

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

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**

**STAFF'S STATUS REPORT REGARDING  
CITY UTILITIES OF SPRINGFIELD'S  
PLASTIC PIPE REPLACEMENT PROGRAM**

**COMES NOW** the Staff of the Missouri Public Service Commission (Staff) by and through counsel, and files its report detailing City Utilities' progress replacing plastic pipe that is subject to damage from rock impingement. Staff recommends City Utilities continue the current replacement program and leak survey schedule. In support, Staff states:

1. Attached is Staff's Status Report in which it discusses City Utilities progress monitoring leaks on and replacing plastic pipe which may fail as a result of rock fill being used when the pipe was installed.

2. City Utilities continues focusing its efforts on replacing plastic pipe that has experienced or could have failures due to rock impingement.

3. This attached status report discusses Staff's on-going monitoring and evaluation of City Utilities' efforts.

4. Staff's involvement in this particular program began in 2004. The recommendations contained in Staff's June 16, 2004 Report, the augmented recommendations contained in the Staff's October 2007 Report, and the May 18, 2011 Joint Recommendations, have been implemented into City Utilities' gas safety program, and are the foundation of City Utilities' continuing plastic pipe replacement program. All of these recommendations must be considered together in order to achieve the

purpose of the replacement program, which is protection of public safety, and each, therefore, complement the other.

5. Staff has been and will continue to monitor the effectiveness of City Utilities' plastic main and service line replacement program and leak surveys.

6. If at any time, Staff determines that the program requirements should be enhanced, it will immediately bring its concerns and recommendations to the Commission. Staff will file another Status Report on or before July 31, 2013.

**WHEREFORE**, Staff requests the Commission accept Staff's Report and Order Staff to file another Status Report on or before July 31, 2013.

Respectfully submitted,

**/s/ Lera L. Shemwell**

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**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all counsel of record this 23rd day of July, 2012.

**/s/ Lera L. Shemwell**