BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of the Missouri	
Association of Natural Gas Operators, Inc. for	
a Permanent Waiver From the Provisions of	Case No. GE-2022-0214
20 CSR 4240-40.020(2)(D)1B for Estimated	
Property Damage Threshold for a Federal Incident,)	
and 20 CSR 4240-40.020(7)(B) Distribution System)	
Mechanical Fitting Failure Reports.	

MOTION FOR RECONSIDERATION

COMES NOW the Missouri Association of Natural Gas Operators, Inc. ("MANGO"), on behalf of its members, and, pursuant to Missouri Public Service Commission ("Commission") Rule 20 CSR 4240-2.160, states the following as its *Motion for Reconsideration*:

- 1. On March 9, 2022, the Commission issued its *Order Granting Temporary* Waiver in this matter. That *Order* granted certain identified members of MANGO a one year waiver of Commission Rule 20 CSR 4240-40.020(2)(D)1B and Commission Rule 20 CSR 4240-40.020(7)(B).
- 2. At Staff's request, MANGO had supplemented its application on February 22, 2022, to identify those MANGO members "primarily interested in the relief sought by the Application." However, that filing was not intended to modify or amend the fact that the requested waiver was sought for MANGO's entire membership. Consistent with that request was MANGO's *Response to Commission Order*, also filed on February 22, 2022, which stated that "the MANGO board of directors continues to desire to pursue a waiver from the provisions of 20 CSR 4240-40.020(2)(D)1B and 20 CSR 4240-40.020(7)(B) for its membership."
 - 3. Attached as Appendix A is a list of the MANGO membership. The additional

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¹ With the opportunity to apply for an extension of the waiver, if additional time beyond one year is necessary.

MANGO members that would be covered by an expansion of the Order to all of the MANGO membership are primarily municipal and other small natural gas operators for whom the requested waivers would be particularly helpful.

4. MANGO apologizes for any confusion that may have resulted from its *Supplement* to *Application* and asks that the Commission reconsider its *Order Granting Temporary Waiver* and issue an amended order that grants a temporary waiver for the entire MANGO membership.

WHEREFORE, MANGO requests that the Commission reconsider its *Order Granting*Temporary Waiver and, thereafter, issue an amended order granting a temporary waiver for the MANGO members listed on Appendix A.

Respectfully submitted,

Dean L. Cooper

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ATTORNEYS FOR APPLICANT

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail to the following this 14th day of March, 2022:

Office of the General Counsel staffcounselservice@psc.mo.gov

Office of the Public Counsel opcservice@opc.mo.gov

- Identifies those entities included in the Commission's *Order Granting Temporary Waiver* issued March 9, 2022

City Utilities of Springfield, Missouri, 301 E. Central, P.O. Box 551, Springfield, MO 65801

The Empire District Gas Company, P.O. Box 127, 602 S. Joplin Avenue, Joplin, MO 64802

Liberty Utilities (MNG), 2751 North High Street, Jackson, MO 63755

Spire, Inc., 700 Market Street, 6th Floor, St. Louis, MO 63101

Summit Natural Gas of Missouri, Inc., 2 Delorme Drive, Suite 100, Yarmouth, ME 04096

Union Electric Company, 1901 Chouteau Avenue, P.O. Box 66149, Mail Code 1310, St. Louis, MO 63166

Albany Municipal Gas System, Attn: City Administrator, 106 E. Clay Street, Albany, MO 64402

Altenburg-Frohna Municipal Gas System, Attn: Mayor of Frohna, Joint Utilities Gas Department, Frohna, MO 63748

Altenburg-Frohna Municipal Gas System, Attn: Mayor of Altenburg, 9144 Main Street, P.O. Box 22, Altenburg, MO 63732

Amber Glenn Apartments, 2977 Highway K, Ste. 239, O'Fallon, MO 63368

Ameresco, Attn: Manager of Operations, 111 Speen St. Ste. 410, Framingham, MO 01701

Ashley Energy, LLC, Attn: Operations Manager, One Ashley Place, St. Louis, MO 63102

Bernie Municipal Gas System, Attn: Mayor of Bernie, P.O Box 605, 101 W. Main Street, Bernie, MO 63822

Bethany Municipal Gas System, Attn: City Administrator, P.O. Box 344, 206 N. 16th Street, Bethany, MO 64424

Bismark Municipal Gas System, Attn: Mayor of Bismark, P.O. Box 27, 924 Center Street, Bethany, MO 63624

Clarence Municipal Gas System, Attn: Mayor of Clarence, P.O. Box 9, Clarence, MO 63437

Cuba Municipal Gas System, Attn: Mayor of Cuba, City Hall, P.O. Box K, 202 N. Smith Street, Cuba, MO 65453

Dogwood Energy, LLC, Attn: Utility Safety & Design, Inc., P.O. Box 206, 28847 Highway 136, Unionville, MO 63565

Flower Box Motel, 722 West Spring Street, Neosho, MO 64540

Fulton Municipal Gas System, Attn: Director of Administration, P.O. Box 130, 4th & Market Streets, Fulton, MO 65251

Granby Municipal Gas System, Attn: Mayor of Granby, P.O. Box 500, 302 N. Main Street, Granby, MO 64844

Grant City Municipal Gas System, Attn: Mayor of Grant City, 101 W. 3rd Street, P.O. Box 398, Grant City, MO 64456

Green City Municipal Gas System, Attn: Mayor of Green City, P.O. Box 235, #4 Green Street, Green City, MO 63545

Hermann Municipal Gas System, Attn: Public Works Director, 1902 Jefferson Street, Hermann, MO 65041

John Knox Village, Attn: Manager of Facilities, 400 NW Murray Rd., Lee's Summit, MO 64081

Kennett Municipal Gas System, Attn: Superintendent of Utilities, P.O. Box 40, 303 S. Anthony, Kennett, MO 63857

Laddonia Ethanol Plant, Attn: CFO and VP of Admin Services, Missouri Public Utility Alliance, 1808 I-70 Dr., S.W., Columbia, MO 65203

Liberal Municipal Gas System, Attn: Mayor of Liberal, P.O. Box 67, 209 S. Main Street, Liberal, MO 64762

Linden Mobile Home Park, 400 NE 76th Terrace, Kansas City, MO 64118

Macon Municipal Gas System, Attn: Mayor of Macon, P.O. Box 569, 106 W. Bourke Street, Macon, MO 63552

Madison Municipal Gas System, Attn: Mayor of Madison, P.O. Box 141, 209 S. Main Street, Madison, MO 65263

Marshall Municipal Utilities, Attn: Underground Facilities Director, 75 East Morgan Street, Marshall, MO 65340

Mercer Municipal Gas System, Attn: Mayor of Mercer, City Hall, 14402 State Street, Mercer, MO 64661

Middletown Municipal Gas System, Attn: Mayor of Middletown, City Hall, P.O. Box 127, 203 Johnson Street, Middletown, MO 63359

Mid-Missouri Energy, Attn: President, 15311 N. Saline 65 Hwy., Malta Bend, MO 65339

Milan Municipal Gas System, Attn: Mayor of Milan, City Hall, P.O. Box 247, 212 East Second Street, Milan, MO 63556

Monroe City Municipal Gas System, Attn: Mayor of Monroe City, City Hall, 109 2nd Street, Monroe City, MO 63456

Montgomery City Municipal Gas System, Attn: Mayor of Montgomery City, 723 North Sturgeon Street, Montgomery City, MO 63361

New Florence Municipal Gas System, Attn: Mayor of New Florence, P.O. Box 70, 217 South Main Street, New Florence, MO 63363

New Haven and Berger Municipal Gas System, Attn: Mayor of Berger, 404 Rosalie, Berger, MO 63014

New Haven Berger Municipal Gas System, Attn: Mayor of New Haven, City Hall, 101 Front Street, New Haven, MO 63068

Oakridge Apartments, Attn: Director of Asset Management Gardner Capitol, 8000 Maryland Ave., Ste. 300 St. Louis, MO 63105

Omega Pipeline Company, Attn: DPW Bldg., 2222 1334 First Street, Ft. Leonard Wood, MO 65473

Oronogo Municipal Gas System, Attn: Mayor of Oronogo, P.O. Box 201, 653 E. Central Street Oronogo, MO 64855

Perryville Municipal Gas System, Attn: City Administrator, 215 North West Street, Perryville, MO 63775

Perry Municipal Gas System, Attn: Mayor, P.O. Box 280, 127 E. Main Street, Perry, MO 63462

Paris Municipal Gas System, Attn: City Superintendent, 112 S. Main, Paris, MO 65275

Plattsburg Municipal Gas System, Attn: City Administrator, 114 Maple Street, Plattsburg, MO 64477

Potosi Municipal Gas System, Attn: Mayor, 121 E. High Street, Potosi, MO 63664

Princeton Municipal Gas System, Attn: Mayor of Princeton, City Hall, 507 West Main Street, Princeton, MO 64673

Richland Municipal Gas System, Attn: Mayor of Richland, P.O. Box 798, Richland, MO 65556

Saint Louis University, 3545 Lindell Boulevard, Wool Center Room 223, St. Louis, MO 63103

Shelbina Municipal Gas System, Attn: Mayor of Shelbina, P.O. Box 646, 116 East Walnut, Shelbina, MO 63468

Show-Me Ethanol, LLC, Attn: General Manager, 26530 Hwy., 24 E., Carrollton, MO 64633

Roeslein Alternative Energy Services, Attn: President, 9200 Watson Rd., Ste. 200, St. Louis, MO 63126

St. James Municipal Gas System, Attn: Mayor of St. James, P.O. Box 426, 200 N. Bourbeuse Street, St. James, MO 65559

St. Robert Municipal Gas System, Attn: Mayor of St. Robert, 194 Eastlawn Ave., Ste. A, St. Robert, MO 65584

Stanberry Municipal Gas System, Attn: City Administrator, 130 W. First Street, Stanberry, MO 64489

The Talisman Condominiums, Attn: Chris Gripe, Centennial Management & KC Properties Construction, P.O. Box 15142, Shawnee Mission, KS 66285

Unionville Municipal Gas System, Attn: Mayor of Unionville, P.O. Box 255, 1611 Grant Street, Unionville, MO 63565

Waynesville Municipal Gas System, Attn: City Administrator, 100 Tremont Drive, Waynesville, MO 65583

Wheaton Municipal Gas System, Attn: Mayor of Wheaton, P.O. Box 70, 219 E. Main Street, Wheaton, MO 64874