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## Missouri Public Service Commission

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

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February 18, 2011

TO: Missouri Natural Gas Operators

FROM: Robert Leonberger, Missouri Public Service Commission

SUBJECTS: 1) Dangers of Abnormal Snow and Ice Build-Up on Gas Related Equipment  
2) PHMSA Online Data Entry  
3) MANGO General Meeting  
4) Providing Depth Information to Excavators Using Trenchless Technology

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

### 1) 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.

Some of the commonalities of these natural gas incidents involved a roof overhang that was directly above a natural gas meter set and no guttering was attached to the overhang to carry the water away, or the gutter was blocked with leaves and debris. Also, the majority of the gas meters had service regulators in which the breather vent screen assembly was positioned above the top of the meter casing (middle-mount or angle-style regulator). Another commonality was that significant amounts of precipitation and below-freezing temperatures over a period of several days contributed to the icing problem.

The Staff is asking that all operators discuss and review this possible safety issue with Service Department personnel and Meter Readers that typically see natural gas meter set installations. If an operator has experienced any type of pressure regulating and/or pressure relieving problem that was attributed to ice build-up, that has either caused a gas

outage, or an over-pressure condition of the downstream fuel line piping, investigation of these types of equipment failures would be required by 4 CSR 240-40.030(12)(L) in order to minimize the possibility of a recurrence. Measures might include moving the natural gas meter set to a more favorable location or providing some type of regulator shield/cover to divert the water in an effort to prevent the formation of ice directly on the service regulator and/or pressure relieving device.

Additionally, please be aware that PHMSA recently 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. The advisory discusses how past events on natural gas distribution system facilities appear to have been related to either the stress of snow and ice or the malfunction of pressure control equipment due to ice blockage of pressure control equipment vents. A copy of the Federal Register-Advisory Bulletin is attached.

## **2) PHMSA Online Data Entry**

The PHMSA website for online data entry as it applies to an operator's Distribution Annual Report (PHMSA F7100.1-1) and Mechanical Fitting Failure Report (PHMSA F 7100.1-2) is now operational. As a reminder, PHMSA is requiring all operators to submit their data on-line for the Annual Report Forms and the new Mechanical Fitting Failure Report. Please refer to Staff's January 13, 2011 All Operators Letter for additional instructions for accessing the forms and entering the data or go to <https://opsweb.phmsa.dot.gov/cfdocs/opsapps/pipes/main.cfm> and click on the **NEW: IT Guide on How to Submit A Gas Distribution Annual Report** link which includes a PowerPoint presentation for the instructions.

Submission requirements are as follows:

1. Distribution Annual Report, submit no later than March 15, 2011
2. Mechanical Fittings Failure Report – not due until March 15, 2012 for calendar year 2011, but may be submitted sooner for individual failures.
3. Transmission Annual Report, submit no later than June 15, 2011 (Note: This form is not electronically available yet on the PHMSA website, but should be available by 4/28/11).

After you complete and submit your Annual Report forms to PHMSA, please forward an electronic copy to [PipelineSafetyProgramManager@psc.mo.gov](mailto:PipelineSafetyProgramManager@psc.mo.gov) or print a copy and send to Bob Leonberger at the Missouri PSC.

For now, Missouri will not be requesting copies of the mechanical fittings failure reports. Please keep copies of these reports for review by Staff during your annual inspections.

## **3) MANGO General Meeting**

The next MANGO general meeting has been set for 10:00 a.m. on **Wednesday, March 9, 2011, in Jefferson City. The meeting will be on the 4<sup>th</sup> floor (Room 450, Ballroom) 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 from the Governor Office Building. If you have suggested discussion items, please contact a MANGO Board Member or the MoPSC Staff.

**Possible discussion items include:**

- Board Meeting Update
- Treasurer's Report
- 2011 Safety Seminar Planning
- Learfield Program Update
- New PHMSA F7100.1-1 and F7100.2-1 annual reports and on-line submission
- DIMP regulation planning & implementation issues
- Damage Prevention Statute Revisions Proposed by Staff
- Proposed changes to State regulations including Leak rule changes – Staff's report submitted to PSC in February
- Federal Amendments
- Sign-up packets for next year's Learfield Public Awareness radio Campaign
- Electrofusion waiver revisit
- NTSB Recommendations, reports and hearing on 9/9/2010 San Bruno, CA incident
- PHMSA Advisor Bulletin (ADB-11-01) in response to NTSB San Bruno recommendations
- Congressional hearings on incidents, legislation and reauthorization
- Special leak survey at direction of PSC (Ameren-town of Center and Laclede Gas Company, PSC Chairman media quotes)

**4) Providing Depth Information To Excavators Using Trenchless Technology**

The Staff would like to take this opportunity to remind operators to review Chapter 319.030(1.) which requires an operator to provide an excavator using trenchless technology with accurate depth information to the best of his or her knowledge or ability. Also, Chapter 319.037(2.) discusses the requirement for an excavator using trenchless technology to confirm the horizontal and vertical location of underground facilities in the vicinity of the proposed excavation before any power-driven equipment for trenchless excavation is used.

An exception to confirming the actual horizontal and vertical location of underground facilities would apply if the excavator excavates a hole over the underground facilities to a depth two feet or more below the planned boring path and then carefully and prudently monitors the horizontal and vertical location of the boring device in a manner calculated to enable the device to be visually observed by the excavator as it crosses the entire width of the marked approximate location of the underground facilities.

Operators will also need to consider how to document those instances when an excavator using trenchless technology was provided with depth information. At a minimum, the documentation should explain how the depth information was obtained and when it was given to either the excavator (by phone or by on-site meeting), or a representative working for the excavator.

If you have any questions, please contact Greg Williams at 573-751-3411, or me at 573-751-3456.

Sincerely,

Robert R. Leonberger  
Assistant Manager-Gas Safety/Engineering

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