

Bringing Power Home.

January 13, 2004

JAN 1 4 2004 Missouri Public Service Commission

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VIA OVERNIGHT MAIL Dale Hardy Roberts Secretary, Public Service Commission P.O. Box 360 Governor Office Building 200 Madison Street Jefferson City, MO 65102-0360

> Re: In the Matter of City Utilities of Springfield, Missouri Case No. GS-2004-0040

Dear Mr. Roberts:

Please find for filing in the above case an original and eight copies of City Utilities of Springfield's Response to PSC Staff Recommendations in Gas Incident Report Filed on December 16, 2003.

Sincerely,

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Rex C. McCall Assistant Legal Counsel

c: Dana K. Joyce Missouri Office of the Public Counsel

## **BEFORE THE PUBLIC SERVICE COMMISSION**

## OF THE STATE OF MISSOURI

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Missouri Public Service Commission

In the Matter of City Utilities of Springfield, Missouri, Concerning an Incident at the Frisco Building at the Ozark Empire Fairgrounds.

Case No. GS-2004-0040

# CITY UTILITIES OF SPRINGFIELD'S RESPONSE TO PSC STAFF RECOMMENDATIONS IN GAS INCIDENT REPORT FILED ON DECEMBER 16, 2003

Comes now City Utilities of Springfield, Missouri ("City Utilities"), a municipally-owned utility, and makes the following responses to the recommendations of the Public Service Commission Staff filed with the Commission on December 16, 2003:

## **Conclusions of Staff**

PSC Staff concluded that the explosion of the Fairgrounds was due to natural gas leaking from a 2-inch City Utilities service line located 48 feet from the Frisco Building. The leak in the pipe was caused by a rock impingement and no determination was made regarding who was responsible for the improper backfill. Also, PSC Staff could not determine when the improper backfill was used. Other locations along the line were properly bedded in sand. The PSC Staff's investigation found no violations of pipeline safety regulations by City Utilities that caused or contributed to the incident.

#### **Recommendations of Staff**

- 1) City Utilities agrees with this recommendation. City Utilities is already doing this and it plans to make it a part of its Operations Manual currently being updated.
- 2) City Utilities agrees with this recommendation. City Utilities has already begun tracking failures on Aldyl pipe, including those caused by rock impingement. These data have been incorporated into plans for replacing existing mains. City Utilities recommends that it meet with PSC Staff while the separate case investigation is conducted to determine more specific parameters with respect to the length of main to renew.

Also, if City Utilities discovers new leaks on pipe due to rock impingement, it will evaluate the need for the extent of the replacement with consideration to location and timing of performing the appropriate renewal. For example, if a leak occurred on a pipe that was in the middle of a busy thoroughfare or was very long so that immediate replacement would be impractical, City Utilities would monitor it by surveying for leaks more frequently until a renewal could be properly planned.

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- 3) City Utilities agrees in general with the recommendations of the PSC Staff and, as always, shall cooperate fully with the PSC Staff to enhance the safety of City Utilities' customers.
- 4) City Utilities follows all safety regulations of the Commission to ensure a safe natural gas system. City Utilities agrees that opening a new case to do a study of plastic pipe failures, leak survey techniques, installation and backfill procedures, and replacement criteria would be beneficial for City Utilities and all other gas distribution system operators in Missouri. A second case that is not focused specifically on the Fairgrounds incident, but on all procedures involving the installation, operation, and maintenance of plastic pipe would enhance safety for Springfield and the entire state.

City Utilities remains confident in the safety of its natural gas distribution system. City Utilities will continue to cooperate with the PSC on this second, broader study to determine if there are other opportunities to enhance safety for City Utilities' customers and natural gas customers across the state.

Wherefore, City Utilities of Springfield, Missouri respectfully requests the Commission to adopt the recommendations of PSC Staff, with the clarifications stated above.

Respectfully submitted,

Rex C. McCall Missouri Bar No. 29751 P.O. Box 551 Springfield, MO 65801 417-831-8605 417-831-8303 (fax) Rex.McCall@cityutilities.net ATTORNEY FOR CITY UTLITIES OF SPRINGFIELD, MISSOURI

#### **Certificate of Service**

I certify that I served the foregoing document on the Missouri Office of the Public Counsel, Governor Office Bldg., Suite 650, P.O. Box 7800, Jefferson City, MO 65102, and Dana K. Joyce, General Counsel, P.O. Box 360, Jefferson City, MO 65102, by mailing a copy of the same to them on January 13, 2004.

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