

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

In the Matter of the Establishment of a Working)
Case for the Review and Consideration of) File No. GW-2021-0272
Amending the Commission's Natural Gas Safety)
Rules.)

AMEREN MISSOURI’S COMMENTS ON PARTS 2 AND 3

COMES NOW Union Electric Company d/b/a Ameren Missouri (“Company” or “Ameren Missouri”), and responds to the Missouri Public Service Commission's ("Commission") *Order Directing Additional Responses* effective March 22, 2021, which directs any natural gas providers to respond to questions posed in Attachment A and Attachment B to Staff's motion seeking additional comments for parts 2 and 3 of the docket ("Staff's Motion") on or before May 6, 2021. Ameren Missouri provides the following comments and answers to questions posed by Attachments A and B to Staff's Motion:

General Comments on Parts 2 and 3

1. As a preliminary matter, Ameren Missouri again appreciates the opportunity to provide these Comments and otherwise participate in this docket.

2. Part 2 of this docket and Attachment A to Staff's Motion relate to potential amendments to 20 CSR 4240-40.030(12)(S)1.B. Due to the COVID-19 pandemic, Staff sought and the Commission granted a temporary waiver of visual inspections of customer gas piping and connected equipment inside customers' homes in File No. GE-2020-0297. While Ameren Missouri provides detailed responses to the questions posed in Attachment A to Staff's Motion below, the Company wishes to express appreciation for Staff's thoughtful pursuit of the temporary waiver in File No. GE-2020-0297, and believes permanent amendments to 20 CSR 4240-40.030(12)(S)1.B. would be helpful beyond the pandemic circumstances to potentially improve coworker safety, security, and health.

3. Part 3 of this docket and Attachment B to Staff's Motion relate to the **very problematic** proposal for the Commission to consider requiring gas operators, like the Company, to make information regarding leaks publicly available. Ameren Missouri provides detailed responses to the questions posed in Attachment B to Staff's Motion below, but wishes to explain its general approach to providing natural gas system information publicly. Federal pipeline safety regulations (49 C.F.R. §192.616) incorporate the American Petroleum Institute's Recommended Practice 1162 and require pipeline operators, like Ameren Missouri, to develop and implement public awareness programs. Ameren Missouri has a robust public awareness program in place and is focused on safety for our customers, communities, and coworkers. As part of public outreach, Ameren Missouri works to make the natural gas pipeline system as safe as possible by sharing critical safety information with those who live or work near pipelines, and conducts safety education for emergency responders, contractors, customers, and children. Some helpful information regarding Ameren Missouri's focus on natural gas safety can be found at <https://www.ameren.com/company/safety/natural-gas-safety>. Thus, Ameren Missouri absolutely supports public awareness of its system that further safety goals. The proposal for the Commission to consider requiring gas operators to make information regarding leaks publicly available is contrary to such safety goals, and accordingly, the Company strongly opposes the proposal.

Attachment A to Staff's Motion

Ameren Missouri's Responses in Blue Font

Questions Related to Revision of (12)(S)1.B.

Responding Operator: **Ameren Missouri**

Name of Person Responding: **Pam Harrison**

Contact Information: **AmerenMOService@ameren.com**

A. General Questions:

1. Did your City/Company make use of this waiver at any time during the pandemic? **Yes**

- a. Approximately how many times have you made use of the waiver? For three customers' homes in Ameren Missouri's service territory
- b. Please explain any negative consequences that you are aware of as a result of making use of the waiver. The following two points may be viewed as negative consequences: 1) the return trips to the locations increase operations and maintenance costs; and 2) a special process for tracking the locations and return trips had to be developed, and field workers had to be trained on the special process.

2. Do you foresee any future need to seek relief from the requirements of 20 CSR 4240-40.030(12)(S)1.B. going forward? Yes.

- a. Please explain. Beyond the current pandemic circumstances, Ameren Missouri gas operations believes amendments to the Rule could improve coworker safety, security, and health in certain circumstances. For example, if a customer threatened a coworker with a weapon upon entering the customer's home, the Company believes that amendments to the Rule that allowed for documented alternative evaluations in the future would improve coworker safety and security. In addition, sometimes the customer gas piping and connected equipment inside customers' homes can only be inspected by entering into unsanitary and unsafe crawlspaces, basements, buildings, etc. The Company believes amendments to the Rule allowing for documented alternative evaluations for such limited circumstances could also improve coworker safety and health.

3. Do you have any additional comments related to the requirements of 20 CSR 4240-40.030(12)(S)1.B.? Yes. During the pandemic, Ameren Missouri's essential natural gas field workers have risen to the challenge of continuing to work in the field, taking necessary health/safety precautions, and delivering safe and reliable service to our customers. The temporary waiver granted by the Commission provided comfort to coworkers who did not want to have negative interactions with customers who were concerned about COVID-19.

B. Specific Questions

A possible amendment to the requirement of 20 CSR 4240-40.030(12)(S)1.B. would be to extend the existing exemption to large commercial or industrial customers....

1. Would you be in support of, or opposed to such an amendment to 20 CSR 4240-40.030(12)(S)1.B.? Ameren Missouri is not opposed to such an amendment to the Rule.

- a. Please explain why you would be in favor of, or opposed. Although Ameren Missouri gas operations has not observed any non-residential customers denying access for inspection, Ameren Missouri understands offering a similar exemption to non-residential customers and believes it could similarly promote coworker safety, security, and health as described in response to Question 2a above.

2. Would you suggest any additional conditions be added to provide an exemption for residential or small commercial customers? No.

3. Please provide information on the fiscal impact an amendment to 20 CSR 4240-40.030(12)(S)1.B. would have on the operations of your City/Company. **The Company anticipates that the fiscal impact would be relatively small and less than \$50,000.**

Attachment B to Staff's Motion

Ameren Missouri's Responses in Blue Font

Questions for Gas Operators – Public Leak Data

Responding Operator: **Ameren Missouri**

Name of Person Responding: **Pam Harrison**

Contact Information: **AmerenMOService@ameren.com**

1. Do you currently make information on active leak indications available to the public? **Yes, Ameren Missouri makes limited leak information available to the public.**

- a. If “no”, please continue to Question 2.
- b. If “yes”, please provide input on the following:

- i. Please provide a description of what information is made public, and provide a recent example. **Through required PHMSA reporting — specifically, PHMSA form Annual Report 7100, Part C — the Company annually provides the number of hazardous versus non-hazardous leaks by cause. The Company's 2020 Annual Report to PHMSA is attached as Exhibit 1 to these Comments. In addition, information on the number of active leaks by class, material, and cause is submitted to the Commission's pipeline safety program ("PSP") annually via email. The Company's 2020 Annual Report to the Commission PSP is attached as Exhibit 2 to these Comments.**

- ii. Please explain how the information is provided (e.g., website, mailings, on request). **The information is provided via annual reporting forms for PHMSA and the Commission PSP.**

- iii. Please explain how frequently the information is updated. **Annually**

2. Do you currently make information on repaired leaks publically available? **Yes, Ameren Missouri makes limited information on repaired leaks publically available.**

- a. If “no”, please continue to Question 3.
- b. If “yes”, please provide input on the following:

- i. Please provide a description of what information is made public, and provide a recent example. **Please refer to the Company's response to Question 1(b)i above.**

- ii. Please explain how the information is provided (e.g., website, mailings, on

request). Please refer to the Company's response to Question 1(b)ii above.

iii. Please explain how frequently the information is updated. Please refer to the Company's response to Question 1(b)iii above.

iv. Please explain how long the information is retained following the repair date of the leak. The repair information is retained for the life of the facility.

3. If a member of the public contacts you and requests information on active or repaired leaks near a specific location, what information, if any, do you currently provide? If a member of the public and/or customer contacts the Company with an "odor complaint," which is where they say they smell gas or believe gas may be escaping, the Company will provide information to the customer or person after the Company completes its on-site evaluation, such as: what was found as the cause of the odor smell (i.e., leak or not a leak), and if the leak is on Ameren Missouri facilities, the estimated timeframe for repair. If there is an "incident" as that term is defined in 49 C.F.R. §191.3, incident notification and reporting is required to PHMSA and/or the Commission PSP.

4. What are your current capabilities to make active leak indications publically available? The Company does not currently have capabilities to make such information publically available, and believes that to do so could significantly undermine safety.

a. Please explain your current process for tracking active leak indications. All leak investigations, active leaks, and associated work are tracked and recorded in the Company's Gas Compliance System (Maximo) with a spatial location provided. Maximo is configured to automatically generate leak surveillances and repairs with accurate compliance dates based on the leak classification.

b. Please explain to what extent active leak indications data is input into an electronic database. All active leaks and associated work (surveillance and repairs) are housed electronically in the Company's Maximo system.

c. Please explain to what extent active leak indications are digitized into mapping, or other systems that visually indicate geographic locations. Active leaks have a spatial location assigned in Maximo, and are available to view in Maximo's map viewer. The leak data is replicated nightly to GIS, and is available to view the next day in Ameren Missouri's GIS. Access to the Company's GIS is limited to Ameren Missouri employees and requires employee credentials.

5. What are your current capabilities to make information on repaired leaks publicly available? The Company does not currently have capabilities to make such information publically available other than the information provided publicly via PHMSA and Commission PSP annual reporting as described in response to Question 2 above.

a. Please explain your current process for tracking repaired leaks. Please refer to the Company's response to Question 4 above.

b. Please explain to what extent leak repair data is input into an electronic database. Please refer to the Company's response to Question 4 above.

c. Please explain to what extent leak repairs are digitized into mapping, or other systems that visually indicate geographic locations. Please refer to the Company's response to Question 4 above.

6. Please describe any benefits you see to making active or repaired leak information publically available. None. In fact, as explained in response to Question 7 below, Ameren Missouri is concerned that making such information could significantly undermine safety.

7. Please describe any concerns you have regarding making active or repaired leak information publically available. Overall, Ameren Missouri sees this as opposite to promoting natural gas safety. To publicly identify critical infrastructure that may be especially vulnerable (leaking or repaired leak) would create a roadmap for those looking to sabotage critical infrastructure and/or customers served nearby, and runs absolutely counter to principles for protection of critical infrastructure. Furthermore, Ameren Missouri is deeply concerned that a publicly available active leak map may provide a false sense of security to the public, and inhibit timely odorant complaint reporting and follow-up Company on-site investigations. Consider a not unlikely scenario where a customer smells gas and would access a map with active leak information on it, the customer sees an active leak near their home, and disregards the smell and does not call in an odor complaint to Ameren Missouri, assuming that the source of the smell is the nearby leak. This scenario completely undermines public outreach efforts (call Ameren Missouri if you smell odorant), and thwarts the Company from being contacted to respond and perform an on-site investigation to verify conditions have not changed. Of particular concern to Ameren Missouri's regard to public safety are: a new or different hazardous leak may be present, an existing leak may have worsened, or other conditions may have changed with an existing leak causing gas to migrate creating a hazardous situation. Moreover, it is unclear how often the information could be, or would be required to be, updated. The cost and administrative burden of keeping such leak information updated could be significant.

8. If the Commission were to require that active or repaired leak information be made publically available, how often would you be able to update that information for the gas system(s) you operate? The Company is currently not equipped to provide this information publicly, and as stated above, believes the provision of such information would compromise safety. If, in spite of those concerns, the Commission requires the Company to provide such information publicly, the Company will endeavor to comply with the rules developed by the Commission.

Respectfully submitted,

/s/ Jermaine Grubbs
Jermaine Grubbs, #68970
Corporate Counsel
Ameren Missouri

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St. Louis, MO 63166-6149
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AmerenMissouriService@ameren.com

ATTORNEY FOR UNION ELECTRIC
COMPANY d/b/a AMEREN MISSOURI

Dated: May 6, 2021

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been emailed to the parties of record on this 6th day of May, 2021.

/s/ Jermaine Grubbs
Jermaine Grubbs

NOTICE: This report is required by 49 CFR Part 191. Failure to report can result in a civil penalty not to exceed 100,000 for each violation for each day that such violation persists except that the maximum civil penalty shall not exceed \$1,000,000 as provided in 49 USC 60122.

OMB NO: 2137-0629
EXPIRATION DATE: 10/31/2021



U.S Department of Transportation
Pipeline and Hazardous Materials Safety Administration

Initial Date Submitted:

03/11/2021

Form Type:

INITIAL

Date Submitted:

ANNUAL REPORT FOR CALENDAR YEAR 2020 GAS DISTRIBUTION SYSTEM

A federal agency may not conduct or sponsor, and a person is not required to respond to, nor shall a person be subject to a penalty for failure to comply with a collection of information subject to the requirements of the Paperwork Reduction Act unless that collection of information displays a current valid OMB Control Number. The OMB Control Number for this information collection is 2137-0629. Public reporting for this collection of information is estimated to be approximately 16 hours per response, including the time for reviewing instructions, gathering the data needed, and completing and reviewing the collection of information. All responses to this collection of information are mandatory. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to: Information Collection Clearance Officer, PHMSA, Office of Pipeline Safety (PHP-30) 1200 New Jersey Avenue, SE, Washington, D.C. 20590.

Important: Please read the separate instructions for completing this form before you begin. They clarify the information requested and provide specific examples. If you do not have a copy of the instructions, you can obtain one from the PHMSA Pipeline Safety Community Web Page at <http://www.phmsa.dot.gov/pipeline/library/forms>.

PART A - OPERATOR INFORMATION

(DOT use only)

20210955-42381

1. Name of Operator	AMERENUE
2. LOCATION OF OFFICE (WHERE ADDITIONAL INFORMATION MAY BE OBTAINED)	
2a. Street Address	1901 CHATEAU AVE
2b. City and County	ST LOUIS
2c. State	MO
2d. Zip Code	63103
3. OPERATOR'S 5 DIGIT IDENTIFICATION NUMBER	20050
4. HEADQUARTERS NAME & ADDRESS	
4a. Street Address	1901 CHOUTEAU
4b. City and County	SAINT LOUIS
4c. State	MO
4d. Zip Code	63103
5. STATE IN WHICH SYSTEM OPERATES	MO
6. THIS REPORT PERTAINS TO THE FOLLOWING COMMODITY GROUP (Select Commodity Group based on the predominant gas carried and complete the report for that Commodity Group. File a separate report for each Commodity Group included in this OPID.)	
Natural Gas	
7. THIS REPORT PERTAINS TO THE FOLLOWING TYPE OF OPERATOR (Select Type of Operator based on the structure of the company included in this OPID for which this report is being submitted.):	
Investor Owned	

PART B - SYSTEM DESCRIPTION

1.GENERAL

	STEEL				PLASTIC	CAST/ WROUGHT IRON	DUCTILE IRON	COPPER	OTHER	RECONDITION ED CAST IRON	SYSTEM TOTAL
	UNPROTECTED		CATHODICALLY PROTECTED								
	BARE	COATED	BARE	COATED							
MILES OF MAIN			813.71	2598.35	0	0	0	0	0	3412.06	
NO. OF SERVICES			7473	135563	0	0	0	0	0	143036	

2.MILES OF MAINS IN SYSTEM AT END OF YEAR												
MATERIAL	UNKNOWN	2" OR LESS	OVER 2" THRU 4"	OVER 4" THRU 8"	OVER 8" THRU 12"	OVER 12"	SYSTEM TOTALS					
STEEL	0	233.17	344.96	185.14	50.44	0	813.71					
DUCTILE IRON	0	0	0	0	0	0	0					
COPPER	0	0	0	0	0	0	0					
CAST/WROUGHT IRON	0	0	0	0	0	0	0					
PLASTIC PVC	0	0	0	0	0	0	0					
PLASTIC PE	0	1709.23	542.94	344.32	1.86	0	2598.35					
PLASTIC ABS	0	0	0	0	0	0	0					
PLASTIC OTHER	0	0	0	0	0	0	0					
OTHER	0	0	0	0	0	0	0					
RECONDITIONED CAST IRON	0	0	0	0	0	0	0					
TOTAL	0	1942.4	887.9	529.46	52.3	0	3412.06					
Describe Other Material:												
3.NUMBER OF SERVICES IN SYSTEM AT END OF YEAR												
											AVERAGE SERVICE LENGTH: 90	
MATERIAL	UNKNOWN	1" OR LESS	OVER 1" THRU 2"	OVER 2" THRU 4"	OVER 4" THRU 8"	OVER 8"	SYSTEM TOTALS					
STEEL	0	5329	2111	33	0	0	7473					
DUCTILE IRON	0	0	0	0	0	0	0					
COPPER	0	0	0	0	0	0	0					
CAST/WROUGHT IRON	0	0	0	0	0	0	0					
PLASTIC PVC	0	0	0	0	0	0	0					
PLASTIC PE	0	131622	3863	70	8	0	135563					
PLASTIC ABS	0	0	0	0	0	0	0					
PLASTIC OTHER	0	0	0	0	0	0	0					
OTHER	0	0	0	0	0	0	0					
RECONDITIONED CAST IRON	0	0	0	0	0	0	0					
TOTAL	0	136951	5974	103	8	0	143036					
Describe Other Material:												
4.MILES OF MAIN AND NUMBER OF SERVICES BY DECADE OF INSTALLATION												
	UNKNOWN	PRE-1940	1940-1949	1950-1959	1960-1969	1970-1979	1980-1989	1990-1999	2000-2009	2010-2019	2020-2029	TOTAL

MILES OF MAIN	0	0	2.06	79.91	663.73	157.85	353.41	738.00	995.78	377.32	44.00	3412.06
NUMBER OF SERVICES	0	0	0	0	3452	7588	29623	46694	35470	18127	2082	143036

PART C - TOTAL LEAKS AND HAZARDOUS LEAKS ELIMINATED/REPAIRED DURING THE YEAR

CAUSE OF LEAK	MAINS		SERVICES	
	TOTAL	HAZARDOUS	TOTAL	HAZARDOUS
CORROSION FAILURE	2	0	14	5
NATURAL FORCE DAMAGE	12	5	29	10
EXCAVATION DAMAGE	77	72	244	234
OTHER OUTSIDE FORCE DAMAGE	2	0	33	28
PIPE, WELD OR JOINT FAILURE	16	4	65	6
EQUIPMENT FAILURE	15	1	43	8
INCORRECT OPERATIONS	0	0	4	0
OTHER CAUSE	6	0	6	0

NUMBER OF KNOWN SYSTEM LEAKS AT END OF YEAR SCHEDULED FOR REPAIR : 106

PART D - EXCAVATION DAMAGE

1. TOTAL NUMBER OF EXCAVATION DAMAGES BY APPARENT ROOT CAUSE: 332

a. One-Call Notification Practices Not Sufficient: 47

b. Locating Practices Not Sufficient: 58

c. Excavation Practices Not Sufficient: 155

d. Other: 72

2. NUMBER OF EXCAVATION TICKETS : 73739

PART E - EXCESS FLOW VALUE (EFV) AND SERVICE VALVE DATA

Total Number Of Services with EFV Installed During Year: 2322

Estimated Number Of Services with EFV In the System At End Of Year: 17324

* Total Number of Manual Service Line Shut-off Valves Installed During Year: 33

* Estimated Number of Services with Manual Service Line Shut-off Valves Installed in the System at End of Year: 574

**These questions were added to the report in 2017.*

PART F - LEAKS ON FEDERAL LAND

TOTAL NUMBER OF LEAKS ON FEDERAL LAND REPAIRED OR SCHEDULED TO REPAIR: 0

PART G-PERCENT OF UNACCOUNTED FOR GAS

UNACCOUNTED FOR GAS AS A PERCENT OF TOTAL CONSUMPTION FOR THE 12 MONTHS ENDING JUNE 30 OF THE REPORTING YEAR.

[(PURCHASED GAS + PRODUCED GAS) MINUS (CUSTOMER USE + COMPANY USE + APPROPRIATE ADJUSTMENTS)] DIVIDED BY (CUSTOMER USE + COMPANY USE + APPROPRIATE ADJUSTMENTS) TIMES 100 EQUALS PERCENT UNACCOUNTED FOR.

FOR YEAR ENDING 6/30: 3.19%

PART H - ADDITIONAL INFORMATION

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PART I - PREPARER

Preeti Ram, Compliance Specialist (Preparer's Name and Title)	(573)876-3023 _____ (Area Code and Telephone Number)
pram@ameren.com (Preparer's email address)	_____ (Area Code and Facsimile Number)



Missouri Gas Safety Annual Report 20__

1. Operator Information											
Name of Operator					Ameren Missouri					Date	3/1/2020
Prepared By					Preeti Ram					Phone Number	573-202-0465
2. Total number of all odor calls					3. Average response time for odor calls in minutes						
Inside		Outside			Inside		Outside				
2325		1739			25.5		25.6				
4. Inside odor call responses that exceeded one hour (attach additional sheets as necessary) -- Total:											
Date	Address/City		Time Received	Time Dispatched	Time Arrived	Response Time	Explanation				
	See attached.										
5. Outside odor call responses that exceeded two hours (attach additional sheets as necessary) -- Total:											
Date	Address/City		Time Received	Time Dispatched	Time Arrived	Response Time	Explanation				
	See attached.										
6. Number of active leaks at the beginning of calendar year					7. Number of active leaks at the end of calendar year					10. Number of active public reported leaks at end of calendar year	
Class 1	Class 2	Class 3	Class 4	Total	Class 1	Class 2	Class 3	Class 4	Total		
0	1	192	0	193	0	0	85	0	85		
8. Number of new leaks found during calendar year					9. Number of leaks repaired during calendar year (By Class)					Total	
Class 1	Class 2	Class 3	Class 4	Total	Class 1	Class 2	Class 3	Class 4	Total	64	
373	34	200	0	607	375	32	237	0	644		
11. Number of underground leaks repaired during calendar year (By Material - Do not include Excavation or Other Outside Force)										*12. All above ground leaks	
Unprotected Steel	Bare CP Steel	Coated CP Steel	Ductile Iron	Cast Iron	Copper	PE	PVC	Total	Total		
0	0	68	0	0		132	0	200			
13. Number of underground leaks repaired during calendar year (By Cause)											
Corrosion	Natural Forces	Excavation	Other Outside Force Damage	Materials or Welds	Equipment	Operations	Other	Total			
9	39	321	6	83	53	6	12	529			
14. Number of excavation notifications received											
Through Missouri One Call			Direct to Operator			Does operator utilize a contractor for locating?					
15. Classification of third-party excavation damages											
a. Total number of third-party excavation damages								332			
b. Number of third-party excavation damages when excavator did not provide notification to MO One Call								47			
c. Number of third-party excavation damages when MO One Call was notified, but no locate marking was provided								0			
*1. Number of these notifications that were indicated by the excavator to involve an "emergency"								DO NOT TRACK			
*2. Number of "emergency" notifications that the pipeline operator does not agree was an "emergency"								DO NOT TRACK			
d. Number of third-party excavation damages when the locate markings were within the "approximate location"								122			
e. Number of third-party excavation damages when the locate markings were not within the "approximate location"								73			
f. Number of third-party excavation damages when the locate markings were lost or destroyed								18			

*Optional