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TO:

Missouri Public Service Commission Official Case File

Case No. GO-91-239, Pipeline Replacement Programs.

20K

John D. Kottwitz and Robert R. Leonberger DM

Energy Department - Gas Safety

SUBJECT: Service and Yard Line Replacement Program Update

DATE:

FROM:

March 19, 1993

Reviewed By: Jesu Glesomen 3/22/93 Robert 7 feet 3/23/93 205 3/23/93
Utility Operations Division/date General Counsel's Office/date

Subsection (15)(C) of 4 CSR 240-40.030 requires each operator to establish a replacement program for unprotected steel service lines and yard lines, and "notify the Commission" of the replacement option the operator will implement. Case No. GO-91-239 was established to address the replacement program status of each operator and to receive the programs. For operators with unprotected steel service or yard lines, the Commission was notified of the selected option(s). On April 19, 1991, a final Order Concerning Pipeline Replacement Programs (Order) was issued in Case No. GO-91-239. During the monitoring of natural gas operators, the Gas Safety Staff has identified some additions and changes that need to be made to the information contained in the Order concerning the unprotected steel service and yard line programs.

The identified additions and changes of the operators' pipeline replacement programs which require an update of the Commission's files are contained in the following three items.

- 1. Revisions to the replacement programs for unprotected steel service lines and/or yard lines are attached to this memorandum for the following operators.
 - a. City of Altenburg-Frohna Joint Utilities
 - b. Associated Natural Gas Company
 - c. City of Bismarck
 - d. Gas Service, A Western Resources Company (formerly known as KPL Gas Service)
 - e. Missouri Public Service (MPS) **
 - f. City of Perry

**The MPS program also contains revisions regarding the replacement of cast iron and unprotected steel mains. This change requires Commission approval and is being addressed in a separate docket.

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MISSOURI PUBLIC SERVICE COMMISSION

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- 2. Originally in Case Bo. GO-91-239, the City of Montgomery (City) notified the Commission that they did not have unprotected steel service lines or yard lines in their system. During the Staff's inspection of the City in 1992, the Staff concluded that there existed 24 unprotected steel service lines in the City's system on December 15, 1989. These service lines were discussed by the Staff and City in 1990, but due to a misunderstanding were not scheduled for replacement. As a result of the 1992 inspection, the Staff cited the City for a probable violation of 4 CSR 240-40.030(15)(C) and requested that the City submit a replacement program. The City has submitted a replacement program wherein option (15)(C)3. was chosen. The program is attached. In accordance with 4 CSR 240-40.030(15)(C), the Commission is hereby notified of the replacement option selected by the City.
- 3. The Staff's motion and Commission Order in Case No. GO-91-239 did not address the natural gas facilities located in the Missouri towns/areas of Burgess and South Lineville. These facilities are extensions of the gas systems in Mulberry. Kansas and Lineville, Iowa, respectively, which are both operated by Utility Consultants Inc. (UCI). UCI has reported that Burgess and South Lineville do not have unprotected steel service lines or yard lines. By this memorandum the Commission is being informed that the operator of the gas systems in Burgess and South Lineville has indicated that they do not have unprotected steel service or yard lines.

Summary:

This memorandum serves only to notify and update the Commission of the three (3) subjects contained in this memo related to its final order in Case No. GO-91-239. In the Staff's opinion, no further Commission action is necessary.

/ba

Director-Utility Operations Division (w/o attachments) Directory-Policy and Planning Division (w/o attachments) Assistant to the Director-Utility Services Division (w/o attachments) Manager-Financial Analysis Department (w/o attachments) Manager-Accounting Department (w/o attachments) Manager-Energy Department (w/o attachments) Office of Public Counsel Certified Copy List - Commission Order dated 4/19/91 (w/o attachments) Gerald T. McNeive, Jr. - Laclede (w/o attachments) Gary W. Duffy - (for) United Cities (w/o attachments) Mark G. Thessin - United Cities (w/o attachments) Norman Engert - City of Altenburg-Frohna Joint Utilities Garlan G. McTernan - Associated Natural Gas Company Mark L. Hedrick - City of Bismarck Hans E. Mertens - Gas Service, A Western Resources Company Allen J. Spivey - MPS Don Huff - City of Perry

Russell Burton - City of Montgomery