

Law Offices
Quinn, Johnston, Henderson & Pretorius
Chartered

Telephone: (217) 753-1133
Fax: (217) 753-1180

205 South Fifth Street
Suite 900
Springfield, Illinois 62701

email: quinnlaw@qjhp.com
Website: http://www.qjhp.com

July 25, 2005

RECEIVED

JUL 27 2005

Adjudication Division
Public Service Commission

FILED²

JUL 27 2005

Missouri Public
Service Commission

R. Michael Henderson
Murvel Pretorius, Jr.
Bradley W. Dunham
Robert H. Jennetten
Gregory A. Cerulo
Paul P. Gilfillan
Laurie M. Judd
Stanley L. Morris
James A. Borland
David B. Collins
John F. Kamin
Michael J. Holt
Matthew B. Smith
Peter R. Jennetten
Michael A. Kraft
Matthew J. Maddox
Jonathan A. Stump
Laura A. Petersen
Kevin M. Miller
Jo T. Wetherill

John A. Wolters
Allison N. Bell
Adam P. Chaddock
Melinda M. Rowe
Claire E. Craig
James S. Putnam
Amanda J. Watson

of Counsel
W. Thomas Johnston

Lowell R. McConnell
(1911-1971)
Golden A. McConnell
(1914-1974)
Joseph A. Leimkuehler
(1931-1974)
Thomas B. Kennedy, Sr.
(1912-1988)
William C. Nicol
(1911-1996)
John C. Newell, Jr.
(1915-1996)
Richard E. Quinn
(1928-2000)

Ms. Colleen Dale
Secretary of the Commission
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

RE: Case No. GS-2005-0246
Our File No. 102 252 041

Dear Ms. Dale:

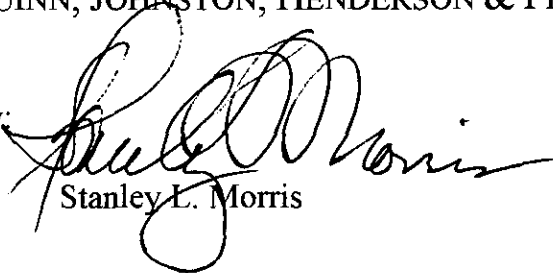
Attached is the response of West Central Energy to the Recommendations of the staff in Gas Incident Report of events at Unionville and Milan, Missouri, further identified as Case No. GS-2005-0246.

Please contact the undersigned if there are any questions.

Very truly yours,

QUINN, JOHNSTON, HENDERSON & PRETORIUS

By:



Stanley L. Morris

SLM/pm
Attachment
cc: Rick Zehner (w/attachment)

Peoria Office
227 N.E. Jefferson Street
Peoria, Illinois 61602
Telephone: (309) 674-1133
Fax: (309) 674-6503

STATE OF MISSOURI
MISSOURI PUBLIC SERVICE COMMISSION

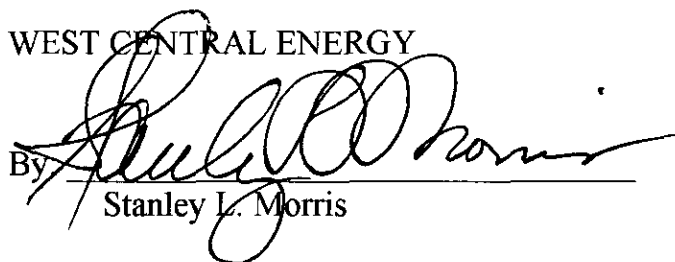
WEST CENTRAL ENERGY)	
)	GS-2005-0246
Gas Incident Report - Unionville and)	
Milan, Missouri)	

RESPONSE OF UTILITY SAFETY AND DESIGN, INC.

NOW COMES WEST CENTRAL ENERGY, and for its Response to the Recommendations of Staff in the above matter, attaches a letter of June 27, 2005, from David Wood, Vice President of Utility Safety and Design, Inc., to Mr. Greg Williams of the Missouri Public Service Commission and attachments to said letter.

WEST CENTRAL ENERGY

By



Stanley L. Morris

Stanley L. Morris, No. 21401
QUINN, JOHNSTON, HENDERSON & PRETORIUS
205 South Fifth Street, Suite 900
Springfield, Illinois 62701
Telephone: (217) 753-1133

PROOF OF SERVICE

The undersigned certifies that on July 25, 2005, all counsel of record were served with a copy of the foregoing document at their respective addresses by the method indicated below:

- ☒ U.S. Mail
☐ Personal Delivery
☐ Facsimile
☐ Overnight Courier

Samuel McConnell

Greg Williams
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Ms. Lera Schemwell
Office of General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Mo 65102



Utility Safety & Design, Inc.
1717 Main St.
P.O. Box 206
Unionville, Missouri 63565
Ph. (660) 947-3316 Fax (660) 947-3146

June 27, 2005

*Mr. Greg Williams
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO. 65102*

*RE: Gas Incident Report
Unionville & Milan, Mo.
Case No. GS-2005-0246*

Dear Mr. Williams,

Enclosed for your consideration is our response to the recommendations you have made due to the above mentioned gas incident.

- 1. Wording has been added to the O & M manual in response to this recommendation.
(See attachments)*
- 2. At the annual liaisons with public officials meeting, it will be stressed to the appropriate personnel the need for them to contact us in these situations, so as to handle natural gas in a safe manner.*
- 3. A notice will be enclosed in our annual fall customer awareness mailing and wording will be added to our "If you Smell Gas" newspaper notifications. (See attachments)*

Should you have any questions or comments concerning our reply, please contact me at (660) 947-7085.

Sincerely,

A handwritten signature in dark ink, appearing to read "David Wood", is written over a horizontal line.

*David Wood
Vice President*

Enclosures

*Copies: Clyde Shultz, Mayor, City of Unionville
Ed Maulsby, Mayor, City of Milan
Darin Houchin, USDI
Robert Erxleben, USDI*

OPERATING AND MAINTENANCE PLAN

3.3 INITIAL CUSTOMER TURN-ON AND REINSTATEMENT OF DISTRIBUTION AND SERVICE LINES (192.725 – 192.72)

3.31 Distribution service lines that have been abandoned or relocated may be reactivated only after being cleaned and tested in the same manner as a new line.

3.32 Service lines that have been abandoned or relocated may be reactivated only after being cleaned and tested in the same manner as a new line, from the meter connection to the point of disconnection. If portions of the line are used to maintain continuous service, such as installation of a bypass, any portion of the original line used to maintain continuous service need not be tested.

3.33 Fuel lines that have been abandoned or relocated may be reactivated only after being cleaned and tested in the same manner as a new line, from the meter connection to the point of disconnection.

3.34 All service lines that have been temporarily disconnected from their source of pressure for any reason must be pressure tested from the point of disconnection to the service line valve in the same manner as a new line before being put back into service.

Service lines that have been temporarily disconnected due to third party damage may be reactivated only after being cleaned and tested from the point of disconnection to the service line valve, and leak surveyed from the point of disconnection back to the main, using a leak detection instrument.

3.35 When a new service is turned on, the following procedures will be followed, and documented.

- A) The service person will do a visual inspection of the meter set. This will include, but not limited to, the physical condition and placement in relationship to the building's openings and roof edge drip line. Any condition found that needs corrected will be done before service is turned on. The corrections would include, but not limited to, the moving of the meter set or the installation of a proper regulator vent shield or piping.
- B) A subsurface atmosphere check using a C.G.I., will be made by the use of at least one bar hole at the building's foundation, over the gas service.
- C) A 5 minute no-flow check will be made using the ½ ft. hand of the meter. If the delivery pressure to the customer is 1 lb. or above, the time for the no-flow check will be extended to at least 15 minutes.
- D) A visual inspection of accessible house piping will be done.
- E) All appliances shall be checked to make sure they are in good working condition and venting properly.

OPERATING AND MAINTENANCE PLAN

2.1 PATROLLING

2.11 The System Manager, or a designated employee shall be responsible for periodic inspections of the distribution system. The Manager, and/or qualified personnel under the direction of the Manager shall patrol the distribution system as hereinafter indicated.

A) During each calendar year on a quarterly basis, at intervals not to exceed 4-1/2 months, personnel shall inspect all locations for possible leakage where pipe casing has been installed under railroad crossings and where the distribution pipe crosses under arterial highways. Once annually, not to exceed 15 months, during the regular meter reading cycle or at the time of a complete leak survey, a patrol of the distribution system will be made to report any activities or conditions that might affect the safety and operations of the system. This would include, but not limited to, meter set's physical condition and placement in relationship to the building's openings and roof edge drip line. Any conditions found that need corrected will be done as soon as possible. These corrections would include, but not limited to, the moving of the meter set or the installation of a proper regulator vent shield or piping. A written report shall be made using **Patrol Report Form**.

B) During the daily operation of the distribution system, the Manager, or a designated employee shall be responsible for general surveillance of construction operations and other activity which might affect the safety and operations of the system. Leak indicators, such as vegetation variations and gas odors, which are observed in the course of meter reading, corrosion work, or other activities, must be recorded and responded to in accordance with procedures.

For all residential and commercial services placed in service after May 1, 1989, the Manager, or a designated employee shall ensure that all yard lines, whether customer installed or company installed are inspected and comply with the testing, maintenance, and replacement requirements of city, state, and federal regulations.

ATTENTION ALL NATURAL GAS CUSTOMERS: DURING WINTER MONTHS
FREEZING RAIN AND DRIPPING SNOW MELT FROM ROOF EDGES CAN FALL
ON GAS METER REGULATORS CAUSING GAS SERVICE **INTERUPTION** TO
YOUR HOME. IF YOU HAVE EXPERIENCED THIS PROBLEM IN THE PAST OR
SUSPECT THIS COULD HAPPEN DUE TO THE LACK OF RAIN GUTTERING,
PLEASE CONTACT THE GAS OFFICE BEFORE COLD WEATHER STARTS. WE
1 WILL CHANGE THE METER SET TO AVOID THIS POSSIBLE PROBLEM.

The Milan Standard, Milan, Missouri, Thursday, June 23, 2005 - Section 3 - Page 8.

IF YOU EVER SMELL Natural Gas



If Gas odor is slight

1. Open windows and doors to ventilate the area.
2. Check pilot lights, Relight only if you know how.
3. Call your gas company if gas odor persists.

If Gas odor is strong

1. DO NOT light matches
2. DO NOT turn light switches ON or OFF
3. DO NOT use the telephone.
4. If possible, notify everyone in the building to leave immediately.
5. CALL the gas company from a neighbor's phone.
6. DO NOT re-enter your home until the gas company has told you you it's safe to do so.

Milan & Green City NATURAL GAS SYSTEMS

Call 24 Hours (Day or Night)

Dial 1-800-770-7282

NOTICE: ARE YOU PLANNING ANY UNDERGROUND EXCAVATION??
Please Call Missouri One Call at 1-800-344-7483 BEFORE you dig

* ATTENTION: IF YOU NOTICE ICE BUILD UP ON YOUR NATURAL GAS METER SET, PLEASE CALL 1-800-770-7282 IMMEDIATELY - DAY OR NIGHT.

* The above language will be added to all of our "IF YOU SMELL GAS" ads in the fall newspaper notifications.