suite 100
Yarmouth, ME 04096

Union Electric Company

Legal Department
1901 Chouteau Avenue
P.O. Box 66149, Mail Code 1310
St. Louis, MO 63166
AmerenMOService@ameren.com

Albany Municipal Gas System

Attn: City Administrator
106 E. Clay Street
Albany, MO 64402

Altenburg-Frohna Municipal Gas System

Attn: Mayor of Frohna
Joint Utilities Gas Department
Frohna, MO 63748

Altenburg-Frohna Municipal Gas System

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

Altenburg-Frohna Municipal Gas System

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

Ashley Energy, LLC

Attn: Operations Manager
One Ashley Place
St. Louis, MO 63102

Ameresco

Attn: Manager of Operations
111 Speen St. Ste. 410
Framingham, MO 01701

Bernie Municipal Gas System

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

Bethany Municipal Gas System

Attn: City Administrator
P.O. Box 344
206 N. 16th Street
Bethany, MO 64424

Bismark Municipal Gas System

Attn: Mayor of Bismark
P.O. Box 27
924 Center Street
Bethany, MO 63624

Clarence Municipal Gas System

Attn: Mayor of Clarence
P.O. Box 9
Clarence, MO 63437

Cuba Municipal Gas System

Attn: Mayor of Cuba
City Hall
P.O. Box K
202 N. Smith Street
Cuba, MO 65453

Dogwood Energy, LLC

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

Fulton Municipal Gas System

Attn: Director of Administration
P.O. Box 130
4th & Market Streets
Fulton, MO 65251

Granby Municipal Gas System

Attn: Mayor of Granby
P.O. Box 500
302 N. Main Street
Granby, MO 64844

Grant City Municipal Gas System

Attn: Mayor of Grant City
101 W. 3rd Street
P.O. Box 398
Grant City, MO 64456

Green City Municipal Gas System

Attn: Mayor of Green City
P.O. Box 235
#4 Green Street
Green City, MO 63545

Green City Municipal Gas System

Attn: Utility Safety & Design, Inc.
P.O. Box 206
28847 Hwy. 136
Unionville, MO 63565

Hermann Municipal Gas System

Attn: Public Works Director
1902 Jefferson Street
Hermann, MO 65041

John Knox Village

Attn: Manager of Facilities
400 NW Murray Rd.
Lee's Summit, MO 64081

Kennett Municipal Gas System

Attn: Superintendent of Utilities
P.O. Box 40
303 S. Anthony
Kennett, MO 63857

Laddonia Ethanol Plant

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

Liberal Municipal Gas System

Attn: Mayor of Liberal
P.O. Box 67
209 S. Main Street
Liberal, MO 64762

Linden Mobile Home Park

Attn: Mr. Jim Janecek
400 NE 76th Terrace
Kansas City, MO 64118

Macon Municipal Gas System

Attn: Mayor of Macon
P.O. Box 569
106 W. Bourke Street
Macon, MO 63552

Madison Municipal Gas System

Attn: Mayor of Madison
P.O. Box 141
209 S. Main Street
Madison, MO 65263

Marshall Municipal Utilities

Attn: Underground Facilities Director
75 East Morgan Street
Marshall, MO 65340

Mercer Municipal Gas System

Attn: Mayor of Mercer
City Hall
14402 State Street
Mercer, MO 64661

Middletown Municipal Gas System

Attn: Mayor of Middletown
City Hall
P.O. Box 127
203 Johnson Street
Middletown, MO 63359

Mid-Missouri Energy

Attn: Ryland Utlaut, President
15311 N. Saline 65 Hwy.
Malta Bend, MO 65339

Milan Municipal Gas System

Attn: Mayor of Milan
City Hall
P.O. Box 247
212 East Second Street
Milan, MO 63556

Monroe City Municipal Gas System

Attn: Mayor of Monroe City
City Hall
109 2nd Street
Monroe City, MO 63456

Montgomery City Municipal Gas System

Attn: Mayor of Montgomery City
723 North Sturgeon Street
Montgomery City, MO 63361

New Florence Municipal Gas System

Attn: Mayor of New Florence
P.O. Box 70
217 South Main Street
New Florence, MO 63363

New Haven and Berger Municipal Gas System

Attn: Mayor of Berger
404 Rosalie
Berger, MO 63014

New Haven Berger Municipal Gas System

Attn: Mayor of New Haven
City Hall
101 Front Street
New Haven, MO 63068

Perryville Municipal Gas System

Attn: City Administrator
215 North West Street
Perryville, MO 63775

Perry Municipal Gas System

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

Paris Municipal Gas System

Attn: City Superintendent
25804 Business Highway
24
Paris, MO 65275

Plattsburg Municipal Gas System

Attn: City Administrator
114 Maple Street
Plattsburg, MO 64477

Potosi Municipal Gas System

Attn: Mayor
121 E. High Street
Potosi, MO 63664

Princeton Municipal Gas System

Attn: Mayor of Princeton
City Hall
507 West Main Street
Princeton, MO 64673

Richland Municipal Gas System

Attn: Mayor of Richland
P.O. Box 798
Richland, MO 65556

Saint Louis University

Attn: Mr. Michael Lucido
3545 Lindell Boulevard
Wool Center Room 223
St. Louis, MO 63103

Shelbina Municipal Gas System

Attn: Mayor of Shelbina
P.O. Box 646
116 East Walnut
Shelbina, MO 63468

Show-Me Ethanol, LLC

Attn: General Manager
26530 Hwy., 24 E.
Carrollton, MO 64633

**Roeslein Alternative
Energy Services**

Attn: President
9200 Watson Rd., Ste. 200
St. Louis, MO 63126

St. James Municipal Gas System

Attn: Mayor of St. James
P.O. Box 426
200 N. Bourbeuse Street
St. James, MO 65559

St. Robert Municipal Gas System

Attn: Mayor of St. Robert
194 Eastlawn Ave., Ste. A
St. Robert, MO 65584

Stanberry Municipal Gas System

Attn: City Administrator
130 W. First Street
Stanberry, MO 64489

**Unionville Municipal Gas
System**

Attn: Mayor of Unionville
P.O. Box 255
1611 Grant Street
Unionville, MO 63565

Unionville Municipal Gas System

Attn: Utility Safety & Design Vice
President of Engineering
P.O. Box 206
28847 Hwy. 136
Unionville, MO 63565

**Waynesville Municipal Gas
System**

Attn: City Administrator
100 Tremont Drive
Waynesville, MO 65583

Wheaton Municipal Gas System

Attn: Mayor of Wheaton
P.O. Box 70
219 E. Main Street
Wheaton, MO 64874

Missouri One Call System

Attn: Randy Norden
824 Weathered Rock Rd.
Jefferson City, MO 65101

Museum Hill Apartments

Attn: Joy Scharnhorst
Senior Asset Manager-
Fulson Asset Management
220 NW Executive Way
Lee's Summit, MO 64063

Omega Pipeline Company

Attn: DPW Bldg. 2222
1334 First Street
Ft. Leonard Wood, MO 65473

Oronogo Municipal Gas System

Attn: Mayor of Oronogo
P.O. Box 201
653 E. Central Street
Oronogo, MO 64855