

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

In the Matter of Missouri Gas Energy, a)	
Division of Southern Union Company,)	
Concerning a Natural Gas Incident at the)	<u>Case No. GS-2011-</u>
Intersection of 107 th Street and Blue)	
Ridge Boulevard in Kansas City, 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. Missouri Gas Energy (MGE), a Division of Southern Union Company, of Kansas City, Missouri, 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 February 2, 2011, in Kansas City, Missouri, an area served by MGE. There were no injuries or fatalities and no property damage occurred.

5. Staff's initial investigation indicates that natural gas was released from a fractured underground transmission line. A passer-by observed the gas, at a

pressure of about 220 psig, blowing dirt from above the buried line. There was no fire or explosion.

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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