

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

In the Matter of the Establishment of a Working)	
Case for the Review and Consideration of)	File No. GW-2021-0272
Amending the Commission's Natural Gas Safety)	
Rules)	

AMEREN MISSOURI'S INITIAL COMMENTS

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Company" or "Ameren Missouri"), and responds to the Missouri Public Service Commission's ("Commission") *Order Opening a Working Case to Consider Amending the Commission's Natural Gas Safety Rules* effective March 10, 2020, which directs any stakeholder wishing to submit written comments regarding the rule amendments being proposed by Staff to do so no later than April 9, 2021. Ameren Missouri provides the following initial comments:

1. As a preliminary matter, Ameren Missouri appreciates the opportunity to provide these comments and otherwise participate in this docket.

2. Regarding Staff's proposed amendments to the Commission's Natural Gas Safety rules as set out in Attachment A to *Staff's Motion to Establish Working Case*, which incorporate Federal Pipeline Safety Standards amendments, the Company supports such amendments. However, the Company would note two small errors for correction.

3. First, on page 27 of Attachment A, in subpart 12(U)(3)(B)III.d., the word "with" appears to be missing as indicated in italics and brackets:

d) Justification that the reduced MAOP determined by the operator is safe based on analysis of the condition of the pipeline segment, including material properties records, material properties verified in accordance [*with*] subsection (12)(E)....

4. Second, on page 33 of Attachment A, in paragraph 13(DD)(4), the word "and" is missing from Staff's proposed addition as indicated in italics and brackets:

4. Data analysis. An operator must analyze and account for the data obtained from an assessment performed under paragraph (13)(DD)3. to determine if a condition could adversely affect the safe operation of the pipeline using personnel qualified by knowledge, training, and experience. In addition, when analyzing inline inspection data, an operator must account for uncertainties in reported results (e.g., tool tolerance, detection threshold, probability of detection, probability of identification, sizing accuracy, conservative anomaly interaction criteria, location accuracy, anomaly findings, and unity chart plots or equivalent for determining uncertainties and verifying actual tool performance) in identifying [*and*] characterizing anomalies.

Respectfully submitted,

/s/ Jermaine Grubbs

Jermaine Grubbs, #68970

Corporate Counsel

Ameren Missouri

One Ameren Plaza

1901 Chouteau Avenue

P.O. Box 66149 (MC 1310)

St. Louis, MO 63166-6149

(314) 554-2041 (phone)

(314) 554-4014 (facsimile)

AmerenMissouriService@ameren.com

ATTORNEY FOR UNION ELECTRIC
COMPANY d/b/a AMEREN MISSOURI

Dated: April 9, 2021

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been emailed to the parties of record on
this 9th day of April, 2021.

/s/ Jermaine Grubbs
Jermaine Grubbs