



Docket No. GW-2021-0272

Working Case for the Review and Consideration of Amending the Commission's Natural Gas Safety Rules
Questions Related to Revision of (12)(S)1.B.

Responding Operator: Omega Pipeline Company, LLC
Name of Person Responding: Jim Newton
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ATTACHMENT A:

A - General Questions:

1. Did your City/Company make use of this waiver at any time during the pandemic?
 - No.
2. Do you foresee any future need to seek relief from the requirements of 20 CSR 4240-40.030(12)(S)1.B. going forward?
 - No.
3. D Do you have any additional comments related to the requirements of 20 CSR 4240-40.030(12)(S)1.B.?
 - No.

B - Specific Questions:

1. Omega is in support of the proposed amendment to remove the limiting language of “large commercial or industrial” to be inclusive of all customers that may deny access for visual inspection.

Reason: As a utility operating on a military installation, Omega is required by the Fort Leonard Wood Department of Public Works (DPW) to inspect new piping and ensure that code requirements are met. Before turning on gas to a facility Omega performs a shut-in test in addition to requiring a pressure test report from installation contractor that demonstrates the line has been tested at 1.5 times the normal operating pressure.

If refused access to the facility to inspect piping, the signed copy or waiver would put liability on the contractor and the government. Omega would likely refuse to turn gas on until given access to the facility.
2. No. Omega does not suggest any additional conditions be added to provide an exemption for residential or small commercial customers.
3. The anticipated operational fiscal impact of the amendment would be minimal; however the fiscal impact could include a possible multi-million-dollar loss to the company if Omega was found at fault if an accident occurred.

ATTACHMENT B:

1. No, Omega does not currently make information on active leak indications available to the public.
2. No, Omega does not currently make information on repaired leaks publicly available.
3. Omega would not typically provide a member of the public requested information on active or repaired leaks near a specific location.
4. Omega does not currently have any formal capabilities to make active leak indications publicly available. Physical records of active leaks are maintained on site and could be made available to the public upon request. Omega would have to get approval from Fort Leonard Wood to release the information.
 - a. Current process for tracking repaired leaks - All leaks are repaired when found or monitored daily until repaired.
 - b. Extent that leak repair data is input into an electronic database - All internal leak indication records are maintained as analog paper documents. Once per year required information is submitted electronically on the PHMSA Gas Distribution Annual Report Form F7100.1-1, as well as Missouri Public Service Commission.
 - c. None. Though Omega does have a GIS system with pipeline locations, leak indications are not digitized into the mapping system.
5. Omega does not currently have any formal capabilities to make information on repaired leaks publicly available. Physical records of repaired leaks are maintained on site and could be made available to the public upon request. Omega would have to get approval from Fort Leonard Wood to release the information.
 - a. Current process for tracking repaired leaks - All leaks are repaired when found or monitored daily until repaired.
 - b. Extent that leak repair data is input into an electronic database - All internal leak indication records are maintained as analog paper documents. Once per year required information is submitted electronically on the PHMSA Gas Distribution Annual Report Form F7100.1-1, as well as Missouri Public Service Commission.
 - c. None. Though Omega does have a GIS system with pipeline locations, leak indications are not digitized into the mapping system.
6. This would provide contractors/builders of potential gas leak hazards in the area. Making active or repaired leak information publicly available would potentially increase awareness of the potential hazard in the area.
7. Fort Leonard Wood may restrict the distribution of active or repaired leak information to the public.
8. If Fort Leonard Wood allows Omega to release active and repaired leak data to the public, the information could be updated once per year in conjunction with other required annual reports.