

MEMORANDUM

TO: Judy Fritsch
Records Department

FROM: John Kottwitz *JK* *ML*
Energy Department - Gas Safety *for*

SUBJECT: Request to Place a Replacement Program Update in Case No. GO-91-239

DATE: October 19, 1994

An updated replacement program for unprotected steel mains submitted by Laclede Gas Company is attached to this memorandum. This update is provided for in the original program that was approved in Case No. GO-91-239. Please place this updated program in Case No. GO-91-239.

Attachment

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8.

**LACLEDE GAS COMPANY
REVISED REPLACEMENT PROGRAM SCHEDULE FOR
UNPROTECTED STEEL MAINS ("REPLACEMENT PROGRAM")
PURSUANT TO 4 CSR 240-40.030(15)(E)
Case No. GO-91-239**

At the time of the filing of its Replacement Program pursuant to 4 CSR 240-40.030, Section (15)(f), the quantity of unprotected steel mains in the Laclede system which was: (1) located beneath pavement which is continuous to building walls (Section (15)(E) 1); and (2) near concentrations of the general public (Section (15)(E) 2), was not known.

The Company has subsequently determined that approximately 6,500 feet of high pressure unprotected steel mains are located beneath pavement which is continuous to building walls, and approximately 11,500 feet of high pressure unprotected steel mains are located near concentrations of the general public. Laclede proposes to revise its Replacement Program schedule for unprotected steel mains to replace all mains in Section (15)(E) 1 and 2 categories at an average annual rate of 1800 feet per year (10% of the aggregate 18,000 feet of main) beginning with the 1995 fiscal year. Priority will be given to replacing those main segments exhibiting any history of maintenance requirements.

As previously noted, unprotected steel mains in areas of construction activity (Section (15)(E) 3), and areas of civic improvement (Section (15)(E) 4), have been replaced routinely in the past and the program will be continued in the future. The Company is not aware of any unprotected steel mains which are subject to stray currents (Section (15)(E) 6). However, mains in this category will exhibit a leak history and therefore be replaced as required by Section (15)(E) 5.

During the first five (5) years (Fiscal years 1991-1995) of the Replacement Program, Laclede committed to the replacement of 30,000 feet per year applicable to all categories of unprotected steel main except categories (15)(E) 1 and (15)(E) 2. The Company's long established experience with replacement of unprotected steel mains indicates that most areas of active corrosion have been eliminated and the average corrosion rate continues to decline. Accordingly, replacements in these categories should continue, but can safely be done at a lower rate. Laclede proposed to revise its Replacement Program in the future to replace unprotected steel mains in all categories other than Sections (15)(E) 1 and 2 at an average annual rate set out in the following schedule.

<u>Fiscal Year</u>	<u>Footage Replaced</u>
1996	20,000
1997	20,000
1998	20,000

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Laclede further proposed that Laclede's entire Replacement Program criteria be re-examined prior to its fiscal year 1979 with the objective being to evaluate whether the emphasis on replacement of unprotected steel mains in categories (15)(E) 1 and (15)(E) 2 should be accelerated.