



Missouri Public Service Commission

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Commissioner

March 25, 2020

TO: Missouri Natural Gas Operators

FROM: Kathleen McNelis, Pipeline Safety Program Manager

SUBJECT: **1) Expanded Email Distribution**
2) Pipeline Safety Inspection Status
3) Temporary Waiver of 20 CSR 4240-40.030(12)(S)1.B.
4) COVID-19 Guidance from CISA

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

1) Expanded Email Distribution

The Missouri PSC Staff are temporarily unable to mail out paper copies of All Operators Letters. We have expanded the email distribution list so as to reach operators that previously received only paper copies. If you are not the appropriate person at your City/Company to receive correspondence related to the natural gas system, please forward this information. Please contact me at Kathleen.mcnelis@psc.mo.gov to request changes or additions to the email distribution list.

2) Pipeline Safety Inspection Status

The Missouri PSC Staff have temporarily suspended routine inspections scheduled through April 10, 2020, and will make a determination on future inspections in upcoming weeks. If you have questions regarding your inspection, please contact the inspector that set it up. If you need a Staff contact list, please contact me at Kathleen.mcnelis@psc.mo.gov.

3) Temporary Waiver of 20 CSR 4240-40.030(12)(S)1.B.

Today the Commission voted to approve a Staff motion to temporarily waive requirements of 20 CSR 4240-40.030(12)(S)1.B., a rule that requires operators to visually inspect the exposed, accessible customer gas piping and connected equipment at the time an operator physically turns on the flow of gas to customers. The Commission order is effective until May 15, 2020, unless Executive Order 20-02 is extended. If Executive Order 20-02 is extended, then this order shall remain in effect until Executive Order 20-02 expires, or until otherwise ordered by the Commission. A copy of the order is attached.

Staff interprets this temporary waiver to extend to specific related requirements of other rule requirements, such as 20 CSR 4240-40.030(13)(N), that directly reference 20 CSR 4240-40.030(12)(S)1.B. Additionally, Staff does not interpret this as a Commission order requiring you to cease visual inspections of customer fuel lines and connected equipment if your City/Company determines that this is the best course of action for you to follow at this time.

The voting included discussion by the Commissioners that they would like for natural gas system operators to provide additional safety education to the customer when the visual inspection of the fuel line and equipment is not conducted per the waiver. The Staff requests that operators consider how they can provide additional safety information to the customer in this circumstance (e.g., leave a door hanger with a number to call if they smell gas and advice to call a plumber if they have gas pipe or equipment issues). At a minimum, Staff requests operators who use this waiver to provide added safety information to customers requesting a meter that is off to be turned on – this could be done when the customer contacts the operator to request the meter turn-on.

4) COVID-19 Guidance

PHMSA indicated to the state programs that the trade associations AGA, APGA, INGAA, API, etc. have been provided the below link for guidance.

<https://www.cisa.gov/publication/guidance-essential-critical-infrastructure-workforce>

Additionally, Staff recommends that if you have not done so already, that you review your mutual aid agreements and stay in contact with each other.