



Bringing Power Home.

May 14, 2007

FILED³

MAY 17 2007

Missouri Public
Service Commission

Colleen M. Dale, Secretary
Missouri Public Service Commission
Governor Office Building
200 Madison St.
Jefferson City, MO 65102-0360

RE: *In the Matter of City Utilities of Springfield, Missouri*
Case No. GS-2004-0257


Dear Ms. Dale:

Please find enclosed for filing in the above case an original and eight copies of City Utilities of Springfield's Response to PSC Staff Reply filed May 10, 2007.

Thank you for your attention to this matter.

Sincerely,

CITY UTILITIES OF SPRINGFIELD, MO

By: 
Lisa Tanner, PP, PLS
Paralegal
Legal Department

cc: Missouri Office of the Public Counsel
Lera L. Shemwell, Deputy General Counsel—PSC
Leonard Phillips, MGR.—Natural Gas Distribution

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

FILED³

MAY 17 2007

In the Matter of an Investigation into)
City Utilities of Springfield Plastic)
Pipe Failures and the Adequacy of its)
Leak Survey Procedures, Installation)
Procedures, and Replacement Criteria)

Case No. GS-2004-0257

Missouri Public
Service Commission

**CITY UTILITIES OF SPRINGFIELD'S RESPONSE
TO PSC STAFF REPLY FILED MAY 10, 2007**

Comes now City Utilities of Springfield, Missouri ("City Utilities"), a municipally-owned utility, and makes the following responses to the recommendations of the Public Service Commission ("PSC") Staff contained in its May 10, 2007, Reply to Response of City Utilities of Springfield, Missouri:

General Comments

City Utilities would like to clarify two statements of facts contained in the PSC Staff's Reply. On the first page of Attachment A, it refers to "the natural gas leak and ignition at 3050 N. Kentwood on July 10, 2003." Although there was a rock impingement of City Utilities' plastic gas pipeline and a resultant leak, the leak did not result in ignition. According to City Utilities' investigation, the ignition was the result of leaks in the internal piping of the building at 3050 N. Kentwood and was unrelated to the leak on City Utilities' pipeline.

Also, page two of the Reply, it states that "in the last 8 months (July 2006-February 2007) there have been 30 leaks on plastic piping." However, the correct number for that time period is 26.

Responses to PSC Staff Modified Recommendations

City Utilities does not object to the modified recommendations of PSC Staff contained in its Reply filed on May 10, 2007, with two exceptions. City Utilities has voluntarily replaced

pipe that it was not required to replace by the Commission's previous orders. On page 4 of its Reply, the PSC Staff states that it "fully expects" that this voluntary replacement would continue at the same rate (50% more than is required). Under the accelerated program as proposed by the PSC Staff, City Utilities will not be able to continue voluntary pipe replacements at the same rate.

On page 5 of the Reply, the PSC Staff recommends that, in addition to the submission of semi-annual reports to the PSC Staff, City Utilities provide the PSC Staff with "brief monthly updates indicating the number of rock impingement leaks found and replacements made during the month." City Utilities requests that such additional reports be quarterly, instead of monthly.

WHEREFORE, for the reasons stated above, City Utilities of Springfield, Missouri respectfully requests the Commission adopt the modified recommendations of the PSC Staff contained in its Reply filed with the Commission on May 10, 2007, with the exception that the additional reports on the number of rock impingement leaks and replacements be quarterly, instead of monthly.

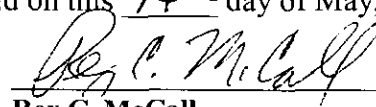
Respectfully submitted,



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ATTORNEY FOR CITY UTILITIES
OF SPRINGFIELD, MISSOURI

CERTIFICATE OF SERVICE

I certify that I served the foregoing document on the Missouri Office of the Public Counsel, Governor Office Bldg., Suite 650, P.O. Box 7800, Jefferson City, MO 65102, by overnight mail, and Lera L. Shemwell, Deputy General Counsel for the Staff of the Public Service Commission, P.O. Box 360, Jefferson City, MO 65102, by mailing a copy of the same in the U.S. Post Office, first-class mail, postage prepaid on this 14th day of May, 2007.


Rex C. McCall