

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

In the Matter of a Proposed Rulemaking)
to Implement Amendments to the Gas)
Pipeline Safety Standards)

Case No. GX-2016-0263

STAFF COMMENTS

COMES NOW the Staff of the Missouri Public Service Commission ("Staff") and states as follows:

The Staff supports the proposed amendments for 4 CSR 240-40.020, 40.030 and 40.080 published in the Missouri Register dated December 15, 2016. These proposed amendments include adoption of amendments to the corresponding federal pipeline safety standards in 49 CFR 40, 191, 192 and 199 that became effective between the previous Missouri adoption of federal amendments in Case GX-2016-0092 and January 2016.

Goals are set for state pipeline safety programs by the Pipeline and Hazardous Materials Safety Administration (PHMSA). PHMSA enforces these goals by reductions in Federal grant-in-aid funding and the potential loss of Federal Certification if the goals are not met. 49 U.S. Code Section 60105 requires that the State authority take measures to adopt each applicable federal pipeline safety standard by the date of its annual certification, or in the event a standard was prescribed not later than 120 days before certification, to be taking steps to adopt that standard.

WHEREFORE, the Staff respectfully submits these comments for the Commission's consideration and supports the adoption of these amendments as they are necessary to update its existing gas safety rules to comport with the recently issued federal standards.

Respectfully submitted,

/s/ Hampton Williams

Wm. Hampton Williams
Assistant Staff Counsel
Missouri Bar No. 65633
Attorney for the Staff of the
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65012
(573) 751-8517 (Telephone)
(573) 751-9285 (Fax)
Hampton.Williams@psc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed with first-class postage, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 17th day of January, 2017.