

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

In the Matter of the Application of Roeslein     )  
Alternative Energy Services, LLC for a         )  
Permanent Waiver From Certain Provisions     )  
of 20 CSR 4240-40.030                             )  
**File No. GE-2020-0238**

**RESPONSE OF RAES TO STAFF RECOMMENDATION**

**COMES NOW** Roeslein Alternative Energy Services, LLC (“RAES” or “Company”), by and through the undersigned counsel, and for its response to the *Staff Recommendation* respectfully states to the Missouri Public Service Commission (“Commission”) as follows:

1. On February 6, 2020, RAES filed its *Application for Waivers* with the Commission. On February 10, 2020, RAES filed its *First Amended Application for Waivers* (“*Application*”) to correct the abbreviation used for RAES throughout the *Application*.

2. The *Application* requests the Commission grant RAES a waiver from Commission regulation 20 CSR 4240-40.030(12)(P) requiring natural gas in a transmission line to be odorized. RAES has constructed an intrastate transmission line to transport renewable natural gas generated at a hog finishing farm in Mercer County, Missouri, to an injection point on the interstate ANR Pipeline, also in Mercer County, Missouri. The renewable natural gas is refined from biogases collected in the existing lagoons on the farm and will be transported on the transmission line to the injection point on the ANR Pipeline. The *Application* requests the Commission grant RAES a waiver from the odorization requirement because ADR’s FERC tariff prohibits the injection of odorized gas into the pipeline system.

3. On April 7, 2020, Staff filed its *Staff Recommendation and Memorandum* in this case. Staff recommends the Commission approve RAES' waiver request subject to four (4) conditions:

1. RAES may not serve any Missouri customers from this pipeline without prior Commission approval;
2. RAES shall conduct leakage surveys and patrols along the entire length of the pipeline at intervals not exceeding four and one-half (4½) months, but at least four (4) times per calendar year;
3. RAES shall conduct a class location study of the RAES transmission pipeline annually, notifying Commission Staff of any class location changes within 30 days of discovery;
4. Whenever RAES is made aware (through notification by Missouri One Call, or other source) that its pipeline lies within the area described in the notice of excavation, or is within two (2) feet of such area, in addition to following the requirements of RSMo Chapter 319 to locate its line, RAES will have personnel onsite monitoring for damages to its pipeline during excavation work.

*Staff Memorandum*, p. 10.


4. Also, on April 7, 2020, the Commission issued its *Order Directing Responses to Staff Recommendation* ("Order"), directing parties to file any response to the *Staff Recommendation* no later than May 1, 2020. RAES filing of this response is in compliance with the Commission's *Order*.

5. RAES has reviewed the *Staff Recommendation and Memorandum* and states that it has no objection to the Commission approving the permanent waiver requested in the *Application* subject to the four (4) conditions requested by Staff and set forth above.

**WHEREFORE**, RAES respectfully requests the Commission issue an Order approving the *Application* and waiver from the requirements of Commission Rule 20

CSR 4240-40.030(12)(P) as requested therein, subject to the four (4) conditions requested by Staff; and for such other relief as the Commission deems just and proper.

Respectfully submitted,



---

Dean L. Cooper Mo. Bar 36592  
BRYDON, SWEARENGEN & ENGLAND P.C.  
312 East Capitol Avenue  
P.O. Box 456  
Jefferson City, MO 65102-0456  
Telephone: (573) 635-7166  
[dcooper@brydonlaw.com](mailto:dcooper@brydonlaw.com)

ATTORNEYS FOR ROESLEIN  
ALTERNATIVE ENERGY SERVICES, LLC

### **CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail to the following counsel this 9<sup>th</sup> day of April, 2020:

Staff Counsel Department  
[staffcounsel@psc.mo.gov](mailto:staffcounsel@psc.mo.gov)

Office of the Public Counsel  
[opc@opc.mo.gov](mailto:opc@opc.mo.gov)

[jamie.myers@psc.mo.gov](mailto:jamie.myers@psc.mo.gov)



---

Dean L. Cooper