

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

In the Matter of City Utilities of Springfield, Missouri    )  
Concerning a Natural Gas Pipeline Incident in the        )  
Vicinity of South Charleston Avenue and East            )  
Republic Road in Springfield, Missouri                    )        **File No. GS-2024-0XXX**

**STAFF’S MOTION TO ESTABLISH A CASE**

COMES NOW, the Staff of the Missouri Public Service Commission (hereafter the “Staff” or “Commission”), by and through counsel, and in support of its *Motion to Establish a Case* states as follows:

1. Section 386.310, RSMo, gives the Commission the responsibility to require every gas utility, including municipal gas systems, to operate its system in a manner that promotes the health and safety of its employees, customers, and the public.

2. Under § 386.572.1, RSMo, any municipality that owns a gas plant shall not “violate any law or any order, decision, decree, rule, direction, demand, or requirement of the commission or any part or portion thereof relating to ... natural gas safety laws, rules, or orders.”

3. City Utilities of Springfield (“CU”) owns and operates a municipal gas system as defined in § 386.310.3, RSMo.

4. CU owns a gas plant and is subject to § 386.572, RSMo.

5. The monetary penalties for violations of such gas safety standards are set forth in § 386.572.2 and .3, RSMo and are considered “separate and distinct offenses, regardless of whether such violations relate to the same incident. In the case of a continuing violation, each day's continuance thereof shall be a separate and distinct offense.”

6. A reportable natural gas incident<sup>1</sup> occurred on Monday, July 17, 2023, in Springfield, Missouri, an area served by CU. A release of natural gas occurred when a CU work crew was preparing to perform maintenance on a high pressure natural gas feeder line.<sup>2</sup> The escaping natural gas ignited at approximately 11:45 a.m., damaging the siding on two nearby homes, CU equipment and vehicles, and nearby electric facilities. The incident occurred in the vicinity of South Charleston Avenue and East Republic Road. Minor injuries to work crew members were reported.

7. Staff's initial investigation indicates that a failure occurred after the CU work crew had excavated a pit to expose a location where three buried pipeline segments intersect. The segment of pipeline scheduled for maintenance had been physically isolated and purged of natural gas prior to the incident occurring. The failure occurred on the pipeline segment still containing natural gas. This pipeline segment contained a valve and a mechanical fitting in the incident vicinity. The cause(s) of the failure have not yet been determined.

8. As a result of this incident, Staff recommends the Commission establish a case for purposes of receiving a report resulting from the investigation of the incident by the Commission's Safety Engineering Department.

9. Staff further recommends that the Commission direct that the report, or a status report, be filed within 180 days of the date on which the case is established.

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<sup>1</sup> See 20 CSR 4240-40.020(3) and (4) for reporting requirements.

<sup>2</sup> As defined by 20 CSR 4240-40.030(1)(B)15, a "feeder line" is a natural gas distribution pipeline that has a maximum allowable operating pressure (MAOP) greater than 100 psig, that produces a hoop stress of less than 20% of specified minimum yield strength (SMYS). SMYS is the minimum yield strength, expressed in pounds per square inch (psi) gauge, prescribed by the specification under which pipe material is purchased from the manufacturer.

**WHEREFORE**, and for the reasons set forth above, Staff respectfully requests the Commission establish a case for the purpose of receiving a report, or status report, as described herein, and for any other such orders and relief as it deems just and appropriate under the circumstances.

Respectfully submitted,

**/s/ Carolyn H. Kerr**

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, prepaid to City Utilities of Springfield and the Office of the Public Counsel on this 31<sup>st</sup> day of July, 2023.

**/s/ Carolyn H. Kerr**