

WHEREFORE, Staff respectfully submits these comments for the Commission's consideration and supports the proposed amendments to 20 CSR 4240-40.020, 40.030 and 40.080.

Respectfully submitted,

/s/ Jamie S. Myers

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 1st day of September, 2021, to all counsel of record.

/s/ Jamie S. Myers

File No. GX-2021-0406

Comments of the Staff of the Missouri Public Service Commission

Staff supports the proposed amendments to 20 CSR 4240-40.020, 40.030 and 40.080 published in the Missouri Register dated August 2, 2021. The proposed amendments to the Chapter 40 rules include the following:

- 20 CSR 4240-40.020 Incident, Annual, and Safety-Related Condition Reporting Requirements – proposing to amend sections (2), (5), (6), (10), (11), (12) and (13)
 - The proposed amendment adopts changes in the federal pipeline reporting requirements of 49 CFR 191 and revisions to the reporting forms.

- 20 CSR 4240-40.030 Safety Standards – Transportation of Gas by Pipeline – proposing to amend sections (1), (2), (3), (4), (5), (6), (9), (10), (12), (13), (16) and the Purpose, Appendix E and Authority section
 - The proposed amendment adopts changes in the federal pipeline safety standards. Amendments to the minimum federal safety standards of 49 CFR Part 192 are related to verification of the maximum allowable operating pressure and integrity management of natural gas transmission pipelines.

- 20 CSR 4240-40.080 Drug and Alcohol Testing – proposing to amend section (1)
 - The proposed amendment adopts changes in the federal drug and alcohol testing regulations for pipeline operators.