

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

In the Matter of Laclede Gas Company)
Concerning a Natural Gas Incident at) **Case No. GS-2009-_____**
7527 Michigan Street, St. Louis, 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 the Commission's General 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 December 30, 2008, in St. Louis, Missouri, an area served by Laclede. There were minor injuries and no fatalities, and property damage occurred to the basement of a building undergoing renovations at 7527 Michigan Street.

5. Staff's initial investigation indicates that a plumbing contractor, while connecting a water line for a sprinkler system, damaged a 4-inch diameter cast iron natural gas main. Natural gas collected in the basement of 7527 Michigan Street and ignited when the plumbing contractor attempted to solder a valve fitting. The plumbing contractor was treated and released on December 30, 2008.

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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