

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

In the Matter of a Workshop Docket to Enhance)
Public Safety Responses to Gas Leaks and to) File No. GW-2016-0013
Prevent Third-Party Damage to Gas Facilities)

**STATUS REPORT
FOR JUNE 2016**

COMES NOW Laclede Gas Company (“Laclede” or “Company”), on behalf of its operating units, Missouri Gas Energy (“MGE”) and Laclede Gas, and submits this Status Report in the above referenced matter for June 2016.

St. Louis Workshop

Since the last Status Report for May 2016, Laclede conducted its June 23, 2016 gas safety workshop in St. Louis, Missouri. The workshop was held from 10:00 am to approximately 3:00 pm at Spazio Westport in St. Louis, Missouri.

In addition to representatives from the Company and the Commission Staff (“Staff”), the workshop was attended by multiple municipal, fire department or law enforcement representatives from Bridgeton, Cottleville, Creve Coeur, Florissant, Frontenac, Maryland Heights, Overland, Perryville, Robertson, Shrewsbury, St. Louis City, and St. Louis County. In total, the attendees and their organizations have law enforcement, fire suppression or emergency response responsibilities for over 1 million Missouri citizens. Representatives for a number of other pipeline operators and associations also attended the workshop, including personnel from Ameren Missouri, Enable Midstream Partners, Liberty Utilities, Missouri One-Call, Summit Natural Gas, and Southern Star Central Gas Pipeline.

Like previous workshops, the one conducted in St. Louis covered a wide variety of issues relating to potential measures for preventing natural gas incidents, especially those

caused by third party damage to natural gas facilities. It also focused on best practices for preparing for and responding to such incidents in an effective manner when they occur. These subjects are highlighted in the PowerPoint presentation made at the workshop, which is attached hereto.

As in previous workshops, Michael Callan also gave a demonstration of his web-based training program for Responding to Utility Emergencies. A copy of Mr. Callan's text book was also made available to all emergency responders who attended, as well as other materials relating to natural gas emergencies. Al Moore, Director of Corporate Security for Spire Inc., also made a brief presentation on present and future efforts to educate and train law enforcement personnel in measures for preventing and responding to natural gas incidents.

There was a significant amount of discussion at the workshop on a number of topics. Among others, they included: (a) the benefits of having law enforcement personnel become more intensively involved in efforts to prevent third party damage to underground facilities; (b) the benefits of having law enforcement personnel become more intensively involved in efforts to respond to natural gas emergencies, especially in terms of their ability to enforce evacuations and crowd control; (c) whether the passage of special ordinances, such as the one enacted by Perryville, would be useful in focusing law enforcement efforts on monitoring excavation or boring activities for purposes of stopping those which are not in compliance with the Missouri one-call law; (d) whether and to what extent additional education and training initiatives would be helpful in encouraging this kind of enhanced focus.

There was also general discussion regarding (a) the benefits of having fire department and EMS personnel equipped with portable gas and carbon monoxide detection equipment;

and (b) the benefits of communicating and coordinately regularly with those businesses that are having significant underground excavation work done.

Finalization of Recommendations and Implementation Plan

As a result of the four gas safety workshops held over the past nine months, there have been a number of recommendations and suggestions made for enhancing the effectiveness of ongoing efforts to prevent and respond to natural gas incidents. Many of those recommendations and suggestions have been detailed in the Status Reports submitted throughout the workshop process.

To ensure that those recommendation and suggestions that have special merit are identified and actually implemented, the Company intends to consult with the Staff and other interested stakeholders for the purpose of reaching a consensus on what measures should be pursued and a plan for pursuing them. After completing this collaborative process, the Company will submit a final list of recommendations, together with the steps that have or will be taken to implement them.

WHEREFORE, Laclede Gas Company respectfully requests that the Commission accept this report.

Respectfully submitted,

LACLEDE GAS COMPANY

By: /s/ Rick Zucker
Rick Zucker, #49211
Associate General Counsel
Laclede Gas Company
700 Market Street, 6th Floor
St. Louis, MO 63101
Telephone: (314) 342-0533
Facsimile: (314) 421-1979
E-mail: rick.zucker@thelacledegroup.com

Natural Gas Safety Workshop

St. Louis, Missouri

June 23, 2016



Introductions

- Laclede Gas Company
- Missouri Public Service Commission
- Safety-Related Associations
- Fire Department Personnel
- Law Enforcement Personnel
- Others?



Purpose and Goals

- Background
 - Implement “lessons learned”
 - Enhance measures to prevent excavation damage to natural gas facilities
 - Enhance training on natural gas safety awareness
 - Enhance natural gas emergency response training
- Previous Workshops
 - Jefferson City – October 20, 2015
 - Kansas City, Mo – April 28, 2016
 - Springfield., Mo – May 26, 2016
- Measures for Preventing Incidents
 - Education (Introduce Tom Delia, LGC Manager, Damage Prevention)
 - Active, effective Damage Prevention Programs



What are the components of an effective damage prevention program?

- Communication between all stake holders
 - Public
 - Excavators
 - Public officials and agencies (i.e. Fire, Police, Public Works)
 - Locate contractors
 - One Call Center
- Developing a partnership among stakeholders
 - Shared responsibility and everyone has a part
- Effective locator performance measures
 - On time
 - Accurate
- Partnership in public education
 - 811 day
 - National dig safe month
 - Supplemental training materials



What are the components of an effective damage prevention program? (continued)

- Complete and accurate damage investigation and collection
 - Responding to the field to investigate all damage to provide fair and consistent data gathering
 - Data collection system
 - CGA DIRT reporting
- Effective reporting and risk analysis
 - What are the trends
 - What is working
 - What is not working
- Proactive involvement based on risk analysis
 - Targeted safety meetings for excavators with high damage rates
 - Watch and protect programs
 - Attorney General involvement



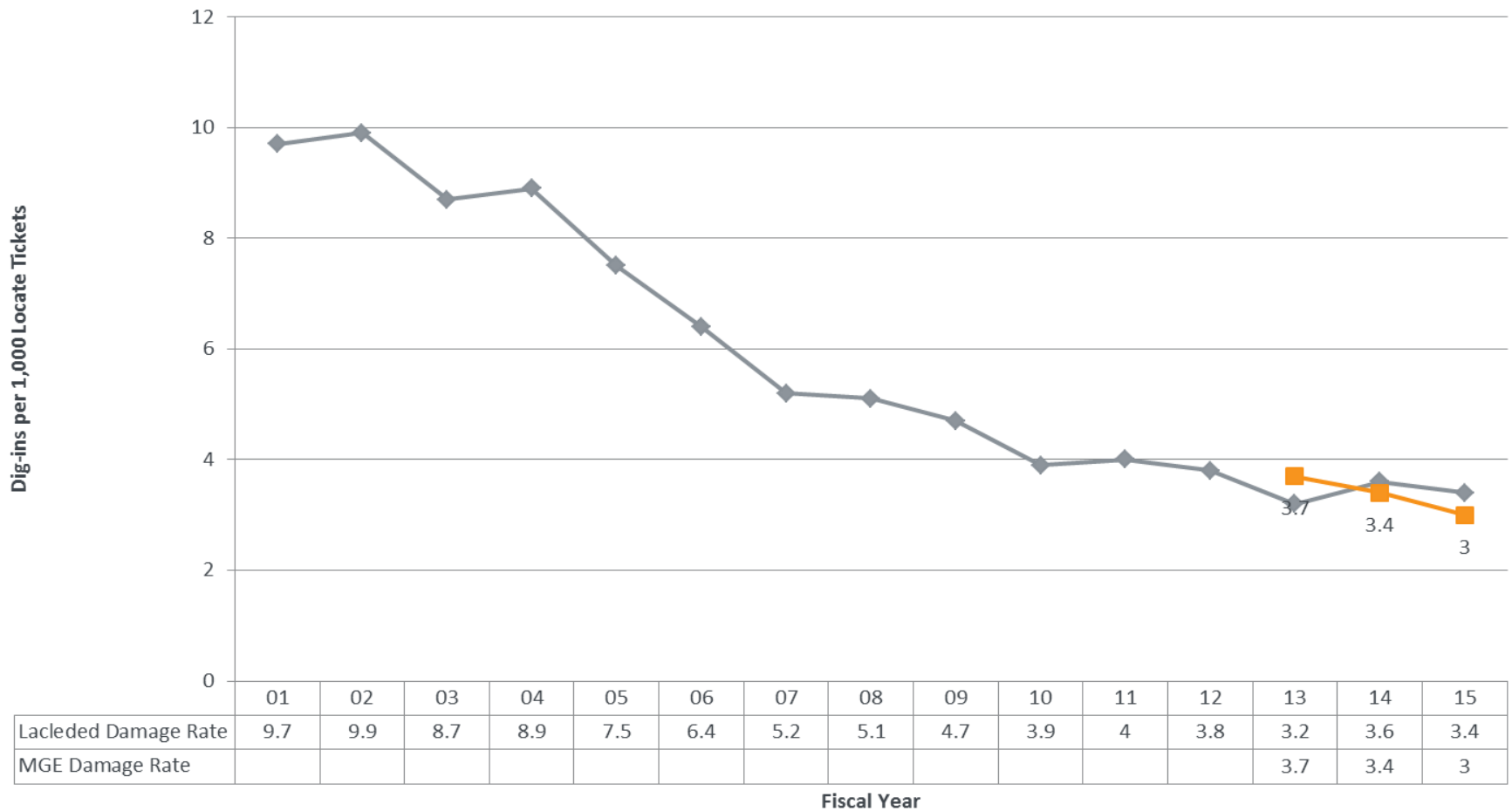
Laclede & MGE Gas Damage Initiatives

- Better communication
 - Attendance in local and state events (MOCGA, MOCs safety meetings, etc.)
 - Damage prevention safety meetings
 - Website and social media to promote 811 and safe excavation
- Damage Coordinators
 - On site field investigation and root cause determination
 - Fair, consistent and timely investigation
 - Relationship building with excavators, public officials, contract locators and community
 - Auditing of contract locators and awareness within excavation community
 - Safety meetings with excavators
- Damage data collection
 - Identification of trends, focus on excavators/locators with high damage rates
- Follow through on damages
 - Invoicing, collection, notification of violations, legal remedies, etc.



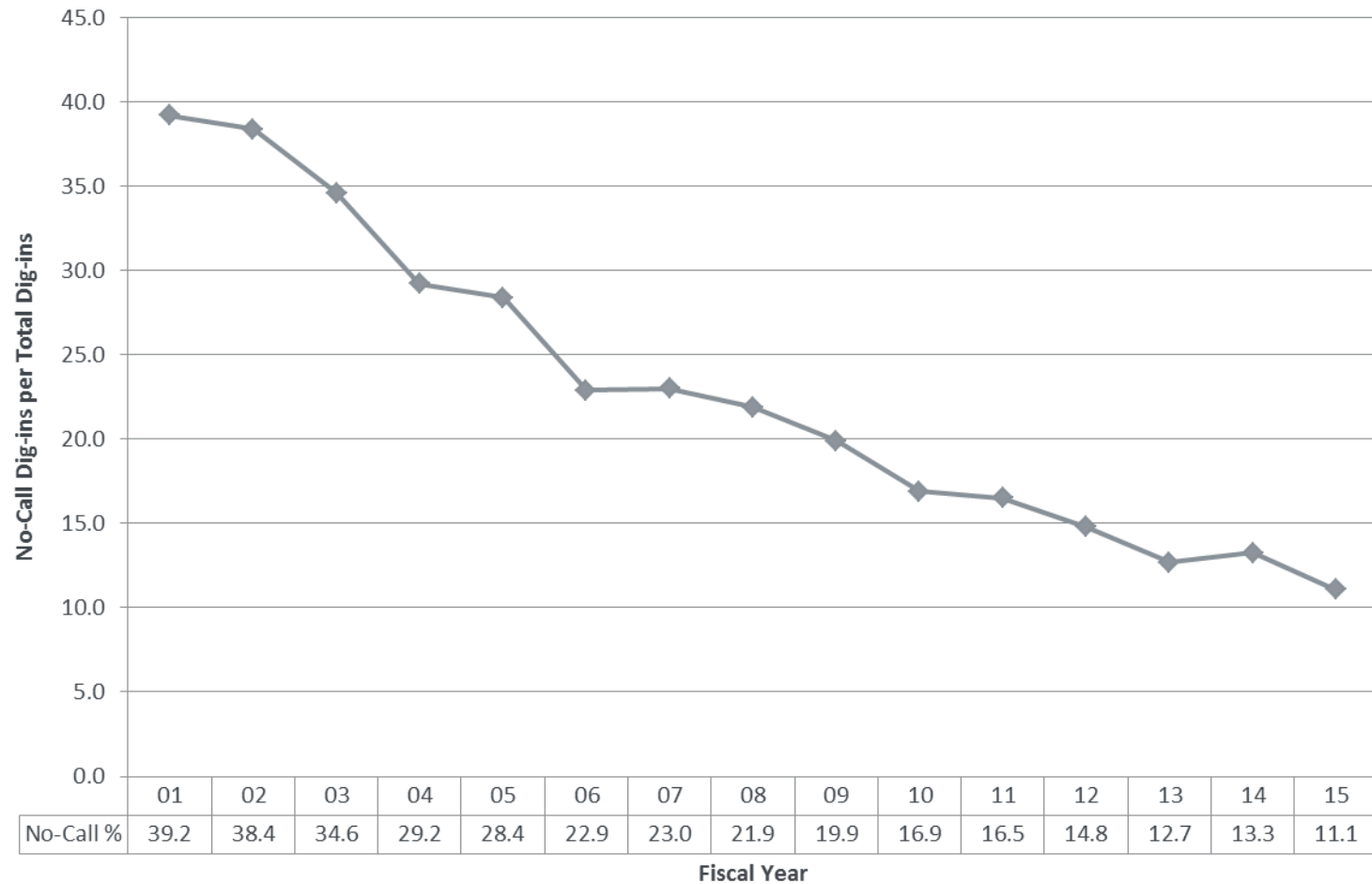
Damage Prevention Program & Update Laclede & MGE Division Only

Third Party Damage Rate



Damage Prevention Program & Update Laclede & MGE Division Only

% Dig-ins without a Locate Ticket



Purpose and Goals (Cont'd)

- Measures For Preventing Incidents
 - Education
 - Active, effective Damage Prevention Programs
 - MGE and LGC conduct targeted safety meetings that focus on excavators with high damage rates
 - Public Awareness – brochure mailings, involvement in community, industry and construction events, social media
 - Spreading the 811 message
 - Field investigation and excavation awareness by Damage Coordinators



Purpose and Goals (Cont'd)

- Measures For Preventing Incidents (Cont'd)
 - Training – Internal training by utilities and enhanced awareness training for fire departments and other public emergency responders
 - Procedure Aids - MGE and LGC developed an Emergency Response reminder card for Company personnel. (Copies of the reminder card are available for attendees.)
 - Enforcement – The Attorney General's office is doing well at ramping up enforcement efforts to encourage compliance with the Missouri One Call laws
 - Cooperation (Shared Responsibility) – Enhance the understanding that we are all in this together. We have a responsibility to not only do our part but to also help others do their part to keep everyone safe. Getting a better understanding of each other's responsibility can help this process
 - Public Communications – Use of bill and website messaging, participation in Arbor day and other events to drive home shared responsibility theme



Measures for Responding More Effectively

- Education – MGE conducts an active liaison program with the fire departments within its service territory. That program includes providing a Natural Gas Hazards and First Responder Handbook to fire departments. (Copies of the handbook are available for attendees.)
- Training – Internal emergency response training by utilities. MGE and LGC provide natural gas emergency response training for fire departments and other public emergency responders. That training includes live fire training. Additionally, a couple of years ago LGC implemented the use of supplemental computer based training on Responding to Utility Emergencies (RTUE) and MGE is has now implemented that supplemental training in its service territory. (We will see a presentation on the RTUE training after lunch.)



Measures for Responding More Effectively (Cont'd)

- Training Enhancements

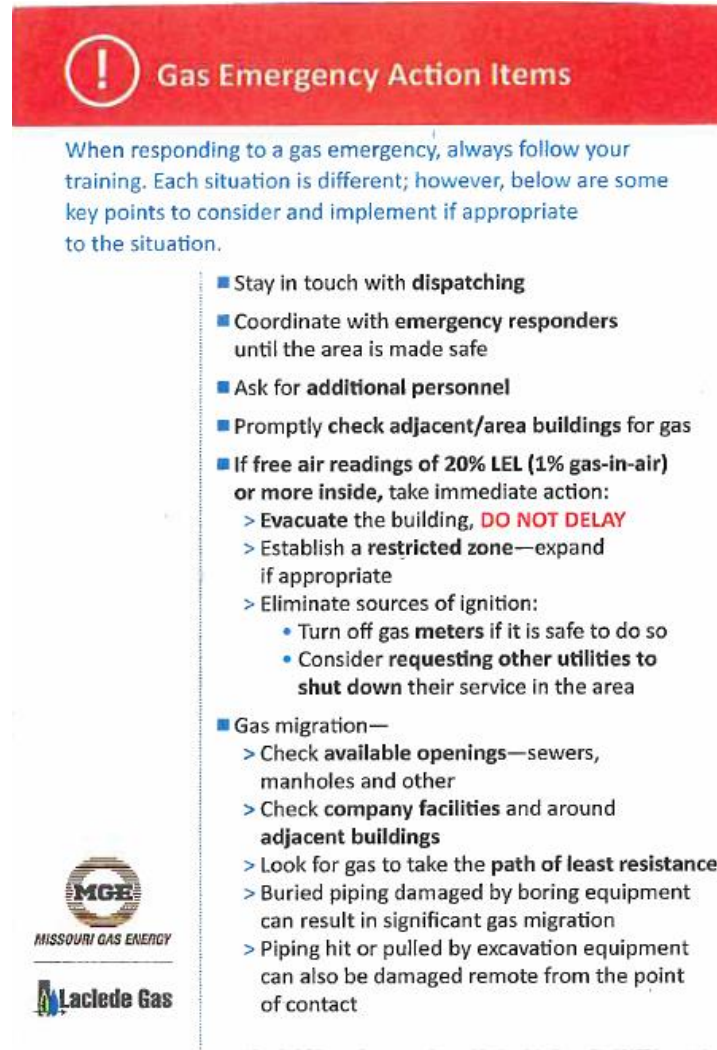
- The Kansas City Fire Department (KCFD) issued new General Operating Guideline establishing procedures for responding to and mitigating a variety of natural gas emergencies.
- MGE revised its emergency response procedures.
 - Added section 3.1.7 to its Emergency Plan that provides for MGE personnel to request that on-site fire and police department personnel to stay on site until the area is made safe
 - Expanded Section 4.1.3.2 of its Emergency Plan to provide more detail for coordinating with emergency responders (Copies of the verbiage from that procedure are available for attendees.)
 - Provided employee training on the revisions to the Emergency Plan
 - MGE and LGC developed an Emergency Response reminder card for Company personnel and trained company personnel on the contents of and the use of the reminder card. (Copies of the reminder card are available for attendees.)



Measures for Responding More Effectively (Cont'd)

- Training Enhancements

- New MGE and LGC Emergency Response Reminder Card





The image shows a reminder card titled "Gas Emergency Action Items" with a red header and a white body. The card contains a list of action items for responding to a gas emergency. At the bottom, there are logos for MGE (Missouri Gas Energy) and Laclede Gas.

! Gas Emergency Action Items

When responding to a gas emergency, always follow your training. Each situation is different; however, below are some key points to consider and implement if appropriate to the situation.

- Stay in touch with **dispatching**
- Coordinate with **emergency responders** until the area is made safe
- Ask for **additional personnel**
- Promptly check **adjacent/area buildings** for gas
- If free air readings of **20% LEL (1% gas-in-air)** or more inside, take immediate action:
 - > **Evacuate** the building, **DO NOT DELAY**
 - > Establish a **restricted zone**—expand if appropriate
 - > Eliminate sources of ignition:
 - Turn off **gas meters** if it is safe to do so
 - Consider **requesting other utilities to shut down** their service in the area
- Gas migration—
 - > Check **available openings**—sewers, manholes and other
 - > Check **company facilities** and around **adjacent buildings**
 - > Look for gas to take the **path of least resistance**
 - > Buried piping damaged by boring equipment can result in significant gas migration
 - > Piping hit or pulled by excavation equipment can also be damaged remote from the point of contact


MISSOURI GAS ENERGY





Measures for Responding More Effectively (Cont'd)

- Training Enhancements

- MGE is in the process of taking the following actions:
 - Reviewed the pilot program for designating two high profile areas and expanded the Plaza high profile area
 - Providing for review of its training program for fire departments on a regular basis, update as necessary, and submit any such changes to the MPSC Staff for review
 - Working to enhance the outreach program to increase the number of fire departments that participate or to make MGE's and LGC's training program an integral part of existing fire department training programs and provide the MPSC Staff regular updates on these efforts
 - Outreach efforts in 2015 to present
 - Annual Kansas City and St. Louis luncheons
 - Training sessions with fire and police departments
 - Promotional efforts to engage more emergency responders



Measures for Responding More Effectively (Cont'd)

- Training Enhancements (Cont'd)

- MGE is in the process of taking the following actions:

- Work with the MPSC Staff to begin meeting with interested parties such as the Missouri Association of Natural Gas Operators (MANGO), the Pipeline Association of Missouri (PAM), the MPSC Gas Safety staff, state and local fire departments and associations, other emergency responders, Missouri One-Call, and the Missouri Common Ground Alliance to develop a statewide policy and apparatus for communication and coordination between gas utilities, fire department, and other emergency responders
 - To enhance the effectiveness of efforts to respond to hazardous situations involving natural gas leaks
 - To enhance the effectiveness of efforts to prevent third party damage to gas facilities
 - Work with fire departments within the MGE and LGC service territories to encourage the adoption of General Operating Guidelines similar to those adopted by the Kansas City, Missouri Fire Department
 - Work with fire departments within the MGE and LGC service territories to develop a natural gas emergency response reminder card



Measures for Responding More Effectively (Con't)

- Training Enhancements

- Draft of Public Safety Responder Natural Gas Emergency Response Reminder Card

<p>Natural Gas Emergency Action Items</p> <p>Upon arrival, promptly check area and adjacent buildings using a Combustible Gas Indicator (CGI).</p> <p>Buried piping damaged by boring equipment can result in significant gas migration.</p> <p>If there is a strong odor or reading of 10% LEL (1/2% gas) or more in free air inside structure:</p> <ul style="list-style-type: none">• Immediately evacuate the building• Ventilate if safe to do so• Shut off gas meter if safe to do so• Establish a restricted zone and evacuate the public to a safe distance• Communicate with the gas company until the emergency situation is mitigated• Eliminate ignition sources, smoking, open flame, running engines, electrical devices etc.• Consider requesting other utilities to shut down their service in the area• Use a CGI to monitor gas migration from the leak source toward exposures• Check available openings such as catch basins, sewers, telephone manholes etc.• Consider removing manhole covers for ventilation• DO NOT squeeze off or plug plastic gas piping; static electricity may cause ignition• Allow primary natural gas fires to burn unless there is immediate danger to life• Position apparatus out of danger zone; avoid front of building and over manhole covers	<p>When responding to a natural gas emergency, always follow your S.O.G. and verify the gas company has been notified</p> <ul style="list-style-type: none">• Utilize a CGI• Evacuate if gas is 10% LEL or more inside• Turn off gas at meter• Establish a restricted zone• Communicate with the gas company• Eliminate ignition sources• Allow natural gas fires to burn• Continue monitoring with CGI
--	--



RTUE Presentation/Georgia Program

- Mike Callan - background and experience
- Purpose and features of RTUE Program
- Demonstration of RTUE web-based training program
- Georgia Coordination Program
 - History
 - Goals and objectives of program
 - Benefits
 - Potential applicability to Missouri



Timelines for Preparing and Submitting Recommendations

- Previous Status Reports
 - January 19, 2016, the second on
 - March 7th, (for February)
 - March 31st (for March)
 - May 16 (for April)
 - June 6th (for May).
- Upcoming Status Reports for June and July
- Staff Final Report



Potential Interim Recommendations

- Make RTUE available statewide – **presentation and discussion**
- Circulate standard operating procedures for utilities, fire and police departments and other emergency responders
- Circulate emergency checklist for operators
- Develop an emergency checklist for other first responders
- Research leading practices in other states (Georgia)
- Evaluate local enforcement for one-call requirements



Next Steps / Future Meetings / Invitees

- Open discussion



Questions?