

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

In the Matter of Union Electric Company d/b/a)
Ameren Missouri Concerning a Natural Gas)
Incident at 3404 Georgia Street in)
Louisiana, Missouri)

File No. GS-2016-0159

STAFF RECOMMENDATION

COMES NOW the Staff of the Missouri Public Service Commission and respectfully states as follows regarding its *Staff Recommendation*:

1. On February 3, 2022, the Commission issued an order in this matter directing Staff and Ameren Missouri to file, either jointly or separately, a pleading indicating whether additional quarterly reports should be required and what information those reports should contain.

2. As more fully discussed in the attached Staff Memorandum, labeled Appendix A, and incorporated herein, Staff and Ameren Missouri discussed the Commission's order and have reached an agreement on an annual reporting form and the substantive categories that Ameren Missouri will be reporting, which is attached and labeled as Appendix B.

3. Staff has also shared this filing with Ameren Missouri and Ameren Missouri consented to Staff representing to the Commission that Ameren Missouri is in agreement with the recommendations Staff states herein.

WHEREFORE, Staff submits this *Staff Recommendation* and respectfully requests that the Commission issue an order as set forth herein; and grant such other and further relief as is just in the circumstances.

Respectfully submitted,

/s/ Jamie S. Myers

Jamie S. Myers

Deputy Counsel

Missouri Bar No. 68291

Attorney for the Staff of the

Missouri Public Service Commission

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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 counsel of record this 28th day of February, 2022.

/s/ Jamie S. Myers

MEMORANDUM

TO: Missouri Public Service Commission Official Case File
Case No. GS-2016-0159, Union Electric Company d/b/a Ameren Missouri

FROM: John D. Kottwitz, Associate Engineer, Safety Engineering Department

/s/ John D. Kottwitz 02/28/2022 /s/ Jamie S. Myers 02/28/2022
Safety Engineering Department/ Date Staff Counsel Division / Date

SUBJECT: Staff Recommendation Regarding Commission Order Dated February 3, 2022

DATE: February 28, 2022

I. Background Information

On November 27, 2015, a natural gas fire occurred along the ground and side of the El Carnaval Restaurant building at 3404 Georgia Street in Louisiana, Missouri. Union Electric Company, d/b/a Ameren Missouri (Ameren Missouri) provided natural gas service to this restaurant. Staff investigated and filed a Gas Incident Report (Report) in this case on May 31, 2017. Staff made three recommendations to Ameren Missouri in the Report:

- Staff noted in the Report that the fire extinguisher provided to the Ameren Missouri service worker did not function at the time of the incident. Staff's first recommendation pertained to maintenance of fire extinguishers. Ameren Missouri has implemented this recommendation.
- Staff noted in the Report that the original service line installation record was missing and this caused difficulty locating the service line at a remote distance from the building fire, which resulted in a delay in Ameren Missouri stopping the gas flow to the natural gas fire. Staff's second recommendation pertained to determining the extent of missing service line records and information, and implementing a plan to gain this information going forward in Ameren Missouri's Distribution Integrity Management Program (DIMP).¹ Ameren Missouri's implementation of this recommendation is ongoing.
- Staff noted in the Report that the incident was likely caused by a separated compression coupling on the service line. Staff's third recommendation pertained to tracking and evaluating the relative risk of compression coupling failures in the Ameren Missouri DIMP². Ameren Missouri has implemented this recommendation.

¹ 20 CSR 4240-40.030(17) sets forth the requirements for gas distribution pipeline integrity management. 20 CSR 4240-40.030(17)(D)1.C. requires that the integrity management plan identify additional information needed and provide a plan for gaining that information over time through normal activities conducted on the pipeline.

² 20 CSR 4240-40.030(17)(D)2. requires operators to consider reasonably available information to identify existing and potential threats, including but not limited to incident and leak history. 20 CSR 4240-40.030(17)(D)3. requires operators to evaluate and rank risk considering each applicable current and potential threat.

Ameren Missouri was ordered to file quarterly reports in this case regarding its progress in addressing Staff's second recommendation regarding missing service line records and information. Ameren Missouri has filed quarterly reports with the most recent filed on December 20, 2021. The quarterly filings have reported Ameren Missouri's progress in determining the extent of missing service line information and plans for further actions. A large number of service line records were found to be missing and a large number of existing service line records were missing important information, such as measurements for the service line location. Ameren Missouri developed a service card remediation plan as part of Ameren Missouri's DIMP and provided a copy to Staff.

On February 3, 2022, the Commission issued an Order stating:

No later than February 28, 2022, Staff and Ameren Missouri shall, jointly or separately, file a pleading indicating whether additional quarterly reports should be required and what information those reports should contain.

II. Staff Response

Staff has discussed the Commission's pending Order with Ameren Missouri personnel. Staff and Ameren Missouri personnel reviewed the service card remediation plan and the three categories of missing service line information that are being tracked by Ameren Missouri. The three categories include service lines with no installation record, service line records with critical information missing including the service line location, and service line records with only the service line location missing. The total numbers in these three categories are in the process of being finalized by mid-2022 and a completion schedule has not been established yet. Due to the large numbers of service lines remaining in all three categories, the service card remediation plan should continue be monitored for progress until a schedule for completion is determined. However, Staff believes that annual reporting will be sufficient instead of quarterly. Ameren Missouri developed an annual reporting form for Staff's review and agreement was reached on an annual reporting form for the three categories starting with the beginning and end of 2021.

III. Staff Recommendation

Staff recommends that Ameren Missouri file annual reports in this case that contain the year-end numbers of missing service line records and the service line records with missing location information and/or other critical information. Staff further recommends that Ameren Missouri file an initial report for the start and end of 2021 using the report that was recently reviewed and discussed with Ameren Missouri personnel.

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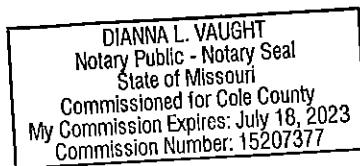
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Further the Affiant sayeth not.

John D. Kottwitz
John D. Kottwitz

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 25th day of February, 2022.

Dianne L. Vaughn
Notary Public



Agreed upon annual reporting format:

	2021		2022	2023	2024
	Remaining Missing Records Year Start	Remaining Missing Records Year End	Remaining Missing Records Year End	Remaining Missing Records Year End	Remaining Missing Records Year End
MR2 - Missing Records (No service line record found)	15,888	13,433			
MR1- No Dimensions (Service line record found but lacking service line location <u>and</u> additional critical data elements)	8,277	8,080			
A1 – Insufficient Location Information Only (Service line location record found but lacking sufficient location information)	23,352	23,000			

Ameren Missouri's plan to remediate the missing service line information includes the following actions:

- Paper records research
- Replacement of service lines associated with the main replacement program
- Targeted investigations of service lines with missing location information utilizing Utility Maintenance Technicians
- Investigation of location of physical assets through routine maintenance activities:
 - Leak investigation and repair
 - Locating
 - Inactive service cutoffs