

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

In the Matter of a Working Case to)	
Review the Commission's Rules)	File No. GW-2020-0036
Regarding Natural Gas Safety.)	

COMMENTS OF UNION ELECTRIC COMPANY
d/b/a AMEREN MISSOURI

COMES NOW Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “Company”), and submits the following *Comments* in response to the Missouri Public Service Commission’s (“Commission”) *Order Opening a Working Case Regarding a Review of the Commission's Rules Regarding Natural Gas Safety ("Order")* issued August 15, 2019. The *Order* invited any stakeholders to submit comments by September 16, 2019 regarding the rule changes proposed by Staff, or the cost to comply with those rule changes.

BACKGROUND

1. The Commission's *Order* was issued in response to a *Motion for Order to Open Docket for Review of the Commission's Natural Gas Safety Rules and to Invite Stakeholder Responses Regarding Proposed Rule Amendments* submitted by the Commission's Staff ("Staff") on August 12, 2019.

2. Staff requested the Commission open this working docket for the purpose of updating the Commission’s gas safety rules to reflect the most recent U.S. Department of Transportation rule changes and to harmonize existing natural gas safety rules and federal rule updates consistent with the transition of the Missouri Public Service Commission from the Department of Economic Development (“DED”) to the Department of Commerce and Insurance (“DCI”). The proposed amendments impact portions of Commission Rules 20 CSR 4240-40.020, 20 CSR 4240-40.030, and 20 CSR 4240-40.080 (collectively, the "Rules").

DISCUSSION

3. Ameren Missouri appreciates the Staff taking the initiative to move to open this docket, propose amendments to update the Rules, and solicit comments from stakeholders.

4. Ameren Missouri does not take issue with any of Staff's proposed amendments as those amendments appear to update the Rules consistent with recent federal rule updates and the Commission's transition to the DCI.

5. Ameren Missouri does not anticipate that it will incur significant additional costs to comply with Staff's proposed amendments to the Rules.

CONCLUSION

6. Ameren Missouri appreciates the opportunity to provide these comments.

WHEREFORE, the undersigned respectfully requests that the Commission take these comments under advisement.

Respectfully submitted,

UNION ELECTRIC COMPANY,
d/b/a Ameren Missouri

/s/ *Jermaine Grubbs*

Jermaine Grubbs, MO Bar #68970

Corporate Counsel

Ameren Missouri

1901 Chouteau Avenue

St. Louis, Missouri 63103

(314) 554-2041

jgrubbs@ameren.com

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of September, 2019, a copy of the foregoing filing was served, via e-mail, on counsel for the Missouri Public Service Commission Staff and the Office of the Public Counsel.

/s/ *Jermaine Grubbs*
Jermaine Grubbs