

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

In the Matter of a Workshop Docket to Enhance)
Public Safety Responses to Gas Leaks and to) File No. GW-2016-0013
Prevent Third-Party Damage to Gas Facilities)

RESPONSE TO STAFF REPORT

COMES NOW Laclede Gas Company (“Laclede”), on behalf of itself and its Missouri Gas Energy (“MGE”) operating unit, and submits this response to the Staff Report filed in the above captioned proceeding on August 15, 2016. In support thereof, Laclede states as follows:

1. On August 15, 2016, the Staff submitted its Report detailing many of the concepts, measures and other safety-related ideas discussed during the workshops held in this proceeding. Staff’s Report also identified the enhancements Laclede has already made to its programs for preventing third party damages to its facilities and, where natural gas incidents occur, for assisting emergency personnel to respond in the most effective and coordinated fashion possible. Finally, Staff made a number of recommendations in its report for steps that should be taken in the future to monitor and assess the effectiveness of these measures.

2. At the outset, Laclede wishes to commend both the Staff for the thoroughness of its report and the Commission for launching this collaborative process to develop and share ideas on how our common goal of advancing natural gas safety in Missouri can best be achieved. To that end, the four workshops held in this case in Jefferson City, Kansas City, Springfield and St. Louis, Missouri were attended by many municipal, fire service and/or law enforcement representatives. Among others, the included representatives from Bridgeton, Cameron, Cottleville, Creve Coeur, Eureka, Florissant, Fort Osage, Frontenac, Kansas City,

Lee's Summit, Liberty, Maryland Heights, Overland, Perryville, Robertson, Shrewsbury, Springfield, St. Louis City, St. Louis County, St. Joseph and Sugar Creek. Representatives for a number of other pipeline operators and associations also attended the workshop, including personnel from Ameren Missouri, Enable Midstream Partners, Liberty Utilities, Missouri One-Call, Summit Natural Gas, and Southern Star Central Gas Pipeline.

3. The Staff Report already provides a good overview of the various measures and concepts discussed during the workshop process. Accordingly, Laclede will limit this response to highlighting two measures that it believes have special promise for contributing to public safety. As discussed below, these include: (a) expanding the use of a comprehensive on-line training tool that can assist emergency personnel in responding effectively to natural gas emergencies and (b) encouraging greater involvement by local public safety authorities in monitoring and, where appropriate, deterring excavation activities that are not being performed in compliance with the Missouri one-call statute. A plan for pursuing implementation of each recommendation is also presented below to better ensure they will actually contribute to the public safety goals of this working case.

Expanded Use of the RTUE On-Line Training Tool

4. As Staff notes in its Report, each of the four workshops included a live presentation of the Responding To Utility Emergencies ("RTUE") training tool. RTUE is an on-line, web-based training program designed to educate emergency personnel on the operational and safety aspects of both natural gas and electric facilities and to train such personnel on how best to respond most effectively and safely to incidents involving such facilities. Developed by Michael Callan, a former firefighter with extensive experience in responding to such emergencies, RTUE has separate interactive training tracks for various

kinds of responders, including firefighters, EMS personnel and law enforcement. It also has monitoring capabilities that permit tracking of participation and use of the system so that operators can assess how widely and effectively the training is being undertaken by emergency responders in a particular state or location. Additional information on the program can be accessed at the on-line gateway for the RTUE at <https://www.rtueonline.com/>.

5. RTUE is not designed to replace existing training programs and outreach efforts provided by operators or emergency personnel; it is intended to supplement such efforts. Because it is primarily online, it is more widely available to emergency personnel who might otherwise have a difficult time accessing live training. Reserve or volunteer firefighters who have irregular schedules and cannot always be available for normal training sessions are one example of the kind of emergency personnel who could be better reached with an on-line program.

6. In terms of implementation, Laclede Gas has already made this training tool available to emergency responders in both the Laclede Gas and MGE service territories. Laclede has also offered to pay the upfront costs of making this tool available to all emergency responders in the State of Missouri through the Missouri Association of Natural Gas Operators (“MANGO”). If made available through MANGO, over 775 fire departments and 773 police departments in the State of Missouri would have access to this training tool. Given an ongoing, annual cost of \$22,580, such an approach would allow all Missouri operators to leverage technology in a way that would provide emergency responders with unrestricted access to this training tool at an effective cost of about \$15 per department.

Greater Involvement by Local Authorities in Damage Prevention

7. One of the most revealing items arising from the workshops was the potential for local authorities, including law enforcement and public works officials, to play a greater role in preventing damage to natural gas and other underground facilities. This would include monitoring excavation activities within their jurisdictional boundaries and, where appropriate, taking action to deter activities that threaten public safety because they are not being done in accordance with the one-call statute.

8. A number of municipalities have already taken the initiative to exert greater oversight of such activities. For example, the City of Perryville Missouri has adopted an ordinance aimed at preventing third party damage to natural gas facilities by specifically authorizing local law enforcement officials to issue citations to excavators who are performing work without complying with the requirements of the one-call statute. Another example is when the City of Lee's Summit Missouri effectively called a time-out on excavation activities within its municipal boundaries after underground facilities were hit 3 or 4 times as a result of an initiative to install fiber optic cable throughout the City.

9. This increased emphasis on local monitoring and enforcement of excavation activities simply recognizes that local authorities are, and always have been, on the front lines in protecting the citizens they serve from potential threats to public safety. It also recognizes that while after-the-fact enforcement of the one-call statute (through the Attorney's General's office or otherwise) can be critical to deterring improper excavation activities, having hundreds or even thousands of local authorities monitoring such activities every day could supplement such enforcement actions in a very positive way and, in the process, better prevent damages to underground facilities.

10. Because third party damage to underground facilities is by far the largest contributor to natural gas incidents in Missouri – with over 2,000 damage incidents to natural gas lines reported by regulated Missouri natural gas facility owners in 2014 — Laclede believes that any implementation plan should focus on means for encouraging greater participation by local authorities in the future. To that end, Laclede intends through its Director of Corporate Security to bolster its present and future efforts to educate and train local law enforcement and other public officials on measures for preventing and responding to natural gas incidents. Laclede also intends to circulate and promote ordinances, like the one adopted by Perryville, for consideration by municipal and county officials.

Responses to Staff Recommendations

11. In addition to the two items addressed above, Laclede also generally concurs with the Staff's recommendations in Sections VII and VIII of its Report. Laclede has only two notes of caution regarding the recommendations. First, implementation of any recommendations involving third party service providers, including contract locators, which require changes in contract terms will, of necessity, be subject to negotiation that could affect the cost and terms of such service. Second, the process of developing specific metrics and then measuring the effectiveness of various emergency responder and damage prevention initiatives may, in some instances, take longer than one year to produce meaningful results. Moreover, there may be some measures implemented by Laclede in these areas that, because of the many variables affecting third party damage or emergency responder results, may not be susceptible to a precise measurement of their individual effectiveness. Laclede looks forward, however, to engaging in ongoing, collaborative dialogue with the Commission Staff to work through any issues or concerns that may arise along these lines.

WHEREFORE, Laclede Gas Company respectfully requests that the Commission accept this response to the Staff Report.

Respectfully submitted,

LACLEDE GAS COMPANY

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