

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

In the Matter of the Application of Union Electric)
Company d/b/a Ameren Missouri for an Order)
Granting a Variance from 4 CSR 240-10.030(19) to)
Revise its Sample Meter Testing Plan) **Case No. GE-2017-0164**

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission and files its recommendation in this case concerning Union Electric Company d/b/a Ameren Missouri’s (“Ameren Missouri” or “Company”) application as set forth in the accompanying *Staff Recommendation Memorandum*, and further states as follows:

1. On December 1, 2016, Ameren Missouri filed an application requesting modifications to its existing variance from the Commission’s rule governing gas meter testing, which was granted in Case No. GO-98-25.

2. On December 15, 2016, the Commission issued an *Order Extending Time for Staff to File a Recommendation* (“Order”) directing Staff to file a recommendation regarding Ameren Missouri’s application no later than March 31, 2017.

3. Staff has reviewed Ameren Missouri’s application and discovery responses, and submits its recommendation as further explained in the accompanying *Staff Recommendation Memorandum* which is incorporated herein by reference.

4. Based on its review, as discussed in further detail in the accompanying *Staff Recommendation Memorandum*, Staff has a safety-related concern if the application is approved without conditions. However, Staff’s recommendation includes

specific conditions which Ameren Missouri has indicated would be agreeable and which would satisfy Staff's concern.

WHEREFORE, for the reasons stated above and discussed in more detail in the accompanying *Staff Recommendation Memorandum*, Staff recommends the Commission issue an order (1) granting Ameren Missouri the requested modifications to its existing variance from the Commission's rule governing gas meter testing *subject to the conditions set forth in the Staff Recommendation Memorandum* and (2) directing the Company to file a revised tariff sheet reflecting the modifications as described in the *Staff Recommendation Memorandum* within thirty days of the Commission's order.

Respectfully submitted,

/s/ Jeffrey A. Keevil

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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 this 22nd day of March, 2017.

/s/ Jeffrey A. Keevil

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
Case No. GE-2017-0164

FROM: John Kottwitz, Utility Engineering Specialist III, Safety Engineering Unit
Kim Cox, Utility Policy Analyst II, Tariff and Rate Design Unit

/s/ Kathleen McNelis 03/21/17 /s/ Jeff Keevil 03/21/17
Safety Engineering Unit / Date Staff Counsel's Office / Date

SUBJECT: Staff's Recommendation on the Application of Union Electric Company d/b/a Ameren Missouri for an Order Granting a Variance from 4 CSR 240-10.030(19) to Revise its Sample Meter Testing Plan

DATE: March 21, 2017

On December 1, 2016, Union Electric Company, d/b/a Ameren Missouri ("Ameren") filed an Application and Request for Variance with the Missouri Public Service Commission ("Commission").

The application requests that the Commission grant specific modifications to its existing variance¹ from Commission Rule 4 CSR 240-10.030(19) which generally requires the removal, inspection, and testing of all natural gas service meters no less than once every 120 months. Ameren asked the Commission to approve the modifications in time to allow the revised gas meter testing procedures to go into effect on January 1, 2017.

On December 1, 2016, the Commission issued, by delegation of authority, an Order Directing Staff to File a Recommendation ("Order") no later than December 16, 2016. On December 15, 2016, the Staff filed a Request for Additional Time to File Recommendation. On December 15, 2016, the Commission issued, by delegation of authority, an Order Extending Time for Staff to File a Recommendation to no later than March 31, 2017.

The primary proposed revisions to Ameren's existing gas meter testing variance are to include a larger gas meter size that Ameren often uses now for medium-sized customers; to allow sampling lots to be established by each gas meter type instead of by every set year for each gas meter type; and to delete the current 30-year maximum testing interval. Staff has reviewed the requested revisions and the supporting information in the Application and data request responses. Staff has a safety related concern regarding deletion of the 30-year maximum testing interval without any compensatory actions. Missouri Public Service Commission Pipeline Safety Regulations require that whenever the operator physically turns on the flow of gas to a customer, each segment of fuel line must be tested for leakage to at least the delivery pressure and a visual inspection of the exposed, accessible customer gas piping, interior and exterior, and all connected equipment shall be conducted.² Each gas meter testing variance currently granted by the Commission includes a maximum testing interval of 30 years. Therefore, if the flow of gas has not been

¹ Granted in Case No. GO-98-25.

² 4 CSR 240-40.030 (12)(S)1.

turned off or on for any other reason, at least once each 30 years the customer owned fuel lines would be tested for leakage and inspected during the work associated with the meter test. To address this concern, Staff submitted Data Request MPSC 0015 asking if Ameren would be willing to take certain actions that would address Staff's concern associated with the deletion of the 30-year maximum testing interval. Ameren responded to Data Request MPSC 0015 that they are agreeable if given time to develop the appropriate processes and anticipates they could have the processes ready in May 2017.

The Staff has reviewed the Application and recommends approval of Ameren's request to revise its Sample Meter Testing Plan subject to these conditions:

- 1) Ameren will notify Staff once the processes for customer offers and courtesy safety inspections outlined in Conditions 2 and 3 below are developed (with an anticipated start date in May 2017);
- 2) For gas meters in the sample meter testing plan, if a meter location has had neither a turn-on or a meter test performed in the previous 30 years, Ameren will send the customer an offer of a courtesy safety inspection as described in Condition 3. [It is suggested that these offers be sent early in the non-heating season, so that any resulting courtesy safety inspections can be scheduled during the non-heating season.];
- 3) If the customer accepts the offer made under Condition 2, Ameren will perform a visual inspection under 4 CSR 240-40.030(12)(S)1.B. and a gas leak check of the accessible fuel line using gas detection equipment; and
- 4) Ameren will revise P.S.C Mo. No. 23rd Revised Sheet No. 54, VII, F. Meter Testing to add "as amended by Case No. GE-2017-0164" directly following Case No. GO-98-25 as stated in its approved tariff sheet.³

Staff recommends that Ameren be granted the requested variance subject to the conditions stated above. Staff also recommends the Company file the revised tariff sheet reflecting this modification within thirty (30) days of the Commission's Order approving this Application with conditions.

³ Ameren's tariff refers to its meter testing variance granted in Case No. GO-98-25.

