

**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	)	Case No. GS-2004-0257
Survey Procedures, Installation	)	
Procedures and Replacement Criteria	)	

**STAFF'S RESPONSE TO THE**

**COMMISSION'S ORDER TO FILE STATUS REPORT**

**COMES NOW** the Staff of the Missouri Public Service Commission (Staff) and in response to the Commission's October 22, 2004 Order Directing Filing of a Status Report states:

1. On December 30, 2003, the Missouri Public Service Commission (Commission) issued its Order Establishing Case No. GS-2004-0257 (Order) for the purpose of conducting an investigation into the plastic mains and service lines used by City Utilities of Springfield (City Utilities).

2. In its Order, the Commission directed Staff to file a report in Case No. GS-2004-0257 by June 16, 2004.

3. On June 16, 2004, Staff filed its report in Case No. GS-2004-0257, which summarized Staff's investigation into City Utilities' plastic mains and service lines. The report contained Staff's recommendations and requested that the Commission issue an order directing City Utilities to file, within 60 days of the filing of Staff's report, a response regarding the recommendations contained in the report.

4. On August 16, 2004, City Utilities filed its response to the Staff's recommendations that were filed on June 16, 2004.

5. On September 10, 2004, the Commission directed Staff to file a Status Report no later than October 12, 2004, on the ongoing nature of the monitoring, evaluation, and replacement of plastic pipe in the City Utilities' system.

6. On October 12, 2004, the Staff filed its Status Report, on the ongoing nature of the monitoring, evaluation, and replacement of plastic pipe in the City Utilities' system. In its report, Staff proposed filing another status report on June 16, 2005.

7. On October 22, 2004, the Commission directed Staff to file another status report no later than June 16, 2005.

8. On June 16, 2005, the Staff filed its Status Report, on the ongoing nature of the monitoring, evaluation, and replacement of plastic pipe in the City Utilities' system. In its report, Staff proposed filing another status report summer of 2006.

9. On February 2, 2006, the Commission issued an ORDER ADOPTING STAFF'S RECOMMENDATIONS in which the Commission adopted the recommendations in Staff's June 16, 2004 report and ordered City Utilities of Springfield to comply with the recommendations as set out in Staff's June 16, 2004 report. Furthermore, the Commission ordered Staff to file a Status Report no later than June 30, 2006, on the ongoing nature of the monitoring, evaluation, and replacement of plastic pipe in the City Utilities' system.

10. On June 27, 2006, the Staff filed its Status Report, on the ongoing nature of the monitoring, evaluation, and replacement of plastic pipe in the City Utilities' system. In its report, Staff proposed that the filing date for the annual Status Report be changed to February/March of each year in order to allow the reporting of data for the calendar year verses the reporting of data from the last half of one year and first half of the next year.

11. On August 29, 2006, the Commission issued an ORDER ACCEPTING STAFF'S REPORT, DIRECTING COMPLIANCE, AND DIRECTING STAFF TO FILE STATUS REPORT in which the Commission ordered City Utilities to continue to follow Staff's recommendations as previously directed and to conduct a leak survey over all pre-1983 plastic piping operating at high pressure (60 psig) that is not currently annually leak surveyed. Furthermore, the Commission ordered Staff to file a Status Report no later than March 30, 2007,

on the ongoing nature of the monitoring, evaluation, and replacement of plastic pipe in the City Utilities' system.

12. Staff has completed a review and analysis of City Utilities' semi-annual reporting to Staff and submits its Status Report attached as Exhibit A. In this Status Report, the Staff has listed several enhancements to the current program for plastic piping. Furthermore, Staff may file an update report within 60 days of the date of this report to inform the Commission if additional enhancements should be made to the program. Staff also proposes to file the next update report during the first quarter of 2008 for calendar year 2007.

13. Staff recommends this case remain open to allow Staff to continue its investigation and to receive additional information from City Utilities.

**WHEREFORE**, Staff files this Status Report in response to the Commission's Order. The Staff requests that the Commission leave this case open to receive additional information from City Utilities and additional reports from Staff, and that the Commission permit Staff to adjust its filing schedule as noted above.

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, transmitted by facsimile or emailed to all counsel of record this 30<sup>th</sup> day of March 2007.

**/s/ Lera L. Shemwell**\_\_\_\_\_