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July 11, 2000

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Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

RE: Case No. GS-2000-525

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of a **MOTION TO FILE REPORT AND REQUEST FOR A COMMISSION ORDER.**

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours,

Bruce H. Bates
Assistant General Counsel
(573) 751-7434
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BB/df
Enclosure
cc: Counsel of Record

FILED²
JUL 11 2000
Missouri Public
Service Commission

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²

JUL 11 2000

Missouri Public
Service Commission

In the Matter of Laclede Gas Company,)
Regarding an Incident at 1904 Birchwood)
Drive, Barnhart, Missouri, on February 7,)
2000.)

Case No. GS-2000-525

MOTION TO FILE REPORT AND REQUEST FOR A COMMISSION ORDER

COMES NOW the Staff of the Missouri Public Service Commission ("Staff")
and for this *Motion to File Report and Request for A Commission Order* states as follows:

1. On February 24, 2000, Staff filed a *Motion to Open Case* in response to an
apparent natural gas incident that occurred at 1904 Birchwood Drive in Barnhart,
Missouri on February 7, 2000. Laclede Gas Company ("Laclede" or "Company") provides
natural gas service to that address.

2. On March 13, 2000, the Missouri Public Service Commission
("Commission") issued an *Order Establishing Case* and ordered Staff to file an incident
report.

3. Staff has completed its investigation and the *Gas Incident Report*
("Report") is enclosed for filing.

4. Staff, in its *Report*, recommends that:

a. Laclede require its contract locator to notify them when they are
aware that horizontal drilling is occurring near their underground natural gas facilities.

b. Laclede contact the contractor to determine the type of excavation equipment that will be used when the excavation notification indicates "unknown" for the excavation device, such as was the case in this incident.

c. Laclede review and revise as necessary its procedures for inspecting construction activities in the vicinity of its natural gas pipelines to increase their effectiveness. Especially, to determine if closer monitoring of contractors is required when Laclede is aware of "trenchless technology" being used near natural gas facilities when such activities are known.

d. Laclede alert contractors utilizing horizontal drilling equipment that any natural gas facilities intersecting the drill path should be excavated and exposed prior to drilling. Laclede continues to encourage excavators to use this guideline.

e. Laclede review and revise as necessary its procedures and employee training for responding to, and taking appropriate actions upon natural gas leaks that are beyond routine action. Specifically, the early recognition of the hazards associated with the magnitude and extent of migration of escaping natural gas and the immediate actions undertaken to protect life and property. The circumstances of this incident should be incorporated into this training.

f. Laclede review and revise as necessary its procedures and employee training for identifying the various actions that should be taken when a hazardous situation is identified. This should include, but not be limited to, fully venting the natural gas to a safe area, installation of a temporary clamp over the leak, utilization of squeeze-off equipment to isolate the leak, reduction of pressure, elimination of ignition sources, and closing valves to isolate the area containing the leak. Emphasis should be placed on using

the best method and/or methods in the specific situation encountered that safely vents or terminates the release of natural gas in a prompt, effective manner. The instruction should include use of proper safety equipment if working where gas is present and the dangers of working in close proximity to potentially hazardous locations when sources of ignition have not been eliminated. Also, that Laclede include provisions in their emergency response procedures that, where possible, require emergency response efforts to be conducted at a safe distance from potentially hazardous sites. Staff believes the procedures and training should be explicit enough, and should detail a sequence of actions to be taken, that they would allow field personnel to take the actions necessary to promptly avert hazards and to protect life and property. The circumstances of this incident should be incorporated into the training.

g. Laclede review and revise as necessary its policies regarding the use of isolation valves and temporarily interrupting gas service to customers when safety of life and property are present.

h. Laclede be directed to file a response to these recommendations in Case No. GS-2000-525 within 30 days after filing of this report for review by the Commission.

WHEREFORE, Staff respectfully requests that the Commission accept the *Report* for filing and issue an order directing Laclede to file a response addressing the Staff recommendations contained herein.

Respectfully submitted

DANA K. JOYCE
General Counsel

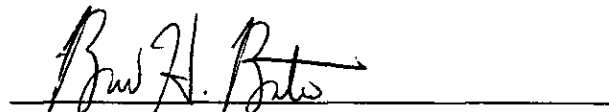


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Certificate of Service

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 11th day of July, 2000.



Service List for
Case No. GS-2000-525
July 11, 2000

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