

STATE OF MISSOURI
PUBLIC SERVICE COMMISSION

At a Session of the Public Service
Commission held at its office
in Jefferson City on the 19th
day of July, 1991.

In the matter of the verified request of Laclede)
Gas Company for a temporary waiver of compliance) CASE NO. GO-91-387
with a provision of 4 CSR 240-40.030(15)(C)(3).)

ORDER GRANTING TEMPORARY WAIVER OF COMPLIANCE

On June 7, 1991, Laclede Gas Company (Laclede) filed a verified request for a temporary waiver of compliance with the terms of 4 CSR 240-40.030(15)(C)3. which requires an annual instrument leak detection survey of unprotected steel yard lines. The request stated that, based on conversation with the Commission Staff, Laclede contemplated that the Staff would support the request.

On July 15, 1991, the Energy Department of the Commission Staff filed its recommendation of approval of the instant request.

The Staff's recommendation acknowledges that prior to filing the request, Laclede informally presented the facts pertaining to this request to the Staff. The Staff acknowledges that Laclede has begun to identify and leak survey yard lines in conjunction with a three-year leak detection survey of all services lines required by the cited rule.

The Staff further states that Laclede identified 394 yard lines while leak surveying 203,068 services lines in 1990. There are 512,021 service lines in the Laclede system. Projecting the annual ratio of yard lines found in 1990 to the entire system produces an estimated total of 994 yard lines, or 600 in addition to those identified in 1990. The request applies to the unprotected steel portion of the estimated total of 600 yard lines which were not leak surveyed in 1990, and to the portion of these yard lines that are not identified and leak surveyed in 1991.

In Case No. GO-90-140 the Commission determined that operators should meet informally with the Staff prior to filing formal waiver requests to consider whether the requests are necessary and what information is needed in support. Upon completing its review of the information submitted Staff agrees with the facts and reasoning presented by Laclede. The two major reasons why safety is not compromised by granting the request are: (1) the low number of yard lines involved, and (2) the fact that these yard lines were included in the piping that was leak surveyed in 1989 as required in Emergency Rule 4 CSR 240-40.055.

The Staff also states that annual leak detection surveys of unprotected steel yard lines are also required by a provision in 4 CSR 240-40.030(13)(M)2.B.(I). The Commission has previously granted Laclede a waiver for those provisions specifically related to buried fuel lines, but not yard lines. It is the Staff's opinion that to accomplish the goal of the request, a temporary waiver of the yard line provision is also needed.

In the Commission's opinion the Staff's recommendation of approval of the instant request is reasonable and proper and should be adopted.

IT IS THEREFORE ORDERED:

1. The application filed herein on June 7, 1991 be granted, and Laclede Gas Company is given a waiver of compliance with the provisions of 4 CSR 240-40.030(15)(C)3., requiring annual leak detection surveys of unprotected steel yard lines that have not been identified. The waiver granted herein shall expire December 31, 1992.

2. That this Order shall become effective on the date hereof.

BY THE COMMISSION

Brent Stewart

Brent Stewart
Executive Secretary

(S E A L)

Steinmeier, Chm., Mueller, Rauch,
McClure and Perkins, CC., Concur.