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TO: Missouri Natural Gas Operators

FROM: Kathleen McNelis, Pipeline Safety Program Manager

SUBJECT:
1) **Rescission of PHMSA Advisory Bulletin**
2) **Fall MANGO General Meeting**
3) **LNG Notification Requirement**
4) **Orders of Rulemaking Published**
5) **Safety Management Systems (SMS)**
6) **Change in MO PSC Program Authority**
7) **New PSC Staff Members**

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

1) Rescission of PHMSA Advisory Bulletin

On June 18, 2025, a notification of rescission of the PHMSA advisory bulletin on Section 114 of the Protecting our Infrastructure of pipeline and Enhancing Safety (PIPES) Act of 2020 was printed in the federal register (90 Fed. Reg. 26085). The *Conclusion* section of the rescission notification provides the following guidance to operators: "Owners and operators of pipeline facilities should adhere to the text of section 114 of the 2020 PIPES Act and section 60108(a) of the Pipeline Safety Act in developing and implementing their inspection and maintenance plans." Additionally, the *Conclusion* section of the Rescission notification provides the following guidance to PHMSA and State authorities: "PHMSA and State authorities should do the same in considering the factors in section 60108(a)(2) and in exercising their inherent enforcement discretion to decide whether an operator's inspection and maintenance plan is adequate."

MO PSC Staff completed inspections of operator's compliance with PHMSA's expectations related to Section 114 of the 2020 PIPES Act in calendar year 2022. In the event that further guidance is provided to state programs on this matter, MO PSC Staff will provide notification in an All Operators letter.

2) Fall MANGO Meeting

The Fall MANGO General Meeting will begin at 10:00 a.m. on October 14, 2025 at Missouri 811's Office located at 824 Weathered Rock Rd Jefferson City, MO 65101.

3) LNG Notification Requirement

Commission Rule 20 CSR 4240-40.033 *Safety Standards – Liquefied Natural Gas Facilities*, adopts 49 CFR 193 by reference. 49 CFR 193.2019(b) requires in part that operators intending to utilize portable LNG equipment provide advance notification to the State agency having jurisdiction over pipeline safety in the State in which the portable LNG equipment is to be located. The MO PSC Staff reminds operators that this notification is required whenever temporary, mobile LNG equipment is to be used, including standby for winter peak demand. Information must be provided at least two weeks in advance, except in emergency situations where such notice is not possible, then as much advance notice as possible must be provided. Information to provide with the advance notification includes: a location description for the installation, including to the extent practical, the details of siting, leakage containment or control, firefighting equipment, and methods employed to restrict public access. Notifications should be made to MO PSC Staff.

4) Orders of Rulemaking Published

Orders of Rulemaking pertaining to amendments proposed in Commission Case No. GX-2025-0249 will be published in the October 1, 2025 *Missouri Register,* beginning on Page 1380: https://www.sos.mo.gov/CMSImages/AdRules/moreg/2025/v50n19Oct1/v50n19.pdf. These proposed amendments will become effective thirty (30) days after publication in the Code of State Regulations (anticipated effective date of November 30, 2025).

5) Safety Management Systems (SMS)

The Pipeline and Hazardous Materials Safety Administration (PHMSA)'s Advisory Bulletin ADB-2025-0001 was published in the Federal Register on March 25, 2025. PHMSA stated that it issued this advisory bulletin to promote the implementation of a pipeline safety management

system (PSMS) by regulated pipeline owners and operators. The text of this advisory bulletin is available at: https://www.federalregister.gov/documents/2025/03/25/2025-04960/pipeline-safety-pipeline-safety-management-system.

6) Change in MO PSC Program Authority

With the passage of Senate Bill 4 earlier this year, the maximum civil penalty amounts for pipeline safety violations in Missouri have been aligned with PHMSA expectations. PHMSA has restored the MO PSC's authority to conduct enforcement actions for probable violations of pipeline safety standards by intrastate pipeline operators under MO PSC safety authority.

7) New PSC Staff Members

The MO PSC pipeline safety program is once again fully staffed. Our newest Staff members are Christopher Fitch (joined in June 2025) and Zachary Millsap (joined in September 2025). Attached is an updated phone listing.