

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

In the Matter of Missouri Gas Energy     )  
Concerning a Natural Gas Incident in Kansas     )  
City, Missouri.     )     Case No. Case No. GS-2007-\_\_\_\_\_

**STAFF'S REQUEST TO ESTABLISH A  
CASE FOR INVESTIGATION OF GAS SAFETY INCIDENT**

COMES NOW the Staff of the Missouri Public Service Commission and for its Motion to  
Open Case states:

1.     The Missouri Public Service Commission has statutory responsibility to assure the health and safety of employees, customers and the public service by natural gas corporations under Section 386.310 RSMo (Supp. 2006).

2.     This section grants the Commission, after hearing or complaint, to issue orders to require a utility to take steps to promote the safety of utility employees, customers and the general public. *Id.*

3.     Missouri Gas Energy of Kansas City, Missouri (MGE or Company) is a gas corporation as defined in Section 386.020(18) and is subject to the jurisdiction of this Commission.

4.     A reportable incident occurred on May 25, 2007, in Kansas City, Missouri, an area served by MGE. Four MGE employees were injured, two employees were hospitalized overnight and two were treated and released the same day. There were no fatalities.

5.     Staff's initial investigation indicates that MGE personnel were excavating over a 24-inch diameter cast iron main to expose a gas leak. The top of a cast iron main was exposed

when the pipe began to come apart and heaved from the ground causing debris to hit the four MGE employees. No ignition or explosion occurred.

6. Staff requests the Commission open a case to receive the investigation of the Commission's Gas Safety Department into this Incident.

7. Within one hundred-twenty (120) days of the Commission opening a case, Staff will either file its final report or will file an update with the Commission detailing progress in the investigation.

**WHEREFORE,** the Staff recommends that the Commission open a case for investigation of the natural gas incident that occurred in Kansas City Missouri in which four MGE employees were injured.

Respectfully submitted,

/s/ Lera L. Shemwell  
Lera L. Shemwell  
Deputy General Counsel  
Missouri Bar No. 43792  
Attorney for the Staff of the  
Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102  
(573) 751-7431  
(573) 751-9285 (Fax)  
lera.shemwell@psc.mo.gov

**Certificate of Service**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 2nd day of July 2007.

/s/ Lera L. Shemwell