

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

In the Matter of Laclede Gas Company)
Concerning a Natural Gas Incident at) **Case No. GS-2011-_____**
3810 Council Grove Avenue, Pine Lawn,)
Missouri.)

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

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and hereby moves the Commission to establish a case for investigation of a gas safety incident, as follows:

1. The Missouri Public Service Commission has statutory responsibility to assure the health and safety of employees, customers, and the public served by natural gas corporations under § 386.310, RSMo.

2. The cited section authorizes the Commission, after hearing or complaint, to order a utility to take appropriate steps to promote the safety of its employees, customers and the general public.

3. Laclede Gas Company of St. Louis, Missouri (Laclede or Company) is a gas corporation within the intendments of § 386.020(18), RSMo, and is thus subject to the jurisdiction of this Commission.

4. A reportable incident occurred on January 8, 2011, in Pine Lawn, Missouri, an area served by Laclede. There were minor injuries and no fatalities, and property damage occurred to a building at 3810 Council Grove Avenue.

5. Staff's initial investigation indicates that natural gas was released from a circumferential fracture in a 2-inch diameter steel main, migrated into the

sanitary system and through the soil, and accumulated in the house at 3810 Council Grove Avenue. An explosion and flash fire resulted, causing extensive damage to the property at 3810 Council Grove Avenue.

6. As a result of the above-described incident, Staff recommends that the Commission establish a case for the purpose of receiving the Gas Incident Report resulting from the investigation of the incident by the Commission's Gas Safety Department.

7. Staff further recommends that the Commission direct that the Gas Incident Report be filed within 120 days of the date on which the case is established.

WHEREFORE, Staff prays that the Commission will establish a case for the purpose of receiving a Gas Incident Report as described herein.

Respectfully submitted,

s/ Kevin A. Thompson
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