

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

In the Matter of the Establishment of a Working)	
Case for the Development of State-Wide Best)	<u>File No. GW-2021-XXXX</u>
Practices for Locating Quality Assurance)	

**STAFF MOTION TO ESTABLISH WORKING CASE
AND REQUEST FOR WORKSHOP**

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), by and through Staff Counsel’s Office, and moves the Commission to establish a working case for the development of state-wide best practices for locating quality assurance and requests the Commission set a date for a workshop and direct notice. In support of its motion Staff states as follows:

1. The Missouri Attorney’s General Office has enforcement authority for the Missouri damage prevention statute (Chapter 319 Revised Statutes of Missouri). However, the Commission has statutory and regulatory authority to enforce certain aspects of damage prevention for operators of intrastate natural gas pipelines. The Missouri pipeline safety standards in 20 CSR 4240-40.030 require, among other things, that intrastate natural gas operators have and follow a written program to prevent excavation damage to pipelines,¹ and follow a written integrity management program that considers the threat of excavation damage to pipeline systems.²

2. Staff reviews operator reported excavation damage root causes as part of its pipeline safety program. As a result of this review, it appeared to Staff that there may be an opportunity for operators of natural gas pipelines in Missouri to reduce the number of pipeline excavation damages in Missouri that are due to insufficient locating practices.

¹ 20 CSR 4240-40.030(12)(I).

² 20 CSR 4240-40.030(17); 20 CSR 4240-40.030(16).

Staff applied for a grant through the U.S. Department of Transportation's Pipeline and Hazardous Materials Administration (PHMSA) One Call Grant program to further evaluate quality assurance with respect to locating underground pipeline facilities.

3. PHMSA awarded grant funding for the Missouri Public Service Commission to first research best practices that have been used by other entities (e.g. CGA, PHMSA, other states), and then engage operators of pipeline in Missouri in a process that will result in the development of state-wide practices for locating quality assurance. The grant agreement states that this will be accomplished through the MO PSC's working docket process, individual discussions with pipeline operators and other stakeholders, a workshop to jointly discuss findings and suggestions, and a final published summary document. The project deliverable will be a compilation of best practices for locating quality assurance to be distributed to natural gas operators throughout the state and made publically available to other interested parties.

4. Staff requests the Commission open a working case for the purposes of engaging stakeholders in this process. This requested working case will be used as a repository this process and for Staff's final published summary document.

5. Staff's final published summary document will be a compilation of best practices for locating quality assurance that will be distributed to natural gas pipeline operators throughout the state and made publically available in the working case to all other interested stakeholders. Staff's desired outcome of this working case is an eventual reduction in the frequency of damages to natural gas pipelines in Missouri.

6. Staff further requests the Commission order a workshop for Staff and stakeholders to discuss findings and suggestions. Staff requests this workshop be held on June 17, 2021, via WebEx, and that notice be given to the stakeholders in Attachment A of this filing. Staff will file in this working case closer to the workshop date additional workshop details.

WHEREFORE, Staff requests the Commission to issue an Order that: 1) opens a working case for the development of state-wide best practices for locating quality assurance; and 2) sets a workshop date of June 17, 2021, for Staff and stakeholders to discuss findings and suggestions and directs notice of such workshop to the stakeholders in Attachment A of this filing.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record as reflected on the certified service list maintained by the Commission in its Electronic Filing Information System on this 20th day of April, 2021.

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