

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

In the Matter of the Application of Roeslein)
Alternative Energy Services, LLC for a)
Permanent Waiver From Certain Provisions)
of 20 CSR 4240-40.030)

File No. GE-2020-0238

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”) and for its *Staff Recommendation*, states as follows:

1. On February 6, 2020, Roeslein Alternative Energy Services, LLC (“RAES”), filed an *Application for Waivers* with the Missouri Public Service Commission (“Commission”) and on February 10, 2020, RAES filed its *First Amended Application for Waivers* (“Application”) to correct items in the February 6, 2020, *Application for Waivers*. RAES’s Application contains a request for a waiver from the odorization requirements contained in 20 CSR 4240-40.030(12)(P).

2. On February 13, 2020, the Commission issued an order and directed Staff to file either a recommendation on RAES’s amended application or status report indicating when Staff intends to file its recommendation no later than March 26, 2020. Staff filed a status report on March 26, 2020, and indicated it would file its recommendation on RAES’s Application no later than April 7, 2020.

3. As further described in the attached Staff’s Recommendation Memorandum, Staff reviewed the Application, conducted discovery, reviewed applicable Commission rules and prior orders, and coordinated with the U.S Department of Transportation (U.S.DOT) Pipeline and Hazardous Materials Safety Administration (PHMSA) regarding federal pipeline safety requirements.

4. Commission rule 20 CSR 4240-40.030(18) allows the Commission to waive, in whole or part, compliance with any of the requirements contained in 20 CSR 4240-40.030, upon a showing that gas safety is not compromised. Based on Staff's review and investigation, Staff recommends the Commission grant RAES's waiver request with the following conditions:

1. RAES may not serve any Missouri customers from this pipeline without prior Commission approval;
2. RAES shall conduct leakage surveys and patrols along the entire length of the pipeline at intervals not exceeding four and one-half (4½) months, but at least four (4) times per calendar year;
3. RAES shall conduct a class location study of the RAES transmission pipeline annually, notifying Commission Staff of any class location changes within 30 days of discovery;
4. Whenever RAES is made aware (through notification by Missouri One Call, or other source) that its pipeline lies within the area described in the notice of excavation, or is within two (2) feet of such area, in addition to following the requirements of RSMo Chapter 319 to locate its line, RAES will have personnel onsite monitoring for damages to its pipeline during excavation work.

5. RAES's Application contained a request that the Commission waive the 60-day filing notice required by 20 CSR 4240-4.017(1). RAES's Application provided a verified declaration that it had not had communication with the office of the commission (as defined by 20 CSR 4240-4.015(10)) within the prior 150 days regarding any substantive issues likely to be in this case, and, therefore, Staff agrees good cause exists, pursuant to 20 CSR 4240-4.017(1)(D), to waive the 60-day notice requirement.

WHEREFORE, Staff respectfully submits this *Staff Recommendation* for the Commission's information and consideration and hereby recommends the Commission approve the *First Amended Application For Waivers*, with conditions, as set forth herein.

Respectfully submitted,

/s/ Jamie S. Myers

Associate Counsel

Missouri Bar No. 68291

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Missouri Public Service Commission

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile, or electronically mailed to all parties and/or counsel of record on this 7th day of April 2020.

/s/ Jamie S. Myers

MEMORANDUM

TO: Missouri Public Service Commission Official Case File,
File No. GE-2020-0238, Roeslein Alternative Energy Services, LLC

FROM: Greg A. Williams, Utility Engineering Specialist III, Safety Engineering Department
Trevor Rucker, Utility Engineering Specialist II, Safety Engineering Department

/s/ Kathleen A. McNelis, PE / 04-07-2020 /s/ Jamie S. Myers / 04-07-2020
Safety Engineering Department/ Date Staff Counsel Division / Date

SUBJECT: Staff Recommendation Regarding Roeslein Alternative Energy Services. LLC
Request for Approval of a Waiver from 20 CSR 4240-40.030(12)(P)

DATE: April 7, 2020

Executive Summary

Roeslein Alternative Energy Services, LLC (RAES) is requesting a waiver from the Commission's requirement to odorize gas (20 CSR 4240-40.030(12)(P)) transported by pipeline for its newly constructed pipeline in Mercer County, Missouri. The approximately 8.77 mile long intrastate gas transmission pipeline will transport gas from a collection point at a farm to an interstate transmission pipeline. RAES states that no customers will be served from this pipeline.

The Commission's Safety Engineering Department Staff (Staff) performed the following review and analysis to reach its recommendations:

- Reviewed the amended application, and additional information provided by RAES through data requests;
- Reviewed applicable Commission rules;
- Reviewed past Commission orders; and
- Coordinated with the U.S. Department of Transportation (U.S. DOT) Pipeline and Hazardous Materials Safety Administration (PHMSA) regarding federal pipeline safety requirements.

Staff is recommending that the Commission approve this waiver, and also order that such approval is contingent on RAES complying with the following conditions:

1. RAES may not serve any Missouri customers from this pipeline without prior Commission approval;

2. RAES shall conduct leakage surveys and patrols along the entire length of the pipeline at intervals not exceeding four and one-half (4½) months, but at least four (4) times per calendar year;
3. RAES shall conduct a class location study of the RAES transmission pipeline annually, notifying Commission Staff of any class location changes within 30 days of discovery;
4. Whenever RAES is made aware (through notification by Missouri One Call, or other source) that its pipeline lies within the area described in the notice of excavation, or is within two (2) feet of such area, in addition to following the requirements of RSMo Chapter 319 to locate its line, RAES will have personnel onsite monitoring for damages to its pipeline during excavation work.

1.0 Background Information

On February 6, 2020, Roeslein Alternative Energy Services (RAES), LLC filed an Application for Waivers, which was amended on February 10, 2020 by its First Amended Application for Waivers, (Application) requesting a waiver of compliance from the provisions of 20 CSR 4240-40.030(12)(P), which, in relevant part, require as follows:

(P) Odorization of Gas. (192.625)

1. A combustible gas in a transmission line or distribution line must contain a natural odorant or be odorized so that at a concentration in air of one-fifth (1/5) of the lower explosive limit, the gas is readily detectable by a person with a normal sense of smell.

RAES is requesting the waiver to obtain Commission approval that it not be required to odorize the gas that is gathered from hog waste lagoons located at the Somerset Farm, and transported approximately 8.77¹ miles by pipeline to a point of injection on the ANR Pipeline, also in Mercer County, Missouri.

RAES stated the reason the waiver is necessary is that gas in the interstate ANR Pipeline system is not odorized, and that gas injected into the ANR pipeline would not be permitted to be odorized in accordance with the ANR Pipeline FERC Tariff Part 6.13 2.(a). RAES further stated that if it did odorize the gas being transported by pipeline from the Somerset Farm to the ANR injection point as required by Commission rules, the odorant would be required to be removed in order to comply with the ANR Pipeline tariff limits prior to injection. RAES stated that this process would involve

¹ RAES response to Staff Data Request No. 0001 described the total length of its pipeline as 46,300 feet which is approximately 8.77 miles (5,280 feet = 1 mile).

additional cost without a significant safety benefit. RAES also indicated that its transmission pipeline will not be used for service to any end users other than the ANR interstate transmission pipeline.

RAES proposed that the requested waiver be subject to the following conditions as a result of its transmission pipeline not being odorized:

1. RAES will conduct leak testing on a semi-annual basis;
2. RAES will conduct patrols of the line four (4) times per year; and,
3. RAES will conduct an area classification study on an annual basis.

In paragraphs 14 and 15 of its Application, RAES requested that the Commission confirm no objection to the waiver from the U.S. DOT.

2.0 Applicable Commission rules

2.1 Waivers of Compliance

20 CSR 4240-40.030(18) states that upon written request to the secretary of the commission², the commission, by authority order and under such terms and conditions as the commission deems appropriate, may waive in whole or part compliance with any of the requirements contained in this rule³. Waivers will be granted only on a showing that gas safety is not compromised. If the waiver request would waive compliance with a federal requirement in 49 CFR part 192, additional actions shall be taken in accordance with 49 U.S.C. 60118 except when the provisions of subsection (17)(G)⁴ apply.

2.2 Definition of Transmission line

As defined by 20 CSR 4240-40.030(1)(B)40., a transmission line means a pipeline⁵, other than a gathering line⁶, that transports gas from a gathering line or storage facility to a distribution center, storage facility, or large volume customer that is not downstream from a distribution center (A large volume customer may receive similar volumes of gas as a distribution center, and includes factories,

² As defined by 20 CSR 4240-40.030(1)(B)6., commission means the Missouri Public Service Commission.

³ Rule in this context refers to 20 CSR 4240-40.030

⁴ Code requirement 20 CSR 4240-40.030(17)(G) applies to an operator's gas distribution integrity management program and the requirement defines when an operator may deviate from required periodic inspections.

⁵ As defined by 20 CSR 4240-40.030(1)(B) 31., a pipeline means all parts of those physical facilities through which gas moves in transportation, including pipe, valves, and other appurtenances attached to pipe, compressor units, metering stations, regulator stations, delivery stations, holders, and fabricated assemblies.

⁶ As defined by 20 CSR 4240-40.030(1)(B)17., a gathering line means a pipeline that transports gas from a current production facility to a transmission line or main.

power plants, and institutional users of gas.); operates at a hoop stress of twenty percent (20%) or more of SMYS⁷; or transports gas within a storage field.

2.3 Requirements to Odorize Natural Gas Transported by Pipeline

Natural gas is a naturally occurring mixture of hydrocarbon and non-hydrocarbon gases⁸ that are odorless and colorless. Because there are no natural warning properties (e.g. odor or color), natural gas cannot be detected without the use of gas detection equipment unless odorant is added. Odorant, typically a proprietary blend of organic compounds containing one or more mercaptans⁹, is added to natural gas to serve as a warning property for natural gas leaks. When gas is released from a pipeline into the air, persons with an ordinary sense of smell are able to readily detect the odorant.

Commission rule 20 CSR 4240-40.030(12)(P)1. requires, among other things, that a combustible gas in a transmission line or distribution line must contain a natural odorant or be odorized so that at a concentration in air of one-fifth (1/5) of the lower explosive limit¹⁰, the gas is readily detectable by a person with a normal sense of smell.

2.4 Requirements to Patrol Transmission Lines

For a transmission line in a Class 1 location, Commission rule 20 CSR 4240-40.030(13)(C)2. requires pipeline patrols at maximum intervals of seven and one-half (7½) months, but at least twice each calendar year at highway and railroad crossings. At all other locations, the maximum intervals between the patrols may not be longer than fifteen (15) months, but at least once each calendar year.

2.5 Requirement to Leak Survey Transmission Lines

For a transmission line in a Class 1 location, Commission rule 20 CSR 4240-40.030(13)(D)1.C. requires an instrument leak detection survey to be conducted at intervals not exceeding fifteen (15) months, but at least once each calendar year.

⁷ As defined by 20 CSR 4240-40.030(1)(B)37., SMYS means specified minimum yield strength is for steel pipe manufactured in accordance with a listed specification, the yield strength specified as a minimum in that specification; or for steel pipe manufactured in accordance with an unknown or unlisted specification, the yield strength determined in accordance with paragraph (3)(D)2.

⁸ Methane is always the largest component of natural gas (typically 70-90%), and typically contains some amount of mixed heavier hydrocarbons including ethane, propane and butane, and non-hydrocarbon gases such as carbon dioxide and nitrogen.

⁹ Mercaptans are a family of organic sulfur containing compounds that have a pungent odor, frequently compared to a “rotten egg” or “skunk” smell.

¹⁰ The lower explosive limit for methane is 5% gas-in-air by volume. The methane gas produced by RAES would have approximately the same lower explosive limit level since it consists of at least 98% methane. Natural gas is composed mostly of methane, but it also contains small amounts of ethane, propane, butane, and non-hydrocarbon gases.

2.6 Damage Prevention

In general terms, Missouri statutes and pipeline safety standards require that:

1. Excavators must provide notification of intent to excavate to allow facility owners to mark buried utilities, and
2. Facility owners must provide temporary markings for their facilities in the areas identified by the excavators.

20 CSR 4240-40.030(12)(I) requires each operator of a buried natural gas pipeline to have and follow a written program to prevent damage to that pipeline by excavation activities.

49 CFR 192.935(d)(2), adopted by reference in 20 CSR 4240-40.030(16), requires that operators either monitor excavations near the pipeline, or conduct patrols of the pipeline at bi-monthly intervals.

3.0 Previous Commission Decisions

On January 17, 2001, in Case No. GE-2001-390, MEP Pleasant Hill, LLC (MEP) submitted an application for waiver from provisions of 20 CSR 4240-40.030(12)(P)¹¹ to odorize natural gas in natural gas transmission pipelines. The MEP pipeline is a 16-inch diameter steel natural gas transmission pipeline that transports natural gas from an interstate natural gas pipeline 7½ miles to a combined cycle combustion turbine generation plant. According to MEP's application, the combined cycle combustion turbine installed has a heightened sensitivity to sulfur products such as those commonly found in natural gas odorant. The entire 7½ mile length of the natural gas intrastate pipeline is located in a Class 1 location. In MEP's application for waiver, MEP proposed several conditions to ensure that pipeline safety was not compromised as a result of the natural gas pipeline not being odorized. The conditions included the following:

1. Combustible gas detection equipment in the boiler facility and turbine enclosures to ensure safety of the plant that does not rely on odorization of the natural gas. The detection equipment would contain audible and visible alarms and be tied to Dogwood's supervisory control and data acquisition ("SCADA") system;
2. Proper maintenance of the above combustible gas detection equipment, including performance tests;
3. Any future "farm tap" added to the pipeline would comply with all applicable safety requirements, including odorization;

¹¹ 4 CSR 240-40.030(12)(P) at the time of the Application, GE-2001-390.

4. Pipeline patrols and leakage surveys would be conducted on a more frequent base than required by 20 CSR 4240-40.030(13)(C) & (D)¹². Pipeline patrols and leakage surveys would be conducted six (6) times per calendar year at intervals not exceeding three (3) months at highway and railroad crossings and at twice the frequency required at all other locations;
5. MEP would review class locations along the pipeline annually and notify Commission Staff within 45 days of the discovery of a class location change, so that the waiver may be reassessed.

The Commission granted the application for waiver, effective February 9, 2001, provided MEP abided by all the conditions contained in the application for waiver.

The RAES pipeline at issue in this waiver case is similar in that it is an intrastate natural gas transmission pipeline with no connection to a distribution system, but is different in that MEP's pipeline transports gas from an interstate natural gas pipeline to the end use of the natural gas while RAES's pipeline transports gas from a production site to an interstate natural gas pipeline. Additionally, the two pipelines have differing technical specifications.

4.0 Coordination with U.S. DOT

The Commission has an annual certification from the U.S. DOT under 49 U.S.C. Section 60105 of 49 U.S. Code to implement its pipeline safety program. 49 U.S.C. 60118 addresses waivers of pipeline safety standards by state authorities. 49 U.S.C. 60118 (d) requires that:

If a certification under section 60105 of this title or an agreement under section 60106 of this title is in effect, the State authority may waive compliance with a safety standard to which the certification or agreement applies in the same way and to the same extent the Secretary may waive compliance under subsection (c) of this section. However, the authority must give the Secretary written notice of the waiver at least 60 days before its effective date. If the Secretary makes a written objection before the effective date of the waiver, the waiver is stayed. After notifying the authority of the objection, the Secretary shall provide a prompt opportunity for a hearing. The Secretary shall make the final decision on granting the waiver.

In guidelines provided to state programs, PHMSA encourages state programs to coordinate review of waiver requests with PHMSA prior to finalizing state approval. Staff therefore submitted a copy of the RAES Application waiver of compliance from odorization requirements to PHMSA on

¹² 4 CSR 240-40.030(13)(C) & (D) at the time of the Application, GE-2001-390.

February 13, 2020. On February 14, 2020, PHMSA replied and requested more information concerning the design, operational and integrity details of the RAES intrastate transmission pipeline.

Staff submitted Staff Data Request Nos. 0004, 0005, and 0006 to RAES on behalf of PHMSA on February 18, 2020, with the caveat that any information provided by RAES would be shared with PHMSA. On February 25, 2020, RAES provided responses to Staff Data Request Nos. 0004, 0005, and 0006 and Staff forwarded a copy of those responses to PHMSA on February 26, 2020.

On March 11, 2020, PHMSA responded to Staff via email that the proposed RAES “...intrastate gas transmission pipeline that is located in a ‘Class 1 location’ will not require odorization to meet the 49 CFR § 192.625 regulations” (Emphasis added by PHMSA).

4.1 Applicable Federal Regulations

As defined by the federal requirement of 49 CFR Part 192.5(a)(1), a “class location unit” is an onshore area that extends 220 yards on either side of the centerline of any continuous 1-mile length of pipeline.

This class location unit can be further classified as either a Class 1, Class 2, Class 3, or Class 4 pipeline location as determined in accordance with 49 CFR Part 192.5(b)(1) through 49 CFR Part 192.5(b)(4) as defined below:

- (1) 49 CFR Part 192.5(b)(1), defines a Class 1 location as any class location unit that has 10 or fewer buildings intended for human occupancy.
- (2) 49 CFR Part 192.5(b)(2), defines a Class 2 location as any class location unit that has more than 10 but fewer than 46 buildings intended for human occupancy.
- (3) 49 CFR Part 192.5(b)(3), defines a Class 3 location as any class location unit that has 46 or more buildings intended for human occupancy; or an area where the pipeline lies within 100 yards of either a building or a small, well-defined outside area (such as a playground, recreation area, outdoor theater or other place of public assembly) that is occupied by 20 or more persons on at least 5 days a week for 10 weeks in any 12-month period (The days and weeks need not be consecutive).
- (4) 49 CFR Part 192.5(b)(4), defines a Class 4 location as any class location unit where buildings with four or more stories above ground are prevalent.

49 CFR Part 192.625(b), requires, among other things, that “After December 31, 1976, a combustible gas in a transmission line in a Class 3 or Class 4 location must be odorized unless certain conditions

apply. One of those conditions is that at least 50 percent of the length of the line downstream from that location is in a Class 1 or Class 2 location”.

5.0 Staff Analysis

5.1 Purpose and Benefits of Odorization

RAES indicated that the total length of the Somerset to TP2 biogas pipeline was 46,300 feet (approximately 8.77 miles) and that the entire length of the pipeline is in a Class 1 location.¹³

Commission rule 20 CSR 4240-40.030(12)(P)1., requires among other things that a combustible gas in a transmission line must contain a natural odorant or be odorized so that at a concentration in air of one-fifth (1/5) of the lower explosive limit, the gas is readily detectable by a person with a normal sense of smell, regardless of class location.

Commission rule 20 CSR 4240-40.030(12)(P)2., requires that for installations made after May 28, 1995, a combustible gas in a transmission pipeline must comply with the requirements of paragraph (12)(P)1., and the odorizer must be located as close as practical to the delivery point from the supplier.

Natural gas is odorless. Odorization is added to natural gas to provide an olfactory warning to the public in the event that natural gas leaks from the pipeline. Operators of gas pipelines in Missouri are required to have and implement written public education plans to educate the public, which must include, among other things, how to recognize and respond to natural gas leaks.

According to information provided by RAES, the gas it will be transporting will be similar enough to natural gas that it can be accepted by ANR pipeline and introduced into the various natural gas distribution systems downstream. Thus, over the approximately 8.77 miles of the pipeline, if the Commission grants this waiver, there will not be any olfactory warning property to alert the public in the event of a leak from the pipeline.

In paragraph 12 of the Application, RAES indicated that the “warning system” in homes and other locations where gas is consumed is not necessary because the RAES transmission pipeline will not be used for service to any end users other than the interstate pipeline (ANR Pipeline). RAES also stated that “Safety will not be compromised by the requested waiver because of the nature of the transmission line in question.” Staff does not agree that the simple lack of end users off of the RAES transmission line means that a warning system to detect leaks would be unnecessary. When a leak occurs on a buried pipeline, gas can migrate undetected some distance underground. This means that an underground leak on the RAES pipeline would not necessarily stay confined to the area immediately around the pipeline but could potentially migrate to areas accessible to the public including road crossings and nearby residences or buildings.

¹³ RAES response to Staff Data Request No. 0001.

In order to address this concern, Staff is proposing additional conditions be required if the Commission approves this waiver, including additional leak surveys and patrols of the pipeline to check for leaks.

In paragraph 13 of the Application, RAES proposed to conduct “leak testing on a semi-annual basis” as an additional precaution. Staff recommends that leakage surveys along the entire length of the pipeline be conducted at intervals not exceeding four and one-half (4½) months, but at least four (4) times per calendar year. In response to Staff Data Request No. 0015, RAES agreed to this condition. An increased leakage survey frequency would aid in the discovery of gas leaks on the pipeline in the absence of odorant in the gas.

In paragraph 13 of the Application, RAES proposed to conduct “patrols of the line four (4) times per year” as an additional precaution. Staff agrees with this frequency of pipeline patrols and recommends that pipeline patrols along the entire length of the pipeline be conducted at intervals not exceeding four and one-half (4½) months, but at least four (4) times per calendar year. An increased pipeline patrol frequency would increase the chance for detecting any excavation activities near the transmission line and observing areas where the pipeline may have been exposed due to flooding or washouts.

5.2 Reason RAES Cannot Odorize Gas in Pipeline

In paragraphs 10 and 11 of the Application, RAES stated that ANR’s FERC tariff prohibits odorized gas to be injected into ANR’s interstate natural gas pipeline in such that gas injected into the pipeline “shall be commercially free from objectionable odors...”,¹⁴ and that the odorant level required by Commission rules would violate ANR’s FERC tariff. Additionally, in response to Staff Data Request No. 0003, RAES provided a copy of a letter from TC Energy¹⁵ which stated that odorized gas could not be accepted from RAES due to the fact that downstream distribution systems would be expecting to receive un-odorized natural gas. The letter further explains that the introduction of odorized gas into ANR’s pipeline could cause the accidental over-odorization of the downstream distribution systems.

In the response to Staff Data Request No. 0007, RAES stated that it was unaware of any commercially available equipment for the removal of odorant from gas. As such, RAES would be unable to odorize the gas for the length of the pipeline and then remove the odorant from the gas prior to injection into the ANR pipeline. Additionally, RAES stated that denial of the waiver would likely make the project to collect gas from the Somerset farm and inject the gas into the natural gas grid cost prohibitive as RAES would have to design and construct equipment capable of removing odorant from gas.

¹⁴ ANR FERC Tariff Part 6.13 2. (a).

¹⁵ Parent company of ANR Pipeline Company.

Staff Conclusions

1. ANR will not accept injection of odorized gas from RAES. RAES stated that it cannot inject then remove odorant from the gas because equipment for the removal of odorant from gas is not currently commercially available.
2. Staff concurs with RAES's assertion that granting the waiver requested in the RAES Application will not compromise gas safety provided alternative measures are implemented to detect gas leaks. These proposed measures, included in Staff's recommendation, are in addition to leak detection measures required in Commission rules, and are intended to mitigate risks associated with not odorizing the gas.
3. Based on the response received from U.S. DOT PHMSA that federal regulations requiring odorization of combustible gas transported by transmission pipelines would not apply to this specific pipeline under these particular circumstances, the federal U.S. DOT will not oppose the waiver.

Staff's Recommendation and Conditions

Staff's recommendation is to approve the Application with conditions in addition to those proposed in the Application by RAES. The conditions recommended by Staff are:

1. RAES may not serve any Missouri customers from this pipeline without prior Commission approval;
2. RAES shall conduct leakage surveys and patrols along the entire length of the pipeline at intervals not exceeding four and one-half (4½) months, but at least four (4) times per calendar year;
3. RAES shall conduct a class location study of the RAES transmission pipeline annually, notifying Commission Staff of any class location changes within 30 days of discovery;
4. Whenever RAES is made aware (through notification by Missouri One Call, or other source) that its pipeline lies within the area described in the notice of excavation, or is within two (2) feet of such area, in addition to following the requirements of RSMo Chapter 319 to locate its line, RAES will have personnel onsite monitoring for damages to its pipeline during excavation work.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

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| In the Matter of the Application of |) | |
| Roeslein Alternative Energy Services, LLC |) | <u>File No. GE-2020-0238</u> |
| for a Permanent Waiver From Certain |) | |
| Provisions of 20 CSR 4240-40.030 |) | |

AFFIDAVIT OF
GREG A. WILLIAMS AND TREVOR RUCKER

| | | |
|-------------------|---|-----|
| STATE OF MISSOURI |) | |
| |) | ss. |
| COUNTY OF COLE |) | |

COME NOW Greg A. Williams and Trevor Rucker and on their oath declares that they are of sound mind and lawful age; that they contributed to the foregoing Staff Recommendation; and that the same is true and correct according to their best knowledge and belief, under penalty of perjury.

Further the Affiants sayeth not.

/s/ Greg A. Williams
Greg A. Williams

/s/ Trevor Rucker
Trevor Rucker